Appendix N2

Comments and Responses
on the Draft 2025 Regional Plan

Attachment J6: Draft 2025 Regional Plan Public Comments and Responses

Introduction

The draft 2025 Regional Plan was released for public review and comment on May 23, 2025. The public comment period concluded on July 18, 2025. Comments were submitted via the 2025 Regional Plan website, email, voicemail, public meetings (learning sessions) hosted by San Diego Association of Governments (SANDAG), community partner pop-ups, letters (via email and mail), and a public hearing held during the July 18 Transportation Committee Meeting. A second public hearing was held December 12, 2025, with the SANDAG Board of Directors.

The following attachments include all public comments received during the public comment period and responses from SANDAG. Comments are separated into tables by source received. Comments received by email and in letter format are attached below each respective table, where they can be viewed in the format they were received.

- Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing)
- Table J6.2: Voicemail-Sourced Public Comments
- Table J6.3: Website-Sourced Public Comments
- Table J6.4: Email-Sourced Public Comments
- Table J6.5: Letter-Sourced Public Comments

Responding to Public Comments

Public input is essential to the development of the 2025 Regional Plan (plan). Every comment received during the public review period is carefully reviewed, considered, and addressed. This strengthens the planning process and supports the development of a Regional Plan that reflects the priorities, values, and needs of our diverse region.

SANDAG reviews all comments received through public meetings, written submissions, emails, and online forms. Each comment is logged and considered part of the formal public record. Comments are reviewed by subject matter experts, who assess the feedback in relation to the plan's policies, data, and technical analysis.

SANDAG reviews and responds to all public comments submitted during the draft 2025 Regional Plan review period, May 23, 2025 through July 18, 2025. Comments that address similar topics or raise common questions are grouped to provide a clear and consistent response. This approach allows us to efficiently address recurring themes while ensuring each comment is acknowledged and addressed in a way that is transparent, accurate, and responsive to community input. Any feedback that concerns infrastructure, programs, or policies within the jurisdiction of other government agencies will be shared with those agencies.

SANDAG received 12 comment submissions on the draft 2025 Regional Plan from government agencies, including Caltrans, City of Carlsbad, City of Coronado, City of Escondido, City of Oceanside, City of San Diego, County of San Diego, Navy Region Southwest (NRSW), NCTD, Orange County Transportation Authority (OCTA), Port of San Diego, and San Diego Air Pollution Control District (SDAPCD). These comments included jurisdiction-specific requests and technical recommendations. As part of continued engagement with our agency partners, SANDAG staff offered to meet with agencies to discuss how their feedback was incorporated into the plan. SANDAG met with all agencies who requested meetings. Copies of all comment letters are included in this attachment, Attachment J6, below Table J6.5.

Responses

The following sections provide SANDAG responses to the comments received, organized by the following topic areas:

- General SANDAG Support and Opposition
- Transit (Buses, Trolleys, or Trains)
- Bikeways and Walkways
- Highways and Local Roadways
- Greenhouse Gas Emissions, Climate, Energy, and Air Quality
- Flexible Fleets
- Housing and Land Use
- Funding
- State and Federal Regulations
- Technology
- Equity and Title VI
- Public Outreach and Engagement
- Goods Movement
- Safety, Security, and Emergency Preparedness

General SANDAG Support and Opposition

SANDAG received general comments both in support of and opposition to the plan's goals and programs, as well as the agency itself. Some commenters expressed a lack of trust in the agency's decision-making and handling of funds, disapproved of the plan's performance, or wanted to see other performance measures used. Others expressed dissatisfaction with SANDAG leadership and board members, and a few commenters called for SANDAG to be abolished. Other commenters were supportive of SANDAG and generally supported the plan.

Response

We are aware that there are many views about the work SANDAG does, and we appreciate the feedback, regardless of whether it is supportive or critical.

Our goal is always to do the work of transportation planning in an efficient, transparent, and accurate manner. We continually work to improve the effectiveness of our staff, our processes, and the technology we use. SANDAG regularly undergoes required audits by our federal and state funding agencies, providing essential checks and balances from neutral parties to ensure that we are responsible stewards of taxpayer funds. These audits are conducted in accordance with federal and state laws and often result in process improvements to ensure the agency meets our fiduciary responsibilities.

SANDAG's plan is required by both federal and state law. Under federal law, SANDAG serves as a metropolitan planning organization (MPO), and is mandated to develop and implement a long-range Regional Transportation Plan (RTP) every four years. The RTP must meet federal air quality standards and complete a federal Title VI analysis to ensure that SANDAG plans, policies, and actions do not result in negative impacts on Title VI populations.

Under state law, SANDAG is required to comply with Assembly Bill (AB) 805 and Senate Bill (SB) 375, both of which require the RTP to include a Sustainable Communities Strategy (SCS) that addresses greenhouse gas emissions-reduction targets set by the California Air Resources Board. State law also requires the inclusion of strategies that promote the use of public transportation. SANDAG must comply with these state and federal requirements to ensure that the region remains eligible for state and federal transportation funding.

Transit (Bus, Trolley, Train)

This topic area is organized into the following subtopics:

- General Support for and Opposition to Transit
- Transit Network Expansion and Access
- Timeline of Transit Projects
- Transit Operations
- Transit Frequency and Hours of Operation
- Transit User Fares and Youth Opportunity Pass (YOP)
- Transit User Experience
- Rapid Buses
- Transit Electrification

- Specialty Transit Types
- Airport Transit Connection (ATC)
- Los Angeles-San Diego-San Luis Obispo (LOSSAN) Corridor
- Purple Line

General Support for and Opposition to Transit

SANDAG received numerous comments both supporting and opposing transit projects, including bus, Trolley, rail, and other specialized transit services. Many commenters called for prioritizing transit funding and supporting transit operations improvements, increasing service frequency, enhancing the user experience, and/or creating better transit connections across the region. Comments overwhelmingly emphasized the need for transit to support environmental goals, reduce reliance on cars, reduce traffic, and provide accessible transportation for all populations. However, there were also concerns that for transit to be successful, it must be fast, safe, and convenient, which some commenters feel is not yet the case. Some commenters preferred one mode of transit over another. Others shared examples from other U.S. and international cities of transit solutions they would like to see in the San Diego region.

SANDAG also received comments opposing transit funding, citing perceptions of low ridership, limited transit frequency and reliability, and concerns about state laws tied to major transit stops and the availability of transit. Some commenters called for cost-benefit analyses to evaluate proposed projects. Additionally, some commenters inquired about specific transit projects.

Response

SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option. We do this by investing in new infrastructure and striving constantly to improve service. It's important to note that a public transit system that attracts more riders will help us reach our state and federally mandated requirements for air quality and accessibility. SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. We also collaborate with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps us identify which transit solutions are most appropriate. The plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as we study and develop each transit project in the coming years.

Transit Network Expansion and Accessibility

SANDAG received many comments in support of a connected, seamless, safe, and multimodal transit network, along with concerns about gaps in the current system. Many comments emphasized the need to prioritize funding for specific improvements that address these gaps, and to better connect riders to their destinations.

Commenters highlighted the importance of accessible transit that serves all populations, including residents, tourists, and employees, by connecting them to activity centers, employment hubs, schools, higher education, hospitals, beaches and key tourism areas, and other destinations., .Commenters also called for better connections across all subregions, and improved service connecting transit stops with homes and other vital destinations, particularly for older adults and others who rely heavily on transit.

Other comments mentioned park-and-ride programs, along with requests for more designated rideshare pickup areas, and continued support for specialized transportation services that serve people with disabilities.

Response

SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The plan also includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. We use a number of tools to anticipate how well this proposed transportation network will serve the region (see **Appendix N***)*, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Timeline of Transit Projects

While SANDAG received comments expressing widespread support for transit, many commenters expressed concern that projects are taking too long to complete. Many noted that the 2035 and 2050 timelines are too far away and called for accelerated implementation to meet environmental goals and bridge gaps in services and access, particularly in communities with the greatest need. Additionally, commenters called for faster implementation of increased transit frequencies, upgraded transit amenities, and transit-supportive infrastructure.

Response

We know that transportation projects take a long time to implement. Project timelines can grow because of studies required in the planning, environmental analysis, design, and construction phases. These studies aim to ensure that the resulting infrastructure best serves the region, while minimizing negative impacts. Time is also spent securing funding for these projects, including competing for funds with regions across the state and country.

Transit Operations

SANDAG received many comments related to expanded and reduced transit operations. These included suggestions to extend, update, or redirect existing routes, identify new areas for transit service, add new routes, bring back previously removed routes, and add or relocate stops. Some commenters expressed support for specific transit modes, discussing the benefits and drawbacks of implementing one over another. While some comments were more general in nature (for example, suggesting changes in operations), others noted specific routes, stops, and geographies they would like to see changed, added, or removed.

Response

The plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before we add new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans.

Transit Frequency and Hours of Operation

SANDAG received many comments about transit frequency and operating hours. Commenters expressed the need for increased frequency and extended service hours to make transit more effective. Requests included 24-hour service, late-night operations, and expanding weekend service. Some commenters raised concerns about unreliable arrival times at transit stops and called for more consistent scheduling on SPRINTER and COASTER rail lines.

Response

Our plan includes these improvements to both frequency and operating hours, subject to the availability of future transit funding. **Appendix A** contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines.

Transit User Fares and Youth Opportunity Pass (YOP)

Some commenters made suggestions about transit fares and how they are collected. There were complaints that transit fares are too high, and especially burdensome on certain populations. Some advocated for lowering or eliminating fares for seniors, unhoused, low-income populations, veterans, and youth. Some comments also said better enforcement of fares is needed, including adding turnstiles and gates at transit stations. Some also supported tap-to-pay options and improvements with PRONTO.

SANDAG also received many comments on the Youth Opportunity Pass (YOP) program. Most commenters praised the program and supported extending funding for YOP and making free transit for youth permanent. Some commenters opposed free transit and supported redirecting funding to other priorities.

Response

We appreciate the feedback regarding transit fares. The Youth Opportunity Pass program is a pilot program currently funded through June 30, 2026. The plan assumes the YOP program will continue. SANDAG, MTS, and NCTD are currently seeking funding solutions to make this a reality.

The plan does not make any immediate changes to YOP or transit fares in general. It does include fare subsidies starting in 2029. Before making any changes to regional transit fares, SANDAG will collaborate extensively with MTS and NCTD to gather feedback from the public on how much it should cost to ride transit, and which population groups should be eligible for discounts.

MTS and NCTD are responsible for collecting fares and enforcing regional fare policies. Progress has been made to better enforce riders paying fares, especially on Trolley lines, including having security officers conduct random verification of rider payment onboard transit vehicles. MTS and NCTD continue to work together to improve the region's fare collection system, PRONTO, by adding new features and making it easier for riders to pay their fares. A tap-to-pay option was recently introduced for all buses, Trolleys, and SPRINTER and COASTER trains, allowing riders to pay fares with debit or credit cards or other contactless payment options, avoiding the step of securing a physical PRONTO card or downloading the smartphone PRONTO application.

Transit User Experience

SANDAG received many comments on transit amenities to improve riders' experience and encourage use of transit. Specifically, commenters requested shade structures, benches, trash cans, free Wi-Fi, restrooms, and wayfinding signs. Additionally, some commenters suggested changes to the design of buses and Trolleys to be more user-friendly and accessible.

Many comments raised concerns about safety, security, and cleanliness both on transit and at transit stops. This concern was common regionwide across all transit modes, but some comments noted specific locations where they felt especially unsafe. Commenters cited issues such as crime, illicit activity, and lack of rule enforcement as barriers to more riders using transit. Suggested solutions included more security officers on Trolleys and at stops, increased use of security cameras, lighting, turnstiles, and visible phone numbers on signage to report incidents. Several commenters specifically mentioned safety concerns related to unhoused individuals. A few commenters noted concerns about transit vehicles crossing paths with those walking and biking; Others said they felt safe and comfortable using transit.

Response

SANDAG works with MTS and NCTD to meet the needs of current and future transit riders. We aim to continue expanding amenities to create a safe, secure, clean, and amenity-rich transit system. The plan includes $864 million for transit amenities. This includes security, improved restroom access and maintenance, Wi-Fi, and more. Subject to available funding, MTS and NCTD are committed to providing security for users, enforcing rules, and upgrading transit station amenities (such as shade structures and signage) as funding becomes available.

Rapid Buses

Many comments supported expanding bus rapid transit (BRT) routes as long-term investments, highlighting their efficiency compared with other bus types and infrastructure features such as dedicated bus-only lanes, transit signal priority, and camera-enforced lanes. Many commenters supported these types of features for transit in general, noting concerns about long transit trip times preventing this transit mode from being competitive with driving a car. Some commenters expressed concern about BRT replacing rail service, reiterating that investments in public transit should be a priority.

Response

We look forward to identifying which strategies can help Rapid bus routes be most effective across the region. The plan proposes an extensive increase in Rapid bus routes, as these projects are faster to implement and cost less compared with rail. Before adding new routes, SANDAG will conduct extensive analysis and work with partners, other local government agencies, and members of the public to identify the best routes, stop locations, infrastructure needs, and operating plans for these services.

It should be noted that rail projects are not being "replaced" by Rapid projects in this plan. Instead, the plan includes both short-term Rapid projects that can provide transit connections more quickly, and longer-term rail projects that can provide higher capacity, speed, and reliability. Staff will continue to study the feasibility of improvements to existing routes like the Blue Line, and of constructing new lines like the Purple Line. This includes considering what the region can reasonably afford within our expected funding sources. We will be planning and collecting extensive public feedback in the coming years to determine which rail improvements are possible and make the most sense.

Transit Electrification

Commenters expressed broad support for electrifying the transit system, including electric buses, rail, and other sustainable transit options.

Response

The plan assumes that MTS and NCTD will transition to zero-emission vehicles over the next two decades, based on each agency's adopted Zero-Emission Bus Fleet Transition Plan prepared in response to the California Air Resources Board's Innovative Clean Transit rule. The MTS Trolley system already runs on electricity and has zero emissions. The plan does not include costs for providing overhead electrification or other infrastructure to facilitate zero-emissions passenger rail on the LOSSAN corridor. However, SANDAG works with Caltrans on the development of the California State Rail Plan and will consider accommodation for future electrification in statewide planning efforts. NCTD will evaluate available technologies and options for zero-emission rail equipment on its COASTER and SPRINTER services as its current vehicles reach the end of their lives.

Specialty Transit Types

Some commenters expressed support for additional types of transit they would like to see in the region; a number voiced support for streetcars and wanted to see more of them included in the plan, especially in tourist and populated areas of the City of San Diego. Other comments mentioned support for additional ferry services, and gondolas. Some comments addressed the state's high-speed rail project.

Response

The plan includes various transit modes, such as neighborhood shuttles, microtransit, vanpools, buses, light rail, or streetcars. While the plan does not include any additional ferry or gondola services, we will continue to evaluate feasible transportation technologies based on the needs of each particular travel corridor in future project planning studies. All transit projects must be studied in much greater detail and be informed by collaboration with other government agencies, analysis of travel patterns and transportation demand, and feedback from the public. Additionally, while California High-Speed Rail may extend to the San Diego region in a future phase (consistent with the California State Rail Plan), such an extension will likely be beyond 2050. California High-Speed Rail would be implemented and funded by the California High-Speed Rail Authority and is included in the plan's Unconstrained Project list, located in **Appendix A** Table A.7.

Airport Transit Connection (ATC)

SANDAG received many comments on the Airport Transit Connection (ATC) project and overwhelming support for a connection to the San Diego Airport via bus, Trolley, or automated people mover, and via bikeways. Comments included both support and opposition to the proposed transit options. Most commenters agreed that establishing this transit connection should be a regional priority. The majority supported a Trolley connection. Many emphasized the urgency of the project and the strong need for it among both residents and tourists. Comments also emphasized the importance of linking ATC to the broader region, particularly North and East San Diego County, and the communities surrounding the airport.

Response

The plan includes both near-term and long-term solutions for the ATC to benefit residents, visitors, and airport employees. In the shorter term, proposed investments include improvements to existing bus service.

In the longer term, a rail connection to the airport is included in the plan. SANDAG is collaborating with local partner agencies to identify the type of rail connection that is most suitable for the region to implement.

Both short- and long-term options will help existing transit hubs like Santa Fe Depot and Old Town Transit Center offer better ways for residents and visitors to reach the airport from all over the region.

Los Angeles-San Diego-San Luis Obispo (LOSSAN) Corridor

SANDAG received comments supporting, opposing, or offering general feedback on the LOSSAN Rail Realignment and the LOSSAN Corridor. Commenters shared input on various railway route options they would like to see, including both support for and opposition to double tracking. Those opposed to rail in this corridor noted safety, noise, cost, and eminent domain concerns. Some comments called for electrification of rail on this corridor. A few emphasized the importance of the LOSSAN corridor for rail access to Los Angeles, regional connectivity, and its economic benefits.

Response

SANDAG acknowledges the importance of the LOSSAN corridor as our region's only rail connection to the rest of the country. The plan includes investments in double tracking and resiliency projects to support the continued safe and reliable operation of passenger and freight trains using this railway, while also laying groundwork so that these trains can operate more frequently and reduce travel times. The San Diego LOSSAN Rail Realignment project is evaluating several future routes to increase the resiliency of the rail corridor near the Del Mar bluffs. The possible routes studied in further detail will be selected through a separate, project-specific environmental process that is ongoing.

Purple Line

SANDAG received a number of comments on the Purple Line project. Most supported the project, emphasizing that it should be a priority in the region. Others offered suggestions about where the railway should go, with some opposing or supporting current plans. Many commenters expressed disappointment about the project appearing in the plan as a light rail instead of a heavy rail project, and others expressed a desire for the project to be implemented more quickly.

Response

Much more extensive planning is needed to finalize where the Purple Line's route will go and its specific stops. Comments we received on these topics will be saved to inform those future planning efforts.

As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035.

More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Bikeways and Walkways

These comments are further organized into the following subtopics:

- General Support for and Opposition to Bikeways and Walkways
- Bikeway and Walkway Network Expansion and Accessibility
- Bikeway and Walkway User Experience
- Roadway Safety for All Users
- Protected Bike Lanes

General Support for and Opposition to Bikeways and Walkways

SANDAG received numerous comments both supporting and opposing active transportation projects. Comments in support expressed appreciation of current and planned active transportation projects. Comments emphasized the critical need for active transportation projects to support environmental goals, reduce reliance on cars, and provide accessible transportation for all populations.

Comments opposing active transportation projects expressed sentiments that bikeways and walkways are underutilized and reduce parking availability. Additionally, some comments expressed not wanting transportation funding to go toward bikeway and walkway projects.

Response

Voters in the San Diego region passed an extension of the half-cent sales tax (**TransNet Extension & Ordinance**) for transportation infrastructure in 2004. This ordinance allocates 2% of total annual revenues for the Bicycle, Pedestrian, and Neighborhood Safety Program. This provides funding for bikeway facilities and connectivity improvements, pedestrian and walkable community projects, bicycle and pedestrian safety projects and programs, and traffic-calming projects. The objective is to create a balanced regional transportation system that makes non-motorized transportation (such as walking, rolling, and riding a bike) safer, easier, and more attractive for people of all ages and abilities.

SANDAG aims to minimize overall parking loss when constructing active transportation infrastructure projects and has frequently done so by adding parking on perpendicular streets or incorporating parking into the project's design.

Bikeway and Walkway Network Expansion and Accessibility

Numerous comments called for the expansion of bikeways and walkways regionwide. Comments noted that there are gaps in the bikeway and walkway networks, which raised concerns over safety and access. Others mentioned wanting more direct routes to save on travel time while walking or cycling. Comments suggested creating more bikeways of various classes, and expanding walkways, especially to connect schools, beaches, parks, transit stations, and other neighborhoods. Comments also expressed the desire to partner with local jurisdictions and prioritize funding to implement active transportation projects sooner.

Response

The plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans.

The plan's Active Transportation Network follows best practices by providing an average network bikeway density of approximately 1 mile so that vital connections between regional activity centers, schools, housing, employment, and transit stops are provided with safe infrastructure for all ages and abilities. During the development of this plan and other recent planning efforts at SANDAG, we compiled feedback such as infrastructure needs, barriers to bikeway use, and gaps in the region's active transportation network. This input has informed our planning and will be shared with partner agencies to inform future planning, design, and implementation efforts.

Bikeway and Walkway User Experience

Multiple comments were related to the safety and accessibility of bikeways and walkways. These expressed concerns about things like potholes and uneven pavement, inadequate removal of trash and debris, poor lighting and signage, a lack of amenities like bike racks and lockers, a lack of shade-providing trees, and a lack of routine maintenance to upkeep facilities.

Response

SANDAG has planned, designed, and constructed many existing regional bikeways. But local cities and other government agencies take ownership of these facilities once they are built. Those cities and government agencies are responsible for maintaining them. SANDAG has shared comments about the current conditions and operations of existing bikeways and walkways with each relevant local partner agency.

Roadway Safety for All Users

Numerous comments expressed a need for safer roadways, bikeways, and walkways across the region for all users, especially near schools, beaches, parks, transit stations, and within neighborhoods. Concerns about unsafe driving included speeding and hazards at highway access ramps, underpasses, overpasses, major street intersections, and train tracks. Suggested solutions included traffic-calming measures such as narrowing roads, roundabouts, speed bumps, lower speed limits, automated enforcement – for example, traffic cameras,- and crosswalks. Other comments suggested wider bikeways and walkways separated from motorized vehicles and curb ramps and other Americans with Disabilities Act (ADA) elements to make these spaces accessible to wheelchairs, strollers, and walkers. A few comments noted the need for educating road users on road safety.

Response

We work closely with local agency and community organization partners to provide technical resources, education, and assistance in active transportation project design and implementation to make streets safer. We appreciate comments regarding specific areas and conditions that create stressful and unsafe conditions for travel, as well as the many helpful recommendations for project features that can serve as countermeasures to improve the transportation network. SANDAG has used many of these strategies and plans to continue using them in future projects. We measure the effectiveness of these safety measures through project evaluations and performance monitoring to promote the success of future projects.

Protected Bike Lanes

Multiple comments addressed protected bike lanes. Some supported protected bike lanes because of their physical separation from motorized traffic—such as medians, curbs, bollards, or trees— especially on high-speed or high-volume roads. Others expressed concern that these barriers become obstacles for both cyclists and drivers, leading to collisions. Additionally, some comments referenced National Association of City Transportation Officials (NACTO) guidance, noting that while it promotes protected bike lanes as a universal safety solution, decisions about bikeway design ultimately rests with local jurisdictions and should reflect location and context.

Response

The active transportation network in the plan proposes a complete network of safe connections to jobs, schools, and other regional activity centers for users of all ages and abilities. Specific facility design decisions are worked out during the project planning and design phase with input from each community. The goal is to develop safe infrastructure for the location and context in collaboration with the local city or county.

Highways and Local Roadways

These comments are further organized into the following subtopics:

- General Support for and Opposition to Highways and Managed Lanes
- Road Maintenance and Desired User Experience Upgrades
- Road Enhancements
- Traffic and Parking
- Evacuation Routes

General Support for and Opposition to Highways and Managed Lanes

Many comments addressed various existing and proposed highway and managed-lane projects. Some opposed highway expansion entirely, citing concerns including induced vehicle miles traveled, greenhouse gas emissions, noise pollution, and the desire to shift funding toward bus and rail operations. Some comments advocated converting the existing highway network to managed lanes, while some proposed replacing managed lanes and toll roads with general lanes. Other comments requested expanded highways and supported the use of managed lanes in varying capacities. SANDAG also received various comments on specific highway projects and operations, which will be shared with Caltrans and partner agencies, as applicable.

Response

Managed lanes have been shown to reduce travel delays and offer a more reliable travel experience. They can encourage more carpooling, vanpooling, and transit, and help goods move more efficiently by providing options for trucks to get around traffic.

The plan proposes a connected network of managed lanes that improve traffic flow and promote carpooling, vanpooling, and transit. The plan focuses on staying within the current footprint of highways wherever possible. Compared to the 2021 Regional Plan, the current plan features a smaller managed lane network and less overall widening. The types of managed lanes and how they are operated will be decided after thorough project planning, analysis, and public outreach, including close coordination with key partners such as Caltrans.

The SANDAG Board of Directors also voted to prioritize eliminating the debt and toll-only operations on State Route 125 (SR 125)[1]. Last year, the Board directed staff to study what kinds of investments would be needed to remove the toll on SR 125. SANDAG and Caltrans have been studying the facility, and a preliminary financial analysis shows that the toll removal will need to take place after 2035.

Road Maintenance and Desired User Experience Upgrades

Many comments pertained to road maintenance and repair, including requests for filling potholes. Many commenters expressed the need for enhanced lighting, cleanliness on roadways, and safe sidewalks.

Response

We agree that keeping our region's existing infrastructure in good condition is a high priority, and the plan includes a Fix It First Policy (**Appendix A**). This supports safety, the environment, and neighborhood economic vitality. It should be noted that after SANDAG plans, designs, and builds transportation infrastructure, it is the responsibility of the operating agency (a local city, San Diego County, or a state agency) to preserve and maintain it.

As many of these comments were related to infrastructure that SANDAG does not operate and maintain, staff forwarded feedback about specific roadways to the relevant agencies.

Road Enhancements

SANDAG received comments recommending highway enhancements in both urban and rural corridors, such as passing lanes and freeway lids.

Response

SANDAG worked closely with Caltrans to identify regional-level operational improvements and safety projects for the plan. Caltrans facilitates a four-year **State Highway Operation and Protection Program (SHOPP)**, identifying projects for the region. It identifies safety and operational improvements for urban and rural freeways, including state-owned infrastructure such as bikeways and walkways, culverts, passing lane projects, Transportation Management Systems (TMS), roadside rest areas, and maintenance stations.

SANDAG is also working on the Barrio Logan Freeway Lid Feasibility Study, which will explore two potential freeway lids on Interstate 5 (I-5). The study's initial planning and early design work will look at reconnecting Barrio Logan and Logan Heights, addressing the impacts caused by the I-5 Freeway infrastructure that divided the two neighborhoods. In addition to studying the feasibility of a freeway lid, the study will explore near-term improvements that can help connect these two communities. The study is anticipated to be completed in 2028.

Traffic and Parking

Many comments referred to high levels of traffic on regional roadways, particularly those near construction sites and Trolley tracks. Some comments expressed frustration with low availability of parking, including construction projects reducing parking spaces.

Response

The plan aims to reduce traffic and improve all modes of transportation. Infrastructure improvements proposed in the plan can have dual benefits for multiple types of transportation users. For example, projects where railroad tracks are relocated above or below roadways improve safety and rail operations, while also helping to reduce vehicle traffic that previously had to wait for trains or Trolleys to pass. Similarly, managed lanes can reduce travel times for people driving and provide more reliable travel times for transit riders in the corridor.

Comments about parking in specific areas have been shared with the appropriate local jurisdiction, as these agencies make decisions about parking.

Evacuation Routes

SANDAG received numerous comments emphasizing the need for regionwide infrastructure improvements to allow for safe evacuation in the event of emergencies and natural disasters. Concerns expressed a lack of sufficient evacuation routes on rural and east-west corridors, traffic entering and exiting Point Loma, and evacuation safety in relation to housing development and transit routes.

Response

The plan includes a number of safety improvements intended to support evacuation events. These include highway curve straightening, shoulder widening, intersection improvements, and technology upgrades. Most of these projects are projected to be completed or in development by 2035 and are listed in **Appendix A**.

Appendix L also describes strategies available for the region to utilize during large-scale evacuations. These include Intelligent Transportation Systems that can change traffic signals to give greenlight priority to the direction of traffic evacuating, and message sign updates that can communicate key safety and routing information to the public. The County of San Diego coordinates the use of available resources, Memorandums of Understanding and Agreement (MOUs/MOAs) with public and private transportation agencies, and mutual aid to assist transportation-dependent populations.

SANDAG will continue to review these evacuation concerns in collaboration with the relevant local partner agencies.

Greenhouse Gas Emissions, Climate, Energy, and Air Quality

These comments are organized into the following subtopics:

- General Support for and Opposition to Environmental Initiatives and Greenhouse Gas Reductions
- Electric Vehicles and Infrastructure
- Energy

- Habitat Conservation, Shoreline Preservation, Sewage Crisis, and Pollutants
- Natural Disasters, Emergency Preparedness, and Resilience

General Support for and Opposition to Environmental Initiatives and Greenhouse Gas Reductions

Many comments emphasized an urgency for climate action, including general support for greenhouse gas (GHG)-reducing initiatives, programs, and goals. Some comments called for the plan to go beyond state GHG reduction requirements currently mandated by Senate Bill (SB 375), and within a sooner timeframe. Many comments also expressed concerns around air quality, public health, and environmental justice.

A smaller number of comments were critical of climate change efforts and oppose GHG reduction projects and climate action goals, advocating for those resources to be used elsewhere.

Response

SANDAG is required by law to develop a Regional Plan and Sustainable Communities Strategy every four years. It must meet the state's requirement to reduce GHG emissions by reducing vehicle miles traveled from passenger vehicles by 19% per capita by 2035 compared with 2005 levels.[2] Meeting this target is an important step toward California's broader climate goals and the State's commitment to reaching carbon neutrality. How much and how quickly our region can reduce GHGs will depend not only on SANDAG, but also on strong collaboration with local jurisdictions, state and federal agencies, and community partners. As SANDAG sets regionwide objectives to reduce GHGs, our agency is limited by many factors outside our control. These include local jurisdiction plans and land use decisions, funding availability, and how quickly various industries are converting to clean technology.

We are committed to doing our part. The plan identifies strategies to reduce emissions, expand travel choices, and support sustainable growth. **Appendix A** of the plan describes the many projects, policies, and programs that reduce pollution, improve public health, and protect the environment. The Plan also provides an analysis, as required by Assembly Bill 805, identifying vulnerable communities in the region and outlining projects, policies, and programs in the Plan that work together to reduce pollution exposure in these communities. (See **Appendix A, Attachment A1)**. **Appendix F** presents the SCS land use pattern that supports the transportation network and preserves natural resources and agricultural lands. **Chapter 3** brings this vision to life by outlining the plan's performance measures and identifying specific actions for achieving the plan's goals. **Appendix G** documents where emissions come from in the region and projected emissions of GHGs to 2050, and **Appendix R** addresses flood prevention and resilience considerations for transportation infrastructure and surrounding communities. SANDAG has also developed a regional Climate Action Roadmap through an EPA grant to provide a long-term vision to reduce carbon emissions by 2045.

Electric Vehicles and Infrastructure

Some comments addressed electric vehicles (EVs), with support for expanding EV infrastructure both regionally and within specific communities. Others questioned the effectiveness of relying on EVs to reduce GHG emissions, noting that all vehicles still contribute to air pollution from tire use. Some also expressed concern about the safety of EV batteries.

Response

SANDAG offers a variety of programs that support the transition to Zero Emission Vehicles (ZEV) including support for public charging infrastructure, completion of a regional ZEV blueprint for trucks and buses, and participation in the Accelerate to Zero Emissions Collaborative, which produced an updated regional EV strategy. Both the blueprint and EV strategy included operational and safety considerations related to batteries, vehicles, and infrastructure.

The draft Environmental Impact Report (EIR) for the plan also includes a GHG mitigation measure to support additional EV charging stations in communities where there has been little investment thus far.

Energy

Comments were also submitted in support of and opposition to utilizing various energy types in the region, including renewable energy, electrification, natural gas, solar, and nuclear. Some commenters expressed support for environmental bans related to energy use, and bans related to the use of gasoline for certain types of vehicles, to protect the environment. Others expressed the continued need for fossil fuel generation because renewable power like solar and wind do not generate power continuously all day and night.

Response

Appendix A of the plan describes SANDAG's recommendations for resilience policies and programs such as building and transportation electrification. The 2021 Regional Plan Amendment's Supplemental EIR also included a new GHG mitigation measure that required SANDAG to develop a regional comprehensive climate action plan, called the Climate Action Roadmap, completed December 1, 2025. This sets a goal for reducing emissions from eight economic sectors: transportation, electricity, buildings, industry, solid waste and materials management, water and wastewater, agriculture, and natural and working lands. The roadmap includes increased renewable energy, energy storage, energy efficiency, and electrification as actions to reduce pollution.

Habitat Conservation, Shoreline Preservation, Sewage Crisis, and Pollutants

Commenters showed strong support for habitat conservation and shoreline preservation efforts, particularly to protect sensitive habitats and reduce the risk of natural disasters such as flooding. Commenters also highlighted the need for improved water management to mitigate erosion and urban runoff. Other commenters expressed concerns about air, noise, waste, water, and light pollution and support for efforts to address these pollutants. A few comments also touched on street trees and vegetation management, and the public benefits. There were some comments regarding the Tijuana sewage crisis.

Response

Appendix R of the plan provides context about how SANDAG and partner agencies in the region will reduce and mitigate the impact of natural hazards, including frequent heatwaves, wildfires, extreme rain and flooding, and destructive storms. These efforts support the resilience and reliability of our transportation infrastructure and protect our natural environment. This includes adaptation measures such as beach replenishment to protect our region's shorelines and vulnerable coastal transportation facilities from erosion and flooding, and incorporating built shade and tree cover in heat vulnerable areas. **Appendix R** also describes how SANDAG and partner agencies like Caltrans are working to manage stormwater runoff. In addition to working with regional transportation infrastructure owners and operators, SANDAG is also working on binational environmental solutions through its development of the **California-Baja California Border Resiliency Plan** (BRP) to identify strategies to protect transportation infrastructure and the communities within the border region that are impacted by natural hazards.

SANDAG also manages the TransNet Environmental Mitigation Program (EMP), which purchases, conserves, and restores native habitats to mitigate the potential impacts of transportation projects. The program has multiple benefits, including preserving habitat for endangered species, conserving open space for visual and passive recreation, and protecting water quality by restoring and protecting watersheds. **Appendix Q** of the plan also describes how SANDAG, through the EMP, is contributing to habitat conservation in the region, in addition to how the region is working together to protect sensitive habitats and resources for future generations.

Natural Disasters, Emergency Preparedness, and Resilience

Many comments addressed the growing threat of natural disasters in the region, including wildfires, sea level rise, extreme heat, flooding, seismic events, and other emergencies. Commenters emphasized the need for both risk reduction and proactive adaptation planning to create a resilient transportation system and infrastructure.

A significant number of comments expressed concern about evacuation safety during emergencies, specifically related to large concentrations of people, housing, and business in small geographic areas, and the need for adequate infrastructure to support safe and efficient evacuation. Some commenters noted that rising risks from natural disasters, coupled with worsening traffic and ongoing development, may further exacerbate these challenges.

Several comments also identified specific areas within the region that may face heightened risk due to their geographic location. Additionally, commenters highlighted the importance of improving community education around emergency preparedness and response, especially with regard to evacuation planning in both rural and urban areas.

Response

While some aspects of preparing the region for emergencies are not within SANDAG's jurisdiction, our organization does coordinate with other government agencies across the region to prepare our infrastructure for the impacts of natural hazards to improve the resilience and reliability of the transportation system.

Appendix A includes a variety of projects that facilitate evacuation, like highway curve straightening, shoulder widening, intersection improvements, and technology upgrades.

Appendix R of the plan describes how the Plan will enhance the resilience and reliability of the transportation system. It also provides context about how SANDAG and partner agencies in the region will reduce and mitigate the impact of natural hazards on our transportation infrastructure.

Flexible Fleets (Neighborhood Shuttles)

These comments are further organized into the following subtopics:

- General Support for and Opposition to Flexible Fleets
- Flexible Fleets Service Improvement and Accessibility
- Flexible Fleets Information & Awareness

General Support for and Opposition to Flexible Fleets

SANDAG received comments both for and against flexible fleets. Supporters expressed excitement and gratitude for the benefits that neighborhood shuttle services can bring. Some conveyed interest in keeping flexible fleet services permanent and searching for funding sources for this purpose. Some comments expressed opposition to funding going toward Flexible Fleets, advocating that this funding to be diverted to other transportation, such as transit and bikeways and walkways.

Response

While SANDAG's plan includes flexible fleet service areas, these projects would be implemented by local jurisdictions or transit agencies. SANDAG has funded a limited number of Flexible Fleet pilot projects around the region to learn about the potential of these services to provide greater mobility and community connections. But current funding can only be used for pilot projects, and SANDAG does not currently have an eligible funding source for the long-term operations of flexible fleet services. SANDAG continues to seek eligible funding sources for flexible fleet operations. Also, the Flexible Fleets Implementation Strategic Plan includes a section in Appendix E on funding to help guide jurisdictions who would like to operate these services.

Flexible Fleets Service Improvement and Accessibility

Commenters expressed a desire for more flexible fleet services, particularly so that seniors can use them. Multiple commenters advocated for improved flexible fleets programs: expanded service areas, extended service hours, and faster service. Some comments expressed concerns over Flexible Fleet fares and asked for more streamlined payment methods. Some comments called for the creation of shared transportation services, like carpools, vanpools, bikeshare, and scootershare. Other comments called for prioritizing these services over neighborhood electric vehicles (NEVs) and microtransit.

Response

The plan includes 36 Flexible Fleet service areas that fill gaps in the transit network. These services are expected to be operated by local jurisdictions or transit agencies. The hours and service areas can be adapted over time in response to community needs and resource availability. The cost of Flexible Fleet services and the forms of payment accepted are analyzed and determined when the operating agency plans the service. In addition to microtransit, the plan supports a wide range of shared mobility services including the Regional Vanpool Program, carpooling, carshare, and micromobility. SANDAG leads a Flexible Fleet Task Force to share best practices and data, and to encourage regional collaboration around operating shared mobility services.

Flexible Fleets Information & Awareness

Some commenters wanted more information on Flexible Fleets, while others stated that flexible fleets sound like a good concept but need to be better publicized to get more riders to use them. Other commenters wanted more information on whether Flexible Fleets would work in certain areas and how they can create these services.

Response

Outreach and education are critical to the success of Flexible Fleets and other transportation services. SANDAG promotes flexible fleet services through a variety of methods, including social media, community outreach, our website, and through our Sustainable Transportation Services Program. SANDAG also partners with local jurisdictions and transit operators to support their outreach and education efforts.

SANDAG produced a **Flexible Fleets Implementation Strategic Plan** provides guidance for implementing successful Flexible Fleet services.

Housing and Land Use

Comments on this topic are organized into the following subtopics:

- Sustainable Growth, Housing Affordability, and Development Concerns
- Open Space and Parks
- Regional Growth Forecast
- Homelessness

Sustainable Growth, Housing Affordability, and Development Concerns

Commenters reflected a range of perspectives on land use, housing, and the region's growth, including interest in understanding where future growth is identified. Several commenters emphasized the need to increase the number of housing units in the region, with a focus on more affordable housing. Many commenters expressed support for sustainable-growth strategies, particularly those that promote infill development, transit-oriented residential and commercial development, urban sprawl reduction, and decreased vehicle miles traveled. Others referenced interest in strategies such as repurposing surplus land, underutilized parking lots, and commercial properties, as well as land value capture.

Numerous commenters expressed concerns or opposition to specific housing types, referencing local jurisdictions' housing programs, zoning regulations, and ordinances. Comments referenced concerns related to increased density and new state laws (including Senate Bill 79 and other bills related to major transit stops), highlighting the potential impacts on traffic, parking, safety, and community character. Other concerns included lack of infrastructure to support housing, evacuation and safety risks, increased traffic, and the potential displacement of existing residents. Commenters also expressed concerns about short-term rentals, tenant protections, homeownership opportunities, and the high cost of development and associated infrastructure.

Response

SANDAG recognizes the importance of housing production and sustainable growth, as well as the need to balance local decision-making and public input within each unique community.

SANDAG does not have the power to permit or develop housing. Nor do we set local standards for zoning, permitting, parking, and development decisions. These decisions properly rest with the cities and the County. Local jurisdictions will decide how to best achieve their housing objectives because those jurisdictions understand the unique needs of their communities and geographies. Local jurisdictions also govern many of the topics raised by commenters, including short-term rentals, tenant protections, developer fees, and other housing concerns mentioned above.

While part of SANDAG's role is to conduct the state-required Regional Housing Needs Allocation and engage closely with state legislation that impacts local zoning authority, housing production, and transit-oriented development, SANDAG cannot otherwise direct state law or local housing programs or policies. SANDAG can and does, however, support local cities in interpreting and meeting state housing requirements. Concerns related to parking changes referenced in comments have primarily been shaped by state law and local actions to encourage housing production and reduce vehicle miles traveled. (See responses in **State and Federal Regulations** for additional details.)

The plan does include policies and programs that help to increase affordable housing, promote infill and transit-oriented development, and align growth with state goals and transportation investments. The **Sustainable Communities Strategy** (SCS), described in **Chapter 2**, reflects city and county planning efforts to develop more housing in areas with access to public transit and other sustainable transportation choices. Eighty percent of future housing and employment growth is expected to occur in areas with existing or planned transportation investments, including key transit stations where people can easily access multiple transportation options.

The SCS land use pattern reflects our close collaboration with jurisdictions, and is consistent with their adopted land use plans (**Appendix F, Figure F.6**).

SANDAG engages in the intergovernmental review process to help ensure future developments are aligned with the plan. The process evaluates the consistency of regionally significant development projects with the SCS. SANDAG also provides funding incentives to advance projects that further the Plan's goals. The SANDAG Housing Acceleration Program (HAP) provides technical and financial assistance for housing plan updates, streamlining, and compliance with state housing laws. HAP initiatives support affordable housing and sustainable growth, including the provision of $14.2 million in planning and capital grants for our local jurisdictions and a $14 million Affordable Housing Trust Fund supporting nearly 1,000 affordable housing units. Other HAP initiatives include a land value capture study to identify and evaluate value-capture opportunities. These would advance housing goals and raise revenues to implement projects in the Plan, as well as a **Regionwide Displacement Study and Toolkit**, to allow better understanding of displacement risks and ensure locally tailored guidance. More information about HAP, along with other housing initiatives, can be found at **sandag.org/housing**.

SANDAG collaborates with local jurisdictions and transit agencies to identify opportunities for transit-oriented development (TOD) and reimagining underutilized land such as parking lots, commercial spaces, and other land classified under state surplus land rules. The **Blue Line TOD Study** is an example of how SANDAG examined how new housing, retail, and community spaces can be integrated around key Blue Line stations to support regional housing goals, improve transit access, and promote healthier, more connected communities. The **Smart Growth Incentive Program** (SGIP) also supports local jurisdictions by funding comprehensive public infrastructure projects and planning activities that facilitate compact, mixed-use, transit-oriented development with increased housing and transportation choices. In the first five cycles, more than $60 million has been awarded to our local jurisdictions for projects throughout the region.

SANDAG will continue to coordinate with jurisdictions to support housing production, sustainable growth, and regional and statewide goals, while respecting local decision-making authority.

For comments related to safety and emergency evacuation concerns, see response on **Evacuation Routes**.

For comments related to housing legislation and the Regional Housing Needs Allocation (RHNA), see responses on **State Housing Laws and Local Housing Initiatives**.

Open Space and Parks

Several comments expressed a desire for more parks, preserving access to open space and green space, more trees, and more and improved park amenities.

Response

SANDAG does not have the authority to decide how specific land is used and developed. These are decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The plan forecasts more than 50% of the region preserved as open space, parks, or habitat (**Appendix F, Figure F.4**). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the plan captures local general plans, community plans, specific plans, and other relevant planning documents.

The plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (**Appendix N**) by measuring how the region's transportation network improves access to daily needs, including parks.

SANDAG collaborates with conservation partners, including local jurisdictions, through the Regional Habitat Conservation Task Force. The goal is to implement the Regional Habitat Conservation Vision to protect, connect, and respect species and their natural habitats to prevent extinction in San Diego County **(Appendix Q – Page Q-7**). SANDAG also worked with regional partners to develop a regional Climate Action Roadmap, which includes urban greening and tree planting efforts.

Regional Growth Forecast

SANDAG received several comments regarding the Series 15 Regional Growth Forecast and its projections for population, housing, and employment. Some commenters expressed concern about apparent divergence between population, housing, and employment forecast figures, specifically that population is projected to grow slowly and eventually decline, while housing and employment are projected to increase. Other commenters expressed concern about accuracy and whether data sources used for projections were up to date. Some commenters expressed concern about the impact that lower population projections could have on regional housing and economic growth, as well as whether certain proposed developments were included in the Series 15 Forecast.

Response

Between 2022 and 2050, the San Diego region is expected to grow by approximately 113,000 people, reflecting slower growth than previous forecasts due to shifts in migration patterns and declining birth rates. The Series 15 Forecast reflects a lower starting population, as the region's population declined between 2020 and 2022 due to COVID-19 pandemic-related losses and outmigration. The Forecast also projects slower growth that aligns with expectations from the California Department of Finance and the U.S. Census Bureau. Despite this slower population growth, the region's existing housing shortages will continue to drive demand for housing and job opportunities, leading to the addition of approximately 203,000 housing units and about 234,000 jobs by 2050. Therefore, while the rate of population growth is slowing, the region is still expected to grow, and these projections provide a planning tool for the region's future housing, employment, and infrastructure needs.

SANDAG forecasts do not advocate for or against growth. They represent neutral data that help policy--makers prepare for the future. The forecasts are developed through a collaborative effort with experts in demographic statistics, housing, economics, and other disciplines, and the close cooperation of the local planning directors and their staff. Forecasts are required by law to be based on the most recent planning assumptions available at the time of forecast development, considering local general plans and other factors, per Senate Bill 375 [see Government Code Section 65080(b)(2)(B)].

Homelessness

Some comments expressed concerns over populations experiencing homelessness, namely unhoused individuals in public spaces. Some commenters advocated for local government to provide resources for unhoused individuals.

Response

The local cities and the County of San Diego are primarily responsible for homelessness programs, services, and housing decisions. The County adopted a multi-step approach to ending homelessness, outlined in its **Homelessness Solutions and Prevention Action Plan**. Local jurisdictions have their own plans, programs, and points of contact responsible for administering homelessness initiatives. If members of the public have concerns about unhoused populations in a particular area, we recommend visiting the website of that jurisdiction to find information about ongoing homelessness initiatives in that area.

Funding

Comments on this topic are organized into the following subtopics:

- Funding Challenges and Concerns
- Road User Charge
- Taxes
- Pricing and Revenue Strategies

Funding Challenges and Concerns

SANDAG received numerous comments addressing funding challenges. Some commenters were worried about whether projects would actually receive funding, while others expressed concern over federal and state funding uncertainty. Commenters also requested cost-benefit analyses on projects and more information on funding sources. Several commenters expressed mistrust of agency spending decisions and practices.

Response

While all future funding is subject to some degree of uncertainty, SANDAG has a strong track record of securing grants and other revenue. Our funding forecasts are based on careful analysis of historical data. All funding assumptions within this plan have been reviewed and approved by both federal and state agencies, which have determined them to be reasonable based on current conditions and projections.

Projects that are included in the plan have been reviewed and are considered eligible for future funding that is reasonably expected to be available. In addition, the plan includes a separate list of projects in an "Unconstrained Network." These are projects that SANDAG does not expect future funding levels to be sufficient to fund, yet they are part of a long-term vision for the region's transportation future and serve as a starting point for future planning and discussion in the case that more funding than expected becomes available. See **Appendix I** for the list of project types eligible by fund source.

At various phases of plan development, the proposed network of projects in the plan are evaluated with a transportation model to determine how they perform and if they are advancing the goals of the plan. The results of this process help refine projects. An overview of the transportation model is included in **Appendix M**; the network evaluation and network development is summarized in **Appendix N**. Projects that are over $100 million are further evaluated based on criteria such as project readiness and anticipated impacts to vehicle miles traveled and air quality. More details on the project evaluation process are included in **Appendix N**.

Our spending practices are audited, as required by law. California Assembly Bill 805 in 2018 mandated the creation of a **SANDAG Audit Committee** and an **Office of the Independent Performance Auditor** (OIPA). In addition to OIPA, SANDAG regularly undergoes required audits administered by our federal and state funding agencies, which provide checks and balances from neutral parties confirming we are responsibly stewarding taxpayer funds. These audits are conducted in accordance with federal and state laws and often result in process changes and improvements to ensure the agency meets our fiduciary responsibilities.

Road User Charge

Commenters expressed both support and opposition to a Road User Charge.

Response

A Regional Road User Charge is not assumed as a funding source in the 2025 Regional Plan.

Taxes

SANDAG received a variety of comments on taxes. Some expressed support of sales and wealth taxes, and of a lower gas tax. Some commenters expressed concern with any potential future taxes.

Response

SANDAG does not have the power to make decisions about taxes. These are decisions made by voters and elected officials. One example is a 1987 measure that approved a half-cent sales tax called TransNet to fund numerous transportation projects and programs in the San Diego region.

SANDAG is required to develop a financial strategy for the plan that identifies probable sources of funding for the region’s future transportation projects. The Proposed Final Plan assumes one 1/2-cent sales tax measure starting in fiscal 2029 that will be led by MTS and will fall within their jurisdiction, and one regional 3/4-cent sales tax measure starting in fiscal 2038. TransNet is assumed to expire in 2048.

Pricing and Revenue Strategies

A handful of comments supported pricing and revenue strategies, including parking pricing and value capture, a type of public financing that recovers some of the revenue that public infrastructure generates for private landowners. Other commenters encouraged seeking private investment and focusing on transit and bike projects in tourism-heavy areas to increase revenue.

Response

The plan assumes revenue from joint development at transit stations throughout the region, as well as parking revenue in popular areas. These types of strategies are already being used by transit agencies and local jurisdictions in our region and are important revenue sources.

Additional sources of private-sector revenue the agency has explored include advertising, naming rights, sponsorship of transit facilities, and developer impact fees on housing units constructed throughout the San Diego region.

Regarding whether tourism is considered when prioritizing improvements in our transportation system, our regional travel demand model and project-specific planning studies do consider visitors, which are an important part of the local economy.

State and Federal Regulations

Comments on this topic are organized into the following subtopics:

- Policy Advocacy
- State Housing Laws and Local Housing Initiatives

Policy Advocacy

Some comments supported SANDAG advocating for regulatory reform at the state and federal levels and working closely with state and federal agencies for regional priorities related to greenhouse gas emissions (GHG), housing, funding, and environmental laws, reforms, or regulations.

Response

SANDAG is required by state and federal laws to prepare its Regional Transportation Plan and Sustainable Communities Strategy every four years. The SANDAG Board of Directors also passes an annual legislative program that serves as a framework for staff to advance policies and legislative initiatives on the state and federal level in support of the agency's mission, strategic goals, and long-term vision. More information on SANDAG's legislative program can be found at **SANDAG.org/about/legislative-program**.

State Housing Laws and Local Housing Initiatives

Some commenters expressed concern with state housing legislation that imposes zoning requirements and streamlining incentives to accelerate housing development, which in some cases supersedes local control. Many were concerned about the implementation of laws related to major transit stops, transit priority areas, parking reductions, and height limits in their communities. Specific locations were cited where commenters opposed the application of these laws, highlighting concerns about density increases and the feasibility of major transit stops. Additionally, there was opposition to major transit stop designations in their communities. A few comments supported state housing legislation to promote development of housing around transit. In addition, a few commenters expressed support for the Regional Housing Needs Allocation (RHNA), while others expressed opposition.

Response

The state has passed legislation in recent years aimed at increasing housing production and streamlining housing development. SANDAG takes positions on pending legislation as directed by the Executive Committee of the Board of Directors. The Board, which is comprised of representatives from every jurisdiction in the region, approves a legislative program annually .Items under the legislative program, or otherwise of interest to SANDAG, are brought to the Executive Committee or the Board for consideration, as appropriate.

SANDAG's primary role in housing is conducting the state-required Regional Housing Needs Allocation (RHNA) process and aligning housing development planning with transit infrastructure and sustainable growth objectives. State law requires that our plan account for housing units as set forth by the California Department of Housing and Community Development for each RHNA cycle. SANDAG does not have the authority to direct local housing programs or policies. Local jurisdictions determine zoning, permitting, and development decisions. Cities and the County implement their own housing and development standards to meet their unique housing needs and goals. More information on RHNA can be found in the final **6th Cycle Regional Housing Needs Assessment Plan**. Progress on RHNA implementation is tracked on a **RHNA Dashboard**.

SANDAG provides technical assistance and grants to jurisdictions to support housing production that reflects local priorities and compliance with state law. SANDAG's Housing Acceleration Program helps local cities and the County interpret and comply with state law and provides timely updates on pending legislation. The program also creates a forum for regional collaboration and tackling housing and legislative challenges in the region.

The State of California has passed laws to incentivize development in areas with existing and planned transportation investments, such as areas surrounding major transit stops. A major transit stop is defined in state law - specifically **Public Resources Code Section 21064.3**[3]; SANDAG does not designate these stops. Additional information about how the transit network was developed can be found in **Appendix N, Attachment N3**. jurisdictions, the public, and other key partners to further refine specific project details through future planning, design, environmental analysis, and outreach efforts.

Comments related to Sustainable Growth, Housing Affordability, Development Concerns, Growth/Forecast, and Unhoused/Homeless are addressed in the **Housing and Land Use response.**

Technology

These comments are organized into the following subtopics:

- Concerns, Critiques, and Opposition to Technology
- Support for Transit Technology and Innovation
- Education and Transparency of Data and Technology

Concerns, Critiques, and Opposition to Technology

Some commenters expressed concern about the advancement and integration of technology in the transit system and general data collection, primarily citing concerns with data privacy, safety, and implementation of autonomous vehicles. Some commenters opposed the overall investment in technology.

Response

SANDAG carefully analyzes potential technological improvements to transportation, including its potential impacts, before proposing technology solutions.

SANDAG has conducted detailed privacy impact assessments to better understand how new data sources may affect the public's privacy. The agency acknowledges that new technologies—such as wireless communications platforms, mobile devices, in-vehicle systems, and advanced roadway-sensing technologies—generate more data than ever. While this information is a critical tool for improving safety and mobility across transportation agencies, SANDAG remains committed to safeguarding the privacy of transportation data. Key steps include:

- Complying with all applicable state laws, rules, and regulations.
- Building on established federal or state data privacy guidelines.
- Building upon SANDAG's existing data privacy policies.

Safety is SANDAG’s highest priority. Before deploying new transportation technologies, SANDAG follows federal and state guidelines and uses a rigorous systems engineering process during planning, design, and implementation. This ensures safety, accountability, and transparency at every stage. SANDAG will continue to balance innovation with public trust and safety.

Support for Transit Technology and Innovation

Commenters mentioned support and opposition to integrating and investing more technology into the transit network to make transit more efficient and better. Some, however, expressed concerns about safety and privacy. Some comments also mentioned integrating technology to improve transportation planning and safety, such as traffic control cameras, transit signal priority, autonomous vehicles, and other technology innovations.

Response

SANDAG is proposing a range of transportation technologies designed to improve roadway safety, reduce traffic congestion, and provide the traveling public with reliable and timely information. These include traffic signal upgrades, ramp metering, changeable message signs, queue warning systems, freeway fiber communications, vulnerable road user detection systems, transit and freight signal priority, real-time information systems, and adaptive signal timing.

Education and Transparency of Data and Technology

Some commenters supported increased education of the public on how to use technology, access data, and surveys, and improved transparency on data sources and data collection. A few commenters expressed a desire for more outreach to educate residents on how to use transit applications and technology in general, specifically seniors or hard-to-reach populations. Some comments also suggested data dashboards for accountability and transparency.

Response

SANDAG will continue to explore opportunities to make it easier for the public to access and understand our data through user-friendly tools such as data dashboards, while continuing to provide clear communication about data sources, collection methods, and safeguards.

We also know that new tools and applications only improve user experience if people know about them and how to use them. We are committed to increasing public awareness through expanded education and engagement efforts. This includes working to support seniors and hard-to-reach populations having access to the resources needed to confidently use transit applications and related technologies.

Equity & Title VI

These comments are organized into the following subtopics:

- General Support for and Opposition to Equity Considerations
- Planning for Specific Populations
- Providing Resources

General Support for and Opposition to Equity Considerations

Numerous comments endorsed improvements benefitting underserved communities and transit-dependent populations, with an emphasis on seniors and disabled populations as well as veterans and students. Comments also expressed general support for racial justice, civil rights, and Title IV, and called for the SANDAG Board of Directors to advocate more for the region and its constituents. Some comments opposed social equity and diversity, equity, and inclusion principles.

Response

SANDAG is legally required to comply with Title VI of the Civil Rights Act of 1964, which states that "no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance." The plan must ensure a fair opportunity for everyone to participate in its planning process and provide a transportation network whose benefits are shared by all.

SANDAG's legal framework includes compliance with California Assembly Bill 805, SANDAG Board Policy No. 025 (Public Participation Plan) and the Americans with Disabilities Act (ADA).

This is evaluated in **Appendix E** of the plan. This measures how well the network helps people in the region access basic needs and expands access to opportunities for Title VI, senior and low-income populations as well as the region. **Appendix A** outlines how SANDAG has prioritized inclusive engagement and planning efforts through:

- Engagement of Title VI, hard to reach, and limited mobility populations in the planning and decision-making process through collaboration with Community-Based Organizations (CBOs) from across the San Diego region
- A data-driven and informed process to identify where these communities are located within the region and provide connections and transportation options to and from key destinations and economic opportunities
- Improved analysis of how the plan meets federal and state mandates, including Title VI of the Civil Rights Act of 1964

Planning for Specific Populations

SANDAG received comments on the historic impacts of freeways being built and current impacts of freeways dividing communities with an emphasis on reconnecting communities. Commenters also requested increased investment in East County and rural areas and the modification of some Title VI minority community designations.

Response

Freeway Impacts and Reconnecting Communities

SANDAG is undertaking multiple planning projects that identify communities that are physically disconnected by transportation infrastructure, and is proposing improvements to increase access and safety for those communities. This includes a feasibility study for a freeway lid over Interstate 5 to restore connections between Barrio Logan and Logan Heights.

East County and Rural Areas

As outlined in **Appendix E**, we are committed to working with all our region's communities to best understand and address their unique needs. The plan breaks down projects proposed into subregions, including East County and Rural Areas, by project categories in **Appendix A**: Transportation Projects, Programs, Policies, and Phasing. Projects can be viewed by transportation type including active transportation, complete corridors (highway improvements), transportation management, transit, and flexible fleets.

Majority Minority Community Designations

The plan defines "majority minority" communities as areas where there is no single race or ethnic group that comprises more than 50% of the population. More information on the current and projected San Diego regional populations by race and ethnicity can be found in **Appendix E**.

Providing Resources

Comments highlighted various other concerns, including car affordability and access to basic needs.

Response

Appendix E of the plan measures how well our network provides access to basic needs and opportunities using various types of transportation. SANDAG also has a Sustainable Transportation Services program that provides resources to make it easier to bike, walk, take transit, and carpool. These services include incentives, subsidies, and educational programs. More information can be found on our **Sustainable Transportation Services web page**.

Public Outreach and Engagement

These comments are organized into the following subtopics:

- General Support for and Opposition to Public Outreach and Engagement Efforts
- Education and Information
- Partnerships
- Marketing, Social Media, and Feedback Collection Mode

General Support for and Opposition to Public Outreach and Engagement Efforts

SANDAG received comments expressing satisfaction with current outreach efforts, including virtual options, and social media content. Other comments expressed the opinion that SANDAG does not consider public feedback and that the agency lacks trust and transparency with the public. A few commenters suggested that the demographics of members of the public who often comment on the plan may be unrepresentative of the regional population at large.

Response

SANDAG strives to conduct outreach that is accessible, transparent, and understandable to the average person. The agency has contracts with community-based organization (CBO) partners who are trusted messengers in communities across the San Diego region. They have been vital in informing our messaging, educational resources, and tactics to reach people throughout our regional planning process. We were proud to collect – with the help of our CBO network - thousands of online and paper public comments, and to host attendees at public meetings from all corners of the region. In 2023, we released a summary of public feedback received on the initial concept for our plan and how this input shaped the projects, programs, and policies in our plan. **Appendix J** documents SANDAG's consideration of comments received during the public comment period for the draft 2025 Regional Plan.

Education and Information

SANDAG also received feedback on potential improvements to public engagement and information sharing. Many commenters expressed a desire for SANDAG to conduct more outreach, both large and small-scale, to obtain more community input. Commenters also requested more incentives for public participation and use of convenient meeting times for additional workshops, with increased time for Q&A. A few commenters also requested that information be available in a greater number of languages.

Response

Throughout the development of the plan, our outreach team and community-based organization partners offered small- and large-scale opportunities to learn about the plan and how to provide input about their transportation needs to shape its contents. As outlined in **Appendix J** of our Plan, SANDAG embedded education and input opportunities into many existing community events and other locations where members of the public congregate, such as busy transit centers, grocery stores, food distributions, recreation centers, schools, libraries and more. These events occurred at times of day that varied to provide a way for residents with different schedules to participate. Our workshops were kept to 90 minutes or shorter to be respectful of the public's time, and unstructured Q&A was a feature of these events. In addition, we provided childcare, light dinner, and interpretation at these larger public workshops. Other avenues (such as the **regionalplan@sandag.org** email, and the Regional Plan hotline) were made available to the public to send follow-up questions to staff after the events concluded.

All public-facing materials and activities at public events regarding the plan were provided in English and Spanish, along with Spanish interpretation at public meetings. Materials and interpretation in other languages was made available by request: for example, community organizations received materials they requested in Vietnamese, Arabic, and Farsi. Additionally, a translation plug-in on our website and public surveys made information available in 18 languages. We encourage any individuals or organizations serving limited-English proficiency populations to reach out to us in the future to request translated versions of any of our educational materials or request an interpreter in another language at a future meeting.

Partnerships

Some comments requested that SANDAG more meaningfully engage with Community-Based Organizations and underserved communities to understand their needs and provide equitable transportation improvements that go beyond the minimum of what federal and state regulations require, as well as increased coordination during project construction. Commenters also recommended strengthening partnerships with Mexico.

Response

In our above response in General Support for and Opposition to Public Outreach and Engagement efforts, we describe our partnerships with community-based organizations across the region and our objective to engage meaningfully with even more community partners in the future.

Because people in our region have a wide range of transportation needs, investments in our plan can be seen in many transportation modes This means not prioritizing one form of transportation over another, and creating a plan that is financially feasible. The plan includes a suite of projects, programs, and policies that expand choices for everyone in the region to get around in a healthy, convenient, and safe manner, while mitigating environmental impacts across the region.

Prior to and during construction of SANDAG projects, SANDAG works closely with contractors to stay informed about how this work will impact community members, businesses, and other partners in the project area so they can proactively alert the public of impacts. SANDAG strives to let the public know what can be expected during construction, including impacts to daily travel patterns and routines in the area, noise, presence of equipment, parking, impacts to business access, deliveries, school drop-offs, and emergency vehicle corridors.. Construction updates additionally inform the public when work will be happening and its duration, especially at night and on weekends. SANDAG uses many tactics to reach a broad swath of community members in the project area such. These tactics include mailers, canvassing local businesses to get them signed up for email updates, dropping off construction door hangers, pop-up booths at community events, and geotargeted social media ads. SANDAG also updates elected officials in project areas to amplify the message about construction impacts.

SANDAG recognizes that the flow of people and goods between our region and Tijuana is an important piece of understanding our region's needs and opportunities for investment. These considerations have been factored into our planning process. SANDAG periodically conducts surveys that measure trends in cross-border travel. The data from these surveys help develop analysis tools that are leveraged in the plan along with general information such as reports. Federal crossing, border wait time, and selected economic data is also provided on the SANDAG **Open Data Portal** for use by our jurisdictional and community partners and the public. We continue to collaborate with partners in Mexico to shape our work through our Borders Committee, which advises our Board of Directors on major interregional planning activities that impact the borders of the San Diego region. Additionally, as the plan was developed, we hosted two public workshops with government agency planning partners, key partners, and community leaders in Tijuana (one in-person, and one virtual) to better understand binational mobility needs and opportunities to align planning efforts in the cross-border region.

Marketing, Social Media, and Feedback Collection Mode

Commenters proposed various marketing, outreach, and social media strategies to better market transit and encourage ridership. Other recommendations were provided regarding expanding SANDAG's reach, including rider feedback collection, expanding social media reach by partnering with local influencers, increasing quantities of educational social media content about projects in different parts of the region, as well as expanding audience reach by participating in social media trends and memes.

Response

Our social media strategy for the plan focused on creating content that is engaging, modern, and relevant to the entire San Diego region. We appreciate content ideas and recommendations to stay up to date with how people consume content online. Our social media goals include growing our audience, exploring opportunities for collaboration, and finding ways to keep the public informed and engaged during the planning process.

We encourage members of the public to share input regarding marketing particular transit routes, encouraging transit ridership overall, and improving service with our local transit operators: **MTS** and **NCTD**.

Every five years, SANDAG collects feedback regarding transportation habits, patterns, and needs from transit riders across the region through our Onboard Transit Passenger Survey. The information collected is used to make improvements to transit infrastructure and service. The latest survey was conducted in 2023 and collected information from riders on bus, Trolley, and train routes to identify areas of improvement, implement solutions, and meet Federal Transit Administration (FTA) Title VI requirements.

Goods Movement

These comments are organized into the following subtopics:

- Goods Movement Projects
- Impacts from Trucking

Goods Movement Projects

Public comments expressed strong interest in strengthening the region's goods movement system, including support for highway and freight improvements, sustainable freight technologies, and better integration of rail, transit, and airport connections. Concerns were also raised about noise, air quality, and community impacts in areas near major freight corridors.

Response

The plan aims to strengthen efficient goods movement through our ports, highways, railways, airports, and border crossings, supported by the San Diego and Imperial Counties Sustainable Freight Implementation Strategy and Freight Gateway Study. The plan advances near-term actions to strengthen freight resiliency partnerships, support truck route designations under Assembly Bill 98, and update federal freight corridor designations. Longer-term strategies focus on sustainable freight technologies, resiliency, and continued coordination with such partners as the Port of San Diego and the San Diego County Regional Airport Authority. Overall, the Plan seeks to improve goods movement while supporting community health goals.

Impacts from Trucking

Some comments were concerned with the air quality impacts associated with trucking and cargo, highlighting the public health impacts to communities located near trucking activities. Commenters emphasized the need for stronger commitments to zero-emission freight technologies, environmental justice screening, and binational collaboration to address cross-border emissions.

Response

The plan aligns with California's statewide plan to transition to zero-emission trucks and freight technologies, and advances strategies identified in the San Diego and Imperial Counties Sustainable Freight Strategy. This includes pursuing freight resiliency partnerships, updating truck routes and freight corridor designations, and positioning the region to secure state and federal funding for zero-emission freight infrastructure. The Plan also prioritizes reducing pollution exposure in disadvantaged communities (consistent with Assembly Bill 805), supports implementation of the Portside and the International Border Community Emissions Reduction Plans, and supports projects such as Otay Mesa East Port of Entry that are designed to reduce idling, improve efficiency, and lower emissions. SANDAG will continue to coordinate with state, federal, tribal, and Mexican partners to address binational air quality and water quality challenges. Together, these efforts facilitate freight strategies that support both economic growth and community health.

Safety, Security, and Emergency Preparedness

SANDAG received a small number of comments concerning public safety. Commenters expressed feeling unsafe in public spaces and wanting an overall increase in safety and security. Some comments related to the current operations of public safety and security, which SANDAG has shared with our partner agencies as applicable. Other comments related to safety, security, and emergency preparedness, including safety and security on transit, roadways, bikeways, and walkways.

Response

SANDAG has a Criminal Justice Research Division (CJRD) that serves as a vital source of accurate, timely, and actionable information on public safety and criminal justice matters in the San Diego region. The team is composed of experts who research, analyze data, and collaborate with regional partners to inform policy decisions, enhance public safety strategies, and support community well-being. They also participate as members of various local criminal justice-related committees, councils, and task forces to share trends and findings on these issues.

Through its Criminal Justice Clearinghouse, CJRD collects and disseminates data on crime trends and public safety, and examines substance use in local jails to better understand the connections between drugs, crime, and other societal challenges. The team continually updates its databases to provide current and reliable information. These efforts support the assessment of crime control program effectiveness and efficiency, helping to inform local criminal justice planning and policymaking. The division's work offers valuable insight into crime patterns and public safety challenges, supporting the development of crime-reduction strategies and responses to regional crime.

Additionally, through its Independent Evaluations, the division provides comprehensive data analysis and impact assessments of public safety and criminal justice initiatives across the region.

The Public Safety Committee (PSC), one of SANDAG's Policy Advisory Committees, composed of elected officials and public safety representatives, works to advise the Board of Directors on major policy-level matters related to public safety. The PSC aims to improve the quality of life in the region by promoting public safety and justice through collaboration, information sharing, effective technology, and objective monitoring and assessment.

For comments related to safety, security, and cleanliness both on transit and at transit stops, see response on **Transit User Experience**.

For comments related to roadway safety for all users (e.g., motorists, cyclists, pedestrians) and emergency evacuation concerns, see responses on **Roadway Safety for All Users**, **Protected Bike Lanes**, **Road Maintenance and Desired User Experience Upgrades**, and **Road Enhancements**.

For comments related to concerns over emergency preparedness and evacuation routes, see responses on **Evacuation Routes** and **Natural Disasters, Emergency Preparedness, and Resilience**.

Anexo J6: Comentarios y respuestas del público al borrador del Plan Regional 2025

Introducción

El borrador del Plan Regional 2025 se publicó para revisión y comentarios del público el 23 de mayo de 2025. El periodo de comentarios del público concluyó el 18 de julio de 2025. Los comentarios se enviaron a través del sitio web del Plan Regional 2025, correo electrónico, correo de voz, reuniones públicas (sesiones informativas) organizadas por la Asociación de Gobiernos de San Diego (SANDAG, por sus siglas en inglés), eventos con socios comunitarios, cartas (por correo electrónico y postal) y una audiencia pública celebrada durante la reunión del Comité de Transporte del 18 de julio. Una segunda audiencia pública se llevó a cabo el 12 de diciembre de 2025 con la Mesa Directiva de SANDAG.

Los siguientes adjuntos incluyen todos los comentarios públicos recibidos durante el período de comentarios y las respuestas de SANDAG. Los comentarios se separan en tablas según la fuente de la que se recibieron. Los comentarios recibidos por correo electrónico y en formato de carta se adjuntan debajo de cada tabla correspondiente, donde pueden verse en el formato en el que se recibieron.

- **Tabla J6.1: Comentarios del público provenientes de reuniones públicas (sesiones informativas y audiencia pública)**
- **Tabla J6.2: Comentarios del público provenientes de correo de voz**
- **Tabla J6.3: Comentarios del público provenientes del sitio web**
- **Tabla J6.4: Comentarios del público provenientes del correo electrónico**
- **Tabla J6.5: Comentarios del público provenientes de cartas**

Respuesta a los comentarios del público

La participación pública es fundamental para el desarrollo del Plan Regional 2025 (el “plan”). Cada comentario recibido durante el período de revisión pública se analiza, se considera y se aborda detenidamente. Esto fortalece el proceso de planeación y contribuye al desarrollo de un Plan Regional que refleje las prioridades, los valores y las necesidades de nuestra región diversa.

SANDAG revisa todos los comentarios recibidos a través de reuniones públicas, presentaciones por escrito, correos electrónicos y formularios en línea. Cada comentario se registra y forma parte del expediente público formal. Expertos en la materia analizan los comentarios y valoran las aportaciones en relación con las políticas, los datos y el análisis técnico del plan.

SANDAG analiza y responde a todos los comentarios públicos presentados durante el período de revisión del borrador del Plan Regional 2025, del 23 de mayo de 2025 al 18 de julio de 2025. Los comentarios que abordan temas similares o plantean preguntas comunes se agrupan para proporcionar una respuesta clara y coherente. Este enfoque permite abordar de manera eficiente los temas recurrentes y, a la vez, garantiza que cada comentario se reconozca y conteste de forma transparente y precisa, y que responda a los aportes de la comunidad. Cualquier comentario relacionado con infraestructura, programas o políticas que correspondan a la competencia de otras agencias gubernamentales se compartirá con dichas agencias.

SANDAG recibió 12 envíos de comentarios sobre el borrador del Plan Regional 2025 por parte de agencias gubernamentales, incluidas Caltrans, la Ciudad de Carlsbad, la Ciudad de Coronado, la Ciudad de Escondido, la Ciudad de Oceanside, la Ciudad de San Diego, el Condado de San Diego, Navy Region Southwest (NRSW), NCTD, la Autoridad de Transporte del Condado de Orange (Orange County Transportation Authority, OCTA), la Autoridad Portuaria de San Diego y el Distrito de Control de la Contaminación del Aire de San Diego (San Diego Air Pollution Control District, SDAPCD). Estos comentarios incluyeron solicitudes específicas por jurisdicción y recomendaciones técnicas. Como parte del compromiso continuo con nuestras agencias asociadas, el personal de SANDAG ofreció reunirse con las agencias para explicar cómo sus comentarios se incorporaron al plan. SANDAG se reunió con todas las agencias que solicitaron reuniones. Copias de todas las cartas de comentarios se incluyen en este anexo, Anexo J6, debajo de la Tabla J6.5.

Respuestas

Las siguientes secciones presentan las respuestas de SANDAG a los comentarios recibidos, organizadas por las siguientes áreas temáticas:

- **Apoyo general y oposición hacia SANDAG**
- **Transporte público (autobuses, Trolleys o trenes)**
- **Ciclovías y senderos peatonales**
- **Carreteras y vialidades locales**
- **Emisiones de gases de efecto invernadero, clima, energía y calidad del aire**
- **Flotas flexibles**
- **Vivienda y uso de suelo**
- **Recursos financieros**
- **Regulaciones estatales y federales**
- **Tecnología**
- **Equidad y Título VI**
- **Difusión y participación pública**
- **Movilización de mercancías**
- **Seguridad, protección y preparación para emergencias**

Apoyo general y oposición hacia SANDAG

SANDAG recibió comentarios generales tanto de apoyo como de oposición a los objetivos y programas del plan, así como hacia la agencia misma. Algunas personas que enviaron comentarios expresaron falta de confianza en la toma de decisiones de la agencia y en la administración de fondos, desaprobaron el desempeño del plan o solicitaron el uso de otras medidas de rendimiento. Otras expresaron inconformidad con el liderazgo y los integrantes de la Mesa Directiva de SANDAG, y algunas pidieron la eliminación de SANDAG. Otras personas manifestaron apoyo hacia SANDAG y, en general, respaldaron el plan.

Respuesta

Reconocemos que existen numerosas opiniones sobre el trabajo que realiza SANDAG y agradecemos todos los comentarios, independientemente de que sean favorables o críticos.

Nuestra meta siempre es realizar la planeación del transporte de manera eficiente, transparente y precisa. Trabajamos continuamente para mejorar la eficiencia de nuestro personal, así como la eficacia de nuestros procesos y la tecnología que utilizamos. SANDAG se somete regularmente a auditorías obligatorias de nuestras agencias financiadoras federales y estatales, lo que proporciona controles y equilibrios esenciales de partes neutrales para garantizar que seamos administradores responsables de los fondos de los contribuyentes. Estas auditorías se llevan a cabo conforme a las leyes federales y estatales, y con frecuencia derivan en mejoras de procesos que garantizan que la agencia cumpla con nuestras responsabilidades fiduciarias.

El plan de SANDAG es un requisito tanto federal como estatal. Conforme a la ley federal, SANDAG sirve como una Organización de Planificación Metropolitana (MPO, por sus siglas en inglés) y tiene el mandato de desarrollar e implementar un Plan Regional de Transporte (RTP, por sus siglas en inglés) a largo plazo cada cuatro años. El RTP debe cumplir con los estándares federales de calidad del aire y realizar un análisis federal de Título VI para asegurar que los planes, las políticas y las acciones de SANDAG no generen impactos negativos en las poblaciones protegidas bajo dicho título.

Según la ley estatal, SANDAG debe cumplir con el Proyecto de ley de la Asamblea (AB, por sus siglas en inglés) 805 y el Proyecto de ley del Senado (SB, por sus siglas en inglés) 375, los que requieren que el RTP incluya una Estrategia de Comunidades Sustentables (SCS, por sus siglas en inglés) que aborde los objetivos de reducción de emisiones de gases de efecto invernadero establecidos por la Junta de Recursos del Aire de California. La ley estatal también exige la inclusión de estrategias que fomenten el uso del transporte público. SANDAG debe cumplir con estos requisitos estatales y federales para garantizar que la región siga siendo elegible para financiamiento estatal y federal destinado al transporte.

Transporte público (autobús, Trolley, tren)

Esta área temática se organiza en los siguientes subtemas:

- Apoyo general y oposición al transporte público
- Expansión y acceso a la red de transporte público
- Cronograma de proyectos de transporte público
- Operaciones de transporte público

- Frecuencia y horarios de operación de transporte público
- Experiencia de usuarios de transporte público
- Tarifas del transporte público y Pase de Oportunidades para Jóvenes (Youth Opportunity Pass, YOP)
- Autobuses Rapid
- Electrificación del transporte público
- Tipos especiales de transporte público
- Conexión de transporte público al aeropuerto (Airport Transit Connection, ATC)
- Corredor entre Los Angeles-San Diego-San Luis Obispo (LOSSAN)
- Línea púrpura del Trolley

Apoyo general y oposición al transporte público

SANDAG recibió numerosos comentarios tanto de apoyo como de oposición a los proyectos de transporte público, incluidos autobuses, Trolley, trenes y otros servicios especializados de transporte público. Muchas personas que enviaron comentarios pidieron priorizar los fondos del transporte público y apoyar mejoras en las operaciones, aumentar la frecuencia del servicio, mejorar la experiencia del usuario o crear mejores conexiones en toda la región. Los comentarios destacaron de manera contundente la necesidad de que el transporte público contribuya a alcanzar las metas medioambientales, reduzca la dependencia del automóvil, disminuya el tráfico y proporcione transporte público accesible para todas las poblaciones. Sin embargo, también hubo preocupaciones sobre la necesidad de que el transporte público sea rápido, seguro y conveniente para lograr éxito, algo que algunas personas que enviaron comentarios consideran que aún no sucede. Algunas personas que enviaron comentarios expresaron preferencia por una modalidad de transporte público sobre otra. Otros compartieron ejemplos de soluciones de transporte público de ciudades de Estados Unidos y de otros países que les gustaría ver en la región de San Diego.

SANDAG también recibió comentarios en oposición a los fondos del transporte público, y mencionaron percepciones de poca cantidad de pasajeros, frecuencia y confiabilidad limitadas, así como inquietudes sobre leyes estatales vinculadas a paradas principales de transporte público y la disponibilidad del servicio. Algunas personas que enviaron comentarios solicitaron análisis de costo-beneficio para evaluar los proyectos propuestos. Además, algunas hicieron preguntas sobre proyectos de transporte público específicos.

Respuesta

La meta de SANDAG es mejorar la calidad de vida en la región al convertir el transporte público en una opción de viaje más conveniente y confiable. Para ello, invertimos en nueva infraestructura y trabajamos de manera constante para mejorar el servicio. Es importante destacar que un sistema de transporte público que atrae a más pasajeros ayuda a cumplir los requisitos estatales y federales relacionados con la calidad del aire y la accesibilidad. SANDAG propone rutas de transporte público específicas basadas en análisis detallados que consideran factores como los lugares a los que se desplazan con frecuencia los grupos de personas de la región y qué poblaciones tienen mayor probabilidad de utilizar transporte público. También colaboramos con el Sistema Metropolitano de San Diego (Metropolitan System, MTS), el Distrito de Transporte Público del Condado Norte (North County Transit District, NCTD) y otras agencias gubernamentales locales, y recabamos aportaciones del público sobre sus necesidades de transporte público. Todo esto nos ayuda a identificar qué soluciones de transporte público son las más adecuadas. El plan incluye muchos proyectos de transporte público que aún se encuentran en etapas iniciales de planeación, por lo que todavía no hay información detallada disponible para cada proyecto. Tendremos más información, incluidos costos y beneficios, a medida que se estudie y desarrolle cada proyecto de transporte público en los próximos años.

Expansión y accesibilidad a la red de transporte público

SANDAG recibió numerosos comentarios en apoyo a una red de transporte público conectada, continua, segura y multimodal, junto con inquietudes sobre brechas en el sistema actual. Muchos comentarios destacaron la necesidad de priorizar fondos para mejoras específicas que atiendan estas brechas y conecten mejor a los pasajeros con sus destinos.

Las personas que enviaron comentarios resaltaron la importancia de contar con transporte público accesible que sirva a todas las poblaciones (residentes, turistas y empleados) al conectarlas con centros de actividades, centros de empleo, escuelas, instituciones de educación superior, hospitales, playas, áreas turísticas clave y otros destinos. También solicitaron mejores conexiones entre todas las subregiones y un servicio mejorado que vincule las paradas de transporte público con viviendas y otros destinos esenciales, en particular para los adultos mayores y otras personas que dependen mayormente del transporte público

Otras personas mencionaron los programas para estacionar y compartir el viaje, junto con solicitudes de más áreas designadas para servicios de viajes compartidos, así como la continuación del apoyo para servicios especializados de transporte público destinados a personas con discapacidades.

Respuesta

SANDAG comparte la visión de la comunidad de una red regional de transporte público bien conectada que facilite el desplazamiento de las personas hacia los lugares a los que necesitan o desean ir. El plan también incluye mejoras en carreteras, ampliación de las áreas de servicio de enlace en vecindarios y ciclovías, además de actualizaciones tecnológicas para apoyar los viajes en toda la región y conectar de manera más eficaz a las personas con las paradas de transporte público. Utilizamos diversas herramientas para anticipar qué tan bien funcionará esta red de transporte propuesta para la región (véase el **Apéndice N**), y nos enfocamos en la capacidad del sistema para conectar a las personas con destinos como centros de empleo, instalaciones médicas, educación, comercios, parques, acceso costero y otros, tanto por transporte público como por otras modalidades de viaje.

Cronograma de proyectos de transporte público

Si bien SANDAG recibió comentarios que muestran un apoyo generalizado al transporte público, muchas personas expresaron preocupación porque los proyectos están tardando tiempo demasiado en completarse. Varias personas señalaron que los cronogramas para 2035 y 2050 quedan demasiado lejanos y pidieron una implementación acelerada para cumplir las metas medioambientales y cerrar brechas en los servicios y en el acceso, especialmente en las comunidades con mayores necesidades. Además, las personas que hicieron comentarios pidieron una implementación más rápida de mayores frecuencias del transporte público, mejores servicios de tránsito e infraestructura de apoyo al tránsito.

Respuesta

Reconocemos que completar los proyectos de transporte lleva mucho tiempo. Los cronogramas del proyecto pueden extenderse por los estudios necesarios en las fases de planeación, análisis medioambiental, diseño y construcción. Estos estudios buscan asegurar que la infraestructura final responda mejor a las necesidades de la región y reduzca los impactos negativos. También se requiere tiempo para obtener los recursos financieros, lo que incluye competir por fondos con otras regiones del estado y del país.

Operaciones de transporte público

SANDAG recibió numerosos comentarios relacionados con la ampliación y la reducción de operaciones de transporte público. Hubo sugerencias para extender, actualizar o redirigir rutas existentes; identificar nuevas zonas para ofrecer servicio; agregar rutas nuevas; restablecer rutas eliminadas; y agregar o reubicar paradas. Algunas personas expresaron apoyo a ciertas modalidades de transporte público, y mencionaron las ventajas y desventajas de su implementación. Mientras algunos comentarios fueron de carácter general (por ejemplo, sugerencias de cambios en las operaciones), otros señalaron rutas, paradas y áreas específicas que desean modificar, agregar o eliminar.

Respuesta

El plan refleja la información que SANDAG recibió del público y de otras agencias gubernamentales, la evaluación de qué rutas servirían a más personas y la necesidad de equilibrar los costos (tanto de construcción como de operación y mantenimiento) con los ingresos disponibles. Antes de agregar rutas de transporte público nuevas o modificar las existentes, SANDAG y otras agencias locales deben analizar con atención los posibles resultados y escuchar al público para definir los tipos de transporte público, los mapas de rutas y paradas, las necesidades de infraestructura y los planes operativos.

Frecuencia y horarios de operación de transporte público

SANDAG recibió muchos comentarios sobre la frecuencia del servicio de transporte público y los horarios de operación. Las personas expresaron la necesidad de aumentar la frecuencia y extender los horarios para que el transporte público sea más eficaz. Las solicitudes incluyeron servicio las 24 horas, operaciones nocturnas y ampliación del servicio los fines de semana. Algunas personas expresaron preocupación por la falta de puntualidad en las paradas de transporte público y pidieron horarios más constantes en las líneas de tren SPRINTER y COASTER.

Respuesta

Nuestro plan incluye estas mejoras en la frecuencia y en los horarios, siempre sujeto a la disponibilidad de fondos futuros para el transporte público. El **Apéndice A** presenta las características operativas previstas para las rutas existentes y planificadas en 2035 y 2050, incluidas las proyecciones de frecuencia y horarios de servicio. La mayoría de las rutas tendrá un servicio mejorado, ya sea a través de una mayor frecuencia o mediante horarios más temprano por la mañana, por la noche o los fines de semana. Las inversiones en tecnología para priorizar el transporte público y en otra infraestructura mejorarán la confiabilidad y permitirán horarios más constantes para las líneas de tren.

Tarifas del transporte público y Pase de Oportunidades para Jóvenes (Youth Opportunity Pass, YOP)

Algunas personas hicieron sugerencias sobre las tarifas del transporte público y la forma en que se recaudan. Hubo quejas de que las tarifas de transporte público son demasiado altas y representan una carga especialmente pesada para ciertas poblaciones. Algunas personas recomendaron reducir o eliminar las tarifas para adultos mayores, personas sin vivienda, personas de bajos ingresos, veteranos y jóvenes. Otros comentarios también señalaron la necesidad de reforzar la verificación del pago de tarifas, incluso mediante torniquetes y puertas en las estaciones de transporte público. También hubo apoyo para opciones de pago sin contacto y para mejoras en PRONTO.

SANDAG también recibió muchos comentarios sobre el programa Pase de Oportunidad para Jóvenes (YOP, por sus siglas en inglés). La mayoría elogió el programa y apoyó extender los fondos para el programa YOP, así como hacer permanente el transporte público gratuito para jóvenes. Algunas personas se opusieron al transporte público gratuito y recomendaron redirigir los fondos a otras prioridades.

Respuesta

Agradecemos los comentarios sobre las tarifas del transporte público. El Pase de Oportunidades para Jóvenes es un programa piloto, actualmente financiado hasta el 30 de junio de 2026. El plan supone la continuidad del programa YOP. Actualmente SANDAG, MTS y NCTD buscan soluciones de recursos financieros para lograrlo.

El plan no establece cambios inmediatos al programa YOP ni a las tarifas del transporte público en general. Incluye subsidios de tarifa a partir de 2029. Antes de realizar cambios en las tarifas de transporte público regionales, SANDAG colaborará ampliamente con MTS y NCTD para obtener comentarios del público acerca de cuánto deberían costar los viajes en el transporte público y qué grupos deberían ser elegibles para descuentos.

MTS y NCTD son responsables de recaudar las tarifas y aplicar las políticas regionales. Se lograron avances para reforzar el pago de tarifas, especialmente en las líneas del Trolley, incorporando oficiales de seguridad que realizan verificaciones aleatorias de pago a bordo de los vehículos de transporte público. MTS y NCTD continúan colaborando para mejorar el sistema regional de recaudación de tarifas, PRONTO, mediante la incorporación de funciones nuevas y la simplificación del proceso de pago para las personas que viajan. Recientemente se implementó una opción de pago sin contacto para autobuses, Trolleys y los trenes SPRINTER y COASTER. Esta opción permite pagar con tarjetas de débito o crédito u otros métodos de pago sin contacto, sin necesidad de obtener una tarjeta física PRONTO o descargar la aplicación PRONTO en un teléfono inteligente.

Experiencia de usuarios de transporte público

SANDAG recibió muchos comentarios sobre las instalaciones del transporte público para mejorar la experiencia de los pasajeros e incentivar el uso del transporte público. En particular, las personas solicitaron estructuras de sombra, bancos, cestos de basura, Wi-Fi gratuito, sanitarios y señalización para orientar a los usuarios. Además, algunas propusieron cambios en el diseño de autobuses y Trolleys para que resulten más accesibles y fáciles de usar.

Numerosos comentarios expresaron preocupación por la seguridad, la protección y la limpieza tanto a bordo del transporte público como en las paradas. Esta preocupación fue común en toda la región y en todas las modalidades de transporte, pero algunas personas mencionaron ubicaciones específicas donde se sienten especialmente inseguras. Entre los problemas citados estuvieron el delito, las actividades ilícitas y la falta de cumplimiento de las normas, lo que se percibe como un obstáculo para que más personas opten por usar el transporte público. Las soluciones sugeridas incluyeron más oficiales de seguridad en los Trolleys y en las paradas, mayor uso de cámaras de seguridad, alumbrado, torniquetes y números de teléfono visibles en la señalización para denunciar incidentes. Varias personas mencionaron inquietudes de seguridad relacionadas con personas sin hogar. Algunas personas también expresaron preocupación por los cruces entre vehículos de transporte público y peatones o ciclistas; otras dijeron sentirse seguras y cómodas usando el transporte público.

Respuesta

SANDAG trabaja con MTS y NCTD para atender las necesidades de los usuarios actuales y futuros del transporte público. Nuestro objetivo es ampliar las instalaciones para ofrecer un sistema de transporte público seguro, protegido, limpio y con mejores servicios. El plan incluye US$864 millones para instalaciones de transporte público. Esto incluye seguridad, acceso mejorado a sanitarios y su mantenimiento, Wi-Fi y más. Sujeto a la disponibilidad de fondos, MTS y NCTD se comprometen a ofrecer seguridad a los usuarios, hacer cumplir las normas y mejorar las instalaciones de las estaciones de transporte público (como estructuras de sombra y señalización) conforme haya recursos financieros disponibles.

Autobuses Rapid

Muchos comentarios apoyaron la expansión de las rutas de Autobuses de Transporte Rápido (BRT) como inversiones a largo plazo, destacando su eficacia en comparación con otros tipos de autobuses y las características de infraestructura como carriles exclusivos para autobuses, sistema de semáforos prioritarios y carriles controlados mediante cámaras. Muchas personas apoyaron estas características para el transporte público en general y mencionaron su preocupación por los largos tiempos de viaje que impiden que esta modalidad de transporte público compita con el automóvil particular. Algunas personas expresaron inquietud por la posibilidad de que el BRT reemplace el servicio ferroviario y reiteraron que las inversiones en transporte público deben ser una prioridad.

Respuesta

Esperamos identificar qué estrategias pueden hacer que las rutas de autobuses Rapid sean más eficaces en toda la región. El plan propone una expansión significativa de estas rutas de autobuses Rapid, dado que estos proyectos se implementan con mayor rapidez y cuestan menos en comparación con los proyectos ferroviarios. Antes de agregar nuevas rutas, SANDAG realizará análisis exhaustivos y colaborará con los grupos de interés, otras agencias gubernamentales locales y miembros del público para determinar las mejores rutas, ubicaciones de paradas, necesidades de infraestructura y planes de operación para estos servicios.

Es importante aclarar que los proyectos ferroviarios no se reemplazan por proyectos de Rapid en este plan. En cambio, el plan incluye tanto proyectos de Rapid a corto plazo que pueden proporcionar conexiones de transporte público más rápidas como proyectos ferroviarios a largo plazo que pueden brindar mayor capacidad, velocidad y confiabilidad. El personal continuará analizando la viabilidad de mejoras a rutas existentes como la Línea azul (del Trolley), y de construir nuevas líneas como la Línea púrpura del Trolley. Esto incluye considerar lo que la región puede financiar razonablemente con las fuentes de fondos previstas. En los próximos años, planearemos y recopilaremos una gran cantidad de comentarios del público para determinar qué mejoras ferroviarias son posibles y más convenientes.

Electrificación del transporte público

Las personas que comentaron expresaron un amplio apoyo a la electrificación del sistema de transporte público, incluidos autobuses eléctricos, trenes y otras opciones sustentables de transporte público.

Respuesta

El plan supone que MTS y NCTD harán la transición hacia vehículos de cero emisiones durante las próximas dos décadas, conforme a los Planes de Transición a Flotas de Autobuses de Cero Emisiones adoptados por cada agencia como respuesta a la regulación Transporte Público e Innovador de la Junta de Recursos del Aire de California. El sistema de Trolley de MTS ya funciona con electricidad y no produce emisiones. El plan no incluye costos de electrificación aérea u otra infraestructura para facilitar el transporte ferroviario de pasajeros con cero emisiones en el corredor LOSSAN. Sin embargo, SANDAG trabaja con Caltrans en el desarrollo del Plan Ferroviario del Estado de California y considerará adaptaciones para la electrificación futura en los esfuerzos de planeación a nivel estatal. NCTD evaluará tecnologías disponibles y opciones de equipo ferroviario de cero emisiones para sus servicios COASTER y SPRINTER conforme los vehículos actuales lleguen al final de su vida útil.

Tipos especiales de transporte público

Algunas personas expresaron su apoyo a otros tipos de transporte público que les gustaría ver en la región. Varias personas expresaron su apoyo a los tranvías y querían ver más de ellos incluidos en el plan, especialmente en las zonas turísticas y pobladas de la Ciudad de San Diego. Otros comentarios mencionaron apoyo para ampliar los servicios de ferris y para sistemas de góndolas. Algunos comentarios se refirieron al proyecto estatal de Tren de Alta Velocidad.

Respuesta

El plan incluye diversas modalidades de transporte público, como servicios de enlace en vecindarios, microtransporte, camionetas compartidas, autobuses, trenes ligeros o tranvías. Aunque el plan no incorpora servicios adicionales de ferris o góndolas, seguiremos evaluando tecnologías de transporte viables conforme a las necesidades de cada corredor de viaje específico en futuros estudios de planeación de proyectos. Todos los proyectos de transporte público deben analizarse con mucho mayor detalle y sustentarse en la colaboración con otras agencias gubernamentales, en el análisis de los patrones de viaje y la demanda de transporte, y en los comentarios del público. Además, aunque es posible que el Tren de Alta Velocidad de California pueda extenderse a la región de San Diego en una fase futura (conforme al Plan Ferroviario del Estado de California), dicha extensión probablemente no ocurrirá antes de 2050. La implementación y financiación del Tren de Alta Velocidad de California corresponde a la Autoridad del Tren de Alta Velocidad de California y aparece en la lista de Proyectos No Restringidos del plan, ubicada en el **Apéndice A**, Tabla A.7.

Conexión de transporte público al aeropuerto (Airport Transit Connection, ATC)

SANDAG recibió numerosos comentarios sobre el proyecto de Conexión de Transporte al Aeropuerto (ATC) y un apoyo contundente para establecer una conexión con el Aeropuerto de San Diego mediante autobús, Trolley o un transportador automatizado de personas, así como mediante ciclovías. Los comentarios incluyeron tanto apoyo como oposición respecto a las opciones de transporte público propuestas. La mayoría coincidió en que establecer esta conexión de transporte público debe ser una prioridad regional. Gran parte apoyó una conexión mediante Trolley. Muchas personas destacaron la urgencia del proyecto y la fuerte necesidad que existe tanto entre residentes como turistas. También se subrayó la importancia de vincular el ATC con el resto de la región, especialmente el norte y el este del Condado de San Diego y las comunidades próximas al aeropuerto.

Respuesta

El plan incluye soluciones a corto y largo plazo para que el ATC beneficie a residentes, visitantes y personal del aeropuerto. A corto plazo, las inversiones propuestas contemplan mejoras al servicio de autobuses existente.

A largo plazo, el plan contempla una conexión ferroviaria con el aeropuerto. SANDAG colabora con agencias asociadas locales para determinar el tipo de conexión ferroviaria más adecuada para implementar en la región.

Tanto las opciones a corto como a largo plazo permitirán que centros de transporte público existentes, como Santa Fe Depot y Old Town Transit Center, ofrezcan mejores alternativas para que residentes y visitantes accedan al aeropuerto desde toda la región.

Corredor entre Los Angeles-San Diego-San Luis Obispo (LOSSAN)

SANDAG recibió comentarios de apoyo, de oposición y de observaciones generales sobre el proyecto de Realineación Ferroviaria de LOSSAN y sobre el corredor LOSSAN. Las personas que participaron compartieron opiniones sobre distintas opciones de rutas ferroviarias que desean considerar, incluso apoyo u oposición a la doble vía. Quienes se opusieron al ferrocarril en este corredor mencionaron inquietudes relacionadas con la seguridad, el ruido, los costos y el derecho de expropiación. Algunos comentarios solicitaron la electrificación del ferrocarril en este corredor. Unos pocos comentarios destacaron la importancia del corredor LOSSAN para acceder en tren a Los Ángeles, su función en la conectividad regional y sus beneficios económicos.

Respuesta

SANDAG reconoce la importancia del corredor LOSSAN, dado que constituye la única conexión ferroviaria de nuestra región con el resto del país. El plan incluye inversiones para doble vía y proyectos de resiliencia que permitirán mantener operaciones seguras y confiables de trenes de pasajeros y de carga, además de sentar las bases para aumentar la frecuencia de los trenes y reducir los tiempos de viaje. El proyecto de Realineación Ferroviaria de LOSSAN en San Diego evalúa varias rutas futuras para aumentar la resiliencia del corredor ferroviario cerca de los riscos de Del Mar. Las posibles rutas que se estudiarán en mayor detalle se seleccionarán mediante un proceso medioambiental separado, específico para este proyecto, que continúa en curso.

Línea púrpura del Trolley

SANDAG recibió varios comentarios sobre el proyecto de la Línea púrpura del Trolley. La mayoría apoyó el proyecto y destacó que debe ser una prioridad en la región. Otras personas hicieron sugerencias sobre el trayecto ferroviario, algunas en oposición y otras en apoyo a los planes actuales. Muchas personas expresaron su decepción porque el proyecto aparece en el plan como un tren ligero en lugar de un tren pesado, y otras manifestaron su deseo de que el proyecto se implemente con mayor rapidez.

Respuesta

Se requiere una planeación mucho más exhaustiva para definir la ruta de la Línea púrpura del Trolley y sus paradas específicas. Los comentarios recibidos sobre estos temas se guardarán para fundamentar futuras iniciativas de planeación.

Como parte del estudio de Planeación conceptual de la Línea púrpura del Trolley, se determinó que un cronograma realista para este megaproyecto supera los 15 años. Al mismo tiempo, entendemos que conectar estas comunidades mediante transporte público es una prioridad. Por ello, el autobús Rapid 688 ofrecerá una solución a corto plazo, viable para 2035.

Se requiere continuar con la planeación para evaluar la modalidad de transporte público adecuado para la Línea púrpura del Trolley; sin embargo, el estudio de planeación inicial indicó que la distribución de paradas y la cantidad de pasajeros no justificaban un tren pesado. Aunque la visión a largo plazo del proyecto sigue siendo conectar San Ysidro con Sorrento Mesa, el proyecto tendrá que construirse en fases debido a la longitud de la ruta y su costo. Los tramos de la Línea púrpura del Trolley que prestarán servicio a la mayor cantidad de pasajeros se construirán primero, comenzando en el sur del condado de San Diego y terminando en SDSU Mission Valley. Sin embargo, la extensión a Sorrento Mesa podría ocurrir después de 2050, o antes si se identifican fondos adicionales.

Ciclovías y senderos peatonales

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general y oposición a ciclovías y senderos peatonales
- Expansión y accesibilidad a la red de ciclovías y senderos peatonales
- Experiencia de usuarios de ciclovías y senderos peatonales
- Seguridad vial para todos los usuarios
- Carriles protegidos para bicicletas

Apoyo general y oposición a ciclovías y senderos peatonales

SANDAG recibió numerosos comentarios tanto de apoyo como de oposición a los proyectos de transporte no motorizado. Los comentarios de apoyo expresaron reconocimiento a los proyectos de transporte no motorizado actuales y planeados. Además, destacaron la necesidad crítica de proyectos de transporte no motorizado para respaldar las metas medioambientales, reducir la dependencia del automóvil y ofrecer transporte accesible para todas las poblaciones.

Los comentarios en oposición al transporte no motorizado expresaron que las ciclovías y los senderos peatonales están subutilizados y reducen la disponibilidad de estacionamiento. Además, algunas personas mencionaron que no desean que los fondos para transporte se destinen a proyectos de ciclovías y senderos peatonales.

Respuesta

Los votantes de la región de San Diego aprobaron en 2004 una extensión del impuesto a las ventas de medio centavo (**Extensión y Ordenanza TransNet**) para infraestructura de transporte. Esta ordenanza distribuye el 2% de los ingresos anuales totales al Programa de Seguridad para Bicicletas, Peatones y Vecindarios. Estos fondos respaldan instalaciones de ciclovías y mejoras de conectividad, proyectos peatonales y de comunidades aptas para caminar, proyectos y programas de seguridad para ciclistas y peatones, y proyectos de moderación del tráfico. El objetivo es crear un sistema de transporte regional equilibrado que vuelva más seguro, sencillo y atractivo el transporte no motorizado (como caminar, patinar o andar en bicicleta) para personas de todas las edades y capacidades.

SANDAG busca minimizar la pérdida total de estacionamiento al construir proyectos de infraestructura de transporte no motorizado y, con frecuencia, lo ha logrado al agregar espacios de estacionamiento en calles perpendiculares o integrarlos en el diseño del proyecto.

Expansión y accesibilidad a la red de ciclovías y senderos peatonales

Numerosos comentarios solicitaron la ampliación de las ciclovías y los senderos peatonales en toda la región. Se señaló que existen deficiencias en las redes de ciclovías y senderos peatonales, lo que generó inquietudes sobre seguridad y acceso. Otras personas mencionaron que desean rutas más directas para reducir el tiempo de desplazamiento al caminar o andar en bicicleta. Los comentarios sugirieron crear más ciclovías de diversas clases y ampliar los senderos peatonales, especialmente para conectar escuelas, playas, parques, estaciones de transporte público y otros vecindarios. También se expresó el deseo de establecer alianzas con las jurisdicciones locales y priorizar los fondos a fin de implementar los proyectos de transporte no motorizado con mayor prontitud.

Respuesta

La Red de transporte no motorizado del plan combina proyectos ciclistas tanto regionales como locales. Esta red incluye casi 600 millas de ciclovías incorporadas inicialmente en el Plan Regional de 2015, junto con aproximadamente 300 millas de ciclovías adicionales, que consideran rutas adoptadas posteriormente como parte de otras iniciativas locales de planeación de ciclovías o planes regionales integrales de corredores multimodales.

La Red de transporte no motorizado del plan sigue las prácticas óptimas al ofrecer una densidad promedio de ciclovías de aproximadamente 1 milla, para asegurar conexiones esenciales entre centros regionales de actividad, escuelas, viviendas, empleo y paradas de transporte público, con infraestructura segura para personas de todas las edades y capacidades. Durante el desarrollo de este plan y otras iniciativas de planeación recientes en SANDAG, recopilamos comentarios sobre necesidades de infraestructura, barreras para usar ciclovías y deficiencias en la red de transporte no motorizado de la región. Estos comentarios guiaron nuestra planeación y se compartirá con las agencias colaboradoras para informar futuras iniciativas de planeación, diseño e implementación.

Experiencia de usuarios de ciclovías y senderos peatonales

Varios comentarios abordaron la seguridad y accesibilidad de ciclovías y senderos peatonales. Estos expresaron inquietudes sobre baches y pavimento desnivelado, remoción insuficiente de basura y escombros, alumbrado y señalización deficientes, falta de servicios como portabicicletas y casilleros, ausencia de árboles que brinden sombra y falta de mantenimiento periódico para conservar las instalaciones.

Respuesta

SANDAG ha planeado, diseñado y construido muchas de las ciclovías regionales existentes. Sin embargo, los gobiernos locales y otras agencias gubernamentales asumen la propiedad de estas instalaciones una vez finalizada su construcción. Esas ciudades y agencias gubernamentales son responsables de su mantenimiento. SANDAG compartió los comentarios sobre las condiciones actuales y las operaciones de las ciclovías y los senderos peatonales existentes con cada agencia local correspondiente.

Seguridad vial para todos los usuarios

Numerosos comentarios expresaron la necesidad de contar con carreteras, ciclovías y senderos peatonales más seguros en toda la región, especialmente cerca de escuelas, playas, parques, estaciones de transporte público y dentro de los vecindarios. Las inquietudes sobre conducción insegura incluyeron exceso de velocidad y riesgos en accesos a carreteras, pasos subterráneos, pasos elevados, intersecciones de calles principales y rieles del tren. Las soluciones sugeridas incluyeron medidas de moderación del tráfico, como el estrechamiento de las carreteras, rotondas, reductores de velocidad, límites de velocidad más bajos, control automatizado (por ejemplo, cámaras de tránsito) y pasos peatonales. Otros comentarios sugerían ciclovías y senderos peatonales más amplios y separados de los vehículos motorizados, así como rampas en las banquetas y otros elementos de la Ley de Estadounidenses con Discapacidades (ADA) para que estas áreas resulten accesibles para sillas de ruedas, cochecitos y andadores. Algunos comentarios señalaron la necesidad de educar a los usuarios de vialidad sobre seguridad vial.

Respuesta

Trabajamos en estrecha colaboración con agencias locales y organizaciones comunitarias para brindar recursos técnicos, educación y asistencia en el diseño e implementación de proyectos de transporte no motorizado para mejorar la seguridad en las calles. Agradecemos los comentarios sobre áreas y condiciones específicas que generan situaciones estresantes o inseguras al desplazarse, así como las numerosas recomendaciones útiles sobre características del proyecto que pueden funcionar como medidas correctivas para mejorar la red de transporte. SANDAG ha utilizado muchas de estas estrategias y planea seguir aplicándolas en proyectos futuros. Evaluamos la efectividad de estas medidas de seguridad mediante evaluaciones de proyectos y monitoreo del desempeño, a fin de promover el éxito de futuros proyectos.

Carriles protegidos para bicicletas

Varios comentarios se refirieron a los carriles protegidos para bicicletas. Algunas personas apoyaron estos carriles protegidos para bicicletas debido a su separación física del tránsito motorizado (como medianas, banquetas, bolardos o árboles) especialmente en vialidades de alta velocidad o gran volumen de vehículos. Otras personas expresaron preocupación porque estas barreras se convierten en obstáculos tanto para ciclistas como para conductores, lo que puede ocasionar choques. Además, algunos comentarios mencionaron la guía de la National Association of City Transportation Officials (NACTO) y señalaron que, si bien esta guía promueve los carriles protegidos para bicicletas como una solución universal de seguridad, las decisiones sobre el diseño de las ciclovías recaen en última instancia en las jurisdicciones locales y deben reflejar la ubicación y el contexto.

Respuesta

La red de transporte no motorizado incluida en el plan propone una red completa de conexiones seguras hacia empleos, escuelas y otros centros regionales de actividad para personas de todas las edades y capacidades. Las decisiones específicas de diseño de cada instalación se definen durante la fase de planeación y diseño del proyecto, con aportes de cada comunidad. La meta es desarrollar infraestructura segura adecuada para cada ubicación y contexto, en colaboración con la ciudad o el condado correspondientes.

Carreteras y vialidades locales

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general y oposición a carreteras y carriles flexibles
- Mantenimiento de vialidad y mejoras deseadas en la experiencia de los usuarios
- Mejoras de vialidad
- Tráfico y estacionamiento
- Rutas de evacuación

Apoyo general y oposición a carreteras y carriles flexibles

Muchos comentarios se refirieron a diversos proyectos existentes y propuestos de carreteras y carriles flexibles. Algunas personas se opusieron por completo a la ampliación de carreteras, expresando inquietudes como el aumento inducido de millas recorridas por vehículos, emisiones de gases de efecto invernadero, contaminación auditiva y el deseo de redirigir los fondos hacia operaciones de autobús y tren. Algunos comentarios promovieron convertir la red actual de carreteras en carriles flexibles, mientras que otros propusieron eliminar los carriles flexibles y las carreteras de peaje para reemplazarlos por carriles generales. Otros comentarios solicitaron ampliar carreteras y expresaron apoyo al uso de carriles flexibles en diferentes capacidades. SANDAG también recibió varios comentarios sobre proyectos y operaciones de carreteras específicas, que se compartirán con Caltrans y otras agencias asociadas, según corresponda.

Respuesta

Se demostró que los carriles flexibles reducen las demoras en los desplazamientos y ofrecen una experiencia de viaje más confiable. Pueden incentivar aún más el uso de vehículo compartido, camioneta compartida o transporte público, y pueden ayudar al traslado más eficaz de mercancías, ya que brindan opciones para que los camiones eviten el tráfico.

El plan propone una red conectada de carriles flexibles que mejore el flujo del tráfico y promueva el uso de vehículos compartidos, camionetas y transporte público. El plan se enfoca en mantenerse dentro de la demarcación actual de las carreteras siempre que sea posible. En comparación con el Plan Regional de 2021, el plan actual presenta una red más pequeña de carriles flexibles y menos ampliaciones generales. Los tipos de carriles flexibles y su operación se determinarán después de una planeación detallada, análisis y participación pública, con una coordinación estrecha con socios clave como Caltrans.

La Mesa Directiva de SANDAG también votó para priorizar la eliminación de la deuda y las operaciones con peaje exclusivo en la Ruta Estatal 125 (SR 125)[1]. El año pasado, la Mesa Directiva instruyó al personal a estudiar qué inversiones serían necesarias para eliminar el cobro de peaje en la SR 125. SANDAG y Caltrans han estado estudiando estas instalaciones, y un análisis financiero preliminar indica que la eliminación del peaje deberá realizarse después de 2035.

[1] *Mesa Directiva de SANDAG, Resolución n.º 2023-11* adoptada el 8 de julio de 2022.

Mantenimiento de vialidad y mejoras deseadas en la experiencia de los usuarios

Muchos comentarios se refirieron al mantenimiento y reparación de carreteras, incluidas solicitudes para rellenar baches. Varias personas señalaron la necesidad de mejorar el alumbrado, la limpieza en las vialidades y la seguridad de las banquetas.

Respuesta

Coincidimos en que mantener en buen estado la infraestructura existente de la región es una alta prioridad, y el plan incluye una Política "Reparación Primero) (**Apéndice A**). Esta política respalda la seguridad, el medio ambiente y la vitalidad económica de los vecindarios. Cabe señalar que, una vez que SANDAG planea, diseña y construye infraestructura de transporte, la responsabilidad de preservarla y darle mantenimiento recae en la agencia operadora (una ciudad local, el Condado de San Diego o una agencia estatal).

Como muchos de estos comentarios se relacionaban con infraestructura que SANDAG no administra ni mantiene, el personal envió los aportes sobre vialidades específicas a las agencias correspondientes.

Mejoras de vialidad

SANDAG recibió comentarios que recomendaban mejoras en carreteras tanto en corredores urbanos como rurales, como carriles de rebase y cubiertas para autopistas.

Respuesta

SANDAG trabajó en estrecha colaboración con Caltrans para identificar mejoras operativas a nivel regional y proyectos de seguridad para el plan. Caltrans administra el **Programa Estatal de Operación y Protección de Carreteras (SHOPP, por sus siglas en inglés)**, con un ciclo de cuatro años, en el que identifica proyectos para la región. Este programa define mejoras de seguridad y operación para autopistas urbanas y rurales, incluida infraestructura estatal como ciclovías y senderos peatonales, alcantarillas, proyectos de carriles de sobrepaso, Sistemas de Gestión del Transporte (TMS, por sus siglas en inglés), áreas de descanso y estaciones de mantenimiento.

SANDAG también trabaja en el Estudio de Viabilidad de la Cubierta de Autopistas en Barrio Logan, que examina dos posibles cubiertas en la Interestatal 5 (I-5). La planeación inicial y el diseño preliminar del estudio analizan cómo reconectar los vecindarios de Barrio Logan y Logan Heights, abordando los impactos generados por la infraestructura de la autopista I-5 que dividió ambas comunidades. Además de estudiar la viabilidad de la cubierta de autopista, el estudio analiza mejoras a corto plazo que puedan ayudar a conectar estas dos comunidades. Se prevé que el estudio concluya en 2028.

Tráfico y estacionamiento

Muchos comentarios se refirieron a los altos niveles de tráfico en las vialidades regionales, especialmente aquellas cercanas a obras de construcción y vías del Trolley. Algunos comentarios expresaron frustración por la baja disponibilidad de estacionamiento, incluso en zonas donde los proyectos de construcción redujeron los espacios.

Respuesta

El plan tiene el propósito de reducir el tráfico y mejorar todas las modalidades de transporte. Las mejoras de infraestructura que se proponen pueden ofrecer beneficios dobles para diferentes tipos usuarios de transporte. Por ejemplo, los proyectos donde las vías se reubican por encima o por debajo de las carreteras mejoran la seguridad y las operaciones ferroviarias, a la vez que ayudan a reducir el tráfico vehicular que anteriormente tenía que esperar el paso de trenes o tranvías. De manera similar, los carriles flexibles pueden reducir los tiempos de viaje para quienes conducen y ofrecer tiempos de viaje más confiables para quienes utilizan el transporte público en el corredor.

Los comentarios sobre estacionamiento en áreas específicas se han compartido con la jurisdicción local correspondiente, ya que estas agencias son quienes toman decisiones sobre estacionamiento.

Rutas de evacuación

SANDAG recibió numerosos comentarios que destacaban la necesidad de mejorar la infraestructura regional para permitir evacuaciones seguras en caso de emergencias y desastres naturales. Las inquietudes señalaban la falta de rutas de evacuación suficientes en corredores rurales y corredores este-oeste, el tráfico de entrada y salida en Point Loma, y las implicaciones de seguridad de evacuación relacionadas con el desarrollo de vivienda y las rutas de transporte público.

Respuesta

El plan incluye varias mejoras de seguridad destinadas a apoyar eventos de evacuación. Estas mejoras incluyen rectificación de curvas en carreteras, ampliación de acotamientos, mejoras en intersecciones y actualizaciones tecnológicas. Se prevé que la mayoría de estos proyectos estén terminados o en desarrollo para 2035 y se enumeran en el **Apéndice A**.

El **Apéndice L** también describe estrategias disponibles para la región durante evacuaciones a gran escala. Incluyen sistema de transporte inteligente que permiten ajustar los semáforos para dar prioridad de luz verde en la dirección de evacuación del tráfico, e información actualizada en los letreros electrónicos para comunicar datos clave de seguridad y rutas al público. El Condado de San Diego coordina el uso de recursos disponibles, Memorandos de Entendimiento y Acuerdos (MOU/MOA, respectivamente, por sus siglas en inglés) con agencias de transporte públicas y privadas, así como ayuda mutua para brindar asistencia a poblaciones que dependen del transporte.

SANDAG seguirá analizando estas inquietudes sobre evacuación en colaboración con las agencias locales correspondientes.

Emisiones de gases de efecto invernadero, clima, energía y calidad del aire

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general u oposición a las iniciativas medioambientales y a la reducción de gases de efecto invernadero
- Vehículos eléctricos e infraestructura
- Energía

- Conservación del hábitat, preservación del Litoral, crisis de aguas residuales y contaminantes
- Desastres naturales, preparación para emergencias y resiliencia

Apoyo general u oposición a las iniciativas medioambientales y a la reducción de gases de efecto invernadero

Muchos comentarios remarcan la urgencia de actuar frente al cambio climático e incluyen apoyo general para las iniciativas, los programas y las metas orientadas a reducir los gases de efecto invernadero (GEI). Algunos comentarios solicitan que el plan vaya más allá de los requisitos estatales de reducción de GEI establecidos actualmente por el Proyecto de ley del Senado (SB 375), y dentro de un plazo más inmediato. Muchos comentarios también expresan inquietudes sobre la calidad del aire, la salud pública y la justicia ambiental.

Un número menor de comentarios criticó las iniciativas contra el cambio climático y se opuso a los proyectos de reducción de GEI y a las metas de acción climática, y plantea que esos recursos deberían utilizarse para otros fines.

Respuesta

La ley exige que SANDAG desarrolle un Plan Regional y una Estrategia de Comunidades Sustentables cada cuatro años. El plan debe cumplir con el requisito estatal de reducir las emisiones de GEI mediante la disminución del número de millas recorridas por vehículos de pasajeros en un 19% por persona para 2035, en comparación con los niveles de 2005.[2] Cumplir con este objetivo representa un paso importante hacia las metas climáticas más amplias de California y el compromiso del Estado para lograr la neutralidad de carbono. La magnitud y la rapidez con las que la región puede reducir los GEI dependen no solo de SANDAG, sino también de una sólida colaboración con las jurisdicciones locales, las agencias estatales y federales, y los socios comunitarios. Aunque SANDAG establezca objetivos en toda la región para disminuir los GEI, nuestra agencia enfrenta diversos factores ajenos a nuestro control. Estos incluyen los planes y las decisiones de uso de suelo de las jurisdicciones locales, la disponibilidad de fondos y la rapidez con la que diversas industrias adoptan tecnología limpia.

[2] Obligatorio conforme al *Proyecto de ley del Senado 375 (SB 375) de California*, de 2008.

Estamos comprometidos a cumplir con nuestra parte. El plan identifica estrategias para reducir emisiones, ampliar las opciones de transporte y respaldar el crecimiento sustentable. El **Apéndice A** del plan describe los numerosos proyectos, políticas y programas destinados a reducir la contaminación, mejorar la salud pública y proteger el medio ambiente. El Plan también proporciona un análisis, según lo exige el Proyecto de Ley 805 de la Asamblea, que identifica a las comunidades vulnerables de la región y describe los proyectos, las políticas y los programas del Plan que trabajan en conjunto para reducir la exposición a la contaminación en estas comunidades. (Véase **Apéndice A, Adjunto A1)**. El **Apéndice F** presenta el patrón de uso de suelo de la SCS, que apoya a la red de transporte y conserva los recursos naturales y las tierras agrícolas. El **Capítulo 3** ofrece una visión clara al detallar las medidas de rendimiento del plan e identificar las acciones específicas necesarias para cumplir con las metas del plan. El **Apéndice G** documenta el origen de las emisiones en la región y las proyecciones de emisiones de GEI hasta 2050, y el **Apéndice R** aborda medidas de prevención de inundaciones y consideraciones de resiliencia para la infraestructura de transporte y las comunidades cercanas Además, SANDAG elaboró una Hoja de Ruta Regional de Acción Climática mediante un subsidio de la Agencia de Protección Ambiental (EPA, por sus siglas en inglés), con el fin de establecer una visión a largo plazo para reducir las emisiones de carbono para 2045.

Vehículos eléctricos e infraestructura

Algunos comentarios se refieren a los vehículos eléctricos (VE) y expresan apoyo para ampliar la infraestructura de VE, tanto en la región como dentro de comunidades específicas. Otros cuestionan la eficacia de confiar en los VE para reducir las emisiones de GEI, ya que todos los vehículos siguen generando contaminación atmosférica por el uso de neumáticos. Algunas personas también expresaron su preocupación por la seguridad de las baterías de los VE.

Respuesta

SANDAG ofrece diversos programas que apoyan la transición hacia los Vehículos de Cero Emisiones (ZEV, por sus siglas en inglés), entre ellos apoyo para infraestructura pública de recarga, la elaboración de un plan maestro regional para ZEV dirigido a camiones y autobuses, y la participación en la Colaboración Acelerar la Transición a Emisiones Cero, que produjo una estrategia regional actualizada para VE. Tanto el plan maestro como la estrategia de VE incluyen consideraciones operativas y de seguridad relacionadas con baterías, vehículos e infraestructuras.

El borrador del Informe de Impacto Ambiental (EIR, por sus siglas en inglés) del plan también incluye una medida de mitigación de GEI para respaldar estaciones de recarga de VE adicionales en comunidades que han recibido poca inversión hasta la fecha.

Energía

También se recibieron comentarios a favor y en contra del uso de distintos tipos de energía en la región, incluidos energía renovable, electrificación, gas natural, energía solar y energía nuclear. Algunas personas expresan apoyo para prohibiciones medioambientales relacionadas con el uso de ciertas fuentes de energía, y prohibiciones al uso de gasolina en ciertos tipos de vehículos para proteger el medio ambiente. Otros comentarios señalan que aún se necesita generación con combustibles fósiles porque fuentes renovables como la energía solar y eólica no producen electricidad de manera continua durante el día y la noche.

Respuesta

El **Apéndice A** del plan describe las recomendaciones de SANDAG para políticas y programas de resiliencia, como la electrificación de edificios y transporte. El EIR Suplementario de la Modificación al Plan Regional de 2021 también incluyó una nueva medida de mitigación de GEI que requería que SANDAG desarrollara un plan regional integral de acción climática, denominado Guía de Acción Climática, que se completará el 1 de diciembre de 2025. Este plan establece la meta de reducir las emisiones de ocho sectores económicos: transporte, electricidad, edificios, industria, gestión de residuos sólidos y materiales, agua y aguas residuales, agricultura, y tierras naturales y agrícolas. La guía incluye el aumento de las energías renovables, el almacenamiento de energía, la eficiencia energética y la electrificación como medidas para reducir la contaminación.

Conservación del hábitat, preservación del Litoral, crisis de aguas residuales y contaminantes

Las personas que enviaron comentarios mostraron amplio apoyo a las iniciativas de conservación de hábitats y preservación del Litoral, especialmente para proteger hábitats delicados y reducir el riesgo de desastres naturales como inundaciones. También destacaron la necesidad de mejorar el manejo del agua para mitigar la erosión y el escurrimiento urbano. Otros comentarios expresaron preocupación por la contaminación del aire, ruido, residuos, agua y luz, así como apoyo a los esfuerzos dirigidos a atender estos contaminantes. Algunos comentarios mencionaron los árboles en las calles, la gestión de la vegetación y los beneficios públicos asociados. Además, hubo comentarios relacionados con la crisis de aguas residuales de Tijuana.

Respuesta

El **Apéndice R** del plan ofrece contexto sobre cómo SANDAG y las agencias asociadas en la región reducirán y mitigarán el impacto de los peligros naturales, incluidos olas de calor frecuentes, incendios forestales, lluvias intensas e inundaciones, y tormentas destructivas. Estas iniciativas fortalecen la resiliencia y confiabilidad de la infraestructura de transporte y protegen nuestro medio ambiente natural. Las medidas de adaptación incluyen el relleno de playas para proteger el litoral regional y las instalaciones de transporte costeras vulnerables ante la erosión y las inundaciones, además de incorporar sombra construida y cobertura arbórea en zonas vulnerables al calor. El **Apéndice R** también describe cómo SANDAG y agencias como Caltrans trabajan para manejar el escurrimiento pluvial. Además de colaborar con propietarios y operadores de infraestructura de transporte regional, SANDAG también trabaja en soluciones medioambientales binacionales mediante el desarrollo del **Plan de Resiliencia Fronteriza de California-Baja California** (BRP, por sus siglas en inglés) para identificar estrategias que protejan la infraestructura de transporte y las comunidades de la región fronteriza afectadas por desastres naturales.

SANDAG también administra el Programa de Mitigación Ambiental (EMP, por sus siglas en inglés) de TransNet, que compra, conserva y restaura hábitats nativos para mitigar los posibles impactos de los proyectos de transporte. El programa ofrece múltiples beneficios, como preservar hábitats para especies en peligro, conservar espacios abiertos para actividades recreativas pasivas y proteger la calidad del agua mediante la restauración y protección de cuencas. El **Apéndice Q** del plan explica, además, cómo SANDAG, por medio del EMP, contribuye a la conservación de hábitats en la región, y cómo la región trabaja en conjunto para proteger los recursos y hábitats delicados para las generaciones futuras.

Desastres naturales, preparación para emergencias y resiliencia

Muchos comentarios se enfocaron en la creciente amenaza de los desastres naturales en la región, incluidos incendios forestales, aumento del nivel del mar, calor extremo, inundaciones, eventos sísmicos y otras emergencias. Se enfatizó la necesidad de reducir el riesgo y planear la adaptación proactiva para crear un sistema de transporte y una infraestructura resilientes.

Una cantidad considerable de comentarios expresó preocupación por la seguridad de las evacuaciones durante emergencias, específicamente en relación con grandes concentraciones de personas, viviendas y negocios en áreas geográficas pequeñas, y la necesidad de una infraestructura adecuada para facilitar una evacuación segura y eficaz. Algunos comentarios indicaron que el aumento de los riesgos de desastres naturales, junto con el deterioro del tráfico y el desarrollo continuo, podría agravar aún más estos desafíos.

Varios comentarios también identificaron áreas específicas dentro de la región que podrían enfrentar un mayor riesgo debido a su ubicación geográfica. Además, se destacó la importancia de mejorar la educación comunitaria sobre preparación y respuesta ante emergencias, especialmente en relación con la planeación de evacuaciones tanto en zonas rurales como urbanas.

Respuesta

Aunque algunos aspectos de la preparación regional para emergencias no corresponden a la jurisdicción de SANDAG, nuestra organización sí coordina con otras agencias gubernamentales de la región para preparar la infraestructura para los impactos de los peligros naturales, y fortalecer la resiliencia y confiabilidad del sistema de transporte.

El **Apéndice A** incluye diversos proyectos que facilitan la evacuación, como rectificación de curvas en carreteras, ampliación de acotamientos, mejoras en intersecciones y actualizaciones tecnológicas.

El **Apéndice R** describe cómo el Plan reforzará la resiliencia y la confiabilidad del sistema de transporte. También ofrece contexto sobre la manera en que SANDAG y las agencias asociadas de la región reducirán y mitigarán el impacto de los peligros naturales sobre la infraestructura de transporte.

Flotas flexibles (vehículos de enlace en vecindarios)

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general y oposición a las flotas flexibles
- Mejoras en el servicio y accesibilidad de las flotas flexibles
- Información y difusión sobre las flotas flexibles

Apoyo general y oposición a las flotas flexibles

SANDAG recibió comentarios tanto a favor como en contra de las flotas flexibles. Las personas que apoyan este servicio expresaron entusiasmo y agradecimiento por los beneficios que ofrecen los servicios de vehículos de enlace. Algunas personas manifestaron interés en mantener estos servicios de forma permanente y buscar recursos financieros para lograrlo. Otros comentarios expresaron oposición a que se destinen recursos a las flotas flexibles, y propusieron redirigir esos fondos hacia otros tipos de transporte, como transporte público, ciclovías y senderos peatonales.

Respuesta

Aunque el plan de SANDAG contempla áreas de servicio para las flotas flexibles, estos proyectos serían implementados por las jurisdicciones locales o las agencias de transporte público. SANDAG ha financiado un número limitado de proyectos piloto de flotas flexibles en la región para conocer el potencial de estos servicios para mejorar la movilidad y las conexiones comunitarias. Sin embargo, los fondos disponibles solo permiten proyectos piloto, y actualmente SANDAG no cuenta con recursos financieros elegibles para operar estos servicios de manera permanente. SANDAG continúa buscando recursos financieros elegibles para financiar operaciones de flotas flexibles. Además, el Plan Estratégico de Implementación de Flotas Flexibles incluye en su **Apéndice E** una sección sobre recursos financieros para orientar a las jurisdicciones interesadas en operar estos servicios.

Mejoras en el servicio y accesibilidad de las flotas flexibles

Las personas que enviaron comentarios expresaron el deseo de contar con más servicios de flotas flexibles, en especial para que las personas mayores puedan utilizarlos. Varias personas solicitaron mejoras en los programas de flotas flexibles: áreas de servicio ampliadas, horarios de servicio extendidos y un servicio más rápido. Algunos comentarios expresaron preocupación por las tarifas y pidieron métodos de pago más simples. Otros comentarios solicitaron la creación de servicios de transporte compartido, como vehículos compartidos, camionetas compartidas, bicicletas de uso compartido y monopatines de uso compartido. Algunos comentarios pidieron dar prioridad a estos servicios por encima de los vehículos eléctricos en vecindarios (NEV, por sus siglas en inglés) y del microtransporte.

Respuesta

El plan incluye 36 zonas de servicio de flota flexible, destinadas a cubrir vacíos en la red de transporte público. Se espera que a estos servicios los operen las jurisdicciones locales o las agencias de transporte público. Los horarios y las zonas de servicio pueden ajustarse con el tiempo conforme a las necesidades de la comunidad y a la disponibilidad de recursos. El costo de los servicios de flota flexible y las formas de pago aceptadas se analizan y determinan cuando la agencia operadora planea dicho servicio. Además del microtransporte, el plan respalda una gran variedad de servicios de movilidad compartida, incluido el Programa Regional de Camioneta Compartida, así como los vehículos compartidos, los automóviles multiusuarios y la micromovilidad. SANDAG coordina un Equipo de Trabajo de Flotas Flexibles para compartir prácticas óptimas y datos, y para incentivar la colaboración regional en la operación de servicios de movilidad compartida.

Información y difusión sobre las flotas flexibles

Algunas personas solicitaron más información sobre las flotas flexibles, mientras que otras afirmaron que el concepto es bueno, pero que necesitan una mayor difusión para que más pasajeros las utilicen. Otras personas solicitaron información sobre si las flotas flexibles funcionarían en determinadas zonas y cómo pueden implementarse estos servicios.

Respuesta

La difusión y la educación son fundamentales para el éxito de las flotas flexibles y de otros servicios de transporte. SANDAG promueve los servicios de flota flexible por medio de diversos métodos, como redes sociales, difusión comunitaria, nuestra página web y nuestro Programa de Servicios de Transporte Sustentable. SANDAG también colabora con las jurisdicciones locales y los operadores de transporte público para apoyar sus iniciativas de difusión y educación.

SANDAG elaboró un **Plan Estratégico de Implementación de Flotas Flexibles**, que sirve como guía para establecer servicios de flota flexible exitosos.

Vivienda y uso de suelo

Los comentarios sobre este tema se organizan en los siguientes subtemas:

- Crecimiento sustentable, asequibilidad de vivienda y preocupaciones sobre el desarrollo
- Espacios abiertos y parques
- Pronóstico de crecimiento regional
- Personas sin vivienda

Crecimiento sustentable, asequibilidad de vivienda y preocupaciones sobre el desarrollo

Las personas que hicieron comentarios reflejaron diversos puntos de vista sobre el uso de suelo, la vivienda y el crecimiento regional, incluso interés por entender dónde se prevé el crecimiento futuro. Varias personas enfatizaron la necesidad de aumentar la cantidad de unidades de vivienda en la región, con un enfoque en opciones más asequibles. Muchos comentarios respaldaron estrategias de crecimiento sustentable, en particular las que promueven el desarrollo de espacios desocupados, el desarrollo residencial y comercial orientado al transporte público, la reducción de la expansión urbana y la reducción de millas recorridas por vehículos. Otros comentarios mencionaron interés en estrategias como reutilizar terrenos excedentes, estacionamientos subutilizados y propiedades comerciales, además de mecanismos como la captura de valor del suelo.

En sus comentarios, muchas personas expresaron preocupaciones u oposición a tipos específicos de vivienda, y mencionaron programas de jurisdicciones locales de vivienda, regulaciones de zonificación y ordenanzas. Varios comentarios hicieron referencia a inquietudes relacionadas con el aumento de densidad y con nuevas leyes estatales (entre ellas, el Proyecto de ley del Senado 79 y otras leyes relacionadas con paradas principales de transporte público), y señalaron posibles impactos en el tráfico, el estacionamiento, la seguridad y el carácter comunitario. Otras inquietudes incluyeron la falta de infraestructura adecuada para soportar el crecimiento de vivienda, riesgos de evacuación y seguridad, mayor tráfico y posible desplazamiento de residentes actuales. También se mencionaron preocupaciones sobre alquileres a corto plazo, protecciones para inquilinos, oportunidades de adquisición de vivienda, y el alto costo del desarrollo y de la infraestructura asociada.

Respuesta

SANDAG reconoce la importancia de la producción de viviendas y el crecimiento sustentable, así como la necesidad de equilibrar la toma de decisiones locales y la participación pública en cada comunidad.

SANDAG no tiene la facultad de autorizar ni desarrollar viviendas. Tampoco establecemos normas locales sobre zonificación, permisos, estacionamiento ni decisiones de desarrollo. Estas decisiones corresponden a las ciudades y al Condado. Las jurisdicciones locales decidirán la mejor manera de cumplir sus objetivos de vivienda, ya que entienden las necesidades particulares de sus comunidades y geografías. Las jurisdicciones locales también administran muchos de los temas mencionados por las personas que hicieron comentarios, como alquileres a corto plazo, protecciones para inquilinos, tarifas para desarrolladores y otras inquietudes sobre viviendas mencionadas anteriormente.

Si bien parte de la función de SANDAG es llevar a cabo la Distribución Regional de Necesidades de Vivienda exigida por el estado y colaborar estrechamente con la legislación estatal que afecta la autoridad de zonificación local, la producción de viviendas y el desarrollo orientado al transporte público, SANDAG no puede, de ninguna otra manera, dirigir las leyes estatales ni los programas ni políticas locales de vivienda. No obstante, SANDAG sí puede y sí apoya a las ciudades locales a interpretar y cumplir los requisitos estatales en materia de vivienda. Las inquietudes relacionadas con los cambios en el estacionamiento, mencionadas en los comentarios, se estuvieron influenciadas principalmente por la legislación estatal y las medidas locales para incentivar la construcción de viviendas y reducir las millas recorridas por vehículos. (Véanse las respuestas en **Regulaciones estatales y federales** para conocer más detalles).

El plan sí incluye políticas y programas que ayudan a aumentar la vivienda asequible, promover el desarrollo de espacios desocupados y orientado al transporte público, y alinear el crecimiento con las metas estatales y las inversiones en transporte. La **Estrategia de Comunidades Sustentables** (SCS, por sus siglas en inglés), descrita en el **Capítulo 2**, refleja los esfuerzos de planeación de las ciudades y el condado para desarrollar más vivienda en zonas con acceso al transporte público y otras opciones de transporte sustentable. Se espera que el 80% del crecimiento futuro en vivienda y empleo ocurra en zonas con inversiones de transporte existentes o planeadas, incluidas estaciones clave de transporte público donde las personas pueden acceder fácilmente a múltiples opciones de desplazamiento.

El patrón de uso del suelo de la SCS refleja nuestra estrecha colaboración con las jurisdicciones y es coherente con sus planes de uso de suelo adoptados (**Apéndice F, Figura F.6**).

SANDAG participa en el proceso de revisión intergubernamental para ayudar a garantizar que los desarrollos futuros se alineen con el plan. El proceso evalúa la coherencia de los proyectos de desarrollo de importancia regional con la SCS. SANDAG también ofrece incentivos financieros para impulsar proyectos que promuevan las metas del Plan. El Programa de Aceleración de Vivienda (HAP, por sus siglas en inglés) de SANDAG proporciona asistencia técnica y financiera para la actualización de planes de vivienda, optimización de procesos y cumplimiento de las leyes estatales de vivienda. Las iniciativas del HAP respaldan la vivienda asequible y el crecimiento sustentable, e incluyen US$14.2 millones en subsidios de planeación y capital para nuestras jurisdicciones locales y un Fondo Fiduciario de Vivienda Asequible de US$14 millones que respalda casi 1,000 unidades de vivienda asequible. Otras iniciativas del HAP incluyen un estudio de captura de valor del suelo para identificar y evaluar oportunidades de captura de valor. Esto promovería las metas de vivienda y recaudaría ingresos para implementar proyectos en el Plan, así como un **Estudio y kit de herramientas sobre desplazamiento a nivel regional**, para entender mejor los riesgos de desplazamiento y ofrecer orientación adaptada localmente. Hay más información sobre el HAP y otras iniciativas de vivienda disponible en **sandag.org/housing**.

SANDAG colabora con las jurisdicciones locales y las agencias de transporte público para identificar oportunidades de desarrollo orientado al transporte público (TOD, por sus siglas en inglés) y la reinvención de terrenos subutilizados como estacionamientos, espacios comerciales y otros tipos de terrenos clasificados bajo las reglas estatales de terrenos excedentes. El **Estudio del TOD de la Línea azul (del Trolley)** es un ejemplo de cómo SANDAG analizó la integración de vivienda nueva, comercios y espacios comunitarios alrededor de estaciones clave de la Línea azul (del Trolley) para apoyar las metas regionales de vivienda, mejorar el acceso al transporte público, y promover comunidades más saludables y conectadas. El **Programa de Incentivos para el Crecimiento Inteligente** (SGIP, por sus siglas en inglés) también respalda a las jurisdicciones locales al financiar proyectos integrales de infraestructura pública y actividades de planeación que facilitan el desarrollo compacto, mixto y orientado al transporte público, con más opciones de vivienda y transporte. En los primeros cinco ciclos, se otorgaron más de US$60 millones a jurisdicciones locales para proyectos en toda la región.

SANDAG continuará coordinando con las jurisdicciones para apoyar la producción de vivienda, el crecimiento sustentable, y las metas regionales y estatales, a la vez que respeta la autoridad local para la toma de decisiones.

Para comentarios relacionados con seguridad y preocupaciones sobre evacuación de emergencia, véase la respuesta en **Rutas de evacuación**.

Para comentarios relacionados con la legislación sobre vivienda y la Distribución Regional de Necesidades de Vivienda (RHNA, por sus siglas en inglés), véanse las respuestas en **Leyes estatales de vivienda e iniciativas locales de vivienda**.

Espacios abiertos y parques

Varios comentarios expresaron el deseo de contar con más parques, conservar el acceso a espacios abiertos y áreas verdes, aumentar la cantidad de árboles, y aumentar y mejorar los servicios de los parques.

Respuesta

SANDAG no tiene la autoridad para decidir sobre el uso y desarrollo de terrenos específicos. Estas decisiones, incluidas las clasificaciones de zonificación y la identificación de futuros parques y espacios abiertos, corresponden a las ciudades y al Condado. El plan proyecta que más del 50% de la región se conservará como espacio abierto, parques o hábitat natural (**Apéndice F, Figura F.4**). El patrón de uso de suelo muestra espacios abiertos, parques y zonas recreativas de manera coherente con los planes y designaciones de las jurisdicciones locales. SANDAG trabaja en colaboración con las ciudades y el Condado de San Diego para asegurar que el plan incorpore los planes generales locales, planes comunitarios, planes específicos y otros documentos de planeación relevantes.

El plan apoya un mejor acceso a los parques y espacios abiertos mediante inversiones en distintos tipos de transporte que conectan a las comunidades con estas áreas. El Plan evalúa su desempeño futuro (**Apéndice N**) al medir cómo la red de transporte de la región mejora el acceso a necesidades cotidianas, incluidos los parques.

SANDAG colabora con grupos de interés de conservación, incluidas las jurisdicciones locales, a través del Grupo de Trabajo Regional de Conservación de Hábitats. La meta es implementar la Visión Regional de Conservación de Hábitats para proteger, conectar y respetar a las especies y sus hábitats naturales, con el fin de evitar su extinción en el Condado de San Diego (**Apéndice Q – Página Q-7**). SANDAG también colaboró con socios regionales para elaborar una Hoja de Ruta Regional de Acción Climática, que incluye iniciativas de reverdecimiento urbano y plantación de árboles.

Pronóstico de crecimiento regional

SANDAG recibió varios comentarios sobre el Pronóstico de crecimiento regional de la serie 15 y sus proyecciones de población, vivienda y empleo. En algunos comentarios, las personas expresaron preocupación por una aparente divergencia entre las cifras proyectadas: específicamente, que se proyecta un crecimiento lento de la población, con una disminución al final, mientras que la vivienda y el empleo aumentan. Otras personas expresaron inquietudes sobre la precisión de los datos y si las fuentes utilizadas estaban actualizadas. Algunos comentarios manifestaron preocupación por el impacto que las proyecciones de menor población podrían tener en la vivienda regional y el crecimiento económico, y si ciertos desarrollos propuestos estaban incluidos en la serie 15.

Respuesta

Se espera que entre 2022 y 2050, la región de San Diego crezca en aproximadamente 113,000 personas, lo que refleja un crecimiento más lento que el pronosticado anteriormente debido a los cambios en los patrones migratorios y la disminución de las tasas de natalidad. El Pronóstico de la serie 15 refleja una población inicial menor, ya que la población regional disminuyó entre 2020 y 2022 a causa de pérdidas relacionadas con la pandemia de COVID-19 y la migración hacia otros lugares. El Pronóstico también proyecta un crecimiento más lento que se alinea con las expectativas del Departamento de Finanzas de California y la Oficina de Censos de los Estados Unidos. A pesar de este crecimiento poblacional más lento, la escasez de vivienda existente en la región seguirá generando demanda de oportunidades de vivienda y empleo, lo que llevará a la incorporación de aproximadamente 203,000 unidades de vivienda y alrededor de 234,000 empleos para el año 2050. Por lo tanto, aunque la tasa de crecimiento poblacional esté disminuyendo, aún se espera que la región crezca, y estas proyecciones sirven como herramienta de planeación para las futuras necesidades de vivienda, empleo e infraestructura de la región.

Los pronósticos de SANDAG no promueven ni se oponen al crecimiento. Representan datos neutrales que ayudan a quienes elaboran políticas públicas a prepararse para el futuro. Los pronósticos se desarrollan mediante un esfuerzo colaborativo con especialistas en estadística demográfica, vivienda, economía y otras disciplinas, así como con la estrecha colaboración de directores locales de planeación y su personal. La ley exige que los pronósticos se basen en las suposiciones de planeación más recientes disponibles al momento de su desarrollo, considerando los planes generales locales y otros factores, de conformidad con el Proyecto de ley del Senado 375 [véase el Código de Gobierno, Sección 65080(b)(2)(B)].

Personas sin vivienda

Algunos comentarios expresaron preocupación por las poblaciones que están experimentando la falta de vivienda, específicamente por personas desamparadas en espacios públicos. Algunas personas que hicieron comentarios solicitaron que los gobiernos locales ofrecieran recursos para las personas sin vivienda.

Respuesta

Las ciudades locales y el Condado de San Diego son los principales responsables de los programas, servicios y decisiones de vivienda para personas desamparadas. El Condado adoptó un enfoque de varios pasos para poner fin a la falta de vivienda, descrito en su **Plan de acción de soluciones y prevención de la falta de vivienda**. Cada jurisdicción local cuenta con sus propios planes, programas y personas de contacto responsables de administrar las iniciativas relacionadas con la falta de vivienda. Si el público tiene inquietudes sobre personas sin vivienda en un área específica, recomendamos visitar la página web de esa jurisdicción para obtener información sobre las iniciativas activas en esa área.

Recursos financieros

Los comentarios sobre este tema se organizan en los siguientes subtemas:

- Desafíos y preocupaciones sobre recursos financieros
- Cargo de vialidad para los usuarios
- Impuestos

- Estrategias fijación de precios e ingresos

Desafíos y preocupaciones sobre recursos financieros

SANDAG recibió numerosos comentarios sobre los desafíos de recursos financieros. Algunas personas que hicieron comentarios expresaron preocupación sobre si los proyectos realmente recibirían fondos, mientras que otras señalaron la incertidumbre sobre los recursos financieros federales y estatales. También se solicitaron análisis de costo-beneficio para los proyectos y más información sobre las fuentes de los fondos. Varias personas expresaron desconfianza respecto a las decisiones y prácticas de gasto de la agencia.

Respuesta

Si bien todos los fondos futuros están sujetos a cierto grado de incertidumbre, SANDAG tiene un sólido historial en la obtención de subsidios y otros ingresos. Nuestras proyecciones de fondos se basan en un análisis cuidadoso de los datos históricos. Todas las suposiciones de fondos dentro de este plan fueron revisadas y aprobadas por agencias federales y estatales, que determinaron que son razonables según las condiciones y proyecciones actuales.

Se analizaron los proyectos incluidos en el plan y se consideran elegibles para recibir los fondos futuros que se esperan que se espera razonablemente que estén disponibles. Además, el plan incluye una lista separada de proyectos en una “Red no restringida”. Estos son proyectos para los que SANDAG no espera que los niveles de fondos futuros sean suficientes, pero que forman parte de una visión a largo plazo para el futuro del transporte en la región y sirven como punto de partida para la planeación y el diálogo futuro en caso de que haya más fondos disponibles de lo previsto. Consulte el **Apéndice I** para ver la lista de tipos de proyectos elegibles según la fuente de los fondos.

En varias fases del desarrollo del plan, la red propuesta de proyectos se evalúa con un modelo de transporte para determinar su desempeño y si contribuye al avance de las metas del plan. Los resultados de este proceso ayudan a perfeccionar los proyectos. En el **Apéndice M** se presenta una descripción general del modelo de transporte; la evaluación y el desarrollo de la red se resumen en el **Apéndice N**. Los proyectos que superan los US$100 millones se evalúan adicionalmente según criterios como el nivel de preparación del proyecto y los impactos anticipados en las millas recorridas por vehículos y en la calidad del aire. En el **Apéndice N** se incluyen más detalles sobre el proceso de evaluación de proyectos.

Nuestras prácticas de gasto se auditan, según lo exige la ley. En 2018, el Proyecto de ley de la Asamblea de California 805 ordenó la creación de un **Comité de Auditoría de SANDAG** y de la **Oficina de Auditoría Independiente del Desempeño** (OIPA, por sus siglas en inglés). Además de la OIPA, SANDAG se somete de manera regular a auditorías que exigen nuestras agencias federales y estatales de financiamiento, que brindan controles y equilibrios por parte de entidades neutrales que confirman que administramos responsablemente los fondos de los contribuyentes. Estas auditorías se realizan de conformidad con las leyes federales y estatales y con frecuencia dan lugar a cambios e implementaciones de procesos para garantizar que la agencia cumpla con nuestras responsabilidades fiduciarias.

Cargo de vialidad para los usuarios

Las personas que enviaron comentarios expresaron tanto apoyo como oposición a un cargo de vialidad para los usuarios.

Respuesta

No se considera un cargo de vialidad para los usuarios como fuente de fondos en el Plan Regional 2025.

Impuestos

SANDAG recibió diversos comentarios sobre impuestos. Algunas personas expresaron apoyo a los impuestos sobre ventas y sobre la riqueza, y a un impuesto menor a la gasolina. Otras manifestaron preocupación ante cualquier posible impuesto futuro.

Respuesta

SANDAG no tiene la autoridad para tomar decisiones sobre los impuestos. Estas decisiones las toman los votantes y los funcionarios de elección popular. Un ejemplo es una medida de 1987 que aprobó un impuesto de ventas de medio centavo llamado TransNet para financiar numerosos proyectos y programas de transporte en la región de San Diego.

SANDAG debe desarrollar una estrategia financiera para el plan que identifique las posibles fuentes de fondos para los proyectos de transporte futuros de la región. El Plan final propuesto supone una medida de impuesto sobre ventas de 1/2 centavo a partir del año fiscal 2029 bajo el liderazgo de la MTS y dentro de su jurisdicción, y una medida regional de impuesto sobre ventas de 3/4 de centavo a partir del año fiscal 2038. Se prevé que TransNet venza en 2048.

Estrategias fijación de precios e ingresos

Algunos comentarios apoyaron estrategias de fijación de precios e ingresos, incluido el cobro por estacionamiento y la recuperación de valor, una forma de financiamiento público que recupera parte de los ingresos que la infraestructura pública genera para propietarios privados. Otras personas incentivaron la búsqueda de inversión privada y priorizar los proyectos de transporte público y ciclismo en zonas con alta afluencia turística para aumentar los ingresos.

Respuesta

El plan asume ingresos provenientes de proyectos de desarrollo conjunto en estaciones de transporte público en toda la región, así como ingresos por estacionamiento en áreas populares. Las agencias de transporte público y las jurisdicciones locales de nuestra región ya utilizan este tipo de estrategias, que constituyen fuentes importantes de ingresos.

Otras fuentes de ingresos del sector privado que la agencia ha explorado incluyen publicidad, derechos de nombre, patrocinios de instalaciones de transporte público y tarifas de impacto para desarrolladores por unidades de vivienda construidas en toda la región de San Diego.

Respecto de si se considera el turismo al priorizar las mejoras en nuestro sistema de transporte, nuestro modelo de demanda de viajes regional y los estudios de planeación específicos del proyecto sí consideran a los visitantes, que son una parte importante de la economía local.

Regulaciones estatales y federales

Los comentarios sobre este tema se organizan en los siguientes subtemas:

- Promoción de políticas

- Leyes estatales de vivienda e iniciativas locales de vivienda

Promoción de políticas

Algunos comentarios expresaron apoyo a que SANDAG impulse reformas regulatorias a nivel estatal y federal, y a que trabaje en estrecha colaboración con agencias estatales y federales para atender prioridades regionales relacionadas con las emisiones de gases de efecto invernadero (GEI), vivienda, recursos financieros y leyes, reformas o regulaciones medioambientales.

Respuesta

Las leyes estatales y federales exigen que SANDAG prepare su Plan Regional de Transporte y su Estrategia de Comunidades Sustentables cada cuatro años. La Mesa Directiva de SANDAG también aprueba anualmente un programa legislativo que sirve como marco para que el personal promueva políticas e iniciativas legislativas a nivel estatal y federal, a fin de apoyar la misión, las metas estratégicas y la visión a largo plazo de la agencia. Se puede encontrar más información sobre el programa legislativo de SANDAG en **https://www.sandag.org/about/legislative-program.**

Leyes estatales de vivienda e iniciativas locales de vivienda

Algunas personas que comentaron expresaron preocupación por la legislación estatal de vivienda que impone requisitos de zonificación e incentivos de agilización para acelerar el desarrollo de viviendas, lo que en algunos casos sustituye el control local. Muchas personas expresaron inquietudes sobre la implementación de leyes relacionadas con paradas principales de transporte público, áreas prioritarias de transporte público, reducciones de estacionamiento y límites de altura en sus comunidades. Se mencionaron ubicaciones específicas donde las personas se opusieron a la aplicación de estas leyes, ya que señalaron preocupaciones por aumentos en la densidad y la viabilidad de las paradas principales de transporte público. Además, hubo oposición a las designaciones de paradas principales de transporte público en sus comunidades. Algunos comentarios apoyaron la legislación estatal de vivienda para promover el desarrollo de viviendas cercano al transporte público. Asimismo, algunos comentarios apoyaron la Distribución Regional de Necesidades de Vivienda (RHNA), mientras que otros se opusieron.

Respuesta

El estado aprobó la legislación en los últimos años con el objetivo de aumentar la producción de viviendas y agilizar su desarrollo. SANDAG toma posiciones sobre la legislación pendiente según las instrucciones del Comité Ejecutivo de la Mesa Directiva. La Mesa Directiva, que está compuesta por representantes de todas las jurisdicciones de la región, aprueba un programa legislativo cada año. Los temas que se incluyen en el programa legislativo, o que son de interés para SANDAG, se presentan al Comité Ejecutivo o a la Mesa para su consideración, según corresponda.

El papel principal de SANDAG en materia de vivienda es llevar a cabo el proceso de Distribución Regional de Necesidades de Vivienda (RHNA) que exige el estado y alinear la planeación del desarrollo de viviendas con la infraestructura de transporte y los objetivos de crecimiento sustentable. La ley estatal exige que nuestro plan considere las unidades de vivienda establecidas por el Departamento de Viviendas y Desarrollo Comunitario de California para cada ciclo de RHNA. SANDAG no tiene autoridad para dirigir programas o políticas de vivienda locales. Las jurisdicciones locales determinan las decisiones de zonificación, permisos y desarrollo. Las ciudades y el Condado implementan sus propias normas de vivienda y desarrollo para cumplir con sus necesidades y metas particulares. Se puede encontrar más información sobre RHNA en el **Plan Regional final de Evaluación de Necesidades de Vivienda del 6.º ciclo**. El progreso en la implementación de RHNA puede seguirse en un **Tablero de RHNA**.

SANDAG ofrece asistencia técnica y subsidios a las jurisdicciones para apoyar la producción de viviendas que refleje las prioridades locales y el cumplimiento de la ley estatal. El Programa de Aceleración de Vivienda de SANDAG ayuda a las ciudades locales y al Condado a interpretar y cumplir con la ley estatal, y ofrece actualizaciones oportunas sobre legislación pendiente. El programa también crea un espacio para la colaboración regional y para abordar los desafíos de viviendas y legislativos de la región.

El Estado de California aprobó leyes para incentivar el desarrollo en áreas con inversiones de transporte existentes y planeadas, como las áreas alrededor de paradas principales de transporte público. Una parada principal de transporte público está definida en la ley estatal (específicamente en la **Sección 21064.3 del Código de Recursos Públicos**); SANDAG no designa estas paradas. Se puede encontrar información adicional sobre cómo se desarrolló la red de transporte en el **Apéndice N, Adjunto N3**. Las jurisdicciones, el público y otros grupos de interés clave refinarán aún más los detalles específicos del proyecto a través de futuros esfuerzos de planeación, diseño, análisis medioambiental y divulgación.

Los comentarios relacionados con crecimiento sustentable, asequibilidad de la vivienda, inquietudes sobre el desarrollo, crecimiento/pronóstico y personas sin vivienda/desamparadas se abordan en la **respuesta sobre Vivienda y uso de suelo**.

Tecnología

Estos comentarios se organizan en los siguientes subtemas:

- Inquietudes, críticas y oposición a la tecnología
- Apoyo a la tecnología e innovación en el transporte público
- Educación y transparencia respecto a los datos y la tecnología

Inquietudes, críticas y oposición a la tecnología

Algunas personas que comentaron expresaron preocupación por el avance y la integración de la tecnología en el sistema de transporte público y en la recopilación general de datos, principalmente debido a inquietudes sobre la privacidad de los datos, la seguridad y la implementación de vehículos autónomos. Algunas personas se opusieron a la inversión general en tecnología.

Respuesta

Antes de proponer soluciones tecnológicas, SANDAG analiza minuciosamente las posibles mejoras tecnológicas para el transporte, incluidas sus posibles repercusiones.

SANDAG realizó evaluaciones detalladas sobre el impacto en la privacidad para comprender mejor cómo las nuevas fuentes de datos pueden afectar la privacidad del público. La agencia reconoce que las nuevas tecnologías, como las plataformas de comunicaciones inalámbricas, los dispositivos móviles, los sistemas dentro de los vehículos y las tecnologías avanzadas de detección de carreteras, generan más datos que nunca. Aunque esta información es una herramienta fundamental para mejorar la seguridad y la movilidad en las agencias de transporte, SANDAG mantiene su compromiso de proteger la privacidad de los datos de transporte. Los pasos clave incluyen:

- Cumplir con todas las leyes, reglas y regulaciones estatales aplicables.
- Implementar las directrices federales o estatales existentes sobre privacidad de datos.
- Implementar las políticas de privacidad de datos ya establecidas por SANDAG.

La seguridad es la máxima prioridad de SANDAG. Antes de implementar nuevas tecnologías de transporte, SANDAG sigue las directrices federales y estatales, y aplica un riguroso proceso de ingeniería de sistemas durante la planeación, el diseño y la implementación. Esto garantiza seguridad, responsabilidad y transparencia en cada etapa. SANDAG seguirá equilibrando la innovación con la confianza y la seguridad del público.

Apoyo a la tecnología e innovación en el transporte público

Las personas que hicieron comentarios mencionaron apoyo y oposición a integrar e invertir más en tecnología dentro de la red de transporte público para hacer el sistema más eficaz y mejor. Sin embargo, algunas personas expresaron inquietudes sobre la seguridad y la privacidad. Algunos comentarios también mencionaron la integración de tecnología para mejorar la planeación y la seguridad del transporte, como cámaras de control del tráfico, sistema de semáforos prioritarios, vehículos autónomos y otras innovaciones tecnológicas.

Respuesta

SANDAG propone una variedad de tecnologías de transporte diseñadas para mejorar la seguridad en las carreteras, reducir la congestión del tráfico y proporcionar al público viajero información confiable y oportuna. Esto incluye mejoras en los semáforos, medidores de rampa, letreros de mensajes variables, sistemas de notificación de incidencias, comunicación por fibra óptica en autopistas, sistemas de detección de usuarios vulnerables en vialidad, prioridad de señales para el transporte público y el transporte de carga, sistemas de información en tiempo real y sincronización adaptable de semáforos.

Educación y transparencia respecto a los datos y la tecnología

Algunas personas que hicieron comentarios apoyaron ampliar la educación del público sobre cómo usar la tecnología, acceder a datos y encuestas, y mejorar la transparencia sobre las fuentes y la recopilación de datos. Algunas personas expresaron el deseo de una mayor difusión para enseñarles a los residentes cómo utilizar aplicaciones de transporte público y tecnología en general, en particular a personas mayores o poblaciones de difícil acceso. Algunos comentarios también sugirieron tableros de datos para promover la responsabilidad y la transparencia.

Respuesta

SANDAG seguirá explorando oportunidades para facilitar al público el acceso y la comprensión de nuestros datos por medio de herramientas fáciles de usar, como tableros de datos, además de seguir proporcionando comunicación clara sobre las fuentes, los métodos de recopilación de datos y las medidas de protección de datos.

También sabemos que las nuevas herramientas y aplicaciones solo mejoran la experiencia de uso cuando las personas saben que existen y cómo utilizarlas. Estamos comprometidos a aumentar el conocimiento del público mediante iniciativas ampliadas de educación y participación. Esto incluye trabajar para apoyar a las personas mayores y a las poblaciones de difícil acceso para que puedan acceder a los recursos necesarios que les permitan utilizar con seguridad las aplicaciones de transporte público y las tecnologías relacionadas.

Equidad y Título VI

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general y oposición a las consideraciones de equidad
- Planeación para poblaciones específicas
- Provisión de recursos

Apoyo general y oposición a las consideraciones de equidad

Numerosos comentarios respaldaron mejoras que beneficien a comunidades desfavorecidas y a poblaciones que dependen del transporte público, con énfasis en personas mayores, personas con discapacidades, así como veteranos y estudiantes. Los comentarios también expresaron apoyo general a la justicia racial, los derechos civiles y el Título VI, y pidieron que la Mesa Directiva de SANDAG intervenga más por la región y sus habitantes. Algunas personas se opusieron a los principios de equidad social y de diversidad, equidad e inclusión.

Respuesta

SANDAG tiene la obligación legal de cumplir con el Título VI de la Ley de Derechos Civiles de 1964, que establece que “ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de participar en, se le negarán los beneficios de, o será objeto de discriminación en cualquier programa o actividad que reciba asistencia financiera federal”. El plan debe garantizar que todas las personas tengan una oportunidad justa de participar en su proceso de planeación y debe ofrecer una red de transporte cuyos beneficios se compartan entre toda la población.

El marco legal de SANDAG incluye el cumplimiento del Proyecto de ley de la Asamblea 805 de California, la Política de la Junta de SANDAG n.º 025 (Plan de Participación Pública) y la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés).

Esto se evalúa en el **Apéndice E https://www.sandag.org/2025rpappendixe** del plan. Esto mide qué tan bien la red ayuda a las personas de la región a acceder a las necesidades básicas y amplía el acceso a las oportunidades para las poblaciones del Título VI, de personas mayores y de bajos ingresos, así como para la región. El **Apéndice A** describe cómo SANDAG ha priorizado la participación y la planeación inclusivas mediante:

- Participación de las poblaciones del Título VI, de difícil acceso y con movilidad limitada en el proceso de planeación y toma de decisiones a través de la colaboración con organizaciones comunitarias (CBO, por sus siglas en inglés) de toda la región de San Diego.
- Un proceso informado y basado en datos para identificar dónde se ubican estas comunidades dentro de la región, y para brindar conexiones y opciones de transporte hacia y desde destinos clave y oportunidades económicas.
- Análisis mejorado de cómo el plan cumple con los mandatos federales y estatales, incluido el Título VI de la Ley de Derechos Civiles de 1964.

Planeación para poblaciones específicas

SANDAG recibió comentarios sobre los impactos históricos de la construcción de autopistas y sobre los impactos actuales de las autopistas que dividen comunidades, con énfasis en la reconexión de las comunidades. Los participantes también solicitaron una mayor inversión en el este del condado y las zonas rurales, así como la modificación de algunas designaciones de comunidades minoritarias del Título VI.

Respuesta

Impactos de las autopistas y reconexión de comunidades

SANDAG lleva a cabo múltiples proyectos de planeación para identificar comunidades que se encuentran físicamente desconectadas por la infraestructura de transporte y propone mejoras para aumentar el acceso y la seguridad en dichas comunidades. Esto incluye un estudio de viabilidad para instalar una cubierta de autopista sobre la Interestatal 5, con el fin de restablecer la conexión entre Barrio Logan y Logan Heights.

Este del condado y zonas rurales

Como se describe en el **Apéndice E**, mantenemos el compromiso de colaborar con todas las comunidades de la región para comprender y atender sus necesidades particulares. El plan desglosa los proyectos propuestos por subregiones, como el este del condado y las zonas rurales, conforme a las categorías de proyectos en el **Apéndice A**: proyectos de transporte, programas, políticas y etapas. Los proyectos pueden consultarse por tipo de transporte, incluidos transporte no motorizado, corredores completos (mejoras de autopistas), gestión del transporte, transporte público y flotas flexibles.

Designaciones de comunidades con mayoría de minorías

El plan define las comunidades con “mayoría de minorías” como áreas donde ningún grupo racial o étnico constituye más del 50% de la población. Se puede consultar más información sobre las poblaciones actuales y proyectadas de la región de San Diego por raza y etnia en el **Apéndice E**.

Provisión de recursos

Los comentarios destacaron diversas inquietudes adicionales, incluidas la asequibilidad de los automóviles y el acceso a necesidades básicas.

Respuesta

El **Apéndice E** del plan evalúa en qué medida nuestra red proporciona acceso a necesidades básicas y oportunidades mediante distintos tipos de transporte. SANDAG también cuenta con un programa de Servicios de Transporte Sustentable, que ofrece recursos para facilitar el uso de la bicicleta, las caminatas o el senderismo, el transporte público y el vehículo compartido. Estos servicios incluyen incentivos, subsidios y programas educativos. Se puede consultar más información en nuestra **página web de Servicios de Transporte Sustentable.**

Difusión y participación pública

Estos comentarios se organizan en los siguientes subtemas:

- Apoyo general y oposición a las iniciativas de divulgación pública y participación comunitaria
- Educación e información
- Alianzas
- Mercadotecnia, redes sociales y modalidades de recopilación de comentarios

Apoyo general y oposición a las iniciativas de divulgación pública y participación comunitaria

SANDAG recibió comentarios que expresaron satisfacción con las iniciativas actuales de divulgación, incluidas las opciones virtuales y el contenido en redes sociales. Otros comentarios afirmaron que SANDAG no toma en consideración la opinión pública y que la agencia carece de confianza y transparencia ante la comunidad. Varias personas sugirieron que la demografía de quienes suelen comentar sobre el plan podría no representar adecuadamente a la población regional en su conjunto.

Respuesta

SANDAG procura realizar actividades de divulgación que sean accesibles, transparentes y comprensibles para la persona promedio. La agencia tiene contratos con organizaciones comunitarias (CBO) que son mensajeras confiables en comunidades de toda la región de San Diego. Estas organizaciones han sido fundamentales para informar nuestros mensajes, recursos educativos y tácticas para llegar a las personas a lo largo de nuestro proceso de planeación regional. Nos enorgullece haber recopilado, con el apoyo de nuestra red de CBO, miles de comentarios públicos, tanto en línea como en formato impreso, y haber recibido participantes en nuestras reuniones públicas provenientes de todos los rincones de la región. En 2023, publicamos un resumen de los comentarios públicos recibidos sobre el concepto inicial de nuestro plan y de cómo esta retroalimentación moldeó los proyectos, los programas y las políticas incluidos en dicho plan. El **Apéndice J** documenta la consideración por parte de SANDAG de los comentarios recibidos durante el período de comentarios públicos del borrador del Plan Regional 2025.

Educación e información

SANDAG también recibió comentarios sobre posibles mejoras en la participación pública y en el intercambio de información. Muchas personas expresaron el deseo de que SANDAG realice más actividades de divulgación, tanto a pequeña como a gran escala, para obtener más aportes de la comunidad. También se solicitaron más incentivos para la participación pública y horarios de reunión más convenientes para talleres adicionales, con más tiempo destinado a preguntas y respuestas. Unas cuantas personas solicitaron que la información esté disponible en un mayor número de idiomas.

Respuesta

Durante la elaboración del plan, nuestro equipo de divulgación y las organizaciones comunitarias asociadas ofrecieron oportunidades, tanto a pequeña como a gran escala, para conocer el plan y aprender cómo hacer aportes sobre las necesidades de transporte a fin de dar forma a su contenido. Tal como se describe en el **Apéndice J** de nuestro plan, SANDAG incorporó oportunidades de educación y participación en muchos eventos comunitarios ya existentes y en otras ubicaciones donde suele congregarse el público, como centros concurridos de transporte público, supermercados, lugares de distribución de alimentos, centros recreativos, escuelas, bibliotecas y más. Estos eventos se realizaron en distintos horarios para brindar opciones de participación a residentes con diferentes rutinas. Nuestros talleres se limitaron a 90 minutos o menos, por respeto al tiempo del público, y en ellos se incluyó un espacio abierto para preguntas y respuestas. Además, en estos talleres públicos a mayor escala se ofrecieron cuidado de niños, una cena ligera e interpretación. Se pusieron a disposición del público otras vías de comunicación (como el correo electrónico **RegionalPlan@sandag.org** y la línea directa del Plan Regional) para enviar preguntas de seguimiento al personal una vez concluidos los eventos.

Todos los materiales y actividades dirigidos al público durante los eventos sobre el plan se proporcionaron en inglés y español, junto con interpretación al español en las reuniones públicas. Los materiales e interpretación en otros idiomas se proporcionaron a solicitud; por ejemplo, las organizaciones comunitarias recibieron los materiales que solicitaron en vietnamita, árabe y farsi. Además, un complemento de traducción en nuestra página web y las encuestas públicas permitió que la información estuviera disponible en 18 idiomas. Incentivamos a cualquier persona u organización que preste servicios a poblaciones con dominio limitado del inglés a comunicarse con nosotros en el futuro para solicitar versiones traducidas de nuestros materiales educativos o un intérprete en otro idioma para una próxima reunión.

Alianzas

Algunos comentarios solicitaron que SANDAG establezca una participación más significativa con las organizaciones comunitarias y con las comunidades desfavorecidas para comprender sus necesidades y ofrecer mejoras de transporte equitativas que vayan más allá de lo que exigen las regulaciones federales y estatales, así como mayor coordinación durante la construcción de proyectos. También se recomendaron acciones para fortalecer las colaboraciones con México.

Respuesta

En nuestra respuesta anterior sobre Apoyo general y oposición a las iniciativas de divulgación pública y participación comunitaria, describimos nuestras colaboraciones con organizaciones comunitarias en toda la región y nuestro objetivo de entablar una participación aún más significativa con más organizaciones en el futuro.

Dado que las personas de nuestra región tienen una gran variedad de necesidades de transporte, las inversiones de nuestro plan abarcan muchos tipos de transporte. Esto implica no priorizar un medio por encima de otro y crear un plan que sea financieramente viable. El plan incluye un conjunto de proyectos, programas y políticas que amplían las opciones para que todas las personas de la región puedan desplazarse de una manera saludable, conveniente y segura, mientras se mitigan los impactos medioambientales en toda la región.

Antes y durante la construcción de los proyectos de SANDAG, trabajamos en estrecha colaboración con los contratistas para mantenernos informados sobre cómo estas obras afectarán a la comunidad, a los negocios y a otros grupos de interés en el área del proyecto, de modo que podamos alertar al público de manera oportuna. SANDAG procura informar a la comunidad sobre lo que puede esperar durante la construcción, incluidos los impactos en los patrones y rutinas diarias de viaje en el área, el ruido, la presencia de equipos, el estacionamiento, el acceso a los negocios, las entregas, la llegada y salida de estudiantes y los corredores para vehículos de emergencia. La información actualizada de construcción también avisa al público cuándo se realizarán los trabajos y su duración, especialmente durante la noche y los fines de semana. SANDAG utiliza diversas estrategias para llegar a un amplio sector de la comunidad en el área del proyecto. Estas estrategias incluyen el envío de folletos por correo, la visita a negocios locales para registrarlos en las actualizaciones por correo electrónico, la distribución de casetas sobre la construcción, la instalación de módulos informativos emergentes en eventos comunitarios y anuncios en redes sociales con geolocalización. SANDAG también mantiene informados a los funcionarios de elección popular de las áreas del proyecto para amplificar la comunicación sobre los impactos de la construcción.

SANDAG reconoce que el flujo de personas y mercancías entre nuestra región y Tijuana es una parte importante para comprender las necesidades de nuestra región y las oportunidades de inversión. Estas consideraciones se incluyeron en nuestro proceso de planeación. SANDAG realiza encuestas de forma periódica para medir las tendencias en los viajes transfronterizos. Los datos de estas encuestas ayudan a desarrollar herramientas de análisis que se utilizan en el plan junto con información general, como informes. En el **Open Data Portal** de SANDAG también se proporciona información sobre los cruces federales, el tiempo de espera en la frontera y ciertos datos económicos, para uso de nuestros socios jurisdiccionales, grupos de interés y el público. Continuamos colaborando con socios en México para moldear nuestro trabajo a través de nuestro Comité de Fronteras, que asesora a nuestra Mesa Directiva en actividades importantes de planeación interregional que afectan las fronteras de la región de San Diego. Además, durante el desarrollo del plan, organizamos dos talleres públicos con socios de planeación de agencias gubernamentales, grupos de interés clave y líderes comunitarios en Tijuana (uno presencial y otro virtual) para comprender mejor las necesidades de movilidad binacional y las oportunidades para alinear las iniciativas de planeación en la región transfronteriza.

Mercadotecnia, redes sociales y modalidades de recopilación de comentarios

Las personas que enviaron comentarios propusieron diversas estrategias de mercadotecnia, difusión y redes sociales para promover mejor el transporte público e incentivar su uso. Se ofrecieron otras recomendaciones con respecto a la expansión del alcance de SANDAG, incluida la recopilación de comentarios de los pasajeros, la expansión del alcance de las redes sociales mediante la asociación con personas influyentes locales, el aumento de las cantidades de contenido educativo en las redes sociales sobre proyectos en diferentes partes de la región, así como la expansión del alcance de la audiencia mediante la participación en tendencias y memes de las redes sociales.

Respuesta

Nuestra estrategia en redes sociales para el plan centró en crear contenido atractivo, moderno y relevante para toda la región de San Diego. Agradecemos las ideas y recomendaciones para mantenernos actualizados con la manera en que la población consume contenido en línea. Nuestras metas en las redes sociales incluyen aumentar nuestra audiencia, explorar oportunidades de colaboración y encontrar formas de mantener al público informado y comprometido durante el proceso de planeación.

Invitamos al público a compartir sus comentarios sobre la mercadotecnia de rutas específicas de transporte público, el incentivo general del uso del transporte público, y la mejora del servicio directamente con nuestras agencias locales: **MTS** y **NCTD**.

Cada cinco años, SANDAG recopila comentarios sobre hábitos, patrones y necesidades de transporte directamente de los usuarios del transporte público en toda la región a través de nuestra "Encuesta de pasajeros a bordo del transporte público". La información recopilada se utiliza para mejorar la infraestructura y el servicio de transporte público. La encuesta más reciente se realizó en 2023 y recopiló información de los usuarios sobre rutas de autobús, Trolley y tren para identificar áreas de mejora, implementar soluciones y cumplir con los requisitos del Título VI de la Administración Federal de Transporte Público (FTA, por sus siglas en inglés).

Movilización de mercancías

Estos comentarios se organizan en los siguientes subtemas:

- Proyectos de movilización de mercancías
- Impactos del transporte de carga por camión

Proyectos de movilización de mercancías

Los comentarios del público expresaron un gran interés en fortalecer el sistema regional de movilización de mercancías, incluso en apoyar mejoras en autopistas y transporte de carga, tecnologías de carga sustentable y una mejor integración entre conexiones de trenes, transporte público y aeropuertos. También se plantearon preocupaciones sobre el ruido, la calidad del aire y los impactos en comunidades ubicadas cerca de corredores principales de transporte de carga.

Respuesta

El plan tiene como objetivo fortalecer la movilización eficiente de mercancías a través de nuestros puertos, autopistas, vías férreas, aeropuertos y cruces fronterizos, con el apoyo de la Estrategia de implementación de transporte de carga sustentable de los Condados de San Diego e Imperial y el Estudio de la puerto de entrada de carga. El plan impulsa acciones de corto plazo para fortalecer alianzas que aumenten la resiliencia del transporte de carga, apoyar las designaciones de rutas para camiones conforme al Proyecto de ley de la Asamblea 98, y actualizar las designaciones federales de corredores de carga. Las estrategias a largo plazo se enfocan en tecnologías de transporte de carga sustentable, resiliencia y coordinación continua con socios como el Puerto de San Diego y la Autoridad Regional de Aeropuertos del Condado de San Diego. En general, el plan busca mejorar la movilización de mercancías a la vez que respalda los objetivos de salud comunitaria.

Impactos del transporte de carga por camión

Algunos comentarios expresaron preocupación por los impactos en la calidad del aire asociados con los camiones y la carga, y destacaron los efectos en la salud pública en comunidades ubicadas cerca de actividades de transporte de carga por camión. Las personas que hicieron comentarios subrayaron la necesidad de compromisos más sólidos con tecnologías de transporte de carga de cero emisiones, la aplicación de evaluaciones de justicia ambiental y la colaboración binacional para atender las emisiones transfronterizas.

Respuesta

El plan se alinea con el plan estatal de California para la transición a camiones y tecnologías de carga de cero emisiones, y promueve estrategias identificadas en la Estrategia de carga sustentable de los Condados de San Diego e Imperial. Esto incluye impulsar alianzas para la resiliencia del transporte de carga, la actualización de las rutas de camiones y las designaciones de corredores de carga, y el posicionamiento de la región para asegurar el financiamiento estatal y federal para una infraestructura de carga de cero emisiones. El plan también prioriza la reducción de la exposición a la contaminación en comunidades desfavorecidas (conforme al Proyecto de ley de la Asamblea 805), respalda la implementación de los Planes de Reducción de Emisiones de la Comunidad Portuaria y de la Frontera Internacional, y apoya proyectos como el Puerto de entrada este de Otay Mesa que están diseñados para reducir los tiempos con el motor encendido, mejorar la eficiencia y reducir las emisiones. SANDAG continuará coordinando con socios estatales, federales, tribales y mexicanos para abordar los desafíos binacionales en materia de calidad del aire y del agua. En conjunto, estos esfuerzos facilitan estrategias de transporte de carga que apoyan tanto el crecimiento económico como la salud comunitaria.

Seguridad, protección y preparación para emergencias

SANDAG recibió pocos comentarios relacionados con la seguridad pública. Las personas que hicieron comentarios al respecto expresaron sentirse inseguros en espacios públicos y desear un aumento general en las medidas de seguridad y protección. Algunos comentarios se relacionaron con las operaciones actuales de seguridad pública; SANDAG lo compartió con nuestras agencias asociadas correspondientes. Otros comentarios se relacionaron con la seguridad, la protección y la preparación para emergencias, incluidas la seguridad en el transporte público, las carreteras, las ciclovías y los senderos peatonales.

Respuesta

SANDAG cuenta con una División de Investigación en Justicia Penal (CJRD, por sus siglas en inglés) que sirve como una fuente fundamental de información precisa, oportuna y útil sobre seguridad pública y asuntos de justicia penal en la región de San Diego. El equipo está conformado por especialistas que investigan, analizan datos y colaboran con socios regionales para informar decisiones de política, mejorar estrategias de seguridad pública y respaldar el bienestar comunitario. El equipo también participa como integrante de diversos comités, consejos y grupos de trabajo locales relacionados con la justicia penal, con el fin de compartir tendencias y hallazgos sobre estos temas.

A través de su Centro de Información sobre Justicia Penal, la CJRD recopila y difunde datos sobre tendencias delictivas y seguridad pública, y analiza el uso de sustancias en cárceles locales para comprender mejor las conexiones entre las drogas, los delitos y otros desafíos sociales. El equipo actualiza sus bases de datos de manera continua para proporcionar información confiable y actual. Estas iniciativas respaldan la evaluación de la eficacia y eficiencia de los programas de control del delito, lo que ayuda a informar la planeación y la formulación de políticas de justicia penal a nivel local. El trabajo de la división ofrece información valiosa sobre patrones delictivos y desafíos de seguridad pública, y respalda el desarrollo de estrategias de reducción del delito y respuestas frente al delito en la región.

Además, a través de sus evaluaciones independientes, la División proporciona análisis de datos integrales y evaluaciones de impacto sobre iniciativas de seguridad pública y justicia penal en toda la región.

El Comité de Seguridad Pública (PSC, por sus siglas en inglés), uno de los Comités Asesores sobre Políticas de SANDAG, está compuesto por funcionarios de elección popular y representantes de seguridad pública, y tiene la función de asesorar a la Mesa Directiva sobre asuntos importantes de política relacionados con la seguridad pública. El PSC busca mejorar la calidad de vida en la región mediante la promoción de la seguridad pública y la justicia a través de la colaboración, el intercambio de información, la tecnología eficaz y la supervisión y evaluación objetivas.

Para los comentarios relacionados con la seguridad, la protección y la limpieza tanto en el transporte público como en las paradas de transporte, véase la respuesta sobre **Experiencia de usuarios de transporte público**.

Para los comentarios relacionados con la seguridad vial para todos los usuarios (p. ej., conductores, ciclistas, peatones) y las inquietudes sobre evacuaciones de emergencia, véanse las respuestas sobre **Seguridad vial para todos los usuarios**, **Carriles protegidos para bicicletas**, **Mantenimiento de vialidad y mejoras deseadas en la experiencia de los usuarios** y **Mejoras de vialidad**.

Para los comentarios relacionados con inquietudes sobre preparación para emergencias y rutas de evacuación, véanse las respuestas sobre **Rutas de evacuación** y **Desastres naturales, preparación para emergencias y resiliencia**.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing)

ID	Commenter Name	Agency or Organization	Comment
M001	Rod Streeper	n/a	We want a bike lane along Pepper Drive in county unincorporated area from Graves to Main St.
M002	n/a	n/a	Need one to go from Lakeside to Santee
M003	John Martinez	n/a	Thank you for all of the updates and information. The El Cajon Shuttle.
M004	n/a	n/a	Excited to see the transit and active transportation improvements eventually constructed. Looking forward to more transportation options!
M005.A	n/a	n/a	The Regional Transit Map provided is out of date - There is no Green Line trolley going from El Cajon to Santee anymore!
M005.B	n/a	n/a	What is SANDAG doing to straighten the highways in the backcountry? There have been countless accidents along the 67, 76, & 78 to name a few. When will there be Freeway Expansion, as stated in the TransNet Tax Ordinance?
M005.C	n/a	n/a	What is SANDAG doing to ensure public transit is safe? - Particularily the trolley lines at stations under MTS.
M005.D	n/a	n/a	Is SANDAG seeking any future Taxes? And if so - even in the distant future - How can we trust they'll actually happen?
M005.E	n/a	n/a	What is SANDAG going to do about GHG emissions entering our country from cars coming from Mexico that are not compliant to California Emission Standards? Specifically, for SANDAG Otay Mesa East crossing?
M005.F	n/a	n/a	What is SANDAG doing to ensure affordable cars to help everyone get around - especially our elderly or those with disabilities?
M005.G	n/a	n/a	Last year's event didn't incorporate any of the feedback & ideas that I provided or heard. How is SANDAG going to ensure people's feedback & ideas are recorded this time?
M005.H	n/a	n/a	Is there a website where both short-term & long-term solutions to transportation issues are displayed or listed?
M006.A	n/a	n/a	As a resident of San Diego County I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. i frequently use th Coaster and trolleys as a means to commute to work and other region, however I often have to drive to stations. Adding more lanes has just increased traffic and GHG emissions, so I support San Diego Committing to rapid, well connected transit infrastructure.
M006.B	n/a	n/a	Tram connections to north county and inland
M007.A	Jeff Cours	n/a	I'm surprised the flexible fleet coverage does not fully cover Solana Beach. There's a good bit of housing East of I-5 and North of Lomas Santa Fe that microtransit could connect to the transit center along the PCH at Lomas, the train station, the shopping district along South Cedros, and the grocery stores at Lomas and I-5. I believe that stretch of Lomas has a 40 mph speed limit, so it would probably have to drop to 35 to allow low speed vehicles, but that's a fairly minor change.
M007.B	Jeff Cours	n/a	The pedestrian bridge across the San Elijo Lagoon is a definite improvement! There also are some trouble spots that could still use some help. - Lomas Santa Fe is scary to bike on, especially around rush hour. - Popping out from behind the pillars into the right-turn lane at the I-5 entrance is a challenge. - Turning left onto Santa Helena during evening rush hour requires crossing several lanes of traffic to get to the left turn lane. - The bike lanes along the PCH between Solana Beach and Cardiff usually have a fair bit of blowing sand on them, making for a slick experience that can throw you into traffic if you have to brake to avoid a pedestrian. I generally take my chances with the sharrows instead.
M008.A	n/a	n/a	I saw the SANDAG Draft Regional Plan North County. I am surprised to find that almost 1/2 of Solana Beach has no purple color dotted as a good area for flexible fleet. Solana Beach has a train station and no easy way of getting to it at this point. I believe a flexible fleet service is a good way to handline this lack of convenient transportation from the part of Solana Beach to the train station --- providing a convenient transportation to cover the last 1 mile from the station. I also would like t o have a convenient transportation from the city to the airport, especially for the late night because the train stops relatively early. Is it a possibility to make an express bus available for the north county residents, so we can come home after the train service stopped?
M008.B	n/a	n/a	It is challenging for a small city like Solana Beach if they want to set up a flexible fleet. Federal funding is not really available recently. Is there any creative ways that the city can start and maintain a flexible fleet service? I know the city is looking for a creative/low cost / convenient flexible fleet service.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
M009.A	n/a	n/a	I'm very excited to see flexible fleets coming soon to Escondido, this is a great idea specifically for families and the elderly who may be able to reach a destination but may be challenged with walking requirements. Will flexible fleet services have a mean of providing accessibility for these groups with lower rates or priority service? How will drivers be screened for the safety of the passengers?
M009.B	n/a	n/a	E-bike ridership is increasing for children unable to drive, but alongside the increase in popularity has come increased hazards to the riders, cars, and pedestrians. How can San Diego help teach young riders the rules of the road?
M009.C	n/a	n/a	I'm glad to see congestion as a top priority. Can SANDAG encourage regional and statewide policy to increase remote work and local hires?
M010	n/a	n/a	Frequent commuter following the LA to SD route. The I-5 needs a FastTrak lane starting from SD into OC
M011	n/a	n/a	Frequent commuter following the LA to SD route. The I-5 needs a FastTrak lane starting from SD into OC
M012.A	Jovita Serafin	n/a	mas seguridad para los peatones mas sombra y bancas para las personas que usan el autobus y caminan *** More safety for pedestrians, more shade and benches for people who use the bus and walk.
M012.B	Jovita Serafin	n/a	se nesesitan más entrenamientos para preparar a la comunidad en caso de desastres y emerrgencias *** More training is needed to prepare the community in case of disasters and emergencies.
M013.A	n/a	n/a	Stop installing speed bumps in Vista. Hire law enforcement to control speeds. Provide more education to citizens about traffic circles.
M013.B	n/a	n/a	There are significant homeless encampments that run along the Sprinter rail line in North County starting to about College Ave heading West. Because it is NCTD property, gaining access to service these individuals is very difficult.
M013.C	n/a	n/a	These Homeless Encampments on NCTD land are amongst a lot of fire fuel in the form of vegetation.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
M014	Kesav Gupta - San Diego, Alicia Ramirez - Chula Vista, Khalil Ahmed - Mira Mesa, Marisol Vasquez - National City, Connor O'Leary - Pacific Beach, Mei Chen - Clairemont, Jamal Thompson - Lemon Grove, Priya Patel - La Jolla, David Nguyen - City Heights, Sofia Martinez - Barrio Logan, Ethan Walker - La Mesa, Fatima Hassan - El Cajon, Diego Soto – Oceanside, Naomi Goldberg - Rancho Bernardo, Luis Gastillo - San Ysidro, Aisha Suleiman – Encanto, Brandon Kim – Scripps Ranch, Yasmin Garcia - Del Mar, Omar Torres - National City, Emily Davis - Solana Beach, Julio Hernandez - Imperial Beach, Hannah Lee - Carmel Valley, Zachary Jackson - Escondido, Lily Chang - Poway, Carlos Mendez - Lemon Grove, Veronica Ruiz - Chula Vista, Aaron Brooks - Coronado, Emma Sullivan - Mission Hills, Patrick Murphy - Fallbrook, Camila Ortiz - Vista, Sanjay Rao - Mira Mesa, Gabriella Rivera - National City, Daniel Scott - La Mesa, Anita Kapoor - Rancho Penasquitos, Jorge Ramirez - Otay Mesa, Natalie Brooks - Encinitas, Ivan Petrov - Alpine, Sara Martinez - Barrio Logan, Kyle Johnson - Tierrasanta, Chelsea White - Pacific Beach, Marcus Johnson - Skyline Hills, Alejandra Reyes - Lemon Grove, Vincent Brown - North Park, Maya Desai - Poway, Tyler Anderson - Rancho Bernardo, Lucia Fernandez - San Ysidro, Owen Clark - Del Mar	n/a	See submitted comment letter below table.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
M015	n/a	n/a	Disapointing Plan! Stop Highway expansion, stop all new managed lanes, use that money insted to invest in public transit improvments.
M016	Estela Chami	n/a	Me gustaria que fueran Rapido los proyectos y no duren mucho. hay muchos proyectos pero duran mucho. *** I would like the projects to be quick and not take too long. There are a lot of projects, but they take a long time.
M017	n/a	n/a	Paradas no muy retiradas o lejanas. sombra, biancas, y bases en los edificios del condado paradas en DMV, Seguro Social, clinicas, y no muy retiradas de tiempo como el sabado que son aveces cada hora y sin sombra y ni donde sentarse Por favor y muchas gracias. *** Stops that aren't too remote or far away. Shade, benches and platforms in county buildings; stops at the DMV, social security, clinics, and not times that are really remote, like on Saturday, which is sometimes hourly, and there's no shade or place to sit. Please, and thank you very much.
M018	Jackson Byrd	n/a	I would like to see lightrail/trolley expansion included in the regional plan. Particularly along the 15 where the rapid service buses often get stuck in traffic. San Diego's commuter rail infrastructure is lacking compared to other major cities in the US. Rail system expansion would help get more cars off the road and meet help meet climate goals.
M019	n/a	n/a	Having some kind of train or trolly along interstate 15 would be great! Something that went from Escondido to downtown along 15 and then 163 would be very cool.
M020.A	n/a	n/a	7 1/2 minute trolley system wide by 2029 10 minute Peak 15 minute
M020.B	n/a	n/a	next gen pronto by 2026 county wide all door boarding
M021	Bele Huizar	n/a	More info please!!
M022	Marisela Moreira	n/a	Extend bus Route on Main St. from west to east side towards Heritage area
M023	n/a	n/a	Remove all current or future Toll Lanes from the Regional Plan No more border crossings with wastewater treatment plan built by Mexico as a requirement Ensure 2 simultaneous grand openings (1 in Imperial Beach and 1 in San Ysidro) for the Border to Bayshore Bike Project. Help make driving or buying a car more affordable Ensure those in manual wheelchairs can enter trolleys unassisted Ensure more SANDAG oversight of MTS and NCTD Better Frequencies for the Orange, Green, and Copper Trolley to Match the Blue Line.
M024	Luis Apuricio	n/a	I would like to see more lightrail improvements and goods movement
M025	Natasha Anastacio and Estrella Sanchez	n/a	Mixed with backed up traffic and the Palomar trolley I almosted died in a sar. So Sad
M026.A	Claire Greebrer	n/a	FRANC is great! It currently does not service all of National City incldluing some impacted communitiy resources. Id like to see the service area extended. Service time could be improved.
M026.B	Claire Greebrer	n/a	Highlight support ammenities at bus and trolley stops - shade, bathrooms, lighting
M026.C	Claire Greebrer	n/a	Improvements to active transit saftey at the freeway 5 and 805 undert passes
M026.D	Claire Greebrer	n/a	Bus frequency and improved border transit options

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
M027	Jorge Barrios	n/a	Me Parese intersante el Proyecto de transportacion the minibuses ya que ayudaran en el vecindario. Espero poder mirar todo esto en un luturo no muy legando. *** I find the minibus transportation project interesting, because they'll help in the neighborhood. I hope to see all of this in the not-so-distant future.
M028	Beronica Martinez	n/a	Se sugiere que la ruta 929 y 704 que sabados y domingos ls corridas sean mas frequentes y en la noche se necesitan que pasen hasta las 9 y 10 de la noche. *** I suggest that for routes 929 and 704, the routes should be more frequent on Saturdays and Sundays, and in the evenings they need to run until 9 or 10 at night.
M029	n/a	SBCS	Autobus 704 es muy lento en llegar para ir a nuestras areas de trabajo y algunas actividades del diario. El Franc es muy tardado y aveaes o casi siempre se encuentra lleno y No Realizo parada en estacion Trolly 8, la cual es muy importantes union d' Transbordo. *** Bus 704 is very slow getting to our work areas and some daily activities. The Franc is very slow and it's sometimes or almost always full, and it didn't stop at Trolley 8 station, which is a very important transfer connection.
M030	Beatriz Arballo	n/a	Por favor agreguen sombra en las diferentes estaciones de transporte. También que haya camiones más rápidos y con mayor frecuencia en Chula Vista. En E. Orange y Calle Segunda, en Chula Vista, ocurren muchos accidentes en la esquina de la llantera. Agreguen protección en las paradas de autobús para proteger a las familias en las rutas 704 y 929, pues han pasado muchos accidentes con resultado de muerte. *** Please add shade at the various transit stations. Also, that there would be quicker vehicles that run more frequently in Chula Vista. At E. Orange and 2nd Street in Chula Vista, a lot of accidents happen at the corner where the tire shop is. Add safeguards at bus stops to protect families on routes 704 and 929, since many fatal accidents have occurred.
M031	n/a	n/a	Nesecitamas Transporte para la sona de otay for 2026 si es posible no se esfuerson tanto. ***\ We need transportation for the Otay area for 2026 if possible; don't put in too much effort.
M032	Rossy S Torrez	n/a	Me gusta porqut todo los proyecto son para mejorar el transporte. Son necesarios y no pacilitan el modo de vivor mejoro gracias por tener estas juntas y educarnos cada dia. *** I like it because all the projects are meant to improve transportation. They are necessary and make our way of living easier; thank you for having these meetings and educating us every day.
M033	n/a	n/a	STOP DOING MICROTRANSIT
M034	n/a	n/a	Please meet state housing guidelines, build more housing near public transit and make zoning a project requirement, SB79 is a great example to use for this
M035	n/a	n/a	Plese stop funding highway and car infrastructure so heavily, and stop widening highways. Fund more public transportation and do more TOD projects.
M036.A	Leif Gensert	n/a	Don't do Microtransit, do buses instead.
M036.B	Leif Gensert	n/a	Focus on pedestrians and cyclists, not cars.
M036.C	Leif Gensert	n/a	Densify along transit corridors. And stop opposing SB79.
M036.D	Leif Gensert	n/a	Best way to reduce green house gas emissions is increasing public transport.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
M037	Sofia Medina	San Diego 350 and Youth 4 Climate	I like knowing that these amenities will be posted in very densely populated areas, especially in the mid-city where parking is extremely limited. With access to such services, many people will use them, helping our community and the climate. :D
M038	Haylee Rea	n/a	More circulator busses, especially in beaches and surrounding neighborhoods. Less on-demand transit, doesn't fit with a transit oriented city. More increasing cost of driving/parking private vehicles. Heavily prioritize busses in all roadway designs, it needs to compete with cars. Fast track TOD asap. Make trolley stops meaningful destinations. Increase frequency of top 10 routes. Lower monthly fare cap to reward frequent users. Exclusive bus bike lanes. LPI at every intersection in the entire city.
M039	Kaia Lam	n/a	More microtransits/Flexible fleets in Escondido, North County. I live next to Felicita Park & bus stations are miles away. With unwalkable sideways, unrealistic for youth & elderly to access.
M040.B	n/a	n/a	Preferimos que sean camioncitos porque se avanza mas rapido y que las personas sean mas amables con Todo el personal que soben en el vas y que Sean Muchachos mas jovenes para trabajar y Tambien el precio estabo mejor antes el de 5 dlls y era todo el dia el viaje yo soy madre soltera y no estoy economicamente bien por eso me gustaria que bajara un poco los precios *** We prefer them to be smaller vehicles because they go more quickly, and for people to be kinder to all the staff who get on the bus, and that it would be younger guys working. Also, the price was better before, the 5-dollar one, and it was an all-day trip. I'm a single mother and I'm not doing well financially, so I would like it if the prices were lowered a bit.
M041	n/a	n/a	yo soy mamá que viaja mucho en el vas y a mi me gustaria que el transporte fuera mas cortos porque no lleva mucha gente y que aunque estuviera mas pequeños que pasaran mas constante en el cajon Bvl. Hasta Fassion Vale se nesecita uno que sea Rapido ed mejor los camiones Rapidos para el Trabajo o para llegar a Centro comercial y tambien queremos puentes arriba para no cruzar semaforos porque es muy lento los semáforos *** I'm a mother who travels on the bus a lot, and I would like the transport to be shorter because they don't carry a lot of people, and even if they were smaller, that they would come down Cajon Blvd more frequently. Even Fashion Valley needs one that is fast and better; fast vehicles for work or getting to the shopping center, and we also want bridges going over so that we don't have to go through traffic lights, because the traffic lights are very slow.
M042	Briselda Cisneros	n/a	los microbuseo son importantes en la comunidad y para personas de abjos ingresos por que aveces tenemos la necesidad de ir al Hospital con los niños y no tenemos como llegar al lugar. los minibuses necesitamos las 24 hora *** The minibuses are important in the community and for low-income individuals, because sometimes we need to go to the hospital with our kids and we don't have a way to get there. We need 24-hour minibuses.
P001	Karl Rudnick PhD	n/a	See submitted comment letter below table.
P002	Pam Heatherington	Environmental Center of San Diego	See submitted comment letter below table.
P003	Nirmala Singaracharlu	n/a	See submitted comment letter below table.
P004	Megan Nguyen	n/a	See submitted comment letter below table.
P005	Ashley Mayorga	n/a	See submitted comment letter below table.
P006	Sofia Carrasco	Youth v. Oil	See submitted comment letter below table.
P007	Kesav Gupta	n/a	See submitted comment letter below table.
P008	Bruce Nguyen	n/a	See submitted comment letter below table.
P009	Frank Carasco	n/a	See submitted comment letter below table.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P010	Caesare and Purita	n/a	Consistency. Ever-presence, omnipresence. This is our government. We missed something. On feedback. Health. Not just safety. Hell! We cannot defeat nature. We can only protect us. Go ye and multiply. What does it mean? Population explosion, density. Have we have given some.... Percentage to think about. The Eastern Board. Land transportation, and highways. Councillor Rivera in our city. Congested. Filthy. Urine-smelling city. Madam Schmidt! Oh, sorry, Steph, you were the district. For counselors, what have you done on density? Issue. We were like sardines. Encanto. Issue. Community Choice Bali Planning Group. These are lessons. These are inputs which SANDAG must respect. Heavy public participation. Mr. CEO, sir. Let's have incentive for public participation. You don't have to go somewhere. We are here! Listen to our non-agenda inputs. I think you missed that. Madame Presentor. What shall I say? Corruption equals monopoly plus discretionary minus accountability. Councillor Rivera, mother misstep there, are not accountable of their wrongdoings. You are immune, according to the law. And we can assure you! But we have what we call. Another punishment.
P011	Chris Roberts	San Diego 350	Hello, I'm Chris Roberts. I live in Carmel Valley. I bicycled here to the meeting. I volunteer for San Diego 350. We fight for climate action. And I'm here with a number of youth from Youth V. Oil and Youth for Climate, who are also going to speak. We appreciate all the hard work of the SANDAG staff and this committee. And we look forward to working through to the end of the year to fully understand the plan and try to help it improve. We have 4 comments, San Diego 350 has 4 comments. The draft plan cuts greenhouse gas emissions by 19.3%, barely over the state mandate. San Diego 350 supports emission... increasing. The emissions reductions of greenhouse gases to 25%. This is because of the.... Second, the Youth Opportunity Pass program is essential and a permanent funding source must be identified immediately before the program sunsets. San Diego 350 also opposes highway expansions. There are four big projects in the plan, that, proposed... that are going to widen 6- and 8-lane freeways to add managed lanes. Rather, convert existing lanes to managed lanes, widening already very wide highways will not cut greenhouse gas emissions. Finally, SANDAG should use the weighted vote for approval of the 2025 Regional Plan. The 1.4 million residents of San Diego deserve an equal voice. Thank you, SANDAG and this committee, for all your hard work.
P012	KC Gupta	n/a	Hi, board. My name is KC Gupta. I'm a high school student, and I ride transit frequently to school, to meetings, and across the county. I'm here because San Diego's transit system is failing the people who rely on it. And every time this committee meets and talks about regional priorities without centering transit. The situation gets worse. Chair Zito, I know Solano Beach was one of the first cities to adopt strong climate goals, and Vice Chair Elo Rivera, you've spoken many times about the need for systems that serve real people. I'm asking you to lead the board in making these values visible in action, not just words. Buses show up every 30 minutes, if we're lucky. The trolley stops running before many night shift workers even finish their jobs. And there's entire neighborhoods, especially in South and East County, where it's almost impossible to live without a car. I've met students walking an hour just to get to school. I've waited in the dark for a bus that never comes. This is a climate issue, yes, but it's also about racial justice, disability access, affordability, and youth. San Diego talks about being a region of the future. You can't get there by widening freeways or managed lanes. We need high-frequency buses, better night service, safer access to stops, and investment in places people actually ride. This community... this committee has tremendous power, and has the power to shift priorities, not just in the regional plan, but every funding vote. We don't need more reports, we need action. I'm asking you to show leadership by saying clearly. Transit is the backbone of our region's future. Thank you.
P013	Karina Godwin	San Diego 350 and Mid-City CAN	My name is Karina Godwin, I'm with San Diego 350 and Mid-City CAN. I'm here to urge SANDAG to continue pushing forward with their improvements to the quality of life for youth in San Diego. As a senior at University City High School and a resident of Claremont, I know firsthand how important it... how important, accessible, and reliable public transportation is. Like many teens, I participate in sports, school, and activities that support my community. My single mother works full-time, and while I'm lucky to have eventually bought a car, for years, I depended on the bus and the trolley to get everywhere, from work, school, practice, and home. With rising gas prices, driving is a luxury a lot of young people and working-class families can't afford to fund. The stress of not knowing how to... how I'll get somewhere shouldn't be a part of a normal day, but it is. I know many other students with the same situation as I face. And that's why I urge SANDAG to guarantee permanent funding for the Youth Opportunity Pass program and free transit for youth. Free transit for Youth is not just helpful, it's necessary. It gives students access to school, jobs, and community involvement, and it teaches us to rely on transit instead of increasing pollution.
P014	Kaylee Titchner	Youth 4 Climate	Good morning. My name is Kaylee Titchener with Youth for Climate, a youth-led climate action organization. Well, I'm fortunate to live within walking distance of my high school. Many of my friends at University City High rely on public transportation to get to and from school every single day. Accessible public transit benefits the students, the schools, and the broader community by reducing congestion and pollution. The Youth Opportunity Pass should be permanently funded to ensure equal access to free transportation, promote lifelong ridership among young people, and support our climate goals by getting more cars off the road. I urge you to be proactive in fighting the climate crisis and building a future around clean transit, not more highways, by guaranteeing funding to the Youth Opportunity Pass.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P015	Eleanor Grylly	San Diego 350	Hello, my name is Eleanor Grylly. I'm a 17-year-old volunteer with San Diego 350, and I want to, first of all, thank SANDAG for all the great outreach work they've done with this Regional Transportation Plan, and I think the feedback that they've gotten makes one thing really clear. People want better transit. They want to be able to use transit as a way to get around that's just as affordable or convenient as any other method, because at the end of the day, transit is a lifeline, and transit is a climate solution. The proposed expansions to transit and active transportation in the current plan are simply inadequate. They face decades of delays. And mostly still rely on as-yet-uncertain funding. Meanwhile, the plan proposes miles and miles of highway expansions masquerading as managed lanes., additional lanes purportedly intended to speed up buses in high-occupancy vehicles, but lacking any true safeguards to ensure that they won't become yet another highway expansion, inducing demand and polluting our city. All that amounts to not nearly enough being done to reduce greenhouse gas emissions. Climate change is happening right now. We are seeing the effects in devastating climate disasters taking lives across the country, from the wildfires in LA to the floods in Texas. We need rapid emissions reductions, not the bare minimum that SANDAG has committed to. All San Diegans deserve a fast, affordable, and sustainable transportation system. With no more delays and no more excuses.
P016	Felix Lopez	Logan Heights CDC	Hey, hello, good morning, everybody. My name is Felix Lopez, Community Engagement Coordinator at Logan Heights CDC. Our neighborhood is just located 1 mile this way, going east. I'm here to provide public comment regarding the construction delays that have caused undue hardship on small businesses along commercial corridors, such as University Avenue, and soon to be Imperial Avenue. This repeated delays significantly reduce pedestrian traffic and disrupt commercial activity. Throughout this corridors, too often, the timelines for these delays are extended again, and again, such as the case on Imperial and 36th Avenue, which was supposed to be open about 5 months ago, but it's been delayed again for another month, with little to serious consideration for the impact on residents and to small businesses in the area, especially for the disadvantaged communities that get affected like this, especially City Heights and Logan Heights. This degree of impact wouldn't happen to businesses and residents in other areas, such as Scripps Ranch, Mira Mesa, La Jolla, or other cities like Encinitas or Oceanside. And it should not happen in our communities either. We need cooperation to get this project done on time, and done at a pace that does not impact small businesses and residents in disadvantaged communities. It is unfair that this project caused this degree of undue hardship for our often, historically disadvantaged communities. I am asking again for corporations to get these projects done on time, especially the Imperial Avenue Bikeway Project, which is expected to start construction in late July, late this month. Thank you for your time, and I also want to thank Councilmember Sean Elo-Rivera and his representative Roberto, for being proactive on University Avenue, and also being proactive on the impacts that are happening on Imperial Avenue. We will for sure be in touch with those updates, and, we'll for sure be also proactive to make sure that this, phases on the project are completed on time. Thank you.
P017	Diego Sandoval	Youth v. Oil	Good morning, everyone. Buenos dias a todos. Hi, my name is Diego Sandoval. I am a 17-year-old high schooler from the South Bay. Thank you very much. And I'm a volunteer with Youth V. Oil, who used the YOP to get here. I think I speak for countless youth across San Diego when I say that the Youth Opportunity Pass has truly been a game changer for me and my family. The YOP has allowed me access to countless opportunities to further my education within our city, access my job, as well as spend my valuable dollars supporting local businesses. Were it not for the YOP, I never would have began taking public transit. There simply would be no allure. But now, being someone who takes it nearly daily, as I'm young and it's summer. I can say that you've turned me into a devoted public transit user and advocate. However, it saddens me to know that future generations might not have access to the same program that has awarded me with so much. If future and current youth aren't provided with free public transit access, it would take a toll on total youth ridership, as well as local businesses, where youth would otherwise be spending their money. That is why I am asking SANDAG to become more proactive in its approach to guarantee permanent funding for the YOP program past 2026. And prioritize youth public transit ridership, not highway expansion. Every day, youth are faced with the devastating decisions made in Congress. Please understand that when you see the faces of my disappointed peers over here, this is not an us versus you issue. We are just searching for some government body to have faith in, one that truly looks out for us. Thank you, SANDAG, for all your hard work. Thank you.
P018	Steve Linkey	n/a	Good morning again. Steve Linkey, former Carlsbad Traffic Commissioner. One part of the plan is an insistence that cities install separated bikeways, which typically include plastic posts and sometimes wheel stops or parked cars. The Federal Highway Administration and NACTO have been marketing them as safer alternatives, but the evidence is extremely weak. Cyclists are crashing into the posts and curbs and getting doorred. And the separation is making cyclists and drivers less visible to each other during turning maneuvers. North County protected bikeways, there have been at least 3 fatalities and numerous injuries, including many severe ones. Portions of these bikeways have been removed from some cities, and the City of Carlsbad has avoided installing them due to these safety concerns. I prepared and submitted two draft manuscripts. Please review them. One shows how bicycle crashes increased 60% on Coast Highway separated bikeway in Encinitas. And the other is a detailed critique of the studies that claim crash reductions. These studies have had to exclude all solo bicycle crashes and intersection crashes in order to reach their alleged safety conclusions, among many other statistical and other fatal flaws. I have conferred with other subject matter experts across North America who are in agreement with me, and I'm trying to get the Federal Highway Administration to reassess the studies behind their marketing of the alleged safeties of these so-called protected or separated bikeways. In fact, while I was waiting to speak here, I received a message based on a FOIA request I made for the data from one of these safety studies from the Federal Highway Administration, and they're refusing to provide the data to do an independent analysis. These studies are extremely weak. Please review my manuscripts and remove any preference or mandate for separated bikeways from the regional plan, and allow local jurisdictions to carefully design the safest bicycle infrastructure for their local conditions. Thank you very much.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P019	Keena Bromlett	n/a	Thank you, SANDAG, and good morning to everyone. I'd just like to say that I think SANDAG should create and further develop a system that allows San Diegans the freedom and flexibility to have multiple transit options, whether it's walking,biking, bus, trolley, or train or car. The more non-car options we give to San Diegans and folks in the county, the less stress that puts on our highways and roads. And makes it so that we don't need to expand those highways, which leads me to advocate for the citizens in Carmel Valley, where we aren't currently served by any transit lines. I'd love to see a bus connector that either connects us to Solana Beach Station as well as La Jolla to connect to the Blue Line . Just so we have that option, instead of driving to those places to access the transit network, have a bus connector, so then we can leave our cars at home, and, you know, go around the county without needing a car.
P020	Cesar and Purita Javier	n/a	We could only speak of conceptual... What I noticed is.... For the two minutes' time. Councillor Rivera? Supervisor mom step. We learn from this. Think tank top. Please, let us learn from this ting-tong. And be guided of the historic. Errors. Madame from unincorporated, let's say rural. This same concept, the same process of planning. You're right. There must be a different menu from that. Starting point to the congested urban setting. My point here is.... When there is congestion. What is the first reaction? We missed something. We do not have reserve. If the design is 3 fleets. When this congestion, like students cramming for a ride. There must be an outright reserve, like a response flip. My air, my water, my land. Under, over. Councillor Rivera, think of that. We cannot prevent population explosion. Therefore, our ice now. Should be somewhere in the open. Gets the authority for imminent domain. Fairness, just cost. Uplaying the congestion, or we call mobility circulation. Value analysis. Leadership. Tool. The tools. Not from Made in China, but from USA! And third, we must be really.... Specialized education training. The Olympic concept of winning.
P021.A	Sean Elo-Rivera	City of San Diego	Thank you, Chair. Thank you for the work on this, and thank you to everyone from the public who weighed in, especially the young folks who are here today... definitely appreciate everything that you had to offer. On that point, hearing the advocacy for the Youth Opportunity Passes, that you all are now are using or have used definitely warms my heart. One of you mentioned becoming a devoted public transit user as a result of the Youth Opportunity Passes. And there was always the vision that the Youth Opportunity Passes would serve a couple functions. One, reducing costs for families. Two, expanding opportunity for young people. And three, creating a generation and generations of future transit users. And I don't know if there's anything that I've seen, kind of more, successfully be the thing that the advocates said it would be, than Youth Opportunity Passes over the last few years. And that's not just for the constituents that I represent, my understanding is that this is wildly popular throughout the region, whether it's North County or the South Bay. So, I fully agree that this is something that needs to be prioritized, and the public should see that we are committed to making a permanent reality here in San Diego. To that point, just a couple questions... How would you respond to criticism or questions about whether or not what is in the draft is sufficient in terms of providing folks an opportunity to move away from the necessity of owning and operating a vehicle and having transit be a real, reliable, and option for them?
P021.B	Sean Elo-Rivera	City of San Diego	Thank you, Tuere. The shuttle piece, I think, is super important, making transit more accessible, especially to families with small children or seniors who that first and last mile might be less accessible to. I'm glad to hear that there is more committed to transit than there might appear to be on the surface. And I think it's important that we really lean into that. I can't stress this part enough, this is absolutely a cost of living and economic justice issue... expanding service hours and making transit reliable for someone who's working those late night or early morning shifts, those are the most working-class jobs. And oftentimes, the lowest paying jobs in our region. And requiring those folks to own a car in order to get to work is essentially a tax on them by our refusal to provide them another means to getting to work. And it's a disproportionate tax. It's unjust tax, and it's unnecessary. We need to lean more into providing folks with the ability to get to and from work and other opportunities at a lower cost way, and there is no better way to do that than with an effective public transportation system. I know that you know that. But I think that our plan needs to recognize that and lean into that in a really aggressive way. And you mentioned funding is an important piece, and for sure, and there will be, I'm sure, conversations in the future about what additional revenue looks like, and how to secure that. And there are still choices to be made about how we are choosing to divide the pie. There is a reality that expanding freeways... obviously, there's the environmental impacts of that, but we are also taking a big slice of the pie and dedicating it to a form of transportation that is extremely costly. Both in terms of dollars and cents for the folks who have to own and operate a car to get to where they want to go. And because all the environmental costs associated with it as well. So, I do hope that what comes forward at the end is one that leans heavier into public transportation, addresses the fiscal quips that our transit agencies are facing, and, obviously, it lets our young people, who are developing the transit habits that we want them to have, know that they do not need to plan for owning and operating a car in the future, that the system will grow with them, and meet the needs that they'll have as they enter the workforce.
P021.C	Sean Elo-Rivera	City of San Diego	The last question I have is with respect to the connection to the airport, can you speak to the way in which we are or are not planning for a connection to the airport in this plan? And do we feel like the communication between SANDAG and MTS is in a better place than it had been in the past?

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P021.D	Sean Elo-Rivera	City of San Diego	There was one other question that I forgot to ask. I believe the previous regional plan spoke to a skilled and trained workforce performing the work that would be done to implement the plan. I didn't see that in the plan. And I might be mistaken in how I remember it because I thought that was an item of contention in the previous plan. Understood, that's a super important component, obviously, to make sure that the work is done well, that it's done on time, it's done on budget. All of those things. Mayor Duncan, I look forward to working with you to provide free public transportation access to as many people as possible... seniors, youth, parents, you name it... didn't see that partnership in the bingo card, but happy to pursue it. We'll just take the blueprint from New York, and you and I can do it together. Looking forward to it.
P022.A	Jennifer Mendoza	City of Lemon Grove	I echo support for the Youth Opportunity Pass. I raised my granddaughter, just got her off to college, and her experience and a lot of her friends' [experiences], is they found public transit so easy to use, especially in the Lemon Grove area, that they were delaying getting a driver's license. I'm like, “Don't you want to get a driver's license?” “No, why do I need a driver's license?” So, you know, I found a lot of kids are delaying [getting a driver's license]. It used to be a thing when I was young, like, you just couldn't wait the minute you were 15 and a half to get your permit and get out there on the road and drive around, but I really see kids delaying that now. And Mario spoke to that yesterday at MTS, that SANDAG is going to continue to support the Youth Opportunity Pass, and I fully support that.
P022.B	Jennifer Mendoza	City of Lemon Grove	I just want to talk about one of the goals was complete network of managed lanes to improve traffic flow. And I've complained about this before, but my feeling is, as much as possible, we should only be converting existing lanes. I would like to see our goal to only add lanes where absolutely necessary. And in other cities I've seen where HOV lanes are timed. So, during non-high-traffic times, people can use the HOV lane. And yet there's no place in San Diego where you can do that. If it's a managed lane or an HOV lane, there's no time of day that you can open that up. And I'd like to see us start to plan for that. And, you know, it costs very little for an HOV lane, especially if it's an existing lane. You got to put up a few signs and paint the concrete and that's pretty much the roadway, and that's pretty much it. Managed lanes cost money, and you need a whole system to manage those lanes. As part of the plan, I would like to see what it would do to just have HOV lanes with maybe a plan for them to be managed lanes in the future. I've done some research on this, and the research kind of says HOV lanes don't really encourage more people to not drive their car and to carpool, that actually manage lanes improves traffic flow more, which is very disheartening to me, because I would rather that the research pointed in the other direction. Sometimes you do research, and it doesn't tell you what you want it to tell you, and it is very discouraging. But, you know, maybe San Diego could be different. I'm hopeful and, you know, with managed lanes, if you've got money, you can pay. You don't have to go to the little bit of trouble it might take to carpool with someone. You know, for instance, I know two MTS board members who generally always carpool together, Santee and El Cajon. And they don't do it because there's no HOV lane for them to get into, they're just doing it because it's the right thing to do. How can we incentivize people to do the right thing? And that's to carpool when possible. And I have gone through the effort to carpool. I hate driving to North County because the traffic is horrible, you know, on the 15 or the 805, anytime you head north at the wrong time of day. It's just a nightmare. And so then I'll think, alright, who else is going to this meeting that I can get to come with me and then we can get in the managed lane on the 15. But guess what? It's just as full as the regular road. So, we're not doing something right there. Maybe the pricing isn't correct and we need to study that a little bit more. But anyway, that's my two cents on HOV versus managed lines. And we've talked about this before. So, anyway, thank you.
P023.A	Eric Joyce	NCTD	Thank you, Chair. I want to start with thanking the young people that were here again. You are here speaking about your future, my children's future, and the impact that the decisions today will have on your ability to breathe and access the rest of the world in the future, so I appreciate you being here, and I appreciate that you know how serious it is. Thanks for showing up. I was invited to a high school recently to check out community projects. They were investigating whatever was most important to them in their community. And one of the most passionate groups was a group that wanted to help improve the safety of our bus systems, because they use it in such frequency. And so they invited me to take a bus trip with them and come back a different day. And so I came back after school, and what I saw was pretty incredible. A stack of dozens and dozens of students waiting at the small little bus stop, which, admittedly, didn't have the infrastructure it needed to accommodate even a little percent of what they were doing. When the bus arrived, they were clamoring and pushing to get in because the space inside the bus was going to be so cramped because it is cramped every single day for them. And that's because they have this opportunity to take it and not have a financial impact on their families. And that's the power of the Youth Opportunity Pass. In fact, there is a lot of students who didn't get on that bus and had to wait for long lead times for the second bus to come. So, I think we should really consider, as many have already said, to take the threat of losing this thing that we all recognize as vital off the board. Let's just stop holding the gun to it and put it in the plan for the long term so we don't have to continue to have this conversation, which I think, the value has already been shown clearly.
P023.B	Eric Joyce	NCTD	The other piece I wanted to bring up is affordable housing. I saw that it was brought up in the public comments. It's certainly a concern in our area. The market rate housing, especially the new that is being built, is not accessible. I really do appreciate that we're thickening up along our transit-oriented development. I think that's great. When we talk about the people that are using transit most frequently, we're talking about our workers and their ability to access that housing is a serious issue when we're basically going to add these really nice enclaves for people, who don't actually “need” that direct access to public transit, unless we're very deliberate about the housing that we do put in these developments. So, I do ask for our future planning to really be considerate about that, about who is going to have access to these spaces where they can walk out their door and step onto the Coaster, where they can walk out their door and step into the Sprinter.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P023.C	Eric Joyce	NCTD	The other one I wanted to bring up was the double tracking and how critical that is to NCTD's future planning and our connections in the North County. We have lots of areas, and it was brought up by some of the youth, that are absolutely dependent on cars, and if we can build out the infrastructure of bus frequency that gets folks from their houses to the Sprinter, and the Sprinter is actually an efficient way to get across the North County. Then we were going to have a whole new range of people using transit. And, again, making the impact on the long term, so thank you.
P024.A	John Duncan	City of Coronado	Whenever we talk about something here, I always like to have information and facts behind it, you know. Like you said, I mean, the Youth Opportunity Pass is already in the plan. I know, Mr. Elo Rivera said that, you know, it's the most, you know, successful thing ever, but we really haven't talked about any facts or numbers or anything today about it, about cost-benefit analysis, how many people use it, is it really more social justice to have any youth, regardless of their economic situation, have free transportation, but maybe single mothers who are in a bad financial situation, don't have free passes. I'm not really surprised that people who ride for free like that they don't have to pay to ride. I mean, I think any group we gave that to would say the same thing if we said, “hey, all elderly people get to ride all transportation for free,” I imagine we could find 5 elderly people to come in and say, “thank you for letting me ride for free.” That's wonderful. I think if we had free transportation for everybody, it would be outstanding, but as we saw from the transportation agencies, they have deficit budgets planned in the future, so we have to figure out how to pay for everything. That's just the real world, how it works. We have to pay for things. So, I mean, I'd like to give free things to everyone. I certainly wish we would have spent the $14 billion on the high-speed rail for the middle of the state that looks like it's not going to ever happen on free transportation in San Diego, that would have been fantastic. And one of the speakers mentioned something which I would appreciate maybe for the future when we have the transportation agencies here. Talking about an increase in ridership. It's really interesting for me, because when I look at other transportation entities, such as airlines. So when they report, they do capacity, the occupancy based on capacity. So, if you say, for instance, MTS's ridership is up 6%. That sounds pretty solid. But if their capacity was up 20%, and their ridership only went up 6%, they're actually going backwards. So, for me, it's percentage usage versus available seat really shows where it's going. And I really like what one of the speakers said... you know, more transit where it's needed, or as one of the anecdotal stories was that there was a stop where there was a bunch of people who couldn't get on. That type of actual real information, if we had, like, a study on that, and then we could vote to spend money in a more effective way, I'd be very interested in discussing and spending our time working on something to help make community transit better. That's all my comments, thank you.
P024.B	John Duncan	City of Coronado	I would like, in the future, when we talk about, or maybe at the board level, I know maybe it's the majority of the feedback you get you're sharing, but I would like to know the communities and the city leaders where managed lanes are proposed, if that's something that they're supporting or not.
P025	Joy Lyndes	City of Encinitas	Thank you, Chair Zito. I appreciate the opportunity to comment. Something I haven't heard discussed yet has to do with bikeways. I want to go on the record of saying I'm a big supporter of bikeways, and from my perspective with my constituents, I see that there's a growing population of people in our community, in our region, who use bikeways/bike corridors on a regular basis. When we're talking about cost-benefit analysis, as brought up by Mayor Duncan. I am curious, Tuere, if we have any data on the cost to SANDAG of supporting and building bikeway corridors based on the number of users, and how that kind of fits in the whole decision-making for where we get a good benefit from the cost of the transportation facility, and if you could shed some light on that? Or Antoinette? Okay, thank you for that feedback. I think that there's a growing population of people who are using bike facilities, and the success of it is corridor-wide, regional-wide, which the more infrastructure we can put in that supports that, I think then it would support more users. So, it could be that one of the arguments to support that would be something like a cost-benefit analysis. It's just a seat in my pants. I'm just thinking it might demonstrate that it's one of the more affordable ways to provide continuous and safe transportation around the region. Thank you.
P026	Danielle Weizman	Association of Planning Groups	My only comment is that in looking at the public comments, I can't speak for which communities said what, but certainly in updating the plan and taking the comments into account, I think it's important to note the differences between feedback from the unincorporated rural areas compared to the urban areas. I don't think one is more important than the other, even though I do come from unincorporated, but I do think that it's important to recognize, and I think there's a huge sentiment within the unincorporated areas that maybe they get left out, especially when it comes to public transit. But I think a lot of the feedback we heard today is about affordability and housing, and there's a direct correlation with a lot of the youth population, kids graduating college or trade school, and moving out to the unincorporated areas, because that's where it's affordable. And so, I think when we look at equity and affordability, it's not just sort of the urban areas where there is that nuance, but also looking at the suburban and rural areas where people are maybe living with a grandma or their parents while they're working an internship at the age of 25 with a master's degree. I mean, that's what we're facing in San Diego, so thank you.

Table J6.1: Public Meeting-Sourced Public Comments (Learning Sessions and Public Hearing) Continued

ID	Commenter Name	Agency or Organization	Comment
P027.A	David Zito	City of Solana Beach	So, I'll make a couple of comments and a question. I'll start with a little bit of an anecdotal story, simply because one of the public speaker's comments sort of triggered it with me, which is two of my daughters had the privilege, I will specifically say the privilege, of being able to attend King and Crest High School, which was a great school. But it's also a school that had no busing, and it's also a school that, when they went to, had no public transit within 2 miles of that school. And this was at a time when we had 3 kids in 3 different schools. It all started at roughly the same time, and so I had to participate in student carpools to be able to get kids to school, and in order to do that, I had to adjust my work schedule. Fortunately, I had the privilege of a job that could afford me the ability to do that, and I could adjust my work schedule to participate in that. So, leading the story to, with respect to the Regional Transportation Plan, has there been analysis done of how schools are serviced with public transit in the areas that those schools are covering. I just think that's something we need to consider going forward, because once again, you know, for my kids, there was no option. Unfortunately, also Canyon Crest is a street that is on Del Mar Heights Road, which is a pretty terrifying road to bike on, so that wasn't even seemingly a very great option for us as well. So, thanks for that, but, you know, it might be good to have some analysis done of that, just so we understand what schools might be deprived of being able to have public transit access to the kids that they're actually servicing.
P027.B	David Zito	City of Solana Beach	I just want to make some other comments along the lines of one of the public speakers. You know, I did review and see that in Appendix K, there was some specific language in there about bicycle infrastructure, and to some degree, sort of implying policy or guidelines around the bicycle infrastructure. And I want to start out by saying that my belief and my experience as someone who currently commutes about 4,000 miles a year on a bicycle, is that the facilities that SANDAG has been involved with have been done quite well. I mean, the ride that I take here involves the Rose Canyon Bikeway, which then goes into the Santa Fe Lane, protected bike lane, and those are really nice facilities. And most of what I've seen this organization involved with has been done pretty well, but I can't say that with respect to all of the individual cities' efforts as well. And, you know, the one example I would throw out is there's this really weird set of short bollards right on Gilman Drive, right under the I-5 interchange, that don't lead into anything else, don't connect to anything else - they're just bollards right there. And all they're going to do is potentially knock me off my bike. So, having said that, there's this language in Appendix K talking about following the National Association City of Transportation Officials, and reading that information seems to say that any designed protected bike lane is useful for any rider in any circumstance, and I just think that if that's going to stay in there, we need to add some additional context or additional information. Some of the things that I think are worth pointing out, just to put in the record, are, you know, vehicle bike crashes, which is what mostly gets analyzed, are not the only important statistic. We need to really be evaluating all bicycle crashes. Particularly, you know, as I've looked into it, there's a San Francisco Trauma Center study which demonstrates that over half of all cyclists' injuries lack an associated police report. And solo bike crashes are more likely to result in hospital admissions, oddly enough, than ones involving vehicles. So, we need to be paying attention to that. With respect to design. I'd like to call out that the San Diego County Bicycle Coalition has put together a paper that talks about things that should be considered when doing separated bike lane design. And it's not actually dictating what it is, but having a reference to that, or just saying, we need to consider these types of things when we're doing bike lane designs, in order to make sure if we're doing separated bike lanes, that they're being built safely. Another bit of information is a 2023 IIHA study noted that street-level protected bike lanes have similar crash rates and accidents to conventional painted bike lanes. Benefits of separated bike lanes in that study were only realized by grade-separated or elevated cycle tracks. And so making sure that all of our jurisdictions understand this and incorporate it, and we don't just blindly advocate for saying a protected bike lane of any design is good in any situation. If we're going to keep that information in Appendix K that's pretty important, so I'd just like to put that in there. And since I'm talking about this, I did want to make a call out to NCTD, because this morning, I did have my day job, which got in the way of biking down here, but I will bike home, but I had to take the Coaster down, because I had to take a teleconference this morning, and just pointing out that one of the things that e-bikes have done, and bicycles in general, is they're really a very nice last mile connection point. And the train car that I was on had 8 bicycles on it, and so, you know, NCTD has done a good job of shifting their infrastructure around to note that, hey, I got on the train, there was already 7 bikes there, and yet I still had a spot to put my bike, so I could bike home this afternoon. So, I just wanted to call that out, make that note.
P028	McGarrah Wilson	n/a	See submitted comment letter below table.

Dear SANDAG, these are our 10 demands from the People's Platform of San Diego. We demand meaningful change and a better life for our communities. Too many San Diegans endure painfully long commutes every day—they deserve a public transit system that's frequent, affordable, accessible, and reliable. It's time to put people first and build the transit network our region needs.

1. **7½-Minute Trolleys System-Wide by 2029**

   As of today, only the Blue Line between American Plaza and San Ysidro operates at 7½-minute peak frequencies, while the Green and Orange Lines still run 15-minute headways throughout peak, midday, and weekends . We demand that SANDAG upgrade ALL Blue, Green, and Orange lines to 7½-minute peak headways, and guarantee no more than 10-minute waits midday and weekends by 2029—delivering truly rapid light rail service across the network.

2. **10-Minute Peak, 15-Minute Weekend on Top 10 Buses**

   Today's ten highest-ridership bus routes average 12–15-minute headways in peak periods and can slip to 30 minutes or more on weekends, yet they carry over 40% of all bus boardings in the region . By 2029, SANDAG must fully fund a high-frequency grid that locks in 10-minute peak service and 15-minute weekend service on routes 7, 929, 10, 215, 905, and the other top five lifeline corridors—making the bus a reliable choice for every community.

3. **Clock-Face Coaster & Sprinter by 2029**

   Currently, COASTER trains run every 26–120 minutes on weekdays (about 30 trips) and 58–100 minutes on weekends, while the SPRINTER operates every 30 minutes seven days a week, dropping to hourly outside 10 a.m.–6 p.m. on weekends . We demand transforming the COASTER into a true clock-face schedule—30-minute intervals at :00/:30 on weekdays and hourly weekends—and boosting the Coaster Connection at Sorrento Valley to 15-minute, all-day service. The SPRINTER must run 15-minute peak and 30-minute off-peak service throughout each weekday by 2029.

4. **Countywide All-Door Boarding**

   Off-board validation and all-door boarding pilots have cut dwell times by 32% (1.39 seconds per passenger) and shaved 6–7.5 seconds per stop, translating to up to an 8% reduction in total travel time on high-ridership corridors . By 2029, SANDAG must equip every MTS and NCTD bus with off-board validators and rear-door readers, and pair them with unobtrusive camera checks—slashing dwell times, boosting speeds by an average of 5–10%, and making door boarding seamless and ADA-compliant.

5. **Next-Gen PRONTO by 2026**

The current PRONTO system forces riders to carry a physical card or navigate an outdated QR interface that slows boarding. We demand a ground-up redesign funded by 2026 that lets you add PRONTO cards to Apple Wallet or Google Wallet, tap to pay with a phone or smartwatch (no more QR scans), vastly improves the app and web sign-up experience, and installs reload kiosks at schools and libraries. This will cut dwell times, reduce errors, and make fare payment intuitive for all riders.

6. **Permanent Youth Opportunity Pass Funding**

Since spring 2022, over 20 million free rides have been delivered to under-18s through the Youth Opportunity Pass pilot, but funding sunsets in June 2026 . SANDAG must lock in stable funding for YOP through at least 2029, and simplify the sign-up process with streamlined eligibility verification—turning this pilot into a permanent equity and climate-action investment.

7. **Transit Signal Priority at 250+ Intersections**

Today's TSP deployments are limited to a handful of Rapid corridors, leaving most buses stuck at lights timed for cars. We call for activating true preemption and far-side stop logic at 250+ Equity Focus intersections—University Ave, Broadway, South Bay Rapid, and beyond—so that signals automatically adjust to let buses through, improving on-time performance by up to 15% and reducing delays for all riders.

8. **100 Miles of Camera-Enforced Bus-Only Lanes**

While a few Next Gen Rapid corridors have dedicated lanes, most "bus lanes" are mere paint and get ignored by cars. By 2029, SANDAG must build 100 miles of physically separated, camera-enforced bus-only lanes—fully funded with onboard enforcement tech—so that violations are ticketed in real time, buses never get boxed in, and average speeds jump by 10–20% on these priority streets.

9. **Unified Countywide Bike-Share by 2029**

San Diego's docked Discover/DécoBike contract ended in March 2019 and successive dockless operators have come and gone, leaving no true regional system . SANDAG must partner with a private operator to launch an affordable, countywide bike-share—standard and e-bikes, PRONTO integration, tiered pricing, and equitable station density in every neighborhood and campus—so every resident has easy, reliable access by 2029.

10. **Real-Time Transit Accountability Dashboard**

Riders now rely on static PDFs and press releases for performance data. We demand a publicly accessible dashboard—updated quarterly—with real-time metrics on headways, missed trips, TSP installation status, YOP usage, corridor ridership, and equity outcomes. Full transparency, clear data, and noisy accountability are essential for earning and retaining rider trust.

Signed By,

Kesav Gupta–San Diego **Alicia Ramirez** – Chula Vista **Khalil Ahmed** – Mira Mesa **Marisol Vasquez** – National City
Connor O'Leary – Pacific Beach **Mei Chen** – Clairemont **Jamal Thompson** – Lemon Grove **Priya Patel** – La Jolla **David Nguyen** – City Heights **Sofia Martinez** – Barrio Logan **Ethan Walker** – La Mesa **Fatima Hassan** – El Cajon **Diego Soto** – Oceanside **Naomi Goldberg** – Rancho Bernardo **Luis Castillo** – San Ysidro **Aisha Suleiman** – Encanto **Brandon Kim** – Scripps Ranch **Yasmin Garcia** – Del Mar **Omar Torres** – National City **Emily Davis** – Solana Beach **Julio Hernandez** – Imperial Beach **Hannah Lee** – Carmel Valley **Zachary Jackson** – Escondido **Lily Chang** – Poway **Carlos Mendez** – Lemon Grove **Veronica Ruiz** – Chula Vista **Aaron Brooks** – Coronado **Emma Sullivan** – Mission Hills **Patrick Murphy** – Fallbrook **Camila Ortiz** – Vista **Sanjay Rao** – Mira Mesa **Gabriella Rivera** – National City **Daniel Scott** – La Mesa **Anita Kapoor** – Rancho Penasquitos **Jorge Ramirez** – Otay Mesa **Natalie Brooks** – Encinitas **Ivan Petrov** – Alpine **Sara Martinez** – Barrio Logan **Kyle Johnson** – Tierrasanta **Chelsea White** – Pacific Beach **Marcus Johnson** – Skyline Hills **Alejandra Reyes** – Lemon Grove **Vincent Brown** – North Park **Maya Desai** – Poway **Tyler Anderson** – Rancho Bernardo **Lucia Fernandez** – San Ysidro **Owen Clark** – Del Mar

From:	Karl Rudnick
To:	Clerk of the Board
Cc:	David Zito; Lesa Heebner
Subject:	Fwd: Public comment on SANDAG 2025 Regional Plan and for 7/18/2025 Transportation Cmte meeting
Date:	Thursday, July 17, 2025 8:45:49 AM
Attachments:	S Coast Hwy separated bikeway case report v0.9-DRAFT.pdf Dixon-FHWA study critique v0.9-DRAFT.pdf

You don't often get email from rudnick.cooper@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

SANDAG Board, Committee members, and staff:

I have been working with Steve Linke on the two attachments he also provided to you and fully endorse the recommendations he makes regarding separated bikeways of the CA Class IV variety relying primarily on flex post and other vertical elements for separation of bicycles and motor vehicles on the roadway. Context is so important when considering separation infrastructure. Besides context, serious thought should be placed on the safer, more comfortable, higher quality CA Class I facility. Please read the two documents that Linke provides; one a critique of a 2023 FHWA claim about the improved safety of "separated bicycle lanes" via flexible delineators alone, the other the most serious analysis to date of crash and utilization data for the Cardiff South Beach 101 Class IV cycle track installed in 2020.

I also want to second the recommendation of the San Diego County Bicycle Coalition and organizational partners to "urge SANDAG to continue to implement best practices in expanding well-designed bike and walk networks that connect communities across city lines, and to resist efforts to offload responsibility to individual cities. SANDAG is uniquely positioned to strategize beyond municipal borders to continue to develop a thoughtful and cohesive active transportation system" to provide seamless, high quality biking and walking connections across the County.

Sincerely,
Karl Rudnick PhD
[redacted]

---------- Forwarded message ---------
From: **Steve Linke** <splinke@gmail.com>
Date: Thu, Jul 17, 2025 at 4:23 AM
Subject: Public comment on SANDAG 2025 Regional Plan and for 7/18/2025 Transportation Cmte meeting
To: <regionalplan@sandag.org>

SANDAG Board, Committee members, and staff:

One aspect of SANDAG's 2025 Regional Plan appears to be strong encouragement of separated ("protected") bikeway installations/conversions (adding plastic posts, wheel

stops/curbs, etc.), and perhaps requiring that style of bikeway to compete for grant funding. However, despite massive marketing of separated bikeways by organizations like the Federal Highway Administration (FHWA) and the National Association of City Transportation Officials (NACTO), the data behind their safety is extremely weak. I implore you to allow local jurisdictions to make their own decisions on optimal bicycle facilities and encourage them to exercise extreme caution and very careful designs, if they choose to try them.

I am a former Carlsbad traffic commissioner and retired scientist. I have conducted a detailed crash analysis of the separated bikeway installed in 2020 on South Coast Highway 101 at the southern end of Encinitas. I have attached a draft version of a case report manuscript that describes a 59% increase in bicyclist crashes after the conversion of that corridor, including a fatality and numerous severe injuries. The draft manuscript also describes other fatalities and severe injuries in our region and throughout North America in separated bikeways, which, despite apparently creating a perception of safety, introduce inherent new hazards to bicyclists.

I also have conducted an in-depth analysis of the studies cited by FHWA and NACTO that allegedly prove that separated bicycle lanes reduce crashes and injuries. However, these studies are very weak--not accounting for the vast majority of bicycle crashes (e.g., only including crashes with vehicles in the middle of blocks, excluding all intersection crashes and crashes that do not involve vehicles). The study designs are also weak, and they tend to stretch statistics to the limit. I have attached a second draft manuscript (white paper) that discusses these weaknesses. I have contacted other experts who agree with my conclusions, and, with their encouragement, I have contacted the FHWA to try to convince them to reconsider some of their guidance on separated bikeways.

Please study and understand the two attached manuscripts--at least the first several pages of each.

The SANDAG Draft 2025 Regional Plan, Appendix K (Active Transportation), includes the following statement: "**To support safer streets for all users, the updated Regional Active Transportation Network in the 2025 Regional Plan will be built for All Ages & Abilities, consistent with the National Association of City Transportation Officials (NACTO) Contextual Guidance for Selecting All Ages & Abilities Bikeways.**" The NACTO guidance is then presented in Figure K.4, which places an enormous emphasis on "Protected Bicycle Lanes" (PBLs) to the exclusion of most other approaches on all streets other than local neighborhood streets.

Local jurisdictions should be able to make their own decisions on how to create safe bikeways, particularly given the fact the separated bikeways can actually reduce safety in many contexts. Please remove the above language and figure from the 2025 Regional Plan, or modify them to make them optional and not preferred over other bikeway designs.

Best regards,
Steve Linke
Carlsbad

Unproven separated bicycle lane safety: Overreaching conclusions and marketing

Steven P. Linke, PhD, Carlsbad, CA

A. Introduction/Purpose

In 2023, the Federal Highway Administration (FHWA) published a report on separated bicycle lane (SBL) safety ("2023 FHWA study").[1,2] SBLs add vertical elements in the boundaries between bicycle and vehicle lanes to "separate" them (known in California as "Class IV separated bikeways," and sometimes called "cycle tracks" or "protected bicycle lanes"). Based largely on the alleged statistical rigor of this study,[3] the FHWA is now claiming that SBLs are established as "proven safety countermeasures" that "reduce crashes by up to 53%" (see Figures 1 and 2).[4,5] In addition, the National Association of City Transportation Officials (NACTO) is now claiming that SBLs are "appropriate for all streets in all contexts."[6]

However, a deep dive into the 2023 FHWA study and most other studies on the subject reveals that the claim of an expected 53% reduction in crashes should, at a minimum, be accompanied by the following warning statements:

- The expected 53% reduction in bicycle crashes applies only to the subset of crashes with moving vehicles in mid-block locations more than 250 feet on either side of intersections (other crash types were not studied, and intersection crashes had to be excluded from the study in order to achieve statistical significance).[1,7]
- Other studies indicate that crashes are likely to increase with vehicles at intersections on SBL corridors and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout SBL corridors, which could lead to net increases in injuries and fatalities despite mid-block reductions in crashes.
- The expected 53% reduction in bicycle crashes applies to SBL designs with flexible post delineators only. The study found that inclusion of other physical separation (e.g., wheel stops, curbs, parked cars, etc.) degrades safety relative to the posts alone (removal of these other physical separations is expected to decrease crashes by 40%).

The overly broad and thinly supported marketing claims around SBLs are frequently cited by state, regional, and local policy-/decision-makers and their transportation staffs, as well as many bicycle advocacy groups and enthusiastic constituents. This has led to a veritable movement in some communities, including several in San Diego County, to install plastic posts, wheel stops, and other vertical elements under the assumption that they will increase safety. Unfortunately, SBL projects seem to be done in a rather rushed and indiscriminate manner, without assessing appropriate sites and

designs, and without collecting detailed before-after data on usage and crashes, as recommended in professional guidance documents.

Safety studies on the addition of conventional (painted) bicycle lanes on US roadways have been relatively sparse–some showing reductions in crashes or injury severity, and many others showing no reduction or an increase.[8–17] US-based research has been even sparser for SBLs and has generated similarly contradictory or inconclusive findings.[1,11,15,18–23] The studies are plagued by weak study designs, small sample sizes/lack of statistical significance, unreliable bicycle counts, insufficient accounting for confounding variables, exclusion of large numbers of crashes, ignorance of the crash types relevant to the safety interventions, etc. There is stronger evidence in some European cities, particularly in the Netherlands and Denmark, that SBLs may improve safety, but the cultural, topographic, and overall infrastructural contexts are very different there, including the fact that about one-third of trips are done by bicycle,[22] as opposed to about 1% in the US.[24]

Experience over the last five years in the north coastal region of San Diego County has included at least three fatalities in SBLs (representing most of the bicyclist fatalities in the affected communities, which had no fatalities in the prior five-year period), as well as large increases in crashes and injuries in SBLs on South Coast Highway in the Cardiff area of Encinitas.[25] These fatalities and many of the injuries can be directly attributed to the SBLs themselves. Also, the family of a San Diego city staffer, who has been a longtime advocate of SBLs, is now suing the city alleging an SBL led to the injury and emotional traumatization of their son.[26] While anecdotal, these observations also beg caution.

The primary purpose of this white paper is to detail to officials, who may only be familiar with select headlines, conclusions, and marketing statements about SBLs, the limitations of the 2023 FHWA study. While the 2023 FHWA study seemingly set out to be (and is being promoted as) a definitive safety model "development" and "validation" study, it was beset by similar limitations described above for past bicycle lane studies. It also has substantial data transparency issues. Like the SBL safety studies that came before it, the 2023 FHWA study contributes to a growing body of research, but it remains "exploratory," and the level of evidence it provides is not sufficient to set broad policy.

A secondary purpose of this paper is to highlight several factors that can make SBLs more hazardous than conventional painted buffer bicycle lanes. These factors should be considered when designing future SBL studies and when considering installation of SBLs, because context and design are extremely important.[14] While carefully designed SBLs on some roadways may provide enhanced safety, installation should be considered experimental and only done with caution. The aggressive "every street in every context" marketing, and the resulting well-intentioned but indiscriminate installations endorsed by SBL enthusiasts can have dangerous (sometimes lethal) unintended consequences.

B. Executive summary (critique of the 2023 FHWA study)

- **Key study design limitations:**
    - Very basic, but essential, information was inexplicably not disclosed in the 2023 FHWA SBL study, including the numbers and locations of the studied street corridors, as well as the numbers, types, and severity of the crashes.
    - The authors stated that they were unable to determine the dates of installation of the SBLs in their study, so, instead of using a more robust before-after study design (comparing crashes on the same streets before and after SBL conversion), they were forced to employ a weaker cross-sectional study design (comparing crashes on different SBL and non-SBL streets).
    - Cross-sectional studies are more subject to contamination with "confounders" (characteristics other than the SBLs that may account for observed differences in crashes), and several potentially powerful confounders were not examined in the study, including prevailing vehicle and bicycle speeds and driveway/alley density.
    - The authors acknowledge that the number of crashes in the study was "very small," that many statistical safety models were explored, and that the safety model should only be applied with caution to at least one other city (Denver), suggesting that the model may be "overfit," and that the safety claims may not apply generally to other cities.
    - No evidence of independent peer review has been provided, and no records have been produced in response to a 5/29/2025 Freedom of Information Act (FOIA) request for the underlying datasets, so no independent assessment of the data can be done.
- **Crash reporting gaps:**
    - Unfortunately, the 2023 FHWA study only appears to have included the subset of on-road vehicle-bicycle crashes present in police reports, even though it is widely acknowledged (including by the FHWA itself) that this approach vastly under-reports bicycle crashes. The excluded crashes are ones that do not involve moving motor vehicles (e.g., crashes with fixed objects, opened vehicle doors, debris, other bicyclists, pedestrians, etc.) and/or that occur off legally defined roadways–the very types of crashes that are amplified by SBLs. Large proportions of these unreported crashes result in injuries leading to hospital visits/stays.
    - This limited subset of crashes was then further constrained to only crashes that occurred in the portions of mid-block street segments greater than 250 feet from all intersections along the SBL corridors, because exclusion of intersection crashes was necessary to achieve statistical significance to support the safety conclusion. This,

despite the fact that SBLs can reduce visibility of and increase crashes with bicyclists around intersections.

- Bicyclists cannot avoid intersections when traveling on SBL corridors, meaning that any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analysis.

- **Extrapolated bicycle volume data:**
  - Bicycle volume data (critical to calculate crash rates) was not collected as originally planned due to the pandemic. Instead, statistical model-based extrapolation of limited historical data was used, with inconsistent and sometimes counter-intuitive results.
  - 2020–2021 volume data were excluded without showing the effects or providing a detailed justification, undermining the reliability and transparency of the findings.
- **Safety model inconsistencies/Lack of generalizability:**
  - Study results varied widely between cities; statistically significant improvements were only found in one city (San Francisco), and the main finding of the study (that plastic posts alone resulted in the largest crash reduction) was not supported in the city with the largest number of studied segments (Seattle).
  - Crash data from 2020–2021 and from segments with alleged zero traffic was excluded from the study without showing the effects or providing a detailed justification.
  - Validation of the model with data from Austin and Denver was only an assessment of statistical equivalency, not evidence that SBLs actually reduced crashes in those cities, and the authors cautioned about the applicability (generalizability) of the results to Denver.
  - The model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.
  - The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles. However, no data on crash types or injury severities is presented to assess this alleged benefit.
- **Policy implications:**
  - Bodies like FHWA and NACTO are using inconclusive/contradictory studies to promote SBLs, which, given current evidence, should still be treated as experimental and used with caution–not mandated as universal safety solutions in all contexts.
  - Future studies of SBL safety intended to set national policy should: (1) focus on before-after study designs that fully account for confounders, (2) be powered with sufficient

crash sample sizes to make statistical conclusions without model overfitting, (3) make the underlying data available for independent confirmation, (4) more fully account for bicycle crashes and injuries (e.g., by combining emergency/hospital data with police reports), (5) account for safety through entire SBL corridors, including intersections, and (6) accurately account for changes in bicycle counts.

C. Summary of hazards created by SBLs, plus design guidance

- For a good literature review of many of the following issues, see the Discussion in Cicchino et al., 2020,[18] and for examples of SBL design guidance, see the San Diego County Bicycle Coalition's Cycle Track Toolkit.[27]

- Rideable lane width is a key component that affects many of the risks described below, including maneuverability within an SBL. NACTO "recommends" at least 7.5 feet.[6] If that cannot be achieved, painted bicycle lanes should be considered instead of SBLs. The safety of NACTO's 5-foot "minimum" rideable width is unproven.

- SBLs increase solo bicyclist crash risk due to the large number of fixed vertical objects introduced into a constrained space, like plastic posts/bollards and wheel stops. Many of the crashes in the South Coast Highway SBLs have involved such objects.[25]

- Unexpected transitions into SBLs can lead to solo bicyclist crashes with the vertical elements, so they should be well-marked. At least one of the SBL-involved bicyclist fatalities in north coastal San Diego County can be attributed to this.[25]

- SBLs can increase solo bicyclist crash risk due to debris accumulation arising from less cleaning, combined with reduced maneuverability to avoid the debris.

- SBLs increase bicycle-bicycle crash risk due to speed differentials (e.g., recreational bicyclists, experienced cyclists, and e-bicyclists) in the same constrained space.

- SBLs can increase bicyclist-pedestrian crashes due to pedestrians improperly using the SBL for walking/jogging.

- SBLs tend to reduce visibility/awareness between vehicle operators, bicyclists, and pedestrians at intersections, driveways, and alleys, leading to increased crash risk during vehicle right turns (right hooks), particularly for trucks and other vehicles with larger blind spots. Numerous serious injuries and fatalities related to right hooks have been reported across the US at SBL intersections, including a fatality in Encinitas.[25] If vehicle deceleration or mixing areas are not possible or practical, consider painted bicycle lanes instead of SBLs.

- Two-way SBLs are even more dangerous than one-way at intersections/driveways/alleys, because pedestrians and turning drivers may not be aware of bicyclists traveling in both directions (i.e., oncoming bicyclists are coming from an unexpected direction).
- Steep downhill grades that increase bicyclist speeds can further increase the risks described here due to the lack of space/time for maneuvering in the constrained space.
- SBL vertical barriers can hinder emergency vehicle access and maneuvering of disabled vehicles.

D. Conventional vs. separated bicycle lanes

Conventional bicycle lanes are typically delineated only by painted lines, sometimes with striped buffers between them and travel and/or parking lanes. There is currently a movement to promote construction of SBLs, distinguished by the inclusion of vertical elements in the buffer area(s), such as:

- Flexible post delineators (sometimes called "plastic bollards" or "flexposts")
- Wheel stops that create a non-continuous "curb" (similar to those in parking lots)
- Continuous curbs, medians, planters, parking lanes, or other barriers

The rationale for SBLs is that they may increase *perceived* safety and ridership due to "separation" from vehicles.[28] However, despite substantial marketing claims that they also increase *actual* safety, they may only create the *appearance* of safety while making streets more hazardous.

E. FHWA and related SBL safety research

2015 FHWA SBL crash analysis report. In May 2015, the FHWA published a *Separated Bicycle Lane Planning and Design Guide*,[23] which included a "Crash Analysis Report" on 17 street corridors in 9 different cities. The report considered the SBL safety findings to be inconclusive:

> An in-depth analysis of crash and ridership data from implemented separated bike lanes in the U.S was completed to evaluate safety outcomes and inform the recommendations of this guide. While the bicycle collision and volume data that exist for most implemented projects is not yet sufficient to draw broad-based conclusions concerning the overall safety of separated bike lanes, the analysis did uncover useful insights to build upon in future analyses.

Crash Modification Factors. The 2015 FHWA report went on to call for additional safety studies, including the establishment of Crash Modification Factors (CMFs) for SBLs, emphasizing how it was imperative that future studies use more robust data collection and study design methods, which were outlined in an evaluation checklist and data collection section. Recommended methods for the development of CMFs have been published by multiple transportation organizations, as well.[29,30]

Note that a CMF is a number that, when multiplied by expected crashes under current conditions (typically derived from historical crashes), is intended to estimate a change in future crashes when a certain modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF greater than 1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

2023 FHWA study. The study includes the 0.47 CMF for conversion of a generic bicycle lane into an SBL with plastic delineator posts. It includes data from an unspecified number of street corridors in five different cities, although the statistical model that produced the CMFs only included three of the cities (San Francisco, CA, Cambridge, MA, and Seattle, WA) due to limited sample sizes in the other two (Austin, TX and Denver, CO).

It is evident from the published material that the study did not go as originally planned due to profound challenges in collecting the data, as well as inconsistencies in the data. The authors clearly did a lot of work (in fact, a lot more creative statistical work than they likely originally planned), and they seemingly did the best they could under the circumstances to support their premise that SBLs improve safety. However, as detailed below, this new study has many limitations and failed to meet the more robust data collection and evaluation standards considered imperative in the 2015 report.

SANDAG on SBLs. The San Diego Association of Governments (SANDAG), the Metropolitan Planning Organization for San Diego County, has apparently partnered with FHWA and NACTO to some extent on SBLs (based on webinar comments). SANDAG recently released its draft 2025 Regional Plan,[31] which says they will follow the “NACTO Contextual Guidance for Selecting All Ages & Abilities Bikeways" that includes SBLs or other separated paths on all streets with speed limits >25 mph (Figure 3). This appears to create an inappropriate mandate for local jurisdictions to construct SBLs on all streets other than local neighborhood streets in order to receive or compete for SANDAG funding, which could unintentionally make conditions more hazardous for people of all ages and abilities.

F. Challenges to design reliable safety studies

Study basics and confounding factors. It is beyond the scope of this paper to delve deeply into the designs of roadway safety studies. Generally, though, safety “outcome” data (e.g., numbers or rates of crashes, injuries, and/or injury severities) is compared for streets based upon the presence or absence of a safety “countermeasure” (in this case SBLs). Most studies will either compare the same streets before and after SBLs were installed (before-after/longitudinal study), or they will compare different streets with and without SBLs during a single time period (cross-sectional study).

Every comparison will include some potential “confounding factors”—differences between the streets other than the absence or presence of SBLs—which could explain part or all of any differences in safety outcomes independent of the SBLs. Therefore, to establish a clear cause-effect of the SBLs, it is critical to control for potential confounders, such as:

- Traffic volumes (vehicle, transit, bicycle, and pedestrian)
- Different types of vertical SBL elements
- Bicycle lane/buffer widths, presence of green paint, etc.
- Population density/land use
- Vehicle speeds
- Bicycle speeds
- Corridor length
- Grades
- Intersection/driveway/alley numbers and spacing
- Length of vehicle/bicycle mixing zones at intersections
- Vehicle turning frequency
- Intersection control types
- One-way vs. two-way vehicle lanes
- Through- and turn-lane numbers and configurations
- Parking lanes and/or medians
- Lighting
- Crash reporting method changes

Before-after (longitudinal) studies. Studies that compare the *same streets* before and after installation of an SBL are the strongly preferred and most robust study type to estimate CMFs, because there tend to be far fewer known or potentially unknown confounding variables.[30,32,33] The physical characteristics tend to stay the same, except the ones that arise from the SBL installation under study. Factors that vary over time, such as traffic volumes, and perhaps changes in crash reporting, might be examples of the limited variables that need to be controlled.

Cross-sectional studies. Before-after studies typically require several years of data both before and after SBL installation, which requires the existence and collection of more data. A less data-intensive design is a cross-sectional study, in which several different streets are analyzed during the same time period—some with SBLs and some without. However, it is difficult to identify sets of comparable control streets to assess whether differences in crashes are due solely to the SBLs, or whether they are due to one or more of the numerous other confounding variable differences, such as those listed above and, for example, why SBLs were installed on certain streets and not others.

Examples of weak study designs. A 2013 study of 19 US SBLs (**Lusk et al., *Bicycle Guidelines and Crash Rates on Cycle Tracks in the United States***) concluded that SBLs have lower vehicle/bicycle crash rates than a national average crash rate.[34] However, comparing crash rates to an alleged national average is an extremely weak cross-sectional study design that does not account for any confounding variables. In fact, it was subsequently pointed out that the observed crash rate differences were more correlated to intersection density than the presence of SBLs, among other weaknesses. The streets with higher intersection densities had crash rates much higher than the national average and the streets with lower densities had lower crash rates—all independent of the presence of SBLs.[35]

Another widely publicized 2019 study of crashes in 12 large US cities over a 13-year period (**Marshall and Ferenchak, *Why cities with high bicycling rates are safer for all road users***) proclaimed that the presence of SBLs in the cities was associated with better safety outcomes.[21] Although this study was presented as having a very large sample size, its conclusions are specious due to several methodological flaws. For example, the study appears to have included 1,300 miles of off-street trails in its definition of SBLs with only 12.5 miles of actual SBLs, and it failed to account for key confounding variables including population densities and traffic volumes/speeds, among several other statistical problems.[36]

Selection bias. Another factor that affects all studies is potential "selection bias." This arises from the fact that interventions, such as SBL conversions, that do not perform well (and perhaps even removed) are less likely to be included in safety studies, biasing results to locations where they tend to work better.

FHWA study critique:

Study design. The 2015 FHWA report used the more robust and preferred before-after study design on a limited set of sites, but, given an inconsistent mix of findings, the SBL safety results were ultimately considered inconclusive. The report stated:

> …[I]t is imperative…to collect bicycle and motor vehicle crash and volume data for a sufficient period of time before and after separated bike lane installation. This will improve understanding of safety benefits and design considerations…

The 2023 FHWA study was an opportunity to conduct a before-after analysis on a larger set of sites with more robust data. However, the authors used the less robust cross-sectional approach, because, as they describe in the study, they were unable to determine the dates of conversion to SBLs for the sites they were studying.

As described above, cross-sectional studies are more subject to bias from confounding variables when comparing SBL and non-SBL facilities. Adding to that concern, the authors lamented that the 2020 pandemic limited their data collection to pre-existing databases. Further, the authors did not identify any of the specific streets studied as SBL vs. non-SBL. They only identified the cities, preventing any independent comparison.

Confounders. The 2023 study employed a statistical method called "propensity score weighting" (PSW) to help reduce potential confounding variable bias, but PSW can only estimate the effects of variables that are chosen to be included. For example, the authors do not appear to have included vehicle speeds, bicycle speeds, and driveway/alley density, among other variables, in their modeling, all of which have been shown to affect crash frequencies.[22,35,37] And there could be other unknown differences between the undisclosed streets that bias the results.

The study also does not account for variations in the individual SBLs beyond the presence of flexible posts or "other" elements. These potential confounders include variations in lane widths or the types of

other elements (e.g., wheel stops vs. planters vs. parking lanes), which are likely to have very different effects on safety.

Lack of transparency. Beyond just the design, the study has a noteworthy lack of transparency in that very basic, but absolutely essential information, like the numbers and identities of the studied street corridors, as well as the numbers, types, and severity of the crashes, are not disclosed. In addition, bicycle volume and crash data from 2020–2021 and street segments with alleged zero traffic were excluded from the study without showing the effects or providing a detailed justification.

Lack of peer review and inability to confirm results independently. In addition, there is no evidence that the study has undergone any sort of formal peer review (particularly from a statistical modeling standpoint); instead, it was just published directly by the FHWA. A FOIA request was submitted to the FHWA on 5/29/2025 (FOIA Control Number 2025-0509) for access to the databases used for the study. The request was forwarded to the academic institution of the authors (Texas A&M University) and then back to the FHWA, but no responsive information has been received. Without peer review or independent assessment of the data, any findings should be treated with great skepticism.

While cross-sectional studies *can* be acceptable to help establish CMFs, several other limitations in the 2023 FHWA study further compromised it, as described below.

G. Challenges in measuring overall safety throughout street corridors

The ultimate goal of decision-makers should be to improve *overall* safety *throughout* a bicycling corridor. Safety is typically measured by the number or rate of bicycle crashes and injury severity types. However, these measurements are challenging for any bicycle study, particularly for SBLs.

G.1. Under-reporting of bicycle crashes and injuries in police reports

State motor vehicle department crash data is derived from police reports, and a crash is generally defined as "an accident that involved a motor vehicle that occurred on a public highway or road in the U.S. and that resulted in property damage or personal injury."[38] Ironically, while the vast majority of bicycle crash studies have relied almost exclusively on such data, most bicycle crashes and injuries do not involve motor vehicles and/or occur off the legal “roadway.” This includes crashes caused by fixed objects like vertical components adjacent to the bikeway, opened vehicle doors, debris, other bicyclists, pedestrians, animals, etc.--the very types of crashes that are amplified by SBLs–and the SBLs themselves are typically legally considered to be “off-roadway.”

- **Fixed objects.** SBLs add significant numbers of new vertical elements to the roadway, such as the flexible posts and curbs, and concurrently reduce the space to maneuver. This factor directly increases the likelihood that bicyclists will crash into fixed objects.

- **Debris.** Vehicles tend to push road debris to the edges of streets, where SBLs are usually located. The vertical elements of SBLs often amplify debris-related crash risk, because they tend to create lanes that are not accessible by conventional street cleaning equipment. Rain and snow also can differentially affect SBLs due to drainage and plowing issues.

- **Other bicyclists.** The limited widths of most SBLs prevents safe passing. So, with the speed differentials of recreational cyclists, experienced cyclists, and ebikes, there is a higher likelihood of crashes with other bicyclists, or with SBL infrastructure in attempts to leave the SBL to pass.

- **Pedestrians.** Walkers and/or joggers often end up in bikeways for a variety of reasons. For example, some joggers prefer the asphalt of a bikeway to the concrete of a sidewalk. In addition, lack of right-of-way width may mean that an SBL installation reduces or eliminates pedestrian areas. These increase the likelihood of bicycle/pedestrian conflicts and crashes.

References demonstrating crash under-reporting

- 1999: The FHWA published a comprehensive literature review of studies comparing police report-based crashes with emergency department (ED) visits and hospitalizations.[39] Their conclusion was that police reports/crash statistics fail to include about 40-50% of ED visits (up to 82% in one jurisdiction) and 25-40% of hospitalizations of injured bicyclists.

- 2016: Based on data from the Massachusetts Department of Public Health, Boston police reports miss 76% of bicyclist ED visits and 60% of hospital admissions.[40]

- 2018: A University of California, Berkeley SafeTREC group published a more recent literature review, concluding that 54-93% of hospital visits were not linked to police reports.[41]

- 2021: A study in Orlando, Florida showed that 73% of ED visits and 57% of hospital admissions of bicyclists arose from crashes that did not involve motor vehicles, and, thereby, likely would not be reflected in police reports.[37]

- 2024: A study of bicyclist crashes/injuries in Toronto showed that 92% of bicyclist visits to EDs were not reflected in police reports.[42]

- 2025: In a report on the Cardiff-area Coast Highway SBL in Encinitas, CA, over 60% of emergency vehicle dispatches for bicycle-related crashes did not have a corresponding police report.[25]

The references cited above also discuss under-reporting of bicycle crashes from other studies too numerous to cite or detail here. The discordances in crash numbers between police reports and other sources varied greatly among the studies, but the common themes are: (1) most bicycle crashes do not appear in police reports or motor vehicle department statistics, because they do not involve moving motor vehicles and/or occur off-roadway, and (2) substantial percentages of these crashes result in ED visits and hospitalizations. Accordingly, the authors emphasize the need to assess records related to hospital visits, in addition to police reports, to avoid under-reporting of bicycle crashes and to avoid erroneous conclusions about the benefits of proposed safety countermeasures.

FHWA study critique:

The 2015 FHWA report acknowledged that their "[c]rash data includes only reported crashes involving a bicycle and a motor vehicle." In its call for development of CMFs for SBLs and other future studies, it went on to recommend comprehensive collection of crash and injury severity data. Unfortunately, the 2023 FHWA study provides very little information on the source of its crash data, but it, too, included only moving vehicle-bicycle crashes, with the authors stating:

> Possibly, other bicycle crashes may have occurred and were not reported. The research team was unable to incorporate these unreported crashes into the scope of this study.

A study comparing bicyclist visits to San Francisco General Hospital (SFGH) and police crash reports showed that: (1) 41.5% of injuries were bicyclist-only (did not involve a motor vehicle), (2) bicyclist-only injuries were four times more likely to require hospital admission than vehicle-bicycle injuries, and (3) there was no police report associated with 54.5% of all bicyclist injuries.[43] SFGH is the only Level I trauma center serving San Francisco, which is the primary city contributing crash data in the 2023 FHWA study. This under-reporting raises direct questions about the conclusion that SBLs reduce crashes, including those leading to severe injuries.

In summary, the 2023 FHWA study and the vast majority of other SBL safety studies do not account for any of the above-described non-vehicle-involved crashes or vehicle-involved crashes at intersections, which tend to be the majority of bicycle-involved crashes, particularly in SBLs. Therefore, any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analyses.

G.2. Unreliability of bicycle crash rate comparisons/aggregation bias

Bicycle crash *rates* are calculated by dividing the number of crashes by the number of bicycle trips/volume or mileage traveled (e.g., "crashes per 100,000 trips" or "crashes per million miles"). These should provide a more accurate reflection of safety, because different streets have very different amounts of bicycle usage (sometimes called "exposure")—both baseline and changes over time. The previous section described how systematic under-reporting of bicycle crash numbers, particularly in SBLs, has the potential to skew safety results. Guesses at bicycle counts (exposure) can further skew the results.

FHWA study critique:

The 2015 FHWA report emphasizes the importance of collecting accurate bicycle count data when developing CMFs.[23] For the 2023 FHWA study, the original intent was to collect bicycle counts at the study sites in the Spring of 2020 to produce the SBL CMFs, but the authors apparently canceled that due to travel restrictions arising from the pandemic. Instead, they had to rely on limited historical counts from various areas in the cities from which they attempted to develop predictive statistical models to extrapolate counts at the actual sites. Also, many of the bicycle counts appear to be based primarily on

extrapolation from vehicle traffic adjusted for variables like the presence of bicycle lanes, population density, land use, etc., which is an even wilder guess. AASHTO/FHWA guidance on CMF-development protocols points out the likelihood of bias due to data aggregation, averaging, and/or incompleteness.[30]

For the three cities used to produce the SBL CMFs, two of them used different methods, and multiple variables had opposite (and sometimes counter-intuitive) effects, while a statistical model could not even be developed for the third. For San Francisco, a Poisson mixed–effect model was produced to predict the bicycle counts, with higher counts being predicted for streets with more bicycle lanes and higher population density (Table 34). In contrast, for Seattle, a Gaussian mixed-effect model was produced, with *lower* counts counter-intuitively being predicted for streets with bicycle lanes and higher population density (Table 42). For Cambridge, the authors stated: "Although the research team made several attempts to statistically develop a nested mixed-effect negative binomial model, they were unable to identify any models that converged."

The San Francisco model also had the seemingly counter-intuitive observation that bicycle counts were *higher* in commercial and industrial areas relative to residential, public, and mixed-use areas. Also, essentially two different models had to be produced for Seattle (one for data from 2016-2018, and another for data from 2014-2015 plus 2019), because the results were so different in these sets of years.

Further, the authors excluded all bicycle exposure data from 2020 and 2021 for all cities, which they justified by citing the different travel patterns in those years due to the pandemic. However, no quantitative assessments were presented, so it is impossible to determine the impacts on the conclusions, or whether the exclusion was justified.

The authors stated:

> Ideally, this assessment should have included known bicycle exposure volumes…However, the implementation of SBLs in the United States is in its infancy, and multiyear bicycle counts are limited. In addition, the recent COVID-19 pandemic created challenges for research team members to travel to locations and conduct additional counts. Ultimately, the bicycle exposure variable…was estimated based on a variety of bicycle count types that included short-term bicycle counts, periodic counts that occurred regularly (usually every 2 yr), and a few permanent bicycle count stations.
>
> …[T]he team allowed some variability for how much bicycle count data could be used and potentially extrapolated to surrounding facilities.

In summary, despite the critical importance of accurate bicycle exposure data to determine crash rates, the authors of the 2023 FHWA study were unable to collect that data and, instead, had to rely upon guesses from statistical models that included multiple counter-intuitive variables and were different for each city and different time periods. This was not consistent with standards called for by AASHTO/FHWA.

G.3. Intersection crashes (within 250 feet) had to be excluded to achieve statistical significance

SBLs are typically installed on street "corridors" that are comprised of "intersections" linked by the street "segments" between them (as opposed to being installed on single, isolated segments with no intersections). Even setting aside the crash number and bicycle exposure data limitations described above, most SBL safety studies, including the 2023 FHWA study, only report safety improvements within individual segments—not when intersections or complete corridors are included in the analyses.

Obviously, though, it is not possible for bicyclists to skip the intersections, where a majority of vehicle/bicycle crashes occur.[22,44] Ironically, the vertical elements of SBLs tend to make vehicle drivers and bicyclists less aware of and/or less visible to each other, which increases vehicle/bicycle crash risks during turning movements at intersections. SBL separation with parked cars or vegetation further exacerbates the awareness/visibility problem.

In many cases, the vertical elements of an SBL are installed right up to the turning area, so right-turning vehicles must remain in the through lane (often with through-traveling vehicles behind them) until the last second, then suddenly turn right—across the SBL with potentially less visible cyclists. This is in contrast to the more traditional dashed mixing areas, where the bicycle lane becomes a shared right-turn lane for vehicles, or where vehicles move right across the bike lane into a dedicated right-turn lane. Although these mixing areas are potential vehicle/bicycle conflict points, they are designed to be lengths that allow safe mixing, rather than last-second, potentially unexpected turns across the bike area.

Several fatalities and serious injuries have been reported arising from vehicles making right turns across SBLs. For example, in 2020, a bicyclist was killed in the westbound SBL on Leucadia Boulevard at Moonstone Court in Encinitas, CA when he struck the side of a right-turning truck.[45] Plastic post delineators had been installed all the way up to the turning area at the intersection, eliminating any mixing zone. The City of Encinitas eventually settled a lawsuit[46] that alleged: "[These] dangerous conditions created a trap that a reasonably careful person would not notice or anticipate as being dangerous, since the lack of dashed lines, and presence of bollards/stanchions created a false sense of safety while operating a bicycle in the bikeway while at the same time, depriving automobiles adequate opportunity to merge into the bikeway to turn right onto Moonstone Court." Several of the SBL plastic posts leading up to the intersection were removed after the fatality to create a mixing area.

In 2024, two bicyclist fatalities occurred at intersections in SBLs in Cambridge, Massachusetts under virtually identical circumstances to the fatality in Encinitas.[47] Also in 2024, a life-altering traumatic brain injury occurred in Seattle when an SUV made a right turn across an SBL at a driveway (neighbors have reported frequent yelling there due to other close calls).[48] That incident also led to a lawsuit against the city for its dangerous design and insufficient sight distance. In July 2025, a bicyclist riding in an SBL in Montreal struck the side of a right-turning truck (dashcam video available in the linked news story).[49] In each of these cases, the vertical elements (plastic posts or curbs) were installed right up to the intersections, the vehicle drivers appear to have been unaware of the bicyclists traveling in the same direction (blind spot), and the bicyclists were unaware that the right turns were happening until it was too late.

In San Francisco, the Market Street/Octavia Boulevard intersection has been considered one of the most dangerous to bicyclists due to vehicles turning right across an SBL there.[50]. Note that this is not an exhaustive list of right hook crashes in SBLs–just a few recent incidents that include the cities in the 2023 FHWA study (San Francisco, Cambridge, and Seattle).

FHWA study critique:

The 2015 FHWA report observed:

> Increases in bicycle crashes after separated bike lanes were built were especially pronounced at intersections…
>
> It appears that the introduction of separated bike lanes may result in increased challenges at intersections, relative to separated or protected midblock locations. All six of the sites where the analysis included consideration of intersection vs. midblock crashes saw an increase in the percentage of crashes that occurred at an intersection relative to crashes at midblock. This was true for bicycle crashes as well as those not involving a bicycle.

The 2023 FHWA study reported:

> Initially, the research team hoped to develop CMFs for segments and intersections, but their attempts to model intersections and/or entire corridors were unsuccessful. Consequently, the team focused on developing robust CMFs for segments. Future work may be to conduct research that estimates the safety effect of the various types of SBL-to-intersection transitions…
>
> The research team assessed the prospect of using intersection-only and corridor-type models but found that for the available dataset, these two options did not yield statistically viable results.

First, it is particularly bizarre that none of the actual street names/locations of the SBLs were ever revealed for any of the cities in the 2023 FHWA study. Second, the fact that intersection crashes had to be excluded in order to achieve statistical significance is a critical flaw in the safety claim. In fact, all of the SBL intersection-based fatalities and serious injuries described above would have been excluded from the crash analysis.

In addition to excluding all crashes at the intersections themselves, the 2023 FHWA study also excluded crashes that occurred within 200 to 250 feet on both sides, which was not disclosed in the report itself but was described by the primary author in a webinar describing the results.[7] Although those distances are commonly accepted as being within an intersection's "area of influence," it means that the entire study was based only on crashes that happened in the middles of the "blocks" extracted from the full SBL corridors.

Also, block lengths can vary significantly between cities and different parts of the same city, which is not addressed in the study. There is no indication of what proportions of the corridors were actually included in the analysis.

In summary, while the 2023 FHWA study sought to demonstrate the corridor-level safety of SBLs, the inclusion of crashes that happened within 250 feet of both sides of intersections clearly caused the statistical models to fail. In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

G.4. Vehicle safety, emergency vehicle response times

There also are safety concerns with SBLs independent of bicycle crashes. The barriers do not allow disabled vehicles to go to the edge of the street, and they reduce the ability of vehicles to yield to the edge when emergency response vehicles need to pass—requiring them to remain in active through-lanes. This is particularly true of streets with few through-lanes. This could negatively affect emergency vehicle response times and/or put drivers of disabled vehicles at risk.

H. Crash modification factor modeling

FHWA study critique:

The statistical modeling of the crash data to produce the CMFs also was quite muddled in the 2023 FHWA study. Table 1 (below) contains a summary of segment numbers and CMFs for "flexible posts" compared to "traditional or flush buffered bicycle lanes." Although numerous other comparisons were described in the study, this was the main reported finding, so this critique will focus on that area (although it applies to the other comparisons as well).

Table 1

Safety model development sites	Total Segments	Non-SBL Segments	SBLs both directions*	SBLs single direction	CMF	Estimate	Standard Error	*p* -Value	Table[1]
San Francisco (SF)	384	320	28	36	0.338	-1.0849	0.3602	0.0026	47
Cambridge	179	155	24	0	0.592	-0.5244	0.7486	0.4836	50
SF + Cambridge	563	475	52	36	0.316	-1.1507	0.3366	0.0006	52
Seattle	660	541	71	48	1.178	0.164	0.883	0.853	58
All three	1223	1016	123	84	0.468	-0.758	0.267	0.005	60
"Validation" sites									
Austin	68	40	24	4					
Denver	384	368	13	3					

*Either one-way SBLs on both sides of a roadway or a two-way SBL on one side.

Overfitting/small crash sample size. In statistical modeling, when sample/event sizes are small, many variables are included, and many different models are explored, there is a risk of something called "overfitting." This could mean that, while an apparently very good model can describe crashes in the specific data being analyzed, the model does not reflect reality and will not "generalize" to accurately predict crashes in other data/cities.[30] In this regard, the authors stated:

> The research team found the number of bicycle crashes [events] to be very small…
>
> The research team developed several regression models for Cambridge, San Francisco, and Seattle (both independently and with a merged dataset).

The actual numbers of crashes in each city/corridor are never revealed in the study, and many variables (some counter-intuitive) and models seem to have been tested in many different combinations, raising concerns about potential overfitting.

Lack of statistical significance in individual cities. San Francisco was the only individual city for which a statistically significant CMF could be developed (0.338, $p = 0.0026$). It is curious that the addition of Cambridge, which had a worse and not statistically significant CMF as its best model (0.592, $p = 0.4836$), to San Francisco produced a better CMF than San Francisco alone (0.316, $p = 0.0006$). And although Seattle had the largest sample sizes (by far) of both non-SBL and SBL segments, the authors also were unable to develop a statistically significant CMF, and the best case model there showed an *increase* in crashes in SBLs vs. non-SBL segments (CMF = 1.178, $p = 0.853$). Note that Austin and Denver were completely excluded from CMF development, presumably due to low sample sizes of segments and/or crashes.

Disparate Seattle safety element results. The optimal statistical model developed on the Seattle data (although not statistically significant) suggested that SBLs with only flexible posts essentially imparted no safety improvement, while SBLs with flexible posts plus other vertical elements imparted a small safety improvement. This is in contradiction with the overall finding in the model developed from the combined Seattle/San Francisco/Cambridge data that flexible posts alone impart a large safety improvement that is degraded when combined with other vertical elements.

Significant differences between cities. In the final model developed from the combined Seattle/San Francisco/Cambridge data, the city locations themselves showed up as the most impactful coefficients, indicating that the crash rates were substantially different in each city and raising questions about the generalizability of the calculated CMFs to cities other than San Francisco and, perhaps, Cambridge.

Insufficiently characterized data exclusions. For the three-city final model, it appears that the authors removed all segments for which their estimate of average daily vehicle traffic (ADT) or annual average daily bicycles (AADB) was zero. It is unclear why some street segments would have had zero traffic. More importantly, it is unclear how many segments were removed, because the table with the results (Table 59[1]) claims that all 1,223 segments from the three cities were analyzed.

The authors discounted this as a "housekeeping issue." However, there was no explanation of what effect inclusion of those segments would have had on the model, and there was no mention of excluding segments with zero estimated traffic in the separate statistical modeling done on the San Francisco and Cambridge data.

On a related matter, similar to the situation described above for bicycle exposure data, the authors excluded crash data from 2020 and 2021 for all cities, stating in the Tech Brief (and not the main paper):

> Note that data for 2020 and 2021 were excluded from the CMF development efforts because those data were atypical.

However, no further justification was made for the exclusion of this data, beyond the claim that it was "atypical." In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

Inconclusive validations. The so-called "exploratory validation" of the model with the Austin and Denver data was only an assessment of statistical equivalency—without any evidence that SBLs actually reduced crashes in those cities. In addition, while the equivalency test appeared to work for Austin, the Denver findings were quite different, and the authors rationalized this as follows in the Tech Brief with no further justification:

> …[T]he CMF for Denver conditions should be applied cautiously. The team was not completely sure about why these data differed, but Colorado has different weather patterns (particularly in the winter) and has a greater elevation than the other study sites.

This further amplifies the concern that the model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.

Lack of crash type or injury severity data. The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles, which are the ones that occur mid-block.[1] However, the study includes no data on crash types or injury severities to assess this alleged benefit, which could have helped support the safety conclusions. Further, mid-block vehicle overtaking crashes tend to be a small minority (<10%) of overall bicycle crashes,[37] so the study and its crash reduction conclusion ignore the vast majority of bicycle crashes, including the many bicycle crash types that can increase substantially in SBLs (e.g., intersection hooks, crosses, and T-bones, as well as fixed objects, debris, other bicyclists/pedestrians, etc.).

I. Inconsistencies in findings between studies

Flexible posts (bollards) alone vs. bollards plus other elements. It is not uncommon for different studies by different researchers to reach somewhat different conclusions or, for example, suggest some differences in the *magnitude* of safety benefits. However, when it comes to research on SBL safety, the inconsistencies in the findings within individual studies and between studies tends to be quite large. This indicates the need for larger, better-controlled studies.

One example is the alleged impact of different vertical elements on crashes. The 2015 FHWA report concluded:

> Plastic bollards applied in conjunction with other characteristics…were associated with a decrease in average annual total crashes while plastic bollards applied on their own were associated with an increase.

In stark contrast, the main finding of the 2023 FHWA study is that plastic bollards (flexible posts) alone had a CMF of 0.468 relative to conventional bicycle lanes (predicting a 53.2% reduction in crashes[51])--see the red box in Table 60 of the study below. However, when other vertical elements were added to the bollards, crashes increased relative to the bollards alone, and the results were no longer statistically significant (orange box in the table).

In fact, the FHWA CMF Clearinghouse reports a CMF of 0.605 for "Convert Blended vertical element Bike Lane to Flexible Delineator Post Bike Lane" based on the 2023 FHWA study.[52] In other words, for an SBL that includes both plastic posts and wheel stop curbs, *removal* of the wheel stops (leaving only the plastic posts) would be expected to nonsensically reduce vehicle-bicycle crashes by 39.5%.

Table 60. CMFs for bicycle crashes in San Francisco, Seattle, and Cambridge.

Condition	CMF	Estimate	Standard Error	*p*-Value	Significance
Flush buffer[a]	1.128	0.121	0.173	0.484	—
Flexible posts[a]	0.498	−0.698	0.264	0.008	**
Flexible posts[b]	0.441	−0.819	0.297	0.006	**
Flexible posts[c]	0.468	−0.758	0.267	0.005	**
Blended[a]	0.822	−0.196	0.252	0.437	—
Blended[b]	0.729	−0.316	0.300	0.292	—
Blended[c]	0.774	−0.256	0.263	0.331	—
Flexible posts[d]	0.605	−0.502	0.318	0.114	—
Flexible posts or blended[a]	0.640	−0.447	0.203	0.028	*
Flexible posts or blended[b]	0.567	−0.568	0.253	0.025	*
Flexible posts or blended[c]	0.602	−0.507	0.212	0.017	*

—Not statistically significant.
*Statistically significant at the 0.05 level.
**Statistically significant at the 0.01 level.
aBase condition: traditional bicycle lane.
bBase condition: flush buffered bicycle lane.
cBase condition: traditional or flush buffered bicycle lane.
dBase condition: blended vertical element.

Mixing zones. Another area of controversy is the safety of so-called "mixing zones," where vehicles and bicycles conflict at intersections. The 2015 FHWA report stated:

> Mixing zones in combination with other treatments was associated with a decrease in average annual total crashes.

However, FHWA and NACTO guidance recommend minimizing the use of mixing zones, because they allegedly increase the lengths of conflict areas.[3,6]

J. Conclusions

Given the study limitations detailed above, any claims of SBL-based crash reductions or published CMFs should be accompanied by prominent warning statements, such as:

- This claim only applies to vehicle-bicycle crashes in the midblock portions of SBL corridors more than 250 feet on either side of intersections.
- There is evidence that crashes are likely to increase with vehicles within the intersection areas and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout the corridor, which could lead to serious injury or death.
- This claim may not validate to SBLs outside of those included in the underlying study.

Planning of SBL projects and future SBL safety studies should strictly adhere to guidance and best practices, and the concerns listed in Section C above should be considered.

Glossary of abbreviations and terms in the context of transportation safety

AASHTO (American Association of State Highway and Transportation Officials): A national transportation standards-setting organization that publishes guidelines for highway design.

Bollard: A vertical pillar-like object used for traffic control. In the context of SBLs, they are typically flexible plastic posts. In other cases, they can be rigid/crash-resistant for security.

Before-after (longitudinal) study: A study comparing data collected from the same set of sites both before and after safety modifications like SBLs are installed. Less subject to confounders than cross-section studies.

Class I, II, II, and IV bikeways: California classifications. Class I “bike paths” are off-roadway. Class II “conventional bike lanes” are on-roadway with only paint striping. Class III “bike routes” are on-roadway lanes shared with vehicles (sharrows). Class IV “separated bikeways” are on-roadway but separated from vehicle lanes with vertical elements (same as cycle tracks, separated bike lanes, or protected bike lanes).

CMF (Crash Modification Factor): A number that is multiplied by the future estimated crashes without treatment to estimate expected future crashes with a modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF >1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

Confounder (confounding factor): When assessing cause and effect of a safety modification, confounders may prevent accurate assessment of the actual effect of the modification, because the confounder(s) are responsible for part or all of the effect.

Cross-sectional study: A study comparing data collected from different sites during the same period of time—more subject to confounding factors than a longitudinal (before-after) study.

Cycle track: Same as Class IV bikeways, separated bike lanes, or protected bike lanes.

FHWA (Federal Highway Administration): US Department of Transportation division that sponsors roadway safety programs, among many other functions.

Flex post: A type of flexible plastic bollard frequently used for SBLs.

Longitudinal study: Same as before-after study.

NACTO (National Association of City Transportation Officials): Coalition of Departments of Transportation in North American cities that publishes roadway design standards.

Overfitting: While an overfit statistical model can predict safety outcomes in the data from which it was created, it fails to generalize to predict outcomes in other data, because it was based on ”noise.” Overfitting is a particular problem when many complex models are explored in small datasets.

Rideable width: The usable width of a bikeway for riding, excluding any shy distance, gutter pans, vertical SBL elements, or other unrideable areas.

SBL (separated bike lane): Same as Class IV bikeway, cycle track, or protected bike lane (PBL).

SANDAG (San Diego Association of Governments): An association of local governments that serves as the Metropolitan Planning Organization for San Diego County.

Selection bias: Failure to analyze a truly random sample for statistical analysis. For example, in SBL research, unsafe SBLs that have been removed cannot be analyzed, and SBLs that have better safety records may be more likely to be selected for analysis, thereby exaggerating their overall safety.

Wheel stop: Short section of “curb” or “berm” similar to those in individual stalls in parking lots that can serve as vertical elements in SBLs. They can be made of concrete, asphalt, or other materials, and glued or poured in-place.

Figure 1. Images from the FHWA website regarding SBLs.

Figure 2. Additional FHWA marketing regarding SBLs posted on Facebook and elsewhere.

Figure 3. Figure K.4 from the SANDAG draft 2025 Regional Plan.

Roadway Context				All Ages & Abilities Bicycle Facility
Target Motor Vehicle Speed*	Target Motor Vehicle Volume (ADT)	Motor Vehicle Lanes	Key Operational Considerations	
Any		*Any*	*Any of the following:* high curbside activity, frequent buses, motor vehicle congestion, or turning conflicts‡	**Protected Bicycle Lane**
≤ 10 mph	Less relevant	No centerline, or single lane one-way	Pedestrians share the roadway	**Shared Street**
≤ 20 mph	≤ 1,000 – 2,000		< 50 motor vehicles per hour in the peak direction at peak hour	**Bicycle Boulevard**
≤ 25 mph	≤ 500 – 1,500			
	≤ 1,500 – 3,000	Single lane each direction, or single lane one-way	Low curbside activity, or low congestion pressure	**Conventional or Buffered Bicycle Lane, or Protected Bicycle Lane**
	≤ 3,000 – 6,000			**Buffered or Protected Bicycle Lane**
	Greater than 6,000			**Protected Bicycle Lane**
	Any	Multiple lanes per direction		
Greater than 26 mph†	≤ 6,000	Single lane each direction	Low curbside activity, or low congestion pressure	**Protected Bicycle Lane, or Reduce Speed**
		Multiple lanes per direction		**Protected Bicycle Lane, or Reduce to Single Lane & Reduce Speed**
	Greater than 6,000	*Any*	*Any*	**Protected Bicycle Lane**
High-speed limited access roadways, natural corridors, or geographic edge conditions with limited conflicts		*Any*	High pedestrian volume	**Bike Path with Separate Walkway or Protected Bicycle Lane**
			Low pedestrian volume	**Shared-Use Path or Protected Bicycle Lane**

Source: NACTO

About the author

The author has a PhD in Biology from the University of California, San Diego. He is a retired researcher who conducted basic science and clinical studies for the development and validation of cancer diagnostics. He is a former traffic commissioner from the City of Carlsbad, CA, who has dealt with transportation issues in San Diego County for over 14 years.

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Case report showing elevated bicycle crashes and injuries in a separated bikeway in Encinitas, California

Steven P. Linke, PhD; Ron Medak, MD; and Serge Issakov

ABSTRACT

There is substantial inconclusive and contradictory information published on the alleged safety of separated bikeways. This report is an investigation of crashes on a South Coast Highway 101 corridor in the southern part of Encinitas, California. A "before-after" analysis of police report and emergency medical services data showed that crashes increased by 59% after conversion of a portion of the roadway to a separated bikeway configuration, seemingly due mainly to the vertical components and reduced space to maneuver. In contrast, no meaningful change in crash numbers occurred in an adjacent control corridor during the same time periods. Although no bicycle counts were collected by the city to assess crash rates, data from adjacent areas indicated that the increased crashes were largely not attributable to increased volumes. Additional crash data collected using crowdsourcing during the "after" time period further highlighted separated bikeway hazards. The combined police report, emergency medical services, and crowdsourced crash data included a fatality and numerous severe injuries attributable to the separated bikeway infrastructure. In addition, the crash data showed that reliance on police report data alone is likely to miss a majority of crashes, particularly in separated bikeways. Although this report addresses only one separated bikeway and control corridor, when considered in combination with other published observations, it raises serious concerns about the actual safety of separated bikeways.

INTRODUCTION

Over the past couple of decades, there has been an accelerating movement in transportation planning to separate bicyclists from motorists by creating bikeways with vertical components, such as flexible post delineators, wheel stops, curbs/medians, parked cars, etc. In California, these are legally called "Class IV separated bikeways," but they also are known as "separated bicycle lanes," "cycle tracks," or "protected bicycle lanes." The rationale is that they may increase ridership due to an increased perception of safety, and that they also may increase actual safety.[1]

Based largely on a 2023 self-published report,[2,3] the Federal Highway Administration (FHWA) is now claiming that such separated bikeways are established as "proven safety countermeasures" that "reduce crashes by up to 53%."[4,5] In addition, the National Association of City Transportation Officials (NACTO) is now claiming that separated bikeways are "appropriate for all streets in all contexts."[6] However, there is substantial countervailing evidence that crashes are likely to increase with vehicles at intersections on

separated bikeway corridors and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout such corridors, which could lead to net increases in crashes and injury severity.[7]

The 2023 FHWA report and other studies reporting separated bikeway safety tend to exhibit remarkable limitations, including weak study designs, small sample sizes/lack of statistical significance, unreliable bicycle counts, insufficient accounting for confounding variables, exclusion of a majority of crashes (e.g., those that occur at and around intersections and those not involving moving motor vehicles), etc. The findings have been largely inconclusive or contradictory between studies.[7]

Over the past few years in the north coastal region of San Diego County, California, there have been at least three widely reported fatal crashes in separated bikeways, and evidence indicates that the separated bikeway components themselves (plastic post delineators and wheel stops) were primary causes.

1. On November 28, 2020, a bicyclist was killed in the westbound separated bikeway on Leucadia Boulevard at Moonstone Court in Encinitas, when he struck the side of a right-turning truck (right hook crash).[8] The City of Encinitas eventually removed some of the plastic posts in the area and settled a lawsuit that alleged[9]:

   > [These] dangerous conditions created a trap that a reasonably careful person would not notice or anticipate as being dangerous, since the lack of dashed lines, and presence of bollards/stanchions created a false sense of safety while operating a bicycle in the bikeway while at the same time, depriving automobiles adequate opportunity to merge into the bikeway to turn right onto Moonstone Court.

2. On March 17, 2024, a bicyclist was killed in the northbound separated bikeway near the 2800 block of South Coast Highway 101 in Encinitas.[10,11] Official police records indicate that there was no vehicle involvement, but that the bicyclist had collided with a fixed object (California Crash Reporting System[12] Collision ID 4622805). Images of the crash site show that it was adjacent to plastic post delineators and wheel stops.

3. On October 12, 2024, a bicyclist was killed in the northbound separated bikeway near the 1900 block of Jimmy Durante Parkway in Del Mar.[13,14] The City of Del Mar eventually removed some of the plastic posts in the area, presumably because they were suspected of causing the crash.

Just since 2024, there have been several other reports of bicyclist fatalities and severe injuries in separated bikeways across North America, for example, two fatalities in Cambridge, Massachusetts,[15] a life-altering traumatic brain injury in Seattle, Washington,[16] and a hospitalization in Montreal, Canada.[17] In each of these cases, the vertical components (plastic posts, curbs, and/or parked vehicles) appear to have contributed to the vehicle drivers (typically in larger SUVs or trucks) being unaware of the bicyclists traveling in the same direction (blind spot), and to the bicyclists being unaware that the right turns were happening until it was too late—virtually identical to the “right hook crash” on Leucadia Boulevard in

Encinitas. The Seattle crash also led to a lawsuit against the city for the dangerous separated bikeway design,[16] and the legal status is unknown in the other cities.

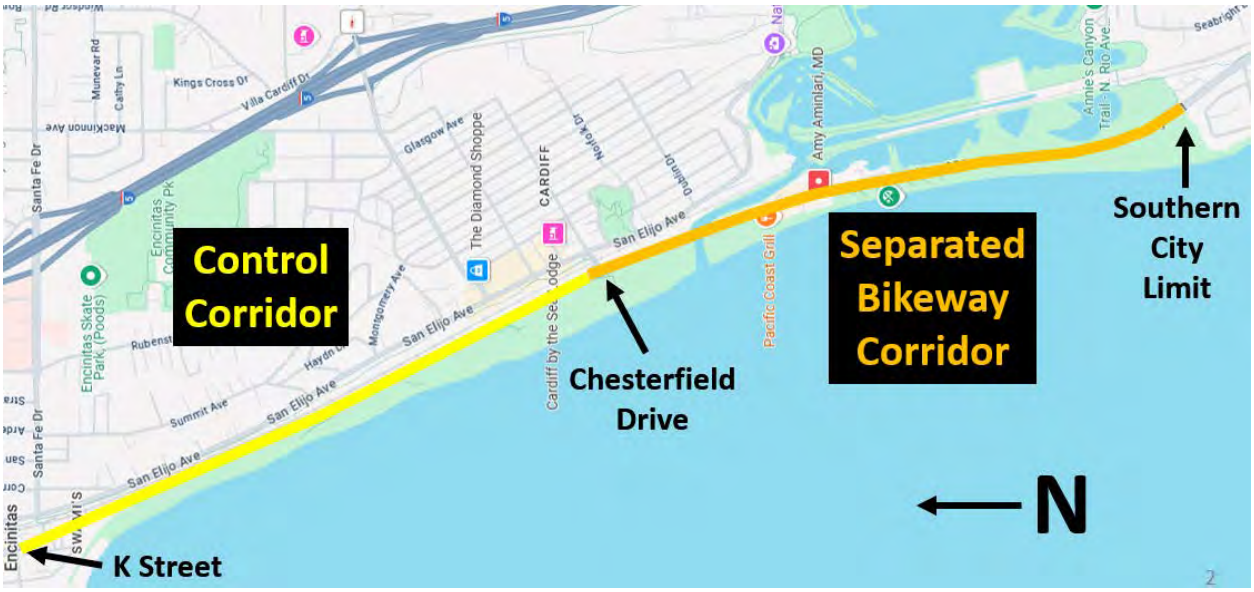
In the South Coast Highway 101 bikeway, along with the fatality described above, bicyclists have been reporting many other crashes, which were either directly or indirectly caused by the vertical components, and several have resulted in serious injuries. The intent of this case report is to assess the crash history of this bikeway.

RESULTS

Street corridors

The "separated bikeway corridor," which is the subject of this report is the approximately 1.3-mile portion of South Coast Highway 101 stretching from the southern city limit of Encinitas (at its border with Solana Beach) up to and including the Chesterfield Drive intersection (Figure 1, orange line). The vertical components include plastic delineator posts and wheel stops. In addition, an approximately 1.4-mile "control corridor" includes the portion of South Coast Highway immediately north of the separated bikeway corridor, stretching from north of Chesterfield Drive up to and including the K Street intersection (Figure 1, yellow line).

Figure 1. Study corridors: Separated Bikeway Corridor (orange) and Control Corridor (yellow).



Official crash data

Official crash data were first collected from the online California Highway Patrol's "California Crash Reporting System" (CCRS) database, which compiles local police reports.[12] However, it is well-known that this under-reports bicycle crashes, particularly those that do not involve motor vehicles and/or that occur off-roadway (separated bikeways are legally off-roadway).[7] Therefore, additional official crash data

were obtained from the Encinitas Fire & Marine Safety Department's emergency medical service (EMS) dispatch logs.

All crash data were filtered for location on the corridors and to include only bicycle-involved incidents. Some crashes were only present in the CCRS database, some were only present in the EMS database, and some appeared in both. Table 1 demonstrates this in a subset of the analyzed crashes that occurred in 2021 through 2022.

Table 1. Official crash data sample (2021 through 2022).

Approximate Collision Date/Time	CCRS Collision_Id	EMS Incident Number
1/17/2021 16:56		2021-004912
4/21/2021 11:28		2021-030639
8/14/2021 0:44		2021-064176
9/6/2021 15:46		2021-071020
10/5/2021 16:08	2873756	
10/9/2021 13:45	2873754	2021-080645
1/14/2022 17:06	2627295	
8/12/2022 17:32		2022-064746
8/27/2022 7:52	2686951	
9/1/2022 18:03	2694444	2022-070711
11/16/2022 11:56		2022-092716

Longitudinal (before-after) approach

The wheel stops creating the separated bikeway were installed by April 2020, and CCRS data was available through December 2024. Therefore, equal 57-month analysis periods before (July 2015 through March 2020) and after (April 2020 through December 2024) conversion to the separated bikeway were compared. This "longitudinal" approach (crashes before and after on the same roadway) minimizes contamination with potentially confounding variables relative to a "cross-sectional" approach (crashes on different roadways compared during the same time period). Confounding variables in this context are differences in roadways other than the bikeway separation that could contribute to crashes.

Large increase in crashes after separated bikeway conversion

Table 2 shows the "before" and "after" bicycle-involved crash numbers for both the separated bikeway and control corridors. When only the police report-based crashes (CCRS database) are considered for the separated bikeway corridor, there were only 7 crashes before conversion and 10 crashes after (little meaningful difference). However, the EMS dispatch logs add an additional 27 crashes that did not generate police reports. In total, there were 17 crashes in the separated bikeway corridor reported in these official records before conversion, and 27 after conversion, representing a 59% increase.

In contrast, the control segment had 14 total crashes before and 13 after (no meaningful difference). Unfortunately, the City of Encinitas did not collect any bicycle counts in these corridors either before or after conversion of the bikeway. Therefore, it is impossible to compare crash "rates" that could have accounted for possible changes in volume. However, the inclusion of the control corridor data helps control for bicycle volumes and other factors that may have changed between the "before" and "after" time periods.

Table 2. Crash numbers before and after separated bikeway conversion. The numbers are split into crashes that appeared only in the CCRS database, only in the EMS dispatch logs, or both.

	Only CCRS	Both	Only EMS	Total	Change
Separated Bikeway Corridor (Southern City Limit to Chesterfield Drive)					
Before	2	5	10	**17**	
After	5	5	17	**27**	**59% increase**
Control Corridor (North of Chesterfield Drive to K Street)					
Before	3	3	8	**14**	
After	2	1	10	**13**	

EMS data demonstrates significant under-reporting of bicycle crashes in police reports

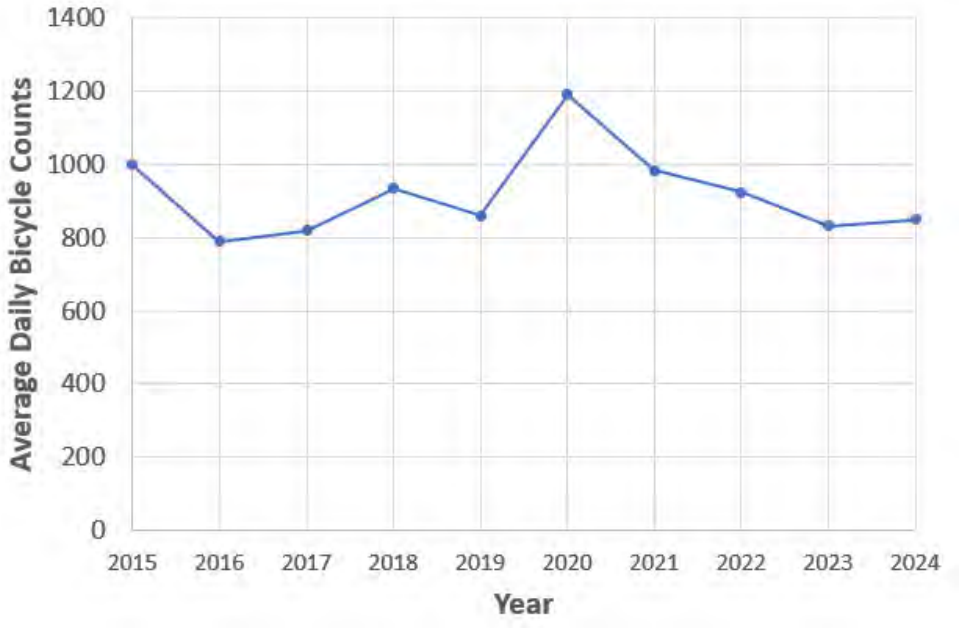
It is remarkable that 63% (45 of 72) of the total crashes in both corridors were recorded only in the EMS dispatch logs—no police reports generated for them to appear in the CCRS database, despite the fact that the injuries were severe enough to call for emergency assistance.

Bicycle volume data

Although the City of Encinitas has collected no bicycle counts in the separated bikeway corridor itself, the San Diego County Association of Governments (SANDAG) has a continuous automated bicycle counter located in Solana Beach at the intersection of South Coast Highway 101 and Lomas Santa Fe Drive (about 0.7 miles south of the separated bikeway).

Apart from a modest temporary increase in 2020 during the pandemic, bicycle counts remained relatively stable on South Coast Highway 101 over the course of the analysis period (Figure 2). Cumulative bicycle traffic was about 7% higher in the after period relative to the before period at the SANDAG counter, which would not account for the 59% increase in crashes in the separated bikeway corridor.

Figure 2. Average daily bicycle counts: Counts obtained from the SANDAG "Coast Highway & Coastal Rail Trail" continuous bicycle counter.



Exploratory analysis of crowdsourced crash data (101 Crash List)

Since conversion of the South Coast Highway 101 corridor to a separated bikeway, Serge Issakov has maintained a "crowdsourced" crash list (101 Crash List) compiled from reports from victims, family members or friends of the victims, or eyewitnesses.[18] From April 2020 through May 2025, there were 37 crashes added to the list, 10 of which also appeared in the CCRS database and/or EMS dispatch logs. Table 3 includes a sampling of the crashes from 2021 through 2022 side-by-side with the CCRS and EMS crashes, giving credence to the crowdsourcing approach.

Table 3. Crowdsourced "101 Crash List" sample (2021 through 2022).

Approximate Collision Date/Time	CCRS Collision_Id	EMS Incident Number	101 Crash List
1/17/2021 16:56		2021-004912	
4/21/2021 11:28		2021-030639	
7/13/2021			✓
8/14/2021 0:44		2021-064176	
9/6/2021 15:46		2021-071020	✓
10/5/2021 16:08	2873756		✓
10/9/2021 13:45	2873754	2021-080645	
1/14/2022 17:06	2627295		
3/23/2022			✓
7/16/2022			✓
8/12/2022 17:32		2022-064746	
8/27/2022 7:52	2686951		✓
9/1/2022 18:03	2694444	2022-070711	
11/16/2022 11:56		2022-092716	

101 Crash List crashes directly attributable to the bikeway

Based on information from the victims or eyewitnesses, it was determined that a minimum of 19 of the crashes on the 101 Crash List could be directly attributed to the existence of the vertical components of the bikeway (e.g., solo crashes from directly hitting a plastic post or wheel stop, or as a result of the inability to conduct an avoidance maneuver). Among these 19 crashes, 16 did not appear in either the CCRS or EMS crash lists, and 10 of those resulted in visible or worse injuries, further demonstrating that even the combined CCRS and EMS crash data does not fully capture all bicyclist injuries, let alone all bicyclist crashes.

Recent individual case reports (supplemental data)

It is also important to note that the crashes and injuries are happening to both experienced/vehicular bicyclists, as well as more casual/recreational bicyclists. Below are 8 example individual case reports.

On May 3rd, 2020, two different children under the age of 16 hit wheel stops, and one of them was thrown into the #2 vehicle lane.

On May 26th, 2020, experienced randonneur "Len" hit a wheel stop trying to avoid surfers and suffered fractures.

On March 13th, 2025, bicycle commuter "Annie" was forced to ride in the #2 vehicle lane, because there were pedestrians in the cycle track. She was crowded by a close-passing car and attempted to re-enter the cycle track, struck a wheel stop, and damaged her bike.

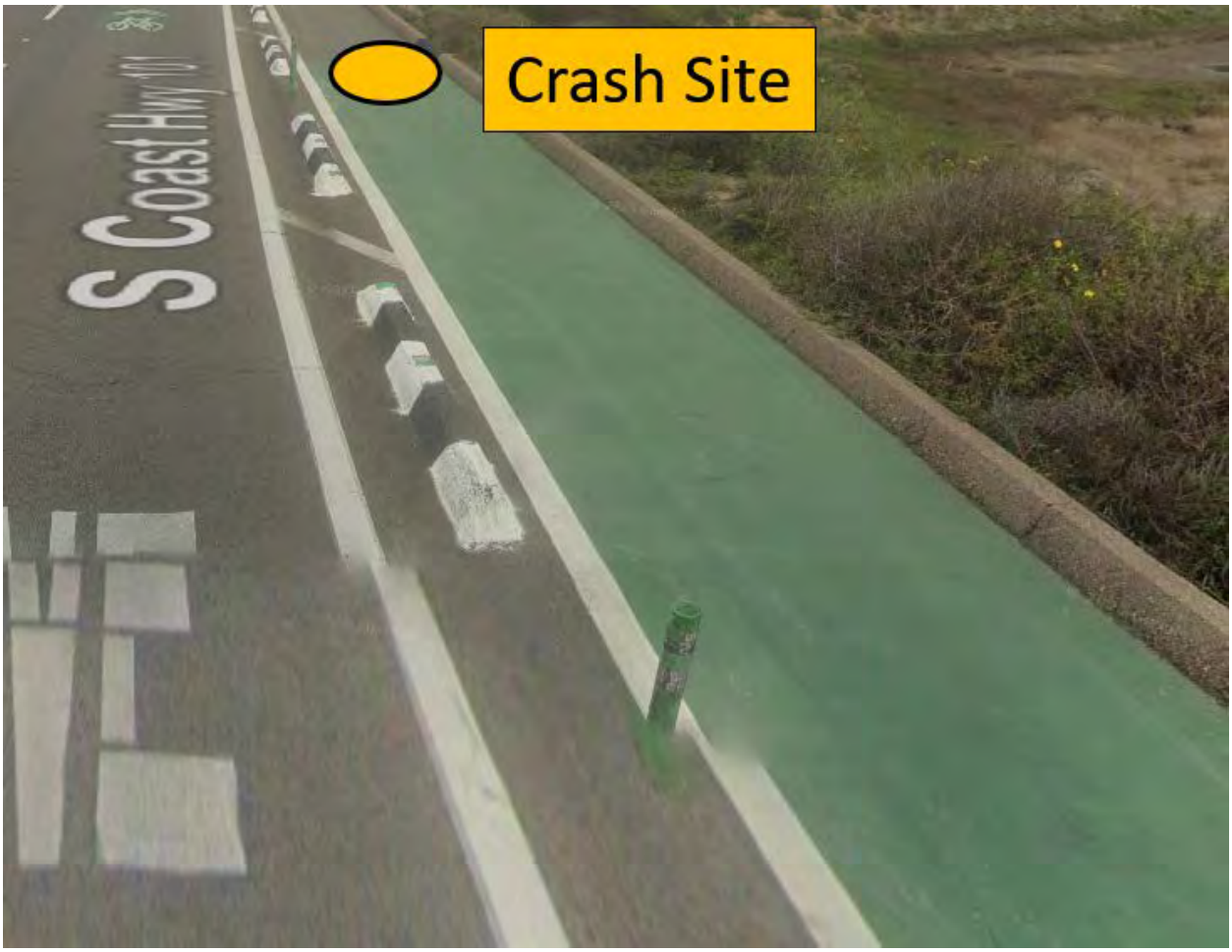
On May 11th, 2025, casual e-bicyclist “Priscilla” lost control in sand, swerved left, and fell, hitting her head on a wheel stop. She suffered a concussion, multiple scrapes, and EMS was dispatched and took her to the hospital.

On August 14th, 2023, experienced bicyclist “Fred” collided with a wheel stop, fell, and hit his head.

On October 5th, 2024, experienced bicyclist “Ken,” acting as sweeper for a local recreational cycle club ride, hit a plastic post, crashed, and broke his clavicle and five ribs. He also had a concussion and brain bleed and was taken to the hospital unconscious.

On April 29th, 2025, experienced bicyclist “Herb” hit a plastic post and wheel stop, crashed, and suffered a concussion. EMS was dispatched and took him to the hospital.

On March 17, 2024, USMC Captain “Ryan” was killed at the location shown below near the northbound entrance at the southern city limit.[10] The police report determined the cause to be a collision with a fixed object, presumably a wheel stop, a plastic post, or the curb.[12]



DISCUSSION

The primary finding in this report was the 59% increase in crashes in the South Coast Highway 101 separated bikeway corridor in the 57-month period after its conversion compared to the 57-month period before. This longitudinal (before-after) approach is superior to a cross-sectional approach to minimize potential confounders. Another strength of this report is the inclusion of before-after data from the contiguous, very similar, control corridor.

The main limitation is the fact that this is a case report of a single separated bikeway corridor, so it is not possible to make any broad statistical conclusions, although that was not a goal. Another limitation is the fact that the City of Encinitas did not collect any bicycle count (exposure) data to account for possible changes in ridership. However, the stable bicycle counts observed directly south of the studied bikeway, as well as the stable crash numbers observed in the control corridor directly north, are strongly

indicative that bicycle counts did not change considerably in the separated bikeway corridor in the before vs. after time periods—at least not enough to account for the 59% increase in crashes. In addition, there is substantial evidence that many of the crashes were directly or indirectly caused by the vertical components themselves, which could not have occurred but for the conversion to a separated bikeway.

Although the crowdsourced data was not available in the before time period, and because it could not be collected in a uniform manner for all crashes, it is considered exploratory. However, the data was thoroughly documented and corroborated, and it provides valuable, complementary information, as described below.

A potential minor limitation of this report is the fact that the construction of the separated bikeway occurred over a few months, so a few crashes with vertical components occurred before all vertical components had been installed. Also, a two-way cycle track was added to part of the control corridor in 2023, but the main roadway with its standard bicycle lanes, remained in operation, and there is not enough data yet to assess the safety of the cycle track.

This report highlights the fact that police report crash data, while critically important in any crash report/study, is far from comprehensive. When considered in the context of EMS dispatch logs, the police report data missed a majority of the crashes (63% of officially reported crashes appeared only in the EMS data). Even the combination of these two official data sources was far from complete, though. Crashes compiled through crowdsourcing overlapped to an extent with the official sources but also included many unique crashes, typically solo incidents.

It is not surprising that solo bicycle crashes would not appear in police reports, because police reports are heavily focused on motor vehicle-involved crashes. However, several of the solo events led to injuries and did not appear in the EMS logs either. While minor (visible) injuries would not necessarily lead to an EMS call, some were more severe, but the victims used alternative means to get medical attention, so these injury crashes did not appear in either official source. Researchers in other studies have analyzed records for emergency department visits and hospitalizations, which could help capture these additional crashes without relying on crowdsourcing. That was beyond the scope of this report, but studies likely need to include all of these sources to be comprehensive.

In conclusion, despite substantial marketing on the alleged safety of separated bikeways, there seem to be many contexts in which their installation makes conditions more hazardous for bicyclists, as demonstrated in this report and discussed in detail elsewhere.[7] Further, this report confirms the need to assess crashes more comprehensively to reach safety conclusions. Police report data alone and data that fails to account for solo bicyclist, off-road, or intersection crashes is not sufficient to make definitive conclusions on safety. Future separated bikeway studies should focus on before-after results with accurate and complete bicycle exposure and crash data, and local decision-makers should proceed with extreme caution when considering installations.

DETAILED METHODS

Street corridor characteristics

Separated bikeway corridor. Generally, there are two vehicle drive-lanes going in each direction (outside lane 11 feet wide, inside lane 10 feet wide) with single one-way bikeways on each side (7 feet of rideable width with 3-foot buffers from vehicles), along with a 5-foot sidewalk on the far west side. In areas with parking, there is also an 8-foot parking lane on the west side with a 2-foot buffer from the drive lane. Black wheel stops with white strips and green plastic delineator posts were installed in the 3-foot bicycle buffer between about February and May 2020. The wheel stops are generally about 10 feet long with 10-foot gaps between, and the plastic delineators are generally installed in every other wheel stop gap. Prior to conversion, generally, there were 5-foot unbuffered bicycle lanes.

Control corridor. Generally, there are one or two vehicle drive lanes going in each direction with 5-foot unbuffered bicycle lanes. In 2023, a two-way cycle track was installed on the west side, but the main configuration remained. Insufficient time has elapsed to assess its safety impacts.

Intersections. All intersections within the corridors were included, and areas within 250 feet of the bounding Chesterfield Drive and K Street intersections were included, consistent with industry standards.

Bicycle counts

Bicycle counts were obtained from the SANDAG Open Data Portal,[19] based on an automated in-pavement Eco Counter Zelt Evo at the "Coast Highway & Coastal Rail Trail" location (near the intersection of Coast Highway and Lomas Santa Fe Drive), about 0.7 miles south of the Cardiff cycle track.

Crash data

California Crash Reporting System (CCRS) database. The most recent ten years of crash records in the State of California are publicly available from the California Highway Patrol's California Crash Reporting System (CCRS) through the California Open Data Portal.[12] This database was formerly known as the Statewide Integrated Traffic Records System (SWITRS). The years 2015 through 2024 were available for download at the time this study was conducted (March 2025), and there are three comma-separated value (CSV) files for each year that can be linked with a "CollisionId" field common to each file: Crashes (crash details), Parties (parties involved in the crashes), and InjuredWitnessPassengers (numbers and severities of injuries). Note that data from 2023 and 2024 are considered "provisional."

The Crash files were first filtered for "City Name" = "Encinitas" and combined into one master database for all years. Second, the database was filtered for all collisions that occurred on Coast Highway 101 as the "PrimaryRoad" (this was a manual process, because there were several spelling variations. Third, the specific locations of the collisions along Coast Highway 101 were determined by using the block numbers, or by using distance ("SecondaryDistance") and direction ("SecondaryDistance") from the listed cross-streets ("SecondaryRoad").

Emergency Medical Services (EMS) dispatch logs. EMS dispatch logs, filtered for location and bicycle involvement, were obtained from the Encinitas Fire & Marine Safety Department for both the main study area and the control area for 2015 through 2024. Injuries for dispatches that resulted in transport to a hospital were assumed to be severe, and all others were assumed to be non-severe. Note that one crash was excluded, because a police report definitively established that it was a solo motor vehicle incident.

101 Crash List

The 101 Crash List is crowdsourced in chronological order based on information about crashes provided to Mr. Issakov by the victims themselves, family members or friends of the victims, or eyewitnesses. The information was transmitted in person; via email, text or phone; or on social media (e.g,, Facebook). Social media posts that could not be independently corroborated were excluded. Injury severity was assessed by Dr. Medak based on the accounts as complaint of pain/probable, visible/minor, or severe/serious.

ABOUT THE AUTHORS

Dr. Steven Linke, PhD (corresponding author: splinke@gmail.com), is a retired scientist and former traffic commissioner for the City of Carlsbad, California.

Dr. Ron Medak, MD, is a physician and traffic commissioner for the City of Encinitas, California.

Serge Issakov is a lifelong cyclist who has been actively advocating for more and safer cycling for more than 20 years. He is a board member of the San Diego Bicycle Club, the San Diego County Bicycle Coalition and the California Association of Bicycling Organizations. He is also a League (of American Bicyclists) Certified Instructor, a ride leader, and a former member of the San Diego Mobility Board.

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From: Pam Heatherington San Diego
To: Clerk of the Board
Subject: Comments on Draft RTP 2025
Date: Wednesday, July 16, 2025 9:45:17 AM

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RE: Comment on 2025 Regional Plan – Protect Biodiversity, Advance Equity, and Prioritize Transit Over Freeways

Dear SANDAG Board of Directors,

Thank you for the opportunity to comment on the Draft 2025 Regional Plan. While we appreciate the inclusion of certain rail, bike, and pedestrian improvements, the Plan falls short of delivering the transformative vision our region urgently needs. San Diego deserves a transportation system that protects our globally significant biodiversity, reduces greenhouse gas emissions, and centers public transit as a tool for equity and climate resilience—not sprawl and car dependence.

We are deeply concerned that the 2025 RP **removes the regional habitat conservation funding** included in the 2021 plan. This funding is essential to protect the region's native wildlife, endangered species, and natural lands. San Diego is a global biodiversity hotspot, and SANDAG must take a leadership role in preserving this natural legacy. Moreover, the plan lacks basic environmental safeguards: there are **no conditions to avoid sensitive habitats, protect wildlife corridors, or control invasive species**. Several planned freeway and rail expansion projects—such as the LOSSAN double-tracking through Carroll Canyon and freeway expansion over Rose Canyon—threaten these irreplaceable ecosystems.

Equally troubling is the continued **prioritization of freeway and managed lane projects**, many of which incentivize sprawl and benefit single-occupancy vehicle drivers at the expense of meaningful climate action. The Plan includes **61 freeway and road projects** by 2035 totaling **$10.84 billion**, compared to just **6 rail projects** during the same time period. Many of these "managed lanes" provide paid FasTrak access that undermines carpooling and slows buses—especially egregious given that some freeways slated for managed lanes have **no express bus service planned**.

Worse still, the 2025 RP **downgrades or removes critical public transit projects** from the previous plan—like the Purple Line commuter rail and direct downtown connections to the U.S.-Mexico border and El Cajon—while failing to deliver a **rail link to the airport**. We urge you to restore these projects and ensure that transit, not cars, leads regional mobility planning.

We also endorse the **People's Platform from RIDE SD**, a community-driven vision that SANDAG must embrace. This includes:

- 7½-minute trolley frequencies across all lines by 2029
- 10-minute peak and 15-minute weekend service on top bus routes
- Clock-face Coaster and 15-minute Sprinter service
- Countywide all-door boarding and upgraded PRONTO
- Permanent Youth Opportunity Pass funding
- Transit signal priority at 250+ intersections
- 100 miles of protected, enforced bus-only lanes
- Real-time public accountability and performance metrics

These are realistic, data-backed solutions that would create a **transit-first system** centered on equity, accessibility, and climate action.

We urge SANDAG to revise the 2025 RP to restore habitat funding and biodiversity protections, cancel sprawl-inducing freeway expansions, and fully embrace a bold, transit-centered future for San Diego County. Our region, our climate, and our most vulnerable communities cannot afford another decade of delay.

Sincerely,
Pamela Heatherington

Pamela Heatherington
Board of Directors
Environmental Center of San Diego
The environment is the foundation for all living things. Please act accordingly.

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: A Letter From A North County Grandma
Date: Wednesday, July 16, 2025 1:48:26 PM

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Lesa Heebner
- Mayor, City of Solana Beach
- Chair, SANDAG Board of Directors

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Begin forwarded message:

From: Nirmala Singaracharlu <noreply@adv.actionnetwork.org>
Subject: A Letter From A North County Grandma
Date: July 16, 2025 at 1:42:58 PM PDT
To: lheebner@cosb.org
Reply-To: nsingaracharlu@gmail.com

CAUTION: External e-mail. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Chair Lesa Heebner,

I'm writing to you as a San Diegan, now in my older years, with a heart full of worry and hope. I've watched this region grow over decades. I've seen neighborhoods thrive—and I've seen how easily we can lose our way when decisions are made that leave people behind.

I may be old, but I still walk these streets. I still ride the bus. I still care deeply about the kind of world we're leaving to our children and grandchildren. And I am begging you, truly begging you, to do better with this Regional Plan.

We are facing a climate crisis. So many in our community—seniors like me, young people, working families—depend on transit that simply isn't there when they need it. Meanwhile, we continue to pour billions into widening freeways, as though that's ever solved anything. It hasn't. It's only made things harder for the very people this plan is supposed to serve.

Please listen: we need a system that's built for people, not just cars. A system where a young person can get to school or work safely and quickly, where a mom with a stroller doesn't have to wait 30 minutes for a bus that never comes, where someone like me can still live an independent life without relying on a car I can no longer drive.

The 10 demands from the People's Platform of San Diego are not extravagant. They're what any caring, forward-thinking region should already be doing:
• 7½-minute trolley service everywhere by 2029
• Reliable buses every 10 minutes during peak, 15 minutes on weekends
• Predictable train schedules and major upgrades for COASTER and SPRINTER
• Easy all-door boarding on every MTS and NCTD bus
• A PRONTO system that works, with tap-to-pay and student passes
• Youth Opportunity Passes made permanent
• Traffic lights that give priority to buses in the places people need them most
• 100 miles of safe, protected, camera-enforced bus lanes
• A real, connected bike-share program across the county
• A transparent public dashboard that shows how transit is really doing

None of this is radical. It's basic. It's decent. And it's what this beautiful place we all call home deserves.

Please—I'm asking with all the sincerity I have left—don't waste another four years. Don't lock us into more car-dependence, more emissions, more heartbreak. You still have time to do the right thing.

I'm begging you. Please, adopt the 10 demands and give San Diego a future we can be proud of.

Nirmala Singaracharlu
nsingaracharlu@gmail.com
[redacted]
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt a Just Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:36:54 AM

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Begin forwarded message:

From: Megan Nguyen <noreply@adv.actionnetwork.org>
Subject: Adopt a Just Transit-First Regional Plan
Date: July 15, 2025 at 8:57:23 PM PDT
To: lheebner@cosb.org
Reply-To: mroohoohyay@gmail.com

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Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

My name is Megan Nguyen and I am a 7th grader at Pacific Beach Middle School. Public transit has been so vital for me to get around, especially as a person who is not yet eligible to drive, and it serves as a way to travel with a lower carbon footprint.

The 2025 Regional Plan, however, does not reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. The current plan set fuels freeway expansions (50% of GHG emissions comes from transportation!) while underinvesting in public transit, walkability, and bike infrastructure. This plan ignores the needs of the people it is supposed to serve, and undermine's San Diego's climate goals.

In particular, I ask for permanent funding for Youth Opportunity Passes beyond 2026. Transportation is a human right. I know many others who rely on public transit, people with schools where the majority of kids use the trolley. Many people using public transit are low-income, therefore free transportation is vital.

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Prioritize climate justice and build the system this region needs.

Megan Nguyen
mroohoohyay@gmail.com
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:36:40 AM

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Begin forwarded message:

From: Ashley Mayorga <noreply@adv.actionnetwork.org>
Subject: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: July 15, 2025 at 8:06:04 PM PDT
To: lheebner@cosb.org
Reply-To: ximenashley@icloud.com

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Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

Countywide all-door boarding on every MTS and NCTD bus

A rebuilt PRONTO system with tap-to-pay and student pass access by 2026

Permanent funding for Youth Opportunity Passes beyond 2026

Transit Signal Priority at over 250 intersections in high-ridership, equity-focused corridors

100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Ashley Mayorga

ximenashley@icloud.com
[redacted]
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:36:25 AM

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From: Sofia Carrasco <noreply@adv.actionnetwork.org>
Subject: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: July 15, 2025 at 8:01:28 PM PDT
To: lheebner@cosb.org
Reply-To: Sofster3579@gmail.com

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Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Best,

Sofia Carrasco
Youth v. Oil Intern

Sofia Carrasco
Sofster3579@gmail.com
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:36:13 AM

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From: Kesav Gupta <noreply@adv.actionnetwork.org>
Subject: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: July 15, 2025 at 7:50:19 PM PDT
To: lheebner@cosb.org
Reply-To: kesav.guptanyc@gmail.com

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Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Kesav Gupta

kesav.guptanyc@gmail.com
[redacted]
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:37:03 AM

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Begin forwarded message:

From: BRUCE NGUYEN <noreply@adv.actionnetwork.org>
Subject: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: July 15, 2025 at 9:41:36 PM PDT
To: lheebner@cosb.org
Reply-To: BRUCENGUYENOD@GMAIL.COM

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Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

DR BRUCE NGUYEN OD

BRUCE NGUYEN
BRUCENGUYENOD@GMAIL.COM
[redacted]
[redacted]

Chair Lesa Heebner,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Dev Gupta
devguptapb@gmail.com
[redacted]
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Stop Ignoring Us. Fix the Plan.
Date: Wednesday, July 16, 2025 10:36:31 AM

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Begin forwarded message:

From: Frank Carasco <noreply@adv.actionnetwork.org>
Subject: Stop Ignoring Us. Fix the Plan.
Date: July 15, 2025 at 8:05:11 PM PDT
To: lheebner@cosb.org
Reply-To: sidixi2410@lhory.com

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Chair Lesa Heebner,

To the SANDAG Board and Planning Staff,

This draft Regional Plan is unacceptable. It fails the moment we needed it most. While our region faces intersecting climate, mobility, and racial equity crises, SANDAG continues to double down on the same car-centric, freeway-first approach that created these problems in the first place. Funding more highway expansions—under the misleading guise of "managed lanes"—is not just negligent, it's indefensible.

Every dollar you pour into roads is a dollar stolen from the future. You are locking us into decades of emissions, sprawl, traffic deaths, and segregation while pretending this is progress. Do you understand how angry people are? How tired we are of your empty climate promises and performative equity rhetoric, only to see another budget stacked with road widenings?

Stop pretending we can have it both ways. We can't meet climate goals while expanding freeways. We can't fix transit without making real investments. We can't claim equity while forcing working-class San Diegans to spend hours on broken, infrequent bus lines because you refuse to fund real alternatives.

The People's Platform demands are not radical. They are the bare minimum. You've had years to act. We've shown up at meetings. We've written letters. We've sat through your planning documents and performance dashboards. And still, you keep building for cars instead of people. Enough.

Adopt all 10 demands. Not later. Now.
• Systemwide 7½-minute trolley service by 2029
• 10-minute peak and 15-minute weekend bus service on top routes
• Clock-face COASTER and SPRINTER with full upgrades
• All-door boarding across MTS and NCTD
• A rebuilt PRONTO with student access and tap-to-pay
• Permanent Youth Opportunity Pass funding
• Transit signal priority on 250+ intersections
• 100 miles of protected, camera-enforced bus-only lanes
• A real countywide bike-share network
• A public, transparent transit performance dashboard

Stop hiding behind studies and excuses. Start building the system we actually need. You are running out of time, and we are running out of patience.

Fix this plan. Or get out of the way.

—Frank

Frank Carasco
sidixi2410@lhory.com
[redacted]

From: Lesa Heebner
To: Francesca Webb
Subject: Fwd: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: Wednesday, July 16, 2025 10:36:18 AM

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Lesa Heebner
- Mayor, City of Solana Beach
- Chair, SANDAG Board of Directors

**Please sign up for the Weekly Newsletter here!

Please note that our email communications are subject to public disclosure.

Begin forwarded message:

From: McGarrah Wilson <noreply@adv.actionnetwork.org>
Subject: Adopt the 10 Demands for a Just, Transit-First Regional Plan
Date: July 15, 2025 at 7:58:46 PM PDT
To: lheebner@cosb.org
Reply-To: mcgarrah8@yahoo.com

CAUTION: External e-mail. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Chair Lesa Heebner,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

Countywide all-door boarding on every MTS and NCTD bus

A rebuilt PRONTO system with tap-to-pay and student pass access by 2026

Permanent funding for Youth Opportunity Passes beyond 2026

Transit Signal Priority at over 250 intersections in high-ridership, equity-focused corridors

100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

McGarrah Wilson

mcgarrah8@yahoo.com
[redacted]
[redacted]

Table J6.2: Voicemail-Sourced Public Comments

ID	Commenter Name	Agency or Organization	Comment
V001	Tom Lichterman	Oceanside Bicycle and Pedestrian Committee	Hello. My name is Tom Lichterman. I'm the chairman of the Ocean Side Bicycle and Pedestrian Committee. I'd like to get some more information about some of the specific projects that are listed in the Appendix A for active transportation. The project IDs and the project descriptions are pretty cryptic, and it's hard to know exactly what it is that's actually proposed for those. Could someone give me a call back at-[redacted]? Thank you. Bye-bye.
V002	Robin Rabins	n/a	Hello, good morning, my name is Robin Rabins, and I have contacted SANDAG a couple of times. I did go to a planning meeting with SANDAG where you were trying to make our area more green. I live in the community of Hidden Meadows, my address is[redacted], Escondido, [redacted]. And currently, the closest public transportation that we have from the community that I live in, Hidden Meadows, is approximately eight miles to a public transportation hub. And there are a lot of people in our community who are non-drivers. There's 4,000 people in our community. We don't have access to any public parks or anything that a lot of normal activities for people who live in a large community would have access to. Therefore, I ask if we could have a van come to our community and give transportation to a transportation hub so we are not left transportationless. Again, my name is Robin Rabins. I can be contacted at [redacted] or via phone [redacted]. Thank you."

Table J6.3: Website-Sourced Public Comments

ID	Commenter Name	Agency or Organization	Comment
S0001	n/a	n/a	Increased frequency on bus route 923
S0002.A	n/a	n/a	Need more service on weekends. Most riders are low income and work on weekends. Service and connections are horrible.
S0002.B	n/a	n/a	If you do bike lanes you have to think about parking. You could put bike lanes on one side of road vs taking parking from both sides. There should be a crosswalk near every bus stop. You should not have to cross two streets.
S0003	n/a	n/a	If you don't have more trains available during the day to and from North County to San Diego, you won't have more riders. Train frequency is the key. Also, transportation options should be for North County and not just the City of San Diego. Very few people up here can really ride their bikes to work or even the grocery store and errands. I feel your priorities do not include us in the North County. Please look for solutions to get people out of their cars who cannot take a bicycle or walk ... especially in North County. Your bus lines take WAY WAY WAY too long, making them extremely inefficient. Your trains are spaced too far apart during the majority of the day and stop too early in the evenings. It's like you don't want riders.
S0004	Jerry Harrington	N/a	I think SanDag should not exist. I feel like it is a political arm of a select party, paid for by tax payers like myself, yet accountable to no one. I would like to know how this organization exists in a democratic society.
S0005.A	n/a	n/a	Why are you building more bike lanes before the flexible fleets? You want us out of our cars, but most people live off of the public transportation grid. A mile uphill to transit is not "close." We also have a silver tsunami hitting. Your choice to focus on able bodied people at the expense of those with less able bodies is going to isolate individuals and impact the quality of life for those aging in this city. 1/3rd of people have balance problems as they age. Major illnesses need door to door transport - not "let's figure out the last mile." Until you figure out that last mile in a way that is equitable to those who are not able bodied, you are not creating an equitable transportation system - far from it. Start with the neighborhood public transportation. Then do the add ons for those the bike lane lobby.
S0005.B	n/a	n/a	Social equity is not just about race or gender. Ableism is the biggest inequity in this country, and by focusing our transportation through ableist eyes, you are blind to the isolation you will be creating.
S0006	n/a	n/a	I may be missing it but I don't see any transit connection to CBX to cross over into the Tijuana airport. I have tried to take public transportation to there but the closest bus stop is far away. I would like to see a bus stop AT the CBX to facilitate public transportation.
S0007.A	n/a	n/a	The transit system in San Diego stinks. I live in Point Loma and the bus system, connections are really unrealistic if you have to be ANYWHERE in a specific time frame without wasting hours. I also think that eliminating a lane on Nimitz and Barnett has caused traffic backups that are unnecessary. I have never seen a bicyclist on Barnett or Pacific Highway, major inconvenience for thousands of people for no one that rides a bike in that area. Same goes for Nimitz, major artery through San Diego area yet reduce the lanes for a very infrequent bike rider. The agenda of Sandag and the city of San Diego is unrealistic, adding thousands of more people yet less ability to drive anywhere and no transportation to provide the ability to get anywhere. I personally think Sandag is a corrupt organization, which has has been proven by all of the studies that have been done that keep finding malfeasance. I think all should be in jail or at least investigated.
S0007.B	n/a	n/a	See above. But in addition to the BS of the bikeways and walkways once you get off of those onto the street, the streets are in such disaster situation that it's dangerous to ride a bike due to super deep potholes. Fix all of the streets and then worry about the gosh, darn bikes that nobody's riding. Just stupidity.
S0007.C	n/a	n/a	The agenda of putting thousands of units in areas that don't have the infrastructure has created a San Diego that is not recognizable even from 10 years ago. It is a pain in the ass to get anywhere, to park anywhere, to attend any event. We cannot keep adding thousands of units in the midway area when you have two lanes on Pacific Highway, two lanes on Barnett ,two lanes on Midway, three lanes soon to be too on Rosecrans to accommodate all the people that need to get in and out of the area. It is dangerous and hazardous to the residence that are already living there, due to the fact that all hospitals and medical facilities are east of the highway five, and we can't even get to the five. Who has been bought off in the city council and in Sandag? None of this makes sense to anybody that lives here so there has to be an alternative reason. Stop the incessant building until we have the infrastructure finally major question where in the hell is the water for all of this? I know it's not this issue, but it doesn't make sense.
S0008.A	n/a	n/a	Please prioritize a Rail / Trolley connection to the San Diego International Airport. Although I realize that the airport just added a bunch of new parking for Terminal 1, driving to and from the airport continues to be a horrible experience (lots of traffic, poor flow, inconvenient access points to travel north from the airport, etc.). This is especially so when there are other events downtown. A dedicated rail option would allow San Diego to join the ranks of other world-class cities. Note that we do frequently utilize the Coaster/Old Town Shuttle option to get from our home in North County (Encinitas) to the San Diego International Airport.
S0008.B	n/a	n/a	Although some communities in North San Diego County have been able to avoid fencing of the rail corridor (Ex, Del Mar), that has not been the case for my community in Encinitas (Northwest Leucadia). As such, we have limited pedestrian opportunities to access the beach or other businesses along the 101 corridor. Please work with Encinitas to facilitate rail crossings in the community of Northwest Leucadia. I would also like to add that I appreciate the efforts SANDAG continues to make in providing bikeways and walkways. In particular, I am very fond of the new path that was added to the San Elijo Lagoon

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0009	Sarah	N/a	The light rail expansion in and around downtown San Diego, and the extension of North County's light rail to include Via Rancho Parkway are both excellent and needed. The Airport Transit Connection is by far and large the most necessary expenditure, and a rail connection is ideally what that looks like. I am disappointed that this 25-year outline doesn't include an airport transit connection for North County. It's necessary. I've left comments as have others requesting a viable option (rapid bus might be the best solution) to the airport. As the population of North County grows, this 25-year outline needs to include that. For inland residents, Via Rancho Parkway would make the best airport transit rapid bus spot, but other areas that would service this need include Oceanside / Carlsbad on the other end of the 78.
S0010.A	Stacy Wolter	N/a	I live in the eastern Olivenhain district. I was really hoping for a bikeway as right now we have narrow two-lane roads (specifically Lone Jack & Rancho Santa Fe Rd). It doesn't feel safe to ride my bike from my house to shopping, for example. I had suggested adding a bike path onto the Olivenhain Trunk Sewer (OTS) project, but it sounds like they moved the sewer to surface streets. What can we do to motivate residents to make streets wide enough for bikes and pedestrians in our neighborhood? Is there an "ADU" type incentive for residents to give up a little of their yard to make streets wider, eg a five-year $1,000 tax break for giving up 10 feet of their yard. If the whole block agrees, the incentive doubles - or something like that. Also, I see there's a bikeway project on the Carlsbad/Encinitas border promised for 2050. I'll be too old to ride my bike then. I'll be riding a wheelchair! What can we do to get this implemented sooner?
S0010.B	Stacy Wolter	N/a	Widening Lone Jack and Rancho Santa Fe Roads is an important part of safety, security and emergency preparedness. Right now the roads are narrow and back-up quickly, making it difficult for emergency vehicles to maneuver and making traffic impassable during a wildfire evacuation.
S0011.A	n/a	n/a	What a joke to remove the purple line. You have no vision, and it is giving "we have tried nothing and are all out of ideas". San Diegans want more rail transit, this is a joke of a plan
S0011.B	n/a	n/a	More is needed but looking at this, it looks like it is not a priority for the agency. You guys are already hated by people who hate bike lanes, now you are hated buy your supporters. Are you trying to get yourself out of business? What a joke
S0012.A	n/a	n/a	Headways and operating hours are paramount. When talking to others, and from my own experience, the single biggest barrier to using transit is operating hours. If I go out at night on the 101 bus to a pub along coast hwy, the fact that I won't have a ride back after 9:30 is a massive detractor to the experience as a whole. Even if bus/trolley/coaster headways are once an hour midnight-3am, it's a vital part of usability Headways are the second largest barrier. People hate waiting around, and waiting 15 minutes at a bus stop is way worse than say, an extra 15 minutes is transit on the bus, even though they are the same duration. Shorter headways lead to timely transfers too. The third thing that would greatly improve the network are frequent (15 mins or better) connections to trolley stops that branch into surrounding neighborhoods. This would allow the trolley to gain many more practical use cases. Coverage comes in 4th place.its great to have more coverage, but a lot of San Diego, especially north county, are served better by peak hour buses, along with "park n rides" for the coaster/sprinter/trolley. Bus frequency and headways should be improved to 15 minutes or better in the core of San Diego to accommodate increasing density there and reduce car traffic.
S0012.B	n/a	n/a	Paratransit should be trialed in north county, but frequent buses will beat out paratransit every time when it comes to capacity, cost, and reliability. LA's metro micro is often 20 minutes late from my experience, making travel time on par if not worse than just taking the bus, at a greatly increased cost.
S0012.C	n/a	n/a	Connectivity is paramount. Bikeways should not be created if they do not connect to at least a protected bike lane bike lane and the rest of the bike network (unless there is a plan to do so in the near future)
S0012.D	n/a	n/a	Housing is inevitable, and can only be fought for so long. We should prioritize placing dense housing near already dense areas and transit hubs in order to minimize car traffic, rather than ADUs and the "a little bit everywhere" strategy which will only add cars to the road. This way, traffic stays decent and single family home residents can keep their lifestyle intact
S0013.A	n/a	n/a	Prioritize the Temecula/Murrieta routes as these have the longest VMT and will relieve the most pressure on the system. Also consider military transit routes directly from Temecula.
S0013.B	n/a	n/a	Prioritize the Temecula/Murrieta highway routes as these have the longest VMT and will relieve the most pressure on the system.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0014.A	Gregg Parker	n/a	Why are we spending millions of dollars on buses, trolleys and trains? I don't ever see anyone on those modes of transportation; everyone drives in San Diego. Why are we investing so much money on 19th century technologies that don't go where people need to be? We need to build more ROADS and WIDEN the roads and freeways, not build expensive rail infrastructure that nobody is going to use. I don't care if you build a rail that will pick me up in front of my house and take me directly to the office every day for half the cost and half the time, I will STILL DRIVE! Why you ask? Have you ever ridden public transit before? The people on the trains are rude, they stink, half the time they cough in your face, they're loud and annoying or listening to music out loud. Then there's all homeless bums masturbating in the back corner of the bus, NO THANKS! I don't care if gas is $20 a gallon, the traffic takes me 2 hours to get to work, and transit is 100% FREE, I will STILL get in my car, and drive. I can leave when I want (no schedules to worry about) I can listen to the music I like, it doesn't stink like a sweaty gym sock, it's quiet (if I want it to be), and yes, I don't have to worry that some smelly homeless bum is in the corner of my car whacking off, shooting up or peeing on the floor. YOU WILL NEVER GET ME TO TAKE PUBLIC TRANSIT NO MATTER HOW MUCH MONEY YOU SPEND, YOU COULD SPEND A QUARDRILLION DOLLARS AND I WILL STILL DRIVE TO WORK EVERY SINGLE DAY! Stop this nonsense, nobody wants it and nobody needs it! Nobody wants you to spend our tax dollars on it except a small percentage of liberal knuckleheads who think this is going to somehow "save the environment" (It's not going to). Meanwhile they are buying all their stuff from China that's powered by dirty coal. But it makes feel all warm and fuzzy inside, so why not waste millions of dollars on it. MORONS!
S0014.B	Gregg Parker	n/a	Why are we spending millions of dollars on bike paths? I don't ever see anyone using those modes of transportation; everyone drives in San Diego. I see a hundred cars backed up, to every one person riding by on a bike! Furthermore, these bike lanes in the middle of the road, and barriers set up on the side of the road where cars are parked in the middle of the street are senseless. All it does is obstruct the street view even more, clutters up the roadway, and takes away much needed lanes and parking spaces. This isn't "Build it and they will come" a very small percentage of people ride bicycles (and frankly it's dangerous to ride a bike on a busy public street) and just because you build more bike lanes, doesn't mean more people are going to use them! I certainly won't! EVER!
S0014.C	Gregg Parker	n/a	Lack of affordable housing was a problem created by SANDAG and other government agencies and now the same agencies that broke it are going to fix it? PLEASE! You want to build affordable house (not subsidized housing, because that's really what SANDAGs plan is) remove all the environmental restrictions, bureaucracy and red tape involved with building apartments and homes, and let the developers build the housing, not government!
S0014.D	Gregg Parker	n/a	Cut the crap with this nonsense. While we are spending millions of dollars trying to be carbon-free (which is a Leftist wet-dream BTW) China, India and other countries are pumping TONS of carbon into the atmosphere!! So, we spend all this money to combat it, while they get low-cost dirty energy, yeah that's fair. You want me to get on board with the Green New Scam, then make the BRIC nations (and others) to do their part first, then I'll start listening to you! Oh BTW, just so you know, the sun doesn't shine all day long and the wind doesn't blow every day.
S0014.E	Gregg Parker	n/a	Social equity basically means, "Let's discriminate against White males while lowering standards for so called 'marginalized' people". Social equity is legalized discrimination, reverse racism and enabling people to be lazy, stupid and counterproductive. This is just dumb as fuck! Have you not learned anything from the last federal election cycle? Americans are rejecting wokeism, at a pace much higher than you are willing to admit, just cut the crap with this nonsense, nobody cares. I support equality based on merit, not equity based on someone's race, national origin, religion, gender (which there's only 2 of those BTW)
S0014.F	Gregg Parker	n/a	SANDAG is a corrupt organization, that has already been caught misappropriating funds. You want my feedback? OK. ABOLISH and DEFUND SANDAG! That's my feedback. You people are corrupt, racist and have no idea what you are doing! You are destroying San Diego at an alarming pace, and the best way to fix it, is to eliminate SANDAG altogether and just allow the communities to determine their own destiny instead of an imbalanced group of Leftists that think they know what they're talking about.
S0015	n/a	n/a	what are the rural corridor improvements for SR 76?
S0016.A	n/a	n/a	Forget EVs. There will be no federal funds and California cannot afford the plans.
S0016.B	n/a	n/a	Forget bikeways and walkways. There will be no federal funding and California cannot afford to waste money and inconvenience driver by new bike ways.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0017.A	n/a	n/a	Existing transit route 28 in the Point Loma Village area should be excluded from SANDAG's aggressive plan to make a rapid transit route. The lanes are narrow, 2 lanes and have no area to stop in a secured location. Changing traffic light configurations will not get buses out of this area or more riders any quicker than they currently are. Adding more cars without the infrastructure will make routes longer due to congestion, not shorter. The current route has little to no riders in this area. The transit times are 30 minutes during peak and do not run several hours of the week. There is no way to turn this area into a rapid transit route for these reasons. There are no bike lanes and no bike routes as there is not enough room and it would be very dangerous (a man was just killed on his bike a few months ago). Your plan triggers this area as an SDA which enables ADU and Complete Communities Housing Solutions to build before any transportation infrastructure is built (if it ever actually gets built due to lack of funding and current City and MTS deficits). In the mean time, you will be putting more cars, not less, more congestion, not less, more greenhouse gases, not less, more environmental strain, not less, more safety hazards for residences, schools and businesses, not less. This is a peninsula with areas of very high severity fire danger. I am respectfully requesting the study(ies) done in this specific area to warrant it becoming a rapid transit route by 2035 without widening roads and creating turnouts. I challenge the determination and plausibility in this area as the route has a 30/100 mobility rating and is being increased in time between buses, not decreasing. The ridership will not warrant the investment in the infrastructure. Put it back in your master plan when you actually have it funded and it is not just a grand dream that will have a tremendous amount of opposite effects NOW that you and the city claim to have in our best interests. The infrastructure needs to be put in place before the density is increased - especially in critical area like Point Loma.
S0017.B	n/a	n/a	Point Loma will never be an actual sustainable development area until the infrastructure is put in place first, not 10 years from now, if ever. This area was never on the Transit Priority List for a reason. You cannot gain enough housing to justify increasing this route to a Next Gen Rapid Route.
S0017.C	n/a	n/a	Rosecrans in this area is the two lane egress and ingress for the Navy Submarine base that has 12,000 to 22,000 personnel daily. It is also located in a high severity fire zone making evacuation should a fire commence, deadly. There is no way to plan for an evacuation on two lane roads with increased buses.
S0017.D	n/a	n/a	There is a deficit in City, State and MTS funding. You do not have the funds in place or actually forthcoming, they are just a blue sky hope. Point Loma will be last on your list of priorities. It will never happen.
S0017.E	n/a	n/a	You never reached out to Point Loma for any of your mobility plan input. I doubt anyone actually came to the area to see route 28.
S0018.A	n/a	n/a	We need to prioritize in connecting North County San Diego with SD downtown and border towns
S0018.B	n/a	n/a	We need to create a second floor freeway to alleviate our congestion & poor traffic flow of cars along our highways
S0018.C	n/a	n/a	A better system that integrates all public transportation acccess and commute times within our region
S0019	Alex Wong	RideSD	The 2025 Regional Plan projects Airport Transit Connection (ATC) frequencies to be only every 10 min. This would be inconvenient--passengers will be strongly discouraged from using the airport transit connection if they have to wait up to 10 min for a 10 min ride from Downtown to the Airport. It is also imperative that SANDAG design the airport transit connection such that it does not merge onto and share tracks with existing Trolley Lines. Doing so could permanently cap Mid-Coast and Green Line frequencies to 10 min each. That would be a highly undesirable outcome given University City, Mission Valley, Grantville, and Midway are all densifying rapidly around the Mid-Coast and Green Lines. SANDAG should also increase frequencies even better than every 7.5 minutes on the existing Trolley network. MTS' Elevate 2020 projected running the South Bay Blue Line every 5 min.
S0020.A	n/a	n/a	The plan should include more improvements / plans for transit, primarily tram services to major neighborhood hubs. Some destinations / neighborhoods that could benefit with complete lightrail lines include 1. Downtown SD -> Airport -> Liberty Station -> SeaWorld -> Pacific Beach, 2. Oldtown SD -> Hillcrest -> University Heights -> SDSU, 3. CBX Tijuana -> Otay Ranch -> Eastlake -> Bonita -> National City -> Downtown SD.
S0020.B	n/a	n/a	Please increase incentives & affordability programs to increase density around transit, and further incentivize ADUs. Whether that be through microloans, pre-approved plans, fee discounts / waivers, or other means.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0021.A	Holden Leslie-Bole	n/a	I am writing to express strong concern about the reduced scope of the Purple Line in the 2025 Regional Plan. Once-in-a-generation opportunities to build new rail infrastructure demand bold vision, not scaled-back compromises. The current plan risks missing a transformative opportunity and could lock the region into decades of car dependency. First, the southern segment of the Purple Line should not terminate in San Ysidro. South County is a growing binational gateway, and the plan should reflect that reality. I strongly urge SANDAG to extend the line to the future Otay Mesa East Port of Entry, then west along Siempre Viva Road to the main Otay Mesa crossing. From there, the route should connect to the Cross Border Xpress (CBX), which still lacks reliable public transit. The line could then proceed north along Britannia Blvd to Brown Field, and continue on Otay Valley Road to reach North Island Credit Union Amphitheater one of the county's largest venues, which has no viable transit access. I have seen, firsthand, people driving away impaired from events there due to the lack of alternatives. From the amphitheater, the route could continue west along Olympic Parkway or Palomar Street to rejoin the planned alignment in Chula Vista. This expanded route would serve high-demand destinations and prepare our region for future cross-border integration. The 2021 Plan recognized this need. It should not be abandoned. Second, the decision to truncate the Purple Line in Mission Valley is short-sighted. The 805 corridor includes major employment centers in Kearny Mesa, Clairemont, University City, and Sorrento Valley. These areas are far from the Blue Line and suffer from intense congestion. There is clear demand for a high-capacity transit alternative along this corridor. The 2021 Plan proposed continuing the Purple Line north to serve these areas. That vision should be restored. Truncating the line fails to address where mobility is most needed. Expanding highways will not solve congestion. It will only increase vehicle miles traveled. If funding is the constraint, reallocate resources away from freeway expansion and invest in the transit infrastructure we actually need. Please don't pass up this chance to build a rail line that matches our region's needs and aspirations. The Purple Line will be a major investment regardless. Let's do it right the first time.
S0021.B	Holden Leslie-Bole	n/a	While SANDAG does not have direct authority over land use decisions, its transportation planning has a profound influence on how our region grows. I want to emphasize just how severe our housing crisis is. We need significantly more housing, and much of the burden is falling on older urban neighborhoods like North Park, Hillcrest, and Normal Heights. Many of us welcome this growth. Rents are too high, home prices are out of reach, and we want to live in vibrant, walkable communities with enough housing for everyone. But this growth has to be matched with serious, immediate investments in transit. The reality is that most job centers downtown, Kearny Mesa, and the Sorrento Valley/University City corridor remain poorly served by high-quality transit. Many new residents in central neighborhoods are commuting to these areas, but are forced to drive because transit is not fast, frequent, or reliable enough. We cannot wait until 2035 or 2050 for transformative projects to materialize. We need options that work now. I and many in my community want to live a car-free or car-light lifestyle. But until transit is time-competitive with driving, that will remain out of reach. Our region cannot achieve its climate, equity, or livability goals if our major job centers remain inaccessible without a car. Fast, high-capacity transit must be prioritized along corridors where people already live and work, not in hypothetical future growth areas. Second, I urge SANDAG to reconsider how much land is wasted on oversized roads and freeway infrastructure. Vast stretches of our region are paved over with eight-lane arterials, wide intersections, and freeway interchanges that prioritize vehicle speed over efficient land use. This is a grotesque misuse of scarce urban space, especially in areas where housing and small businesses are being squeezed. Even managed lane are often just freeway expansions in disguise. That space should be used for dedicated busways, protected bike lanes, or rail lines not more asphalt for more cars. The path forward is clear: road diets, not road widenings. Transit investments, not freeway expansions. Walkable, connected neighborhoods not sprawling parking lots. We have the opportunity to align transportation and land use to build a more affordable, sustainable, and equitable region. But we must act with urgency.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0021.C	Holden Leslie-Bole	n/a	We are in a climate emergency. Global temperatures have already risen more than 1.4°C above pre-industrial levels, and the impacts are no longer abstract they are here. We face worsening extreme heat, intensifying wildfires, chronic drought, sea level rise, and future flooding that will directly affect our children, our communities, and our infrastructure. California's coastal regions, including San Diego, are especially vulnerable. In light of this, I ask two things of SANDAG: First, take full accountability for the fact that transportation is the single largest contributor to greenhouse gas emissions in California. In 2022, it accounted for 39% of the state's total emissions. Despite progress on electric vehicle adoption, we cannot pin our hopes on EVs alone. Federal EV incentives remain politically unstable, supply chain issues persist, and even a full transition to EVs will not eliminate the congestion, land use, and air quality impacts of car-centric planning. SANDAG must directly address vehicle miles traveled (VMT) and prioritize projects that reduce driving not simply make it more efficient. Any project that does not result in a significant and measurable reduction in VMT should not move forward. Highway expansions, even when framed as managed lanes, work against our climate goals and lead to induced demand, sprawl, and higher emissions. Instead, reallocate these funds to accelerate and expand the plan's transit proposals, especially high-capacity rail and bus rapid transit. The science is clear: we need fewer cars on the road, not more. This isn't just about climate it's about air quality and public health, especially in frontline communities who suffer the most from vehicle pollution. Second, I urge SANDAG to adopt a far bolder approach to climate adaptation. As the climate changes, the risks from heat, flooding, and stormwater overload are growing. Adaptation is not just necessary it is cost-effective. SANDAG has a role to play at the regional level in pushing for smart, resilient land use patterns that respond to these threats. Urban areas in San Diego County are still dominated by heat-absorbing asphalt, wide roads, and parking lots, leaving us more vulnerable to extreme heat, flash floods, and biodiversity loss. The Regional Plan should include clear support for urban greening strategies like afforestation, native habitat corridors, green roofs, bioswales, and the conversion of excess roadway space into micro forests and resilience hubs. Other cities from Sacramento to Mexico City are leading on this front. San Diego should be, too. These investments support climate resilience, improve air and water quality, and provide meaningful public space in under-served communities. In short: SANDAG must lead with the urgency this crisis demands. Focus on reducing car dependence, improving transit, and investing in green infrastructure. The future depends on what we build today.
S0022.A	n/a	n/a	Fast trolly fleet following the freeway. We do not need stops that slow transit to a walking speed. Get real, stop wasting money. Your organization is the King of waste and inefective trolly stops. Serve the 90% of riders. Stop serving the unemployed and sport fans.
S0022.B	n/a	n/a	Stop wasting money on less than 1% of the population riding bikes and jogging. Did you hear , less than 1%! Fix the roads and add more trolly tracks.
S0022.C	n/a	n/a	I only ride half as much as I did before the pandemic. To many free loaders. Look at NYC subway, no enforcement means your ridership will not increase.. There should be twice as many roving security as you have and signs saying you are " On Camara" warning.
S0023.A	n/a	n/a	In my experience, fare enforcement is very low on transit in SD. Therefore the system financials look worse than they should be and require more external funds to operate. I believe investing more in collections from riders and enforcing penalties for fare evaders will help to increase revenue even with steady ridership.
S0023.B	n/a	n/a	Transit will be more used if people can live near it and it is a conveniently accessible option. Therefore I believe we should be prioritizing accelerated density development in areas well serviced by existing transit.
S0024	n/a	n/a	It's been almost a decade since the CBX bridge to TJ airport opened. Finally, MTS figured out some people might want to ride transit from, effectively an airport, to Iris Avenue Trolley Station. It was good to see that on the map. Also, can't help but notice the continued almost complete lack of transit in a giant swath of the County bounded approximately by Mira Mesa Boulevard, north to San Marcos, and between the 5 and 15 freeways. It's super-easy to get poor folks to ride, or continue riding, public transit. But how about all those areas that are car-centric suburban estates or country-style living? I guess they can keep on guzzlin' gas, huh? Anyway, all these future plans are meaningless to me unless you step up, be a world-class region, and figure out how to get a trolley to an airport. I'll believe in that project and you as an organization the day I'm riding it.
S0025	n/a	n/a	The Ocean Beach flexible fleet area should utilize Catalina Blvd as its eastern boundary. Residents on top of the hill typically drive down to OB instead of walking due to the steep incline on the way back. Adding these additional blocks would result in more micro-transit use and an easy reduction in greenhouse gas emissions.
S0026	n/a	n/a	I still don't get it. If I want to ride my bike from Old Town to Mission Valley Y, USD, or Mesa College, how will I do it without mixing with freeway on/off ramps? Also, maybe it's me but I can't see how PCH in the Witherby St area will be made passable by bicycle. I have been asking for that for 15 years and the city engineers keep saying "it's in the future overlay," whatever that means. Actually I know what it means, it means f*** you bike riders. Enjoy my taxes and do nothing for me please.
S0027.A	Elizabeth Alyea	n/a	I commute every morning. Ever since the lane for the 235 express bus to downtown was built, I have only once seen the 235 use that lane. I believe this is because it has to cross all 4 lanes to get to it, once it enters from the 15 south, just east of 30th street. Then it has to cross all 4 lanes again in short order, because it turns right on 16th street. So the drivers typically don't bother going over to that lane. Meanwhile we are stuck in very slow traffic, with an unused lane next to us.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0027.B	Elizabeth Alyea	n/a	There is a triangle between the 3 managed lane connectors in mid-city. This triangle is a neighborhood called Fairmount Park, of which I am a resident. We are boardered on 3 sides by freeways (the 94, 805 and 15). Regarding the managed lane connector projects at each point of our triangle (or any freeway project that involves cal-trans and sandag boardering us) my hope is that the projects will include some way for bikes, and possibly pedestrians, to cross those freeways. When the 15 freeway came in, we became cut off from non-motorized transportation to the west. We cannot cross any of those freeways without a car, or a very long bus ride. We must go miles out of our way, to cross to the west, or to the south. The only possibility for including pathways for bikes and pedestrians, is during projects like the ones proposed.
S0027.C	Elizabeth Alyea	n/a	Please help those of us who would like to commute by bike from Fairmount park and points east. We are forced to go miles to the east, then south, or to the north then south, just to head west by bike. Many of us bike out of concern for the environment, but the extra distance makes this unmanageable for some, in terms of time.
S0028.A	n/a	n/a	Burry below grade Carlsbad Village's train tracks from south of Tamarack Avenue, north past the Village train station. This was not listed on the regional plan as a priority. What steps are being taken to move forward with this plan? Safe routs to and from schools should be addressed. Consider adding sidewalks, bike lanes and trees for traffic calming roads. East to West connections should be developed and made more accessible to all.
S0028.B	n/a	n/a	As the mandate for housing development increases, significant amenities are being eliminated, or significantly reduced (grocery stores, pharmacies, hardware, etc.). The strategic placement of 'Convenience' stores become the only accessible food supply, therefore significantly effecting the health, safety and welfare of our communities. As amenities for seniors, vets, disabled community members - without cars - become more inaccessible, could a flexible fleet program help?
S0028.C	n/a	n/a	Safe routs to and from schools should be addressed. Consider adding sidewalks, bike lanes and trees for traffic calming roads. Kids should not be penalized for riding their bike, or walking to school, but safe access should be prioritized. Rail trails are helpful, but does not get kids to school.
S0028.D	n/a	n/a	East to West transit connections should be developed and made more accessible to all. The Sprinter is a start, but not adequate for an entire county. Safe routs to and from schools should be addressed. Consider adding sidewalks, bike lanes and trees for traffic calming roads.
S0028.E	n/a	n/a	Transit technology should begin with all students throughout the County, working with the department of education. Education and free transit access to students should be prioritized. Seniors should also have free transit to access senior centers, medical care facilities, grocery, pharmacy, etc. How can the County use technology to determine routes, and rates of frequency, for these needed programs?
S0028.F	n/a	n/a	Transit oriented housing is a significant improvement, although if transit is not improved, how can car use be reduced? Burry below grade Carlsbad Village's train tracks from south of Tamarack Avenue, north past the Village train station could help. Understanding North County Transit is currently developing a project located at the Carlsbad Village Train Station, its beneficial to consider burring the tracks while this project is still in the design phase. When is the EIR for burring the rial road tracks going to be completed for review? Can SANDAG help expedite this process?
S0028.G	n/a	n/a	Burry below grade Carlsbad Village's train tracks from south of Tamarack Avenue, north past the Village train station. Carlsbad has the highest rail deaths outside the City of San Diego. This is a problem that all the traffic calming speed bumps won't solve. When is the EIR for burring the rial road tracks in Carlsbad Village going to be completed for review? Can SANDAG help expedite this process? https://thecoastnews.com/pedestrian-rail-deaths-in-san-diego-county-reach-all-time-high/
S0028.H	n/a	n/a	Multiple easily accessible transit options help with climate, energy use and air quality. Burry below grade Carlsbad Village's train tracks from south of Tamarack Avenue, north past the Village train station. East to West transit connections should be developed and made more accessible to all. Safe routs to and from schools should be addressed. Kids should not be penalized for riding their bike, or walking to school, but safe access should be prioritized. As amenities for seniors, vets, disabled community members - without cars - become more inaccessible, could a flexible fleet program help?
S0028.I	n/a	n/a	Multiple easily accessible transit options help with social equity. Burry below grade Carlsbad Village's train tracks from south of Tamarack Avenue, north past the Village train station. East to West transit connections should be developed and made more accessible to all. Safe routs to and from schools should be addressed. Kids should not be penalized for riding their bike, or walking to school, but safe access should be prioritized. As amenities for seniors, vets, disabled community members - without cars - become more inaccessible, could a flexible fleet program help?
S0028.J	n/a	n/a	When is the EIR for burring the rial road tracks in Carlsbad Village going to be completed for review? Can SANDAG help expedite this process?
S0029	n/a	n/a	Cycling is the best option for reducing congestion and GHG. Additionally, riders benefit with improved health. The common reply I hear from people is concern for safety. This could be helped by improving infrastructure for cycling.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0030	n/a	n/a	In Carlsbad: La Costa Ave. west bound, left turn lanes to go onto I-5 south. Currently, there are 4 lanes: #1 - I-5 south, #2 & #3 continues west on La Costa Ave., #4 I-5 north. Lane #1 becomes 2 lanes turning left onto I-5 So., but many cut into #1 from #2. Consider having #1 & #2 turn into the 2 left turn lanes onto I-5 south. Less slow down, impatient drivers, etc.
S0031.A	n/a	n/a	Empty buses are already constantly passing by. San Diego didn't grow as a carless city and so it never will be. There are empty bike/bus lanes and congested car lanes. Bus stops for empty buses which could be parking spots. Please stop expanding bus & bike lanes. Instead please build rail from the airport to the gas lamp. This is the one spot in San Diego where millions of people without cars arrive. And consider providing shared services vouchers for people on unpopular bus routes. I feel like my tax money is being wasted and I'm all for public transport. I moved here from nyc over 20 years ago.
S0031.B	n/a	n/a	How about flexible lanes during peak hours? A middle lane which goes one way in the morning, and the other way in the afternoon?
S0031.C	n/a	n/a	The public outreach seems to be minimal.
S0032	n/a	Caltrans	Regional Plan Overview Pg. 6, Figure 1-1 - provide definitions of Jobs Total vs Jobs Wage & Salary. Unclear on what is Jobs Wage & Salary.
S0033.A	n/a	n/a	there should be a priority on south bay rapid transit such as a RAPID route linking Otay Ranch and Palomar street, and the purple line. currently getting from near third avenue to otay ranch could take over an hour if you arent near the 709L. I believe that there could be a protected bus lane up the center of main street and H street as there is on east palomar. also, a rapid route linking otay mesa, otay ranch and El Cajon would help travel times in east county a lot.
S0033.B	n/a	n/a	I believe more land use in north county should be mixed use instead of single family.
S0034	Sheila Unick	n/a	Hello, I'm a Delmar resident who would like to tell you that I am in favor of the north alignment of the yellow plan. The one that wraps around the bottom of the fairgrounds and through the easement and then under the golf area. I'm concerned about drilling through our Rock rather than something like granite that they would have on the East Coast, I'm concerned about constantly shaking the homes along the crest Canyon route. If they were to get damaged from constant shaking, then that water would head straight down the hill. I'm concerned about construction affecting the downtown area for commerce and the effects of Evacuations for wildfires. I'm concerned about taking homes and giving them fair market value yet certainly a valued fair market value because the whole town has lost its value due to the train project. I like the idea of potentially using a cut and fill tunnel and having the Option insert areas to create a public space or recreation area above the train route. That would effectively give a double use for the money. I'm concerned about how the money will actually be created and what entity is going to pay for this train tunnel, I strongly believe that this type of upgrade to a community should first foremost, not destroy the community and secondly, if at all possible remain in areas that are owned by state and federal entities 100% what the coalition for safer trains are suggesting to modify the yellow route thank you for your attention to these matters
S0035.A	Steve Linke	n/a	So-called transit priority developments should only occur in areas where transit is actually usable. The current State definition defines any location with train service as a high-quality transit stop. In Carlsbad, we have two train stations (Poinsettia and Carlsbad Village). However, due to infrequent service and minimal coverage around the city, these stations do not provide viable transit services. Developments near these stations exploit the State and local laws that help them avoid environmental reviews, traffic mitigation, and city development standards, but then, with the knowledge that residents are not going to be able to actually use transit, significant parking is installed to entice buyers/renters. Thus, the developments are only masquerading as "transit priority."

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0035.B	Steve Linke	n/a	Appendix K (Active Transportation) includes the following statement: "To support safer streets for all users, the updated Regional Active Transportation Network in the 2025 Regional Plan will be built for All Ages & Abilities, consistent with the National Association of City Transportation Officials (NACTO) Contextual Guidance for Selecting All Ages & Abilities Bikeways." This NACTO guidance is then presented in Figure K.4, which places an enormous emphasis on "Protected Bicycle Lanes" (PBLs) to the exclusion of most other approaches. This section appears to create an inappropriate mandate for local jurisdictions to follow NACTO's guidance to build extensive PBLSs. Local jurisdictions should be able to make their own decisions on how to create safe bikeways, so the above language should be removed or changed to make it clear that the NACTO guidance is not mandatory. In announcing its latest 2025 bikeway guidance, NACTO made the following disturbing claim: "Protected bike lanes are appropriate for all streets, in all contexts." These types of absolutist claims are pure marketing and not consistent with data-driven decision-making or critical thinking. Multiple bike fatalities and serious injuries in PBLs in Encinitas have almost certainly arisen due to the presence of PBL infrastructure, so it is a myth that they are always safer. Despite these types of marketing claims by organizations such as NACTO and the Federal Highway Administration (FHWA), the research behind the safety of PBLs is actually quite weak and inconclusive. For example, there is an often-cited FHWA statistic that PBLs reduce bicycle crashes by "up to 53%." However, the 2023 study behind it has several fatal flaws, such as: - The safety findings failed when the entire PBL "corridors" were studied. It only worked when intersection crashes were excluded and only the street segments between them were considered. - Of the three cities modeled, only one (San Francisco, CA) showed a statistically significant crash reduction, while the other two (Cambridge, MA and Seattle, WA) did not. In fact, the Seattle data showed that PBLs were less safe in many cases. - Even the San Francisco data is suspect, because the most common bike crashes (solo ones) tend not to be reported in PBLs in California. So, the alleged safety improvement may be largely or entirely due to reduced reporting--not reduced crashes. In my own analysis of the PBLs that replaced buffered Class II bike lanes on South Coast Highway in Encinitas, when crash data was collected from both police reports and emergency vehicle dispatch logs, bike crashes were 50% higher after the PBL was installed. In addition, there have been dozens of additional unreported bike crashes that are not reflected in those official sources. In contrast, the crash frequency on an equally sized corridor just to the north, which retained its Class II bike lanes, remained unchanged in the study period.
S0035.C	Steve Linke	n/a	To reduce GHGs and make transportation and the transport of goods more convenient and safe, a top highway priority should be the completion of an interchange from westbound SR-78 to southbound I-5.
S0036.A	John Eldon	n/a	Regarding Appendix K: First, so-called "Protected Bike Lanes" are NOT bike lanes, but cycle tracks. This vital distinction, at least for now, fortunately makes their use unenforceable, but taking the adjacent travel lane generates resentment among motorists and slows traffic. A Class 2 (painted true bike lane) enables cyclists to position themselves laterally on the roadway according to traffic and road conditions, including obstructions in a bike lane or when approaching an intersection or driveway (see my third point, infra). Second, as tragically demonstrated in the cities of Encinitas and Del Mar, separation bollards and curb stops, whether used individually or jointly, actual CAUSE more injuries, even fatalities, than they prevent, through direct collisions from cyclists, including those who are paying attention and not merely oblivious to road hazards. Third, in addition to the direct collisions we have seen on Coast Highway 101, they also cause "right hook" collisions, as evidenced on Leucadia Bl. in Encinitas, by forcing cyclists to the right (i.e., wrong) side of right-turning motorists. Equally insidious are "left cross" collisions (the only type of car-bike collision I have ever been on the losing side of), in which oncoming left-turning motorists are more likely violate a cyclist's right-of-way because the "protective" road fixtures render the cyclist less visually relevant to the motorist in question. Fourth, please ignore NACTO's grossly mistaken, misleading, and dangerous assertion that "Protected bike lanes are appropriate for ALL streets in ALL contexts." Class 3 bike routes, so-called "slow roads," are ideal in residential areas and many central business districts, where speed limits are already 25mph, often 20. The use of shared lane (sharrow) markings and "Bikes May Use Full Lane" signage are far more appropriate, and safer for all concerns, and also recognize the reality that many streets are not wide enough to accommodate even painted bike lanes. Mandates containing absolutist language ("ALL streets") are blatant over-generalizations. Fifth, the strategies that do work far better than "protective" structures in the street are various context-appropriate combinations of reduced speed limits, painted Class 2 bike lanes (preferably with painted buffer zones and always out of the door zone alongside parked vehicles), shared lane markings, and Bikes May Use Full Lane signage. These are far more economical, and much safer, than "Protected" Bike Lane [sic] structures. Finally, my qualifications include an estimated 120,000 miles of on-road bicycling experience in Los Angeles, Orange, and San Diego Counties. I ride as much for transportation as I do for exercise and enjoyment, and I thereby reduce my personal Vehicle Miles Traveled footprint by more than 50 miles per week. I am in the forgotten middle, between slow, casual cyclists and the fast "road warriors."

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0036.B	John Eldon	n/a	The unrelenting push for ever-increasing densities absolutely must respect our established residential neighborhoods countywide. What makes a given "desirable" neighborhood so attractive is its refuge from the noise, crowding, defoliation, and congestion of higher-density areas. Yes, there are true urbanites who thrive on so-called "vibrant" urban cores, and we already provide high-density options for them. I fully support strategies such as opening sprawling commercial zones and business parks to mixed-use development as the win-win alternative to destroying established residential neighborhoods with overdevelopment. However, we also need to recognize that a significantly larger percentage of our populace craves the "a place for us; peace and quiet and open air" that can be provided only by traditional detached housing. The greatest housing shortage and demand we have countywide is for smaller, less-expensive detached homes, and these are precisely what we lose through densifying redevelopment, including older low-rise apartment buildings. We need to spend more effort preserving our existing affordable housing stock. The experience in the city of San Diego and elsewhere has also amply demonstrated that accessory dwelling units are not the solution, either. If and where these are to be allowed, existing floor area ratio limits, front, side, and rear yard setback restrictions, height limits, and off street parking requirements must be maintained for the sake of the immediate neighbors. This in turn will admittedly reduce the number of ADUs built, but simultaneously ensure that they are an asset, not a huge disruption, to the neighborhood in question. Finally, since state population is decreasing and no longer increasing, the entire Regional Housing Needs Assessment system needs to be overhauled or simply scrapped entirely. It is led to destruction of neighborhoods, loss of existing "naturally affordable" housing, and increased traffic congestion, while not achieving any reduction in housing costs. We also need to recognize, as repentant former YIMBY Prof. Patrick Condon so aptly notes, that we cannot densify our way into housing affordability, because increased density proportionally inflates land values.
S0037	Serge Issakov	n/a	Don’t Be Fooled by the Hype Around “Protected” Bike Lanes A nationwide trend is pushing cities to install so-called “protected” bike lanes—also known as Class IV bikeways. But before we rush to spend millions in taxpayer dollars, it’s worth taking a closer look. The data behind this movement isn’t as clear—or as honest—as proponents would have you believe. 1. Scrutinize the Studies Many of the studies used to justify separated bikeways rely on shaky data and assumptions. Their claims about increased safety and bike usage often don’t hold up under real-world scrutiny. 2. Watch What’s Left Out Solo cyclist crashes—many of them serious or fatal—are often excluded from the safety data simply because they don’t involve cars and technically off the roadway. These crashes caused by the very infrastructure meant to protect riders, are as likely to make it into SWITRS as those that occur in Penasquitos Canyon, and so they’re conveniently ignored in the statistics. 3. Follow the Money A majority of these studies are funded by organizations that stand to benefit financially from building bike infrastructure. There’s a vested interest in showing positive outcomes, even when reality suggests otherwise. 4. Look at Local Results Here in San Diego County, we have a stark example: the Class IV bikeway along Highway 101 in Cardiff, one of the most heavily used routes in the country. Since its installation in 2020, it’s become a danger zone. I’ve documented 37 crashes, including one fatality and four serious incidents already this year. See the evidence for yourself: https://docs.google.com/document/d/1X75Z_txehqEU5lnF1qnd6WcJUmweKlOsgIZg-Rc6AyU/edit?usp=drivesdk 5. Don’t Trust the Wishful Thinking Many “bike encouragement” studies rely on surveys asking people if they would bike more if protected lanes were built. The problem? The predicted increase rarely materializes once the lanes go in. Aspirations don’t equal action. Bottom Line: Don’t let glossy presentations and trendy buzzwords distract from the facts. “Protected” bike lanes may look good on paper, but in practice, they often do little to increase cycling and often even increase injuries and fatalities. Let’s be smart about how we invest in transportation. Cyclists deserve safe infrastructure—not just expensive illusions of it.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0038.A	n/a	n/a	We need to utilize the highway medians to expand the trolley system. For example, extending the Blue Line from UTC to Santee via the State Highway 52 median would dramatically reduce westbound traffic in the morning hours and eastbound traffic in the evening. We desperately need a trolley line along the I-805 corridor, as well as the I-15 corridor from National City all the way to Escondido. Additionally, street cars should be considered for major thoroughfares, especially in popular tourist areas. For example, having a street car from the Balboa station down Grand Avenue to Pacific Beach would be highly beneficial to tourists and locals alike, increasing beach access and minimizing traffic incidents. The Genesee Avenue corridor would also highly benefit from a street car system running from the UTC area down to the Sharp Memorial and Rady Children's Hospital healthcare complex. Perhaps from there streetcars could further connect Pacific Beach to Belmont Park, then on to Sea World, then south towards Point Loma/Liberty Station and even Shelter Island. El Cajon Boulevard could also benefit from a street car system that connects SDSU to the central San Diego neighborhoods of North Park, Kensington, Normal Heights, University Heights, Hillcrest and even on to Old Town, maybe even Balboa Park, Golden Hill and South Park. Looking north, the Mira Mesa Boulevard and Miramar Road corridors could benefit from a street car system connected to UTC, and could even connect the Rancho Penasquitos neighborhood to Mira Mesa via Black Mountain Road. Also, there needs to be a light rail connection to the airport from Downtown at a minimum. There needs to be a discussion around the Central Mobility Hub that is being proposed in the SPAWAR redevelopment project. One last comment on transit: no one uses the bus system... focus on rail, not buses.
S0038.B	n/a	n/a	This is not a good idea. We all saw what happened with Lime and Bird scooters. They become a nuisance and the devices have a limited lifetime. Let's focus on mass transit projects.
S0038.C	n/a	n/a	There needs to be a better way to connect north and south county via bike lanes and walk ways. The San Diego River and Mission Valley corridor bikeways also need to be improved. Currently there are only a few sections that are off-street and protected from vehicles, but they are not continuous and often times surrounded by homeless encampments. We need to do better with this.
S0038.D	n/a	n/a	We should stop expanding highway lanes. These are useless projects and those funds could be better spent on mass transit. Local roadways can be improved by integrating more roundabouts. Most street lights are inefficient and encourage speeding. Roundabouts force people to slow down while maintaining a consistent flow of traffic, while enhancing pedestrian safety.
S0038.E	n/a	n/a	The San Diego County Regional Airport Authority spend millions on expanding cargo service at SAN, already the busiest single-runway airport in the nation. All cargo air traffic should be re-routed through Brown Field. There is already ample infrastructure in that area to handle freight traffic. This would ease up congestion around the downtown area and could even add capacity to bring more tourists directly to the hear of our city.
S0038.F	n/a	n/a	We need to allow local governments to more easily sell surplus land to developers to build more housing. We desperately need housing here.
S0038.G	n/a	n/a	The homeless situation is out of control in the county, especially in San Diego (mostly Downtown). Not only is the situation an embarrassment to the city (our visitors see this), it is a legitimate public health crisis. Homeless individuals are defecating in the streets, openly consuming drugs, and creating an unsafe and often threatening atmosphere. This has to change.
S0038.H	n/a	n/a	We need to stop tying affordable housing projects to prevailing wage requirements unless a project is 100% funded by the public. Adding prevailing wage requirements increases the cost of building by 10-20% on average.
S0039	n/a	n/a	I'm seeing quite a push to make bike lanes "protected", but as someone who tries to ride my bike as much as possible I often find such "protected" or separated bike lanes to make life MORE tricky and treacherous for cyclists. Although eg paths such as those along Hwy56 are nice, adding bollards along regular bike lanes just boxes us in, removes safe ridable space, and introduces major crash hazards. Imagine if the suggestion were to add trenches and potholes along the edge of a bike lane, well bollards and wheel stops are just as treacherous for us. I lose count of how many cyclist crashes I've heard of in San Diego from these objects. Leucadia, Encinitas ,Del Mar, Gilman/I-5 . It seems wherever posts get added we start getting more crashes and deaths. The WORST? ... where we get shoved behind parked cars which renders cycling at any decent speed as impossible. Or posts that make it hard for right-turning cars to get over to the right of cyclists (and us cyclists to get to the left of a right-turn lane). What DOES work... regular buffered bike lanes, where drivers can see us before pulling out or turning. So please, more paint, fewer objects.
S0040	Mike	n/a	RE: Class IV bikeways. I ran into one of those flex posts and nearly had a seroius crash. They are a danger to anyone on a bike. Stick with painted lines ONLY!!! In addition bike funature on bikeways NEVER GET CLEANED and are a hazard to cyclists and their bikes.
S0041.A	Russ Cassidy	n/a	Why are we wasting money on expensive rail, projects and trains? The infrastructure to build these methods of transportation are very expensive and they do not usually go where people need to go. Just look at the bullet train to nowhere we've spent billions of dollars on that. it's not even done it's nowhere near done. There's cost overruns and all kinds of problems with it. This is not a good direction to take San Diego
S0041.B	Russ Cassidy	n/a	Enough with the electric cars! electric cars are more expensive and they're not necessarily green. It really depends on where the electricity is coming from if you're getting your electricity from natural gas and coal powered plants, then you're driving a coal/natural gas car not an electric car. Instead of buying electric car fleets why don't we just have natural gas vehicles which burn very clean they're much cheaper to operate, maintain and purchase instead of this really bad electrification idea!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0041.C	Russ Cassidy	n/a	If I see another row of parking spaces get taken away for a bike lane I swear I'm gonna throw a stick in the spokes of the next person I see riding a bicycle and laugh when they face plant on the ground. Enough of this nonsense 88% of San Diego Dr. a car we need to be able to park. We need to be able to drive without a bicycle riding down the middle of the street. These bike lanes are a waste of money and only a very small percentage of people actually use them. I will see 200+ cars to one bicycle when I'm driving into work in the morning.
S0041.D	Russ Cassidy	n/a	we need to fix our roads our roads are in terrible shape and yet here you are spending money on railroads, bike lanes and other kinds of nonsense. We need the potholes fixed. We need the infrastructure fixed. We need the bridges fixed and we need the freeways widened you spend money on that 88% of Californians drive cars. We need roads, not bike lanes and trains
S0041.E	Russ Cassidy	n/a	The housing problem in California was created by the government and now the government is gonna fix the problem. I don't think so.. You want affordable housing all you have to do is eliminate all the regulations in red tape and let the developers do their job and build homes
S0041.F	Russ Cassidy	n/a	Safety insecurity is always on the top of my mind, but unfortunately, because the Democrat leaders in our local area will not cooperate with ICE and federal authorities. I don't feel safe at all, and I never will.. SANDAG the county government, the city of San Diego and others need to start cooperating with the Trump administration and federal authorities
S0041.G	Russ Cassidy	n/a	Funding is an interesting topic funny that you brought that up wasn't SANDAG caught in the act of wasting money spending on lavish dinners? SANDAG just needs to be completely abolished. You people are disgrace. you're incompetent and you're corrupt
S0041.H	Russ Cassidy	n/a	SANDAG needs to just completely forget about this topic. All these green initiatives are a scam and most of them are not gonna work. The sun does not shine 24 hours a day and the wind is not always blowing. We are always gonna have to have some kind of fossil fuel to rely on for our energy during times when green energy sources do not work this whole liberal leftist wet dream of sustainability and zero carbon is exactly that a wet dream it's never gonna happen so cut it out
S0041.I	Russ Cassidy	n/a	Social equity oh, so you mean the new SANDAG plan is focused for benefiting anybody who is not a white Christian conservative Republican male. got it! Diversity equity inclusion really doesn't mean diverse is the equity and inclusion it means creating opportunities for those who are not white, lowering standards for people who are historically marginalized, and including everybody who is in a white conservative, Christian Republican male
S0041.J	Russ Cassidy	n/a	SANDAG is a complete and total disgrace you have misappropriated funds you have discriminated against people you have oppressed, smaller cities that have less influence just based purely on their political beliefs. SANDAG needs to be completely abolished and allow local governments to take their funds back and invest them wisely in infrastructure that makes sense for their own needs. SANDAG is not concerned about anyone but themselves and their left-wing political ideology.. therefore SANDAG is an illegitimate organization and should be completely defunded abolished and discarded
S0041.K	Russ Cassidy	n/a	Local governments can handle themselves as having a centralized organization like SANDAG does not benefit any of the smaller communities in the area. Their focus is mainly on the city of San Diego and the coastal elites that own, and control most of the money and power in this part of California if SANDAG was completely dismantled local governments would have those funds and be able to appropriate them in a way that benefits their own people, and not just certain people who believe in the same political ideologies
S0042	n/a	n/a	"Protected" bike lanes (which may include concrete stops and posts) can make cycling more dangerous! Debris collects in these lanes because street sweepers can not clean them. The debris can bring down a cyclist or force a cyclist into the roadway. Also, the infrastructure itself can cause bicycle crashes. This has happened many times on Pacific Coast Highway near Cardiff. These crashes may not get reported in the state wide data collection system if a motor vehicle is not involved. Green paint, sharrows and"Bicycles May Use Full Lane" signs may be more effective. Please solicit input from local cycling groups for your planning.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0043	Phil Young	n/a	Protected Bikeways Creating More Hazards Than Safety San Diego's ongoing investment in protected bikeways and cycle tracks has sparked a growing debate among cyclists and urban planners. While intended to safeguard riders from vehicle intrusion, critics argue that these barriers—often in the form of wheel stops, bollards and curbs—may pose more risks than benefits. A False Sense of Security? One of the key concerns is that most car-versus-bicycle accidents occur at intersections and driveways rather than on straight sections of bikeways. Since vertical barriers cannot be placed at intersections, their effectiveness in preventing crashes remains questionable. Additionally, cyclists are forced into narrow lanes lined with wheel stops, bollards, curbs and cars with limited maneuverability, reducing their ability to avoid hazards. Cars frequently run over bollards and wheel stops as see along Nimitz Boulevard and Sea World Drive providing no meaningful protection. Moreover, maintaining these bikeways has become a challenge, with vertical barriers obstructing routine street sweeping and repaving efforts, leaving lanes full of gravel and trash. A Costly Investment With Uncertain Returns Since 2013, San Diego has spent over $279 million on protected bikeways, yet ridership numbers have not significantly increased, and accidents continue to occur. Some advocates argue that innovative road markings—such as reflective colored thermoplastic tactile rumble strips edge markings and green paint bikeway riding surface—would be more cost-effective while still enhancing cyclist safety. San Diego Caltrans has refrained from installing vertical protected barriers on its bikeways, while local municipalities have embraced them in nearly all new projects. However, critics highlight that these installations grant government entities full legal (trail) immunity, meaning cyclists injured or killed on protected bikeways have no legal recourse. Caltrans get this one right - no vertical obstacles in the roadway. Alternative Solutions Replacing wheel stops and bollards with reflective colored thermoplastic tactile rumble strips markings would allow for easier lower cost road maintenance, and provide a safer experience for cyclists. These markings would create an audible and tactile alert for drivers when approaching bike lanes, potentially improving safety without the hazards posed by fixed barriers.
S0044	James B Salatka	n/a	Please do not put wheel stops and bollards next to bike lanes. They are a hazard to cyclists. Cyclists frequently need to leave the bike lane to avoid hazards such as broken glass, nails/screws, joggers, slower cyclists, shopping carts and cars (even when there are wheel stops). Wheel stops and bollards make that difficult and dangerous, trapping cyclists with the hazard in the bike lane or in the car lane after avoiding the hazard. I encourage you to look at the bike lanes in Carlsbad along the 101 as a great design that accommodates all users. There is a wide bike lane with a buffer zone. Where parking is needed, it is to the right of the bike lane and includes a door zone buffer. These bike lanes are easily shared by cyclists of all skill and speed levels. Joggers frequently use the bike lane rather than the sidewalk and it is not a problem because it is easy to move into the safety buffer or even the car lane for the moment it takes to pass. Contrast that to the "protected" lane in Encinitas. There have been numerous crashes caused by the wheel stops, including one fatality. Parking is to the left of the lane such that people need to walk across the bike lane to get to the beach or sidewalk. This creates a continuous zone of interaction between cyclists and pedestrians appearing from between cars to cross the bike lane. The result is that cyclists must ride at very low speeds to allow reaction time to dodge pedestrians. When even pre-teens are capable of 15-20mph on ebikes, that is a dangerous proposition. As in Carlsbad, joggers frequently use the bike lane in Encinitas. Rather than being able to pass with no interaction, cyclists must call out telling joggers to move, pointing out signs saying pedestrians are not allowed in the bike lane. This is unpleasant for everyone and ruined the serenity of what was once the nicest stretch of road on the coast. Most cyclists now just use the shared lane, rendering the protected lane a useless waste of space and money.
S0045	n/a	n/a	Regarding bike path, i.e. shallows, along the 101 in Cardiff / Encinitas. The curbs / bollards have been cause of many injuries and death. Del Mar had one bad injury and immediately removed similar bollards. That's good precedent. The solution along the 101 has worsened the imagined problem. Curbs and bollards, especially the green bollards, should be removed immediately.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0046	Karl Rudnick	n/a	This section heavily favors “protected” bike lanes (PBLs), officially CA Class IV separated bikeways. Before advocating Class IV separated bikeways countywide, reconsider the following: • Appendix K’s language effectively mandates NACTO’s All Ages & Abilities guidance—implying protected bike lanes (PBLs) are required. NACTO even claims “Protected bike lanes are appropriate for all streets, in all contexts,” an absolutist statement unsupported by rigorous, context-specific analysis. Local jurisdictions need flexibility to choose safer, more appropriate designs. The San Diego County Bike Coalition has published a Cycle Tracks Toolkit that can guide jurisdictions to a safe design that serves all road users. • Widely cited safety findings (e.g., FHWA’s “up to 53 % crash reduction”) rest on flawed methodologies: intersection crashes are omitted; some cities (e.g., Seattle) showed no statistically significant benefit; solo-cyclist crashes in PBLs are often unreported in California, so apparent safety gains may simply reflect underreporting. • Cardiff South Beach cycle track (Highway 101): A five-year before-and-after study by Medak and Linke combined CCRS/SWITRS data with Encinitas Fire Dept. EMS records and used a control segment immediately north of the track. Results show a 50 % crash increase after PBL installation, while the control segment remained stable. The “101 Crash List”, compiled by Serge Issakov ot the San Diego Bicycle Club, documents 31 crashes (21 absent from official records), including one fatality and multiple serious injuries. Applying the City of Encinitas’ EPDO formula to 19 track-related crashes yields over $16 million in damage equivalents (excluding human costs). Claimed ridership gains spiked only in 2020 (likely COVID-related) and by 2024 had reverted to 2016 levels—meaning crash rates rose without sustained increases in bike volumes. • South Coast Highway (Encinitas): When buffered Class II lanes were replaced with PBLs, combined police and EMS data show a 50 % rise in crashes. A comparable nearby corridor that retained buffered Class II lanes saw no change, underscoring that vertical separators (wheel stops + bollards) can introduce new hazards rather than eliminate them. • Alternative designs—such as narrowing travel lanes to 10–11 ft and adding wide painted buffers—can improve cyclist safety and preserve vehicle capacity without the confined, hazardous spaces created by low curbs and fixed bollards. Audible edge lines for bike lanes can alert motorists to stay out of bike lanes. If true physical separation is desired, consider a Class I facility. A blanket requirement for Class IV PBLs risks perpetuating these failures. The County should require robust crash analyses (including EMS data and control-segment comparisons) and explore lower-risk, context-sensitive treatments before mandating PBLs. Cyclists deserve genuinely safer infrastructure tailored to each roadway, not one-size-fits-all solutions.
S0047.A	n/a	n/a	Please give us more protected bikeways that connect to activity centers. For example, there is still no safe way to bike from downtown to Mission Bay. Similarly, the amazing Rose Creek Bikeway just dumps you out onto Gilman Dr which is an unprotected highway where cars go 60+ mph. There should be a fully protected route between UCSD and the Rose Creek Bikeway. Even the bike route from downtown to OB is full of dangerous gaps like crossing the 8 at Sunset Cliffs. You have to work with Caltrans to close these gaps.
S0047.B	n/a	n/a	Alternatives to car travel is a key component of protecting the climate. You need to stop widening the freeways and instead provide better bike infrastructure and public transit. Please keep the LOSSAN train corridor running by building the tunnel alignment under Del Mar with enough room for double track and catenary electrification.
S0048.A	n/a	n/a	Transit spending needs to be prioritized in order to alleviate traffic and parking congestion in the region.
S0048.B	n/a	n/a	Bikeways are vital to getting more cars off the roads.
S0048.C	n/a	n/a	More housing needs to be built around transit, otherwise I'm not sure how anyone plans to alleviate our regions over-reliance on cars.
S0049.A	n/a	n/a	. Transit stations need to be connected with protected bike lanes and pedestrian areas.
S0049.B	n/a	n/a	We need a connected network of protected bike lanes that kids and older adults feel safe in. My parents do not feel safe biking on the streets with car traffic. I don't feel safe in many parts of my bike commute. Riding from Hillcrest to liberty station still has dangerous parts. Bikes need to have fully separated trails using trees or concrete to create separation from cars. I've been harassed by cars honking at me and yelling at me. Someone throw a bottle at me once on my way home from work. I'm pregnant and planning to bike with my child when they are born. Safe streets are super important to me. I need my husband to come home from work safe. He also bike commutes.
S0050.A	Kris Marvel	n/a	We need more frequent times for busses especially during large events. The routes shouldn't be rerouted or cancelled when major events are happening. Routes should be more frequent & easier during large events so more people will use transit. It's super frustrating routes are decreased when people are most likely to use transit. The decreased routes also leave non-regular transit users with a bad experience, making it less likely they'll choose transit in the future.
S0050.B	Kris Marvel	n/a	Riding a bike in San Diego is so dangerous, Ive stopped riding except on protected paths. Our city has the ideal weather & topography for biking to become a form of mass transit yet none of the bike paths connect, leaving riders in deadly situations. Combine these poor routes with a total lack of traffic enforcement, and one can see why biking has not taken off in San Diego. The frequency of deaths & injury of pedestrians & bikers is appallingly high. Our city could be the next Paris if only leaders would think with a broader vision than fixing pot holes. Building a protected interconnected bike/pedestrian pathways connecting San Diego's awesome neighborhoods would be good for the environment, improve resident health & create a revenue engine for tourism. Please build interconnecting safe pathways for pedestrians & cyclists.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0050.C	Kris Marvel	n/a	The city needs to be divested from fossil fuel and car industries. Until city officials stop taking money from these lobbyists, our environmental goals will not make progress. Zero by 2035 won't be accomplished without massive changes in the status quo.
S0051.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0051.B	n/a	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare (like Vancouver and Washington DC)). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0051.C	n/a	n/a	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0051.D	n/a	n/a	I support high density housing, and mixed use buildings. I would like to see the bottom floors of high density housing as retail/commercial space for the public.
S0051.E	n/a	n/a	During December Nights 2024, a self cleaning bathroom was debuted. I think these should be all over the city's public parks. I'm happy to pay a few dollars for a guaranteed clean bathroom.
S0052.A	Kaylee Mendoza	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0052.B	Kaylee Mendoza	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0052.C	Kaylee Mendoza	n/a	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0053.A	n/a	n/a	Keep the LOSSAN alignment through Del Mar, don't let the wealthy home owners stop necessary infrastructure!
S0053.B	n/a	n/a	More protected bike infrastructure
S0053.C	n/a	n/a	Encourage and facilitate infill housing density, especially near transit
S0054.A	Zach Day	n/a	SANDAG should invest in a rail connection to the airport, and advancing the Purple Line project to meet climate action goals. And it should focus on increasing ridership and service reliability, through transit priority and safety measures, prioritizing our densest urban neighborhoods that are not as well served as they should be, before expanding out to suburban areas.
S0054.B	Zach Day	n/a	SANDAG should add more micromobility that connects to the same MTS system to streamline payment and generally make the system easy to use. Neighborhood electric vehicles (NEVs) sounds cool, but SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0054.C	Zach Day	n/a	Please expand and connect regional bikeways to make navigating San Diego by bike a feasible reality for more San Diegans. Families and less confident riders will chose to bike more if they feel safe! SANDAG has been responsible for the regions best bikeways like the new Pershing Bikeway. Please do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0054.D	Zach Day	n/a	I grew up when smog covered California cities and I want to avoid that in the future. Public transit and active transportation can help us meet our climate, energy, and air quality goals!
S0055.A	Kareston Markley	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas. Prioritizing places more densly populated and when people want to visit will increase ridership.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0055.B	Kareston Markley	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists. NEVs don't reduce traffic and don't reduce energy consumption the same way public transport can. Bikeshare parking on street (out of the way of pedestrians on the sidewalk) could be used to improve the daylighting of intersections.
S0055.C	Kareston Markley	n/a	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going!!! Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real. PROTECTED Bikeways like the bayshore bikeway make it easier to visit tourist attractions like coronado with my family without driving a car, reducing traffic, emissions, and noise pollution.
S0055.D	Kareston Markley	n/a	The overpasses across the 5 should be made safer for pedestrians and people on bikes. People often speed or drive recklessly in a rush to get on or off the highway. Especially since so many transit station are located along highways it should be made easier and SAFER to get from one side to the other to access transit.
S0055.E	Kareston Markley	n/a	Making transit, biking, pedestrian, and other infrasructure accessible to everyone including children and the diabled will improve ridership. There are many trips I don't take because it would take too long and there is no way to change my baby on the trolley. There should also be more space for bikes and strollers. When children aren't accomodated women are excluded.
S0055.F	Kareston Markley	n/a	I really like the zoom meeting format, it makes the meetings accessible to members of the public who aren't able to take the time to show up in person. I wouldn't be able to engage in SANDAG mettings otherwise. Also, bike everywhere day is awesome! Every year my kids and I have a great time!! I'm excited about the bayshore to border bike way, I wish there was more signage to tell people in the area what it was!
S0056	n/a	n/a	We need a network of protected bike lanes to get around the city. Doesn't feel good to take your life into your own hands every time you want to go to the grocery store. Making it safer to bike will mean more people will use that as their means of transportation; it is literally faster to get around this city the vast majority of the time on a bike. Every person in a bike is one car off the road which means less traffic, better air quality, and people outside of the car walking around their neighborhoods feel safer.
S0057.A	Conrad	n/a	The proposed purple line would be very beneficial to me and many people I know commuting from normal heights to Sorrento valley.
S0057.B	Conrad	n/a	I enjoy all the bike infrastructure that has been put in recently and would like to continue see it being invested as it gives me the ability to travel by bike instead of car.
S0058.A	Johnny Nilsen	n/a	The LOSSAN train corridor must be maintained and enhanced at all cost. It is the ONLY thing that relieves the massive auto congestion between and through L.A., OC, and San Diego. Trolleys and buses need to run on ten minute intervals all day and bus hours need to match trolley hours on all lines. Nothing worse than riding the trolley to a Transit Center at midnight to find all bus lines are done for the day. There needs to be less emphasis on fare enforcement and more on Security. The vibe on most Trolleys is one of lawlessness, with constant disorderly behavior, blaring of music, meltdowns, drug use, vaping, and physical/verbal altercations. Security presence at the most problematic trolley stations (12th and Imperial, Park and Market, 5th Ave, Old Town) needs to be robust and constant during running hours with unticketed loiterers aggressively removed. Smoking, public exposure, drug and alcohol use, littering, etc., all need to be policed immediately and aggressively.
S0058.B	Johnny Nilsen	n/a	Prioritize the F Street promenade connecting 3rd Ave in Chula Vista to the Gaylord Resort. Currently, there isn't even a single east/west bike lane in Chula Vista. There is no safe way for residents to bike to the Resort or the Bayshore Bikeway. Fix the gaps and dead ends on Pacific Highway from downtown to Mission Bay Park. There should be protected lanes the entire length. Don't let the vehicular cyclist road-riding crowd bully you into down-grading protected bike lanes along the Coast Highway. They want less infrastructure because it favors their preferred way to ride and it deters all the Freds they'd prefer to not share the roads with - Otay Lakes Road out to Campo Road is popular with cyclists, but, a narrow, curvy, death trap. Install traffic calming measures and protected lanes the entire length.
S0059.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0059.B	n/a	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0059.C	n/a	n/a	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0060.A	Jesse Clark	n/a	SANDAG must focus on increasing transit ridership and service reliability, through transit priority and increased frequency in our densest urban neighborhoods before expanding into suburban areas. SANDAG must also must prioritize realigning the coastal rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals.
S0060.B	Jesse Clark	n/a	SANDAG needs to push cities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). And SANDAG should focus public investment on improving multimodal mobility by increasing bus/trolley frequency, reliability, and safety especially where transit already exists.
S0060.C	Jesse Clark	n/a	SANDAG needs to expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. SANDAG must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities and the state if needed. We must build a more walkable and bikable San Diego and SANDAG has a key role in making that future real.
S0061	n/a	n/a	The cycle tracks installed on Cardiff South Beach 101 and most recently on Melrose and Sycamore in Vista (where I live) are NOT safer for cyclists, as is shown by Serge Issakov's (San Diego Bicycle Club) "101 Crash List" analysis. I am also aware - and not surprised by the results - of a five-year before-and-after study by Medak and Linke of the Cardiff South Beach cycle track on Highway 101 that shows a 50% crash increase after its installation! As an avid, lifelong recreational cyclist I strongly support the installation of bike lanes wherever possible. BUT I always avoid the types of cycle tracks installed on Cardiff South Beach 101 and now in Vista, because the "wheel stops" are a very serious crash hazard in the event I need to swerve to avoid debris or any other chance obstacle in the bike lane. "Wheel stops" also tend to retain debris leading to flats and blowouts of bicycle tires. As an automobile driver I'm also concerned these "wheel stops" can cause vehicle accidents, even roll overs, if there is any slight drift to the side of the driving lane. Additionally, they make it difficult for drivers who may quite legitimately need to use the bike lane space for right turns or to make way for emergency vehicles. Please consult the San Diego County Bike Coalition's "Cycle Tracks Toolkit" for guidance on safer bike lane designs that serve ALL road users. Thank you!
S0062	John Conover	n/a	Sand for beaches
S0063.A	Brian Nixon	n/a	Carmel Mountain employment and density housing areas should be connected to the Sabre Springs Transit center with a local bus route.
S0063.B	Brian Nixon	n/a	Rancho Carmel Drive north of Ted Williams Parkway should include a On-Street Bikeway.
S0064.A	Vahan H.	n/a	SANDAG needs to focus on the LOSSAN corridor. Millions depend on the train to LA and we can't jeopardize neglecting those rails nor stop improving them for future use. This includes electrification, double railing, moving it away from the bluffs, and better alignment so that the trains can run faster and more frequently. We also need renewed focus on rapid bus lines. We can transform our transit system over night for the fraction of the cost if we just painted bus lanes and installed transit signal priority.
S0064.B	Vahan H.	n/a	I should not need to be forced to call a ride via an app if our busses/trollies ran later into the night and were more frequent. As a last resort, a shared bike/scooter network can help me get home like we used to in San Diego. It's ridiculous that I feel stranded in Downtown unless I call a rideshare/taxi, when we could have those other options.
S0064.C	Vahan H.	n/a	The best bikeway that I rely on the most is the Meade bikeway, which is a SANDAG project. I also rely on the 30th bikeway, which the city setup, but it is a far cry in quality than the 4th/5th bikeways that SANDAG built. SANDAG is just better at building bikeways than local governments and it should not relinquish that role!
S0065.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas. Bring back the Balboa Park Streetcar sooner!
S0065.B	n/a	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0065.C	n/a	n/a	SANDAG has built some of the regiona's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0065.D	n/a	n/a	Build more transit as we fight to increase density and increase frequency

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0066.A	n/a	n/a	The shuttle in Oceanside is great but needs to be expanded or add a few more vehicles.
S0066.B	n/a	n/a	PLease fund the extension of the inland rail trail and the segment of the coastal rail trail to meet up with Carlsbad.
S0067.A	Dylan Hammer	n/a	An excellent subject to consider for the 2026 Plan would be the return of passenger trains to the Fallbrook Branch, finally giving North County residents a fun and practical alternative to Highway 76. Many tens of thousands commute daily from Fallbrook, Pala, Rainbow, Camp Pendleton, Bonsai and other nearby communities, so there would be more than enough ridership to justify having NCTD Sprinter trains operate on this highly-scenic route. Limited access platforms will keep station stops inside Camp Pendleton secure. Just on historical merits alone, getting NCTD trains into Fallbrook would give SANDAG a real publicity coup: Santa Fe Railway's Fallbrook line was the original route used, even before the Surfline was constructed...
S0067.B	Dylan Hammer	n/a	Because the Fallbrook Branch passes directly through Camp Pendleton - and was heavily used by the military (Navy, Marine Corps) until the line was damaged by heavy rains in 1996, the Trump Administration will likely provide Federal grants to pay for most (if not all) of the line rehabilitation costs.
S0068.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0068.B	n/a	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety, especially where transit already exists.
S0068.C	n/a	n/a	SANDAG has built some of the region's best bikeways, like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego, and SANDAG has a key role in making that future real.
S0069.A	n/a	n/a	Existing roads need fixing before we create new ones. Make developers pay for new road ways needed for build out.
S0069.B	n/a	n/a	Add more e bike stations and car shares
S0069.C	n/a	n/a	No more class IV bikeways. They are dangerous, unsightly and a gross waste of money
S0069.D	n/a	n/a	Fix local roads; too many potholes. Also fix and beautify those leading into the airport. We want to have pride
S0069.E	n/a	n/a	No road use fees or taxes.
S0069.F	n/a	n/a	Help control climate change, keep our energy clean and limit any offshore oil. No drill baby drill· here!
S0070.A	n/a	n/a	We need more connectivity, and reliable times. Transit is essential in a city. I only wish I could use it to get more places quickly.
S0070.B	n/a	n/a	Too many of our bikeways simply end, and need to be connected mindfully, prioritizing safety for those outside of cars. Far too much of our design places driver convenience over the safety of others. We end up with paint or flex posts, neither of which can stop a car being driven by someone who has lost control or is distracted. Design in San Diego for bikes is inconsistent, and that's what deters more people from riding. As someone who gets around almost exclusively by bike and transit, I'm often told that I'm insane. But we live in a city, and cities cannot function if everyone is driving. We need to be able to bike and walk, and seriously reduce the reliance on people driving cars and bloated trucks.
S0070.C	n/a	n/a	Mixed-use density is essential. It's wild that some of our busiest corridors are lined with single-story buildings, or, worse, parking lots. There should be businesses and housing all along University and El Cajon Blvd, with protected bike lanes and consistent sidewalks through it all.
S0071.A	n/a	n/a	Please prioritize this in your plans. Given how residents now commute from all over the county, it is no longer possible to continue to add vehicle capacity. It's not sustainable, it only skyrockets costs of road upkeep, and severely reduces quality of life. We must prioritize frequent and fast transit service.
S0071.B	n/a	n/a	The county has made a ton of progress on bikeways and comfortable walking paths over the last 4 years, but given that we started with next to no infrastructure (especially for bikes) there's still a ton of work to do. Please be focused on connecting networks so that there's regional connectivity. Please also create vertical protection from traffic, and take advantage of other ways to physically separate this infrastructure from car traffic. Empirical data proves that more people will choose to bike and/or walk to their destinations if they feel safe, and the route is efficient.
S0071.C	n/a	n/a	Please stop expansion. It's been proven in numerous studies that expansion never results in improving traffic flow. Instead, it creates more safety issues and it skyrockets costs.
S0071.D	n/a	n/a	Please use downtown Oceanside as a model of the economic benefit that can be realized if you invest in allowing more dense housing.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0072.A	n/a	n/a	Arterial Rapid Route 210 should be your number one priority and should have been put in place 20 years ago. This is the connection from uptown and mid-city to Old Town and the beach that has been missing. Not only will it fill major gaps in the current transportation connectivity, it will increase equity in coastal access for mid-city communities.
S0072.D	n/a	n/a	The bike routes are still sorely lacking in connectivity among their very pleasant pieces, and I see no plans to improve these issues. Key problem areas that I run into on every ride across town or to La Jolla from the college area include: (1) Lack of safe and fast connection from East Mission Bay Dr to the Santa Fe section of Rose Creek bike path. I am forced instead to cross over to Morena at Clairemont and then take the ramp to Balboa to Santa Fe. (2) Lack of safe and fast connection from Pacific Highway in Old Town to the well-paved and less heavily car-trafficked portions east of Qualcomm Way. The underpass under 163 on Camino de la Reina is dangerously poorly paved right as cyclists are blinded by the switch from light to dark conditions. The mall traffic is constant danger at every mall entrance/exit. (3) The on-ramp from Camino del Rio to I-15S ought to be eliminated. Failing that, there needs to be appropriate traffic signaling that allows bikes to get a head start across the ramp before cars are allowed to go. The signal from the off-ramp from 15S onto this road should be no turn on red. (4) There is no continuation past Talmadge for cyclists. We are dropped onto a dangerous stretch of Collwood with no good options for continuing east. At a minimum, there should be a traffic signal at 54th and Collwood that allows only pedestrians and cyclists use of the full intersection so we can cross both streets safely to get into the neighborhood.
S0073.A	Maxwell G	n/a	I am very disappointed in this 2025 Regional Plan, the purple line is now Light rail. It has been cut from all the jobs centers in Kearney Mesa, UTC, and Sorrento Valley. There is also no plan to bring Coaster and Surfliner rail services to San Ysidro. There is alot of busses in this plan which if they are in bus lanes and are frequent would be fine. But we cant be planning busses that will just get stuck in traffic. Traffic on a freeway or on a local road or an arterial will slow down the bus and cause people to not take it. For public transportation to be fast and efficient it needs to be separate or faster than cars and this plan is not showing that future. Also please accelerate a Rail transit project to be a 2035 goal. Starting off with a Trolley (not a streetcar) from downtown San Diego to Hillcrest along 6th Ave is an obvious project that can be done soon.
S0073.B	Maxwell G	n/a	NEV and Microtransit has routinely failed here in San Diego. The FRED downtown keeps getting budget cuts and has very long wait times as no one wants to fund it. The Microtransit in PB is slow and has been closed. The Oceanside Microtransit is operating but is new and a pilot project so I expect it to close soon. It is a basic economics issue of how few people can fit in the shuttles. Instead investing in new bus routes and bus frequency is a better use of money. And in areas that currently do not have good pedestrian and bike infrastructure, that investment is more important to how people get around than a temporary shuttle program. How many pilot programs will it take to realize that Microtransit does not work.
S0073.C	Maxwell G	n/a	Build more bikeways and more pedestrian infrastructure. When Sandag builds bikeways, they are amazing. And when Sandag builds pedestrian infrastructure, it make a neighborhood better. Please keep doing these great projects.
S0073.D	Maxwell G	n/a	Stop Highway widenings on corridors that lack adequate public transit. Induced demand is a huge problem in San Diego and people have few options other than to drive in many corridors like the i-15 and i-805 corridors, please build public transit first.
S0073.E	Maxwell G	n/a	We need a regional housing plan and regional transportation plan to go hand in hand, we also need more housing where jobs are (Kearney Mesa for example) and more jobs where people already live (National City and Chula Vista)
S0074.A	Riley Sutton	n/a	I absolutely love the trolley; it made it possible for me to work downtown as a student at UC San Diego, and I wish it went to North County as well. I would love to see more expanded bus routes also, and more train/trolley access in La Jolla/University City area. We have lots of buses right around UCSD campus but I want to be able to have more train stops and trolley stops in North County. Improving the transit access has significantly increased my ability to move around town, spend money at local businesses, explore San Diego, and expand my job search and find a job that is accessible by transit. I love the transit, love that you are planning to expand it further, and hope that you can do so quickly so I can use it as soon as possible!
S0074.B	Riley Sutton	n/a	I think that we do not have the most protected bike lanes that I have seen; in some areas of the city, cars park in the bike lanes, they fade into right turn lanes without a warning, or they are blocked by construction vehicles or other city projects. This makes it very difficult to bike because the lanes are so unreliable. I like the bike lane setup that I have seen in South Park, for example, where there are physical barriers preventing cars from coming into the bike lane, and it is wide enough so that we do not need to squeeze into one tiny line. The bike lanes and access around UC San Diego could definitely be improved. I also think that the city should have more purposefully walkable areas. This means a few things: proper bike lanes and walk lanes, absolutely, but also adequate parking and/or transit to come to the walking area, and mixed-use zoning! I love UTC where I can walk around and spend money but also take the trolley to get home. I also love Little Italy, where there are many businesses and houses (but the sidewalks are often cracked or sometimes unsafe, so they need more maintenance). Achieving more walkability and USE of walkable areas requires that we have the transit infrastructure to get there, and the mixed use zoning to make it an area worth walking to.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0074.C	Riley Sutton	n/a	I would love it if we had more land that was zoned for mixed-use. Mixed-use zoning allows me to live, work, and spend in the same location, and with proper transit access that connects various pockets of mixed-use zoning, residents (like me) will be far more inclined to use the transit AND get housing/spend money in the city. I use the trolley to go downtown to go to Padres games, get dinner with friends, go to concerts, go to my job; I use the Blue Line to visit UC San Diego to take classes, see friends, and go to the doctor; I use the Blue Line to go to UTC to visit friends in their apartments, go to my dentist, and of course spend money at the mall. The transit allows me to go somewhere, but the mixed-use zoning is what makes me WANT to go there, so you need both parts to encourage residents (and visitors) to enjoy the city to its fullest!
S0075.A	n/a	n/a	My family uses the Pershing Dr bike trail on a daily basis. We could use a lot more bike trails like this.
S0075.B	n/a	n/a	we need more safe places to ride our bikes so that we can leave the car at home. thx
S0076.A	n/a	n/a	More non-polluting transit. Wish we had a Coaster that wasn't fueled by diesel. Need more transit lines here in Encinitas.
S0076.B	n/a	n/a	Separate bike paths are the safest. With we had more
S0076.C	n/a	n/a	I'm tired of builders who promise affordable housing in their latest development. The affordable housing simply isn't affordable to middle-class residents.
S0076.D	n/a	n/a	I'm worried that the fed govt is taking away too many grants that will help people survive intense, destructive weather. I worry the FEMA will not have enough people to warn residents soon enough that weather destruction is coming their way. Then after the destruction, I worry that the fed has taken away too many resources to support those people who have lost so mulch in the climate chaos, destructive weather
S0076.E	n/a	n/a	What can we do to support affrdable solar panels and EV cars, when we have an administration who denies climate change and supports fracking and fossil fuels.
S0077	n/a	n/a	I think we need a trolley going around the dense neighborhoods in San Diego. Hillcrest Northpark, South Park, a loop around Balboa Park would be so useful in shaping development patterns and usage to the city. Especially as Hillcrest densifies.
S0078.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor (with room for future electrification!) and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0078.B	n/a	n/a	SANDAG needs to push cities - especially San Diego, Chula Vista, and other coastal communities - to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety - especially where transit already exists.
S0078.C	n/a	n/a	SANDAG has built some of the region's best bikeways - like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. Above all, focus on making a network that connects (NOT isolated projects); this will generate far more usage and justify further expansion of our bikeways. We can build a more vibrant, walkable San Diego - and SANDAG has a key role in making that future real.
S0078.D	n/a	n/a	Please take advantage of the bills coming out of Sacramento right now. There are so many opportunities to increase our housing supply, especially near transit. This can be a great opportunity to provide some reliable operations funding for our desperate transit systems. Be realistic about the amount of usage "park and rides" actually get... perhaps housing would be a better use of the space, generating more ridership than a parking lot.
S0079	Ray Ramage	n/a	Encinitas must immediately remove the road furniture in Cardiff that has caused more than 36 mishaps and one fatality in a place where mishaps were rare before 2020. Every day that it is allowed to remain in the public right of way, another cyclist could be hurt. I have been cycling here for more than 50 years and never had a problem before the installation of the road furniture and the narrowing of the usable portion of the roadway. The Coast Highway must be restored to its original configuration. Parking on the Coast Highway must be removed. There is plenty of room to park at Seaside.
S0080.A	n/a	n/a	Focus on trains! If SD continues to grow, we need to build infrastructure immediately for trains/metros/trolleys to access all major points within the city so that cars are not necessary.
S0080.B	n/a	n/a	Flexible fleets are confusing. Prioritize a regular transit system.
S0080.C	n/a	n/a	More bikeways and walkways! Please keep SD a safe biking and walking city! We love the new Pershing bike path. Bikeways not near highways too please. "We can build a more vibrant, walkable San Diego - and SANDAG has a key role in making that future real."
S0080.D	n/a	n/a	Investigate loudness of sirens - can they be reduced? (Addressing noise pollution)
S0080.E	n/a	n/a	Implement and enforce the ban on gas powered leaf blowers Consider engaging community for issues such as shoreline preservation. Awareness is key.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0081.A	n/a	n/a	We need better transit options and incentives for people to use transit vs personal cars. Trolley connection to the airport and liberty station from downtown would make so much more sense to help move locals and tourists around without causing more traffic.
S0081.B	n/a	n/a	As a year round, perfect weather place, we should build and encourage more bikeable options. Safety is a huge concern when biking and walking given the lack of concern drivers have for following rules of traffic (speed, stop signs, right of way) as well as the emphasis Transportation professionals put on speed and efficiency of vehicular traffic over all other types of traffic. I use bikeways, bike lanes, frequently and would like more options that are safer.
S0081.C	n/a	n/a	Transportation professionals put an overweight emphasis on speed and efficiency of vehicular traffic over all other types of traffic. We should not be building more lanes which just increases traffic and congestion, but consider other options. Local roadways should also be built more pedestrian friendly vs feeling like highways. Reduce speed and lanes.
S0082	Michael von Neumann	n/a	Roads and streets are meant to facilitate people and goods moving from one point to another. While automobiles and trucks are by far the primary users of roads and streets today they are not the only users. Many people walk or ride bicycles to get around. It is the responsibility of government to ensure the safety of all users of roads and streets. Planning for future roads and streets can and should include making bikeways and walkways as safe as possible by separating pedestrians and bicycle riders from motor vehicles. However, very few new roads and streets are built so current roads and streets have to be altered to allow safe cycling and walking. Implementing changes to current roads and streets is a challenge and often controversial. In many cases alterations such as installing raised crosswalks, separated "protected" class IV bikeways with bollards and wheel stops, buffered painted Class II bike lanes, travel lane width reductions and travel lane eliminations are viewed by the operators of motor vehicles as infringements on their rights and habits for what many see as a small number of pedestrians and cyclists. Government has to take steps to ensure the safety of all road users especially those most at risk, such as pedestrians and cyclists, many of whom are not able to purchase and operate a motor vehicle. One's economic status should not be a factor for how safe they are when using streets and roads. Safe bikeways and walkways should take priority when considering changes to roads and streets. That priority can be demonstrated in many ways including by setting and enforcing slower speed limits, installing additional signalized crosswalks, increasing distance between motor vehicle travel lanes and walkways and installing more bikeways. Of course there is no "one size fits all" approach to every road, street, neighborhood or community but the guiding principle has to be whether whatever is done makes pedestrians, bicycle riders and other ways of using roads and streets less likely to be killed or seriously injured.
S0083	Guadalupe	n/a	NA
S0084.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0084.B	n/a	n/a	SANDAG needs to push cities - especially San Diego, Chula Vista, and other coastal communities - to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety - especially where transit already exists.
S0084.C	n/a	n/a	SANDAG has built some of the region's best bikeways - like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego - and SANDAG has a key role in making that future real.
S0084.D	n/a	n/a	Highways and roadways can and should be paid for by their use. SANDAG's mileage tax *was a good idea*. Some equivalent thereof is inevitable, and SANDAG can either lead the way to long-term, sustainable funding for wide-area infrastructure, or continue to chase deficits and subsidize motor vehicle traffic at the expense of a comprehensive transportation vision. SANDAG should be brave and lead on modernizing funding strategies for highways and roadways, especially in a region which is leading the transition away from fossil-fuels (and the implicit use-tax funding they historically enabled).
S0084.E	n/a	n/a	Bring back the mileage tax for road users.
S0085.F	Monica Johnson	n/a	Widen and put new asphalt on Highway 67. Put asphalt on more roads.
S0085.G	Monica Johnson	n/a	Fire prevention, forest clearing
S0086.A	n/a	n/a	It is long overdue for a trolley connection to the airport. The Amtrak to L.A. is a jewel of Southern California. Keep it going with the tunnel in Del Mar.
S0086.B	n/a	n/a	You need to do a better job of connecting the bikeways together. There are huge dangerous gaps which lead them to being less used by women and families who don't feel comfortable riding across these gaps. Like riding between Hillcrest and North Park on University. The bike lane just disappears between 9th and 10th Aves and you're just stranded in a busy street. There's also no good way to bike from Hillcrest to the beach. We need a good bikeway on Washington st.
S0086.C	n/a	n/a	SANDAG needs to support more dense housing so that less people need to drive far distances between home and work.
S0086.D	n/a	n/a	Stop spending most of the budget on freeways which pollute our planet.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0087	Jim Baross, President of the California Association of Bicycling Organizations	California Association of Bicycling Organizations	Separated Bikeways (Class IV), often promoted as "Protected Bike Lanes"· are well-intentioned but not well-suited for transportation-savvy bicyclists. The overreliance on this facility type undermines safety, mobility, and efficiency for those who already rely on bikes as everyday transportation. Infrastructure should evolve with its users. Let's create a system that welcomes new cyclists and respects the needs of those who are already riding, and riding well. Experienced Cyclists Are Underserved - " While it's important to welcome new or less-confident riders, infrastructure should not limit those with greater skill and higher mobility needs. Separated Bikeways restrict visibility, speed, and flexibility that competent riders require. Substandard Widths Reduce Functionality - " These facilities often lack space for safe passing or side-by-side riding. This leads to slower travel and operational inefficiencies, discouraging use by riders who prioritize time and practicality. Physical Barriers Introduce Hazards - " Curbs, posts, and other vertical elements can deflect wheels and cause crashes. These barriers pose serious risks not found in traditional shared lanes or Class II Bike Lanes. Intersection Conflicts Are Increased - " Separated Bikeways often create dangerous blind spots at driveways and intersections, where most crashes occur. Without strong signal controls or visibility, they increase the risk of right hooks, left crosses, and drive-outs. Recommendation: To truly serve all bicyclists, the region must support a variety of bicycle facilities - including Class II Bike Lanes, Shared Roadways, wide curb lanes, and low-speed shared streets. Comfort for the inexperienced should not come at the cost of safety and mobility for experienced riders. Novice bicyclists become competent riders.
S0088.A	n/a	n/a	The bikeways are great, me and my friends have been biking a lot more since you put them in. But some of them are scary. They need better barriers than the plastic sticks. The ones with concrete barriers feel the safest.
S0088.B	Marissa Saenger	n/a	Build more concrete bikeways.
S0089.A	Marissa Saenger	n/a	I support allocating more resources to buses, trolleys, and trains. In particular, I support more frequent bus, trolley, and trains, and adding transit lines to heavily-trafficked routes to reduce vehicle traffic. I support allocating resources toward youth transit vouchers and better amenities at transit stops, such as restrooms, benches, shade, and water fountains.
S0089.B	Marissa Saenger	n/a	I support clean neighborhood microtransit options such as bikeshares.
S0089.C	Marissa Saenger	n/a	I strongly support expanding safe, protected bikeways and walkways, as well as traffic calming on local roadways in order to protect pedestrian and cyclist safety.
S0089.D	Marissa Saenger	n/a	I do NOT support highway expansion under any circumstances. I support replacing car lanes with bus/bike-only lanes and reducing speed limits on local roadways in order to improve driver and pedestrian/cyclist safety.
S0089.E	Marissa Saenger	n/a	San Diego county needs to be doing everything it possibly can to reduce greenhouse gas emissions and improve local air quality in the transportation sector.
S0090.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0090.B	n/a	n/a	SANDAG needs to push cities, especially San Diego, Chula Vista, and other coastal communities, to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety, especially where transit already exists.
S0090.C	n/a	n/a	SANDAG has built some of the region's best bikeways, like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego, and SANDAG has a key role in making that future real.
S0091.A	n/a	n/a	El camion tarda mucho. Fin de semana las estaciones del trolley son inseguras. *** The bus takes a long time. Trolley stations are unsafe on the weekends.
S0091.B	n/a	n/a	Las paradas de los trolleys y camiones estan inseguras. *** Trolley and bus stops are unsafe.
S0092.A	n/a	n/a	We need SANDAG to continue to build bikeways throughout San Diego County. Both the quality and safety of the protected bikeways are much better when SANDAG builds them then when the individual cities do. Having SANDAG build them also brings more design consistency. Design consistency is important for safety because it means both cyclists and drivers know what to expect. This is especially important for bike routes that go between cities.
S0092.B	n/a	n/a	SANDAG should be focused on providing safe alternatives to driving.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0093.A	n/a	n/a	While the Draft Proposed 2025 Regional Plan is presented as a pragmatic and responsive evolution of the 2021 vision, a critical analysis reveals a significant and troubling discontinuity in strategic thought. The near-total erasure of Next OS from the plan's public-facing narrative is not a mere messaging tweak; it is a strategic retreat that demonstrates a fundamental misunderstanding by SANDAG's executive leadership of what a "back-to-basics" approach must entail in the 21st century. This oversight is most alarming when viewed through the lens of data governance and readiness for Artificial Intelligence (AI), exposing a critical gap between the agency's stated technological ambitions and its on-the-ground strategic priorities. The 2021 Regional Plan, for all its controversy, was strategically coherent. It correctly identified that the "5 Big Moves" were not five separate initiatives but an interconnected ecosystem. Next OS was its central nervous system the digital platform that would enable the other four physical moves to function as a single, intelligent organism. It was the core enabler of the entire vision, promising to integrate transit, manage corridors, and provide a seamless user experience. The May 2024 "Next OS Concept White Paper" further details this sophisticated vision, outlining a clear path toward a data-driven transportation network. In stark contrast, the 2025 Draft Plan relegates this "brain" to an afterthought. By removing the Next OS branding and failing to explicitly champion its development, SANDAG sends a clear message: technology is an optional, ancillary layer, not the fundamental infrastructure it truly is. The plan presents a list of discrete projects "bus routes, road improvements, bike lanes" that, without a unifying digital backbone, risk becoming a collection of "dumb" assets. This approach is akin to building a modern city with state-of-the-art buildings but treating the power grid, water mains, and fiber optic cables as secondary concerns to be figured out later. The pivot to a "back-to-basics" approach is, on the surface, a politically savvy response to public feedback. However, SANDAG's leadership appears to have misinterpreted this call as a mandate to return to a 20th-century model of transportation planning, one focused solely on physical assets.
S0093.B	n/a	n/a	A modern, effective "back-to-basics" strategy does not mean abandoning technology; it means recognizing that data infrastructure is the new basic. The fundamental building blocks of a 21st-century transportation system are not just concrete and steel, but also: Data Standards: Common languages for different systems to communicate. Data Sharing Agreements: The legal and operational frameworks for collaboration. Data Stewardship: The responsible and ethical management of public data. These elements are the non-negotiable foundation for efficiency, safety, and future-readiness. By failing to champion Next OS as the vehicle for establishing this foundation, the 2025 plan prioritizes the visible (a new bus) over the vital (the system that makes the bus run on time, adapt to traffic, and connect to a rider's app). The most damning aspect of this strategic oversight is what it reveals about SANDAG's preparedness for the future. The promise of Next OS was not just about convenience; it was about leveraging data analytics and, ultimately, Artificial Intelligence to optimize the entire regional network. However, AI is not magic. It is the product of feeding massive, clean, and well-structured datasets into powerful algorithms. The principle of "garbage in, garbage out" is absolute. Without a robust, recognizable, and publicly championed data governance program, the promise of an AI-optimized network is a fantasy. For years, SANDAG has operated without such a program. Data remains siloed across agencies and jurisdictions, standards are inconsistent, and sharing is ad-hoc. The 2025 plan, by sidelining the very platform designed to solve this problem, demonstrates a profound lack of understanding of the necessary groundwork. It is a tacit admission that the hard, unglamorous work of building a true data foundation is not an executive priority. The de-emphasis of Next OS in the 2025 Draft Plan is more than a communications failure; it is a failure of executive vision. It signals a retreat from the complexities of digital transformation toward the simpler, more familiar territory of project-by-project implementation. This approach is dangerously shortsighted. A true "back-to-basics" plan for a modern transportation agency must treat its data governance program with the same urgency and importance as its capital improvement program. Data is an asset, and the platform to manage it's "Next OS" is critical infrastructure. By failing to maintain continuity of thought on Next OS, SANDAG's leadership risks building a system that is already obsolete. They are planning for the San Diego of yesterday, not the data-driven, intelligent, and responsive region of tomorrow. Without a public, committed, and funded strategy to build the digital foundation, the 2025 plan is not a step forward but a significant step back into a paradigm the "5 Big Moves" were rightly intended to leave behind.
S0094.A	Charlene Pulsonetti	n/a	I would like to see regular public transportation from Ramona and Julian to transit centers along the I-15. I love public transportation, but only when it is regular, efficient, and cost effective.
S0094.B	Charlene Pulsonetti	n/a	I would also like to see traffic calming along the old-town section of Ramona's Main Street, and more street crossings. It's really dangerous at the moment, and having people drive recklessly is killing small businesses in that part of the community.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0095	Matt	n/a	I am writing to urge this body to prioritize methods of transportation other than cars. The way San Diego is set up currently is that almost everyone is forced to have a car. Bus and trolley routes are inefficient and don't go a lot of places people want to go, or are too infrequent or have travel time too long to be viable solutions. Every single time we spend a truckload of money to widen a freeway, they just get clogged up again. In some places, our freeways are 15 or 16 lanes wide, and still there is bumper to bumper traffic. Widening the freeways is a proven way to increase traffic and increase travel time. Study after study concludes this. The definition of insanity is doing the same thing and expecting different results. Instead, I urge you to prioritize real, efficient mass transit. Look, LA prioritized car for decades, and it's now infamous for it's god awful traffic. So infamous that they are now investing billions of dollars to improve their rail system. Lets just skip the awful traffic part and go straight to the rail part! Why can't we put a rail line down the center of the 15? Down the center of the 805? down the 5? Take one lane in each direction and add dedicated rail lines. They do it in LA. They do it in the Bay. Why doesn't our trolly go to the airport? Why doesn't it go anywhere near the beach. Honestly, it's embarrassing that we cannot get this done. Please, don't let San Diego turn into LA. Please, prioritize good rail system improvements before you spend that money just to make our traffic situation worse. Thank you
S0096	Penn Diehl	n/a	Reduce greenhouse gas emissions: While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes. Accelerate timeline for transit: 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible. As a resident of La Jolla, I strongly desire to utilize public transit to navigate the city, primarily to alleviate the burdens of traffic congestion and parking scarcity. However, the current bus service from my apartment on Gilman Drive to the La Jolla Village area is too inefficient. The significant time it takes to travel this relatively short distance makes using the bus impractical compared to driving, despite my strong preference for public transportation. We desperately need more efficient bus routes and accelerated service to make transit a viable and attractive option for residents like myself. Thank you, Penn Diehl
S0097	Emily J Tingley	San Diego 350	My name is Emily Tingley with San Diego 350. I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. NO to highway expansions: There must be NO highway expansions in SANDAG's plans for the future. This includes adding managed lanes, as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including last mile microtransit, and safe walking and biking infrastructure.
S0098.A	Christine O'Connor	n/a	San Diego has a good transit system. We need to add to it. We do not need more highways.
S0098.B	Christine O'Connor	n/a	We n ed more affordable housing!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.A	Kesav Gupta	n/a	My name is Kesav Gupta. I'm a 17-year-old student and a transit rider. I rely on MTS buses and the trolley to get to school, meetings, work, and home. I don't drive. Transit is my only option and it fails me constantly. I've waited for buses that never showed up. I've had to cancel events because the Blue Line trolley ran 15 minutes late. I've stood at dark, unshaded stops at night, with no real-time information, just hoping I was safe. And still, I ride. Because I have no choice. That's why reading the Draft 2025 Regional Plan felt like a slap in the face. The plan talks about expanded transit and 35 new Rapid bus routes but by 2035. That's 10 years from now. I'll be nearly 30. That's not a plan that's a delay. We don't have that kind of time. Our climate doesn't have that kind of time. Our communities don't have that kind of time. Transit in San Diego needs to be fast, frequent, and dignified not 15-minute headways and vague promises. We need 7.5-minute frequency on all trolley lines by 2029. We need 10-minute buses on all core routes. We need real shelters with shade and bathrooms. We need 24-hour service. None of this is funded in the current plan. The plan says we'll reduce per capita GHG emissions 19.3% by 2035 but that depends on shifting how people move. You can't do that without giving people real alternatives. The only way to get people out of cars is to make transit more convenient than driving. Right now, it's not even close. This plan spends $73.9 billion on transit, but most of that is locked into capital projects. Where's the funding for frequency? For actual service? For the drivers we desperately need? For bus lanes that make routes reliable? The answer: nowhere. It's buried under planning jargon and delayed timelines. And the people who suffer most? Black and brown communities. Low-income seniors. Students like me. Workers with night shifts. People with disabilities. We are the backbone of this system, and we're treated like afterthoughts. I've seen friends drop out of college because the bus took over two hours to get them there. I've stood at stops with mothers holding tired toddlers, trying to get home. I've been stranded after meetings because there was no bus after 9:30 p.m. That's what this system does to us. It isolates us. It punishes us. SANDAG says this plan is equitable, healthy, and convenient. But that's not the experience of a single rider I've ever met. Not until we fund frequency. Not until we make dignity a baseline. Not until you treat us like the people this region is supposed to serve. We don't want more talk. We want to get where we're going safely, quickly, and without shame. And we want it now.
S0099.B	Kesav Gupta	n/a	The Draft 2025 Regional Plan gives Flexible Fleets barely a mention and that's a massive mistake. According to the finance plan (Chapter 4), just $201 million or 0.16% of the total $125 billion is allocated to Flexible Fleet investments over the next 25 years. That's a deeply inadequate commitment to what should be a central mobility strategy in a just, climate-forward transportation system. Flexible Fleets are framed in the plan as short, local connections: microtransit, neighborhood electric vehicle shuttles, and other demand-responsive services. The plan calls them a key strategy for improving access and bridging first/last mile gaps (Chapter 2, page 24). But the investment level doesn't match that claim and the timeline doesn't either. The entire rollout is backloaded. Most of the funding and service expansion isn't scheduled to arrive until after 2035, long after the critical needs of riders in Environmental Justice communities should have been met. And while the plan mentions existing pilots like gO'side and Via El Cajon, it fails to clearly outline how or when these services will scale regionally or what criteria will be used to prioritize expansion. If SANDAG is serious about improving transit access, mode shift, and equity, Flexible Fleets need to be prioritized, not buried. The current regional transit system struggles with frequency gaps, long transfer times, and last-mile barriers. This disproportionately harms lower-income residents, students, and disabled people especially in communities like City Heights, National City, and San Ysidro. The plan claims it will promote equitable access (Chapter 1, page 12), but without expanding high-coverage, low-wait-time microtransit, that promise falls flat. There are no clear service guarantees, frequency targets, or minimum standards for Flexible Fleets in this plan. Where's the commitment to wait times under 10 minutes during peak periods? Where's the integration with high-ridership MTS trolley and bus routes? Where's the vision for universal app integration or free transfers between modes? SANDAG needs to triple its investment in Flexible Fleets and establish a clear, community-prioritized rollout plan by 2026. Service zones should be targeted based on need not based on which cities already have grant writers or political pull. That means prioritizing neighborhoods with low car access, long commute times, and high proportions of youth, seniors, and transit-dependent households. Additionally, the plan must clarify how SANDAG will support local jurisdictions in applying for federal microtransit grants, how it will fund operations (not just capital), and how it will guarantee that these services don't just exist but work. The Regional Plan talks about transformation. But Flexible Fleets aren't transformative at 0.16% of the budget. They're a footnote. That needs to change or this won't be a plan for the future. It'l be another missed opportunity.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.C	Kesav Gupta	n/a	The Draft 2025 Regional Plan talks a big game on active transportation, but the reality is underwhelming. The plan claims to expand the regional bikeway network from 182 miles today to 721 miles by 2050 (Chapter 2, page 21), but that timeline is decades too slow, and the strategy lacks both urgency and ambition. If SANDAG is serious about meeting its goals for safety, climate, and equitable mobility, this section of the plan needs major revision. First, the funding. Of the $125 billion plan, only $5.35 billion just over 4% is allocated for active transportation projects (Chapter 4, Table 4.2). That includes everything from major corridors to neighborhood projects. For comparison, Complete Corridors receive $24.8 billion. Local streets and roads get $14.8 billion. The priorities are clear and walking and biking aren't among them. This is unacceptable in a plan that claims to build a safe transportation network for all users and reduce greenhouse gas emissions from vehicles. Active transportation is the most efficient, cost-effective way to reduce VMT, improve public health, and close mobility gaps in underserved neighborhoods. But SANDAG's current pace and investment level guarantee that thousands more will be hit or killed before this network is built out. The timeline to 2050 is especially concerning. Safe bikeways and sidewalks should not take 25 years to deliver. Every year we delay means more people are left to walk or bike in unsafe conditions. We need front-loaded investments, with at least half of the network especially near schools, transit stations, and job centers completed by 2030. Moreover, the plan doesn't set clear benchmarks for separated infrastructure. Class I and Class IV bike lanes which physically separate riders from vehicles are proven to increase ridership and reduce crashes. Yet the plan doesn't commit to what percentage of the network will meet this standard. Painting bike lanes on dangerous arterials does not make them safe. On walkability, the plan is even thinner. There's no clear strategy to retrofit missing sidewalks in older neighborhoods, no funding line item for ADA curb ramps, and no prioritization framework for pedestrian safety upgrades in Environmental Justice communities. If SANDAG is committed to equity, these fixes cannot be optional they must be guaranteed. Lastly, SANDAG must create enforceable performance metrics tied to actual outcomes: reductions in pedestrian injuries and deaths, increases in ridership, and improved sidewalk and bikeway access scores in historically underserved zip codes. If we're not measuring success in terms of lives saved and people empowered to move safely without a car, then we're missing the point. This plan needs to do more than list bike miles on a map. It needs to deliver a safe, connected, protected, and fast-built network now, not in 25 years. Anything less isn't just delay it's neglect.
S0099.D	Kesav Gupta	n/a	The Draft 2025 Regional Plan continues to fund highway expansion under the misleading framing of Complete Corridor and Managed Lanes. While the plan claims these projects support a multimodal system, the reality is that they further entrench car dependency, worsen air quality, and undercut SANDAG's climate and equity goals. The plan allocates $24.8 billion for Complete Corridors (Chapter 4, Table 4.2), significantly more than what is allocated to transit operations, flexible fleets, or bikeways. These corridors include managed lanes (Chapter 2, page 22), which are often new or expanded freeway lanes marketed as congestion management. But study after study has shown that widening highways including by adding managed lanes induces more driving, increases vehicle miles traveled (VMT), and leads to more traffic, not less. SANDAG's own climate modeling (Chapter 2, page 17) claims a 19.3% reduction in per capita greenhouse gas emissions by 2035. But that goal is undermined by highway projects like the I-805 express lanes and SR-125 and SR-94 auxiliary lanes (Chapter 3, page 32). These expansions will generate more emissions for decades. You cannot fight climate change while expanding the infrastructure that causes it. This plan also continues the legacy of harm highways have caused in communities of color. Entire neighborhoods especially in Southeast San Diego, Barrio Logan, and National City were destroyed or divided by freeway construction. Yet the 2025 plan offers little in the way of repair. Where is the funding for freeway caps? For reconnecting communities split by overpasses? For air filtration and sound walls near schools along high-traffic corridors? The timeline only makes this worse. Highway projects are scheduled for the near term, while transit investments are delayed until 2035 or beyond. That's a backwards approach for a region facing a climate emergency. The funding must reflect urgency and right now, it doesn't. To align this plan with its own stated goals of equity, safety, and environmental responsibility, SANDAG must:Cancel all general-purpose and managed lane expansions;Reallocate those billions to high-frequency transit, active transportation, and flexible fleets;Fund projects that undo freeway harm and improve access for non-drivers;Tie any remaining road funds to strict VMT reduction and zero-emissions mobility standards. This is not a neutral issue. Every dollar spent on widening freeways is a dollar not spent protecting our air, our communities, and our future. There is no path to climate justice or transportation equity that includes expanding highways. It's time to stop paving over the problem and start building real solutions

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.E	Kesav Gupta	n/a	The Draft 2025 Regional Plan's approach to goods movement misses a critical opportunity to align freight with public health, equity, and climate goals. While the plan emphasizes economic development and regional competitiveness, it largely avoids addressing the harmful impacts that freight corridors and diesel-heavy logistics hubs impose on frontline communities across San Diego County. The plan calls freight a key part of our regional economy and includes continued investments in highways, intermodal facilities, and border crossings to improve the flow of goods (Chapter 2, page 23). Yet it lacks any binding commitments to reduce the emissions, noise, and health burdens that these same systems create in neighborhoods like Barrio Logan, National City, Otay Mesa, and San Ysidro. This omission is unacceptable. Freight is one of the largest contributors to local diesel particulate pollution. Portside communities already suffer higher rates of asthma, cardiovascular disease, and respiratory illness, driven in large part by exposure to diesel exhaust from heavy-duty trucks, ships, and rail. SANDAG must not treat freight as emissions-neutral it is a public health crisis for those living near the infrastructure. While the plan references the San Diego and Imperial Counties Sustainable Freight Strategy and highlights border efficiency improvements like Otay Mesa East POE (Chapter 3, page 32), it stops short of requiring emissions reductions from freight-related projects. There is no plan to phase out diesel trucks. There is no strategy for zero-emission freight rail. There is no funding earmarked for electric truck charging infrastructure. And there is no mandate that future freight projects meet environmental justice screening. Instead, the plan continues to support widening highways and freight corridors under the Complete Corridors framework, without setting emissions caps or pollution targets. These projects will bring more trucks not cleaner air. To course-correct, the Regional Plan must: Establish clear GHG and local pollution reduction targets specifically for freight; Prioritize investments in zero-emission truck infrastructure and fleet transition; Phase out diesel truck usage at border crossings and intermodal hubs by 2035; Ensure that all freight investments undergo environmental justice screening and public health analysis; Require community consultation and co-design in freight-heavy regions before advancing new projects. Freight movement must evolve not just for economic efficiency, but for the lives of those who live closest to the trucks, trains, ports, and warehouses. SANDAG cannot continue to externalize the costs of freight onto the lungs of working-class communities. The plan must center people, not just cargo.
S0099.F	Kesav Gupta	n/a	The Draft 2025 Regional Plan's approach to transportation technology is overly focused on optimization and innovation for its own sake, rather than grounded in climate action, safety, or equity. While the plan highlights Smart Intersection Systems, data analytics, and even Advanced Air Mobility (Chapter 2, page 24), it lacks clear commitments to ensure that these technologies actually serve the people most dependent on the transportation system not just the convenience of higher-income drivers. Emerging technologies must be judged by how they improve access, reduce emissions, and increase safety especially for people who walk, bike, or rely on public transit. Yet the plan frames transportation tech mostly as a tool for managing vehicle flow and reducing congestion. This is a fundamentally outdated lens in a region where transportation makes up over 45% of greenhouse gas emissions. If the goal is climate resilience, we must be using technology to support mode shift, not just to streamline car traffic. Similarly, there's no clear implementation timeline, funding commitment, or regional performance metric tied to these technologies. How will success be measured? How will underserved communities be protected from digital surveillance, algorithmic bias, or increased traffic speed in neighborhoods that already face high rates of injury and fatality? SANDAG also gives space to speculative tech like Advanced Air Mobility (AAM), despite admitting it will take many years to emerge and currently offers no actual benefit to most residents. Meanwhile, core technologies that would immediately benefit the public such as real-time bus arrival data at every stop, fare integration across platforms, or universal wayfinding for disabled riders remain underfunded or unmentioned. To realign this plan with its stated goals of convenience, safety, and equity, SANDAG must: Set clear standards that all transportation tech must prioritize safety, low-income riders, and mode shift; Expand investments in proven technologies like TSP, automatic pedestrian detection, and real-time info for all modes; Reject the framing of tech as a traffic management tool and center its role in reducing VMT and increasing non-car access; Require community oversight and opt-in for technologies that impact surveillance, data privacy, or public space use; Deprioritize speculative systems like AAM until real public-serving systems are fully deployed and funded. Technology must be a tool, not a distraction. If this plan is going to meaningfully serve San Diego's future, it needs to focus on what works not what dazzles.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.G	Kesav Gupta	n/a	The Draft 2025 Regional Plan appropriately links land use and transportation, but it lacks the bold housing action required to achieve a climate-resilient, affordable, and inclusive region. While the plan references the Series 15 Regional Growth Forecast and RHNA compliance, it fails to grapple with the scale of the housing crisis and the need for proactive regional strategies beyond zoning capacity. The plan proudly states that 80% of new growth will be in areas with high transportation access (Chapter 2, page 19), but it offers no binding commitments to produce deeply affordable housing in those zones. Stating that cities have sufficient zoned capacity is not the same as ensuring housing actually gets built especially for low-income households who are most likely to use transit. What's missing is a clear, funded strategy to accelerate infill development near transit, including: land banking, streamlining approvals for 100% affordable projects, and eliminating parking minimums near high-frequency bus and trolley stops. SANDAG must do more than support local housing elements it must lead. This includes offering incentives, technical assistance, and direct funding through REAP 2.0 and beyond to jurisdictions that commit to building social housing, not just market-rate TOD. The plan should also prioritize anti-displacement strategies. It's not enough to build new housing near transit if it pushes out the very communities the plan claims to serve. Stronger tenant protections, right-to-return policies, and community land trusts must be elevated as core strategies in housing planning. Lastly, land use must serve climate and health goals. Walkable, mixed-use neighborhoods near transit should not be optional they should be the regional standard. Cities that continue to permit low-density sprawl in fire-prone or car-dependent areas should not receive the same level of regional infrastructure support. To make this plan effective, SANDAG must move from passive support to active intervention: by conditioning funding on performance, investing in deeply affordable infill, and treating housing as essential infrastructure.
S0099.H	Kesav Gupta	n/a	The Draft 2025 Regional Plan rightly names safety as a core goal, but it falls short of defining what a truly safe and resilient regional transportation system looks like. Too often, safety is framed through the lens of vehicle throughput, rather than the lived reality of pedestrians, cyclists, and transit riders navigating dangerous roads every day. There is no safety without street-level change. Yet the plan doesn't go far enough to fund and implement proven Vision Zero strategies like protected bike lanes, daylighted intersections, leading pedestrian intervals, and traffic calming in residential zones. In many neighborhoods, sidewalks are crumbling or missing entirely, crosswalks are faded or nonexistent, and transit stops lack lighting or visibility conditions that create daily risk. The plan must fund safety infrastructure on a regional scale, with prioritization for Environmental Justice communities where crash and injury rates are highest. Safety cannot be project-by-project it must be systemic. In terms of emergency preparedness, the plan acknowledges wildfires and climate threats, but it lacks clarity on how the transportation system will respond during disasters. Evacuation planning, redundant routes for transit-dependent populations, and resilience investments in trolley and bus systems must be included. Transit systems must remain operational and safe during emergencies not only for economic continuity, but for community survival. Finally, surveillance-based security systems must be balanced with privacy and civil rights. Increased monitoring in the name of safety can lead to disproportionate harm to Black, brown, and immigrant communities. Any expansion of security infrastructure must be community-driven and subject to public oversight. A truly safe system is one where you can walk, bike, or ride the bus without fear of traffic violence, disaster, or profiling. This plan needs to reflect that more deeply.
S0099.I	Kesav Gupta	n/a	The Draft 2025 Regional Plan lacks the financial boldness necessary to meet its own goals. While it projects $125 billion in revenues through 2050, the vast majority is backloaded, vague, and heavily reliant on uncertain future sources. That's not a fiscally responsible plan it's a gamble. Most alarmingly, the plan spends billions on highway expansions under "Complete Corridors," while underfunding operational needs for transit, active transportation, and flexible fleets. Transit gets $73.9 billion but the lion's share is for capital, not service. Where is the money for 7.5-minute trolley frequency? For 24-hour bus service? For the drivers and mechanics who make the system work? It's not there. Moreover, Flexible Fleets one of the few truly equity-driven tools in the plan receive just $201 million. That's less than 1% of the budget. It reveals where priorities lie. The plan needs a real operations funding strategy. That includes local revenue measures (e.g., a regional sales tax or vehicle license fee), congestion pricing pilots, and fare-free programs for youth and seniors. It also must center equity in funding decisions, directing money to where needs are greatest not just where ROI is highest. Finally, fiscal constraint must be matched with climate alignment. Any dollar spent on highway expansion is a dollar contradicting the plan's own GHG reduction goals. No new funding should go to roadway widening unless it demonstrably reduces VMT and supports multimodal access. We don't need a fantasy plan. We need a funded one that prioritizes frequency, fare equity, and freedom of movement for everyone.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.J	Kesav Gupta	n/a	The Draft 2025 RTP acknowledges the climate crisis but fails to treat it like one. Transportation is the single largest source of greenhouse gas emissions in San Diego County. Any serious transportation plan must not only meet state targets, but exceed them. This draft does neither. Despite SANDAG's past achievement in reducing GHGs, this RTP relies too heavily on managed lanes and long-term strategies without making immediate changes to shift people out of cars. By its own modeling, the RTP doesn't hit 2035 goals for VMT or GHG reduction. The climate cannot wait for 2045. Adding lanes even managed ones directly increases tailpipe emissions. Building new highways while promising climate action is environmental doublespeak. If this plan is to uphold its climate claims, all highway expansion must be ended immediately. SANDAG also falls short on connecting climate to air quality. Many Environmental Justice (EJ) communities especially in National City, Barrio Logan, San Ysidro, and El Cajon suffer from poor air quality due to freeway proximity. This plan continues to fund those same corridors with more car capacity while ignoring the real cost in asthma, cancer, and premature death. Recommendations: Ban all highway expansions, including managed lanes, by 2026 Invest at least $15 billion in zero-emissions transit, microtransit, and active transportation Add air pollution exposure metrics to project evaluation for every RTP corridor Partner with CARB and EPA to monitor cumulative air burden in EJ zones near transportation projects Prioritize clean air zones in school areas near major roadways with vegetation buffers and zero-emissions bus fleets The climate crisis requires more than pledges. It demands bold, fast, and measurable change now. This plan, as written, does not go far enough.
S0099.K	Kesav Gupta	n/a	The RTP's language around equity is strong but implementation is vague and lacks teeth. San Diego's transportation system was built on inequity. From redlining to freeway displacement, low-income communities and communities of color have paid the price. This RTP must do more to repair that harm. The plan includes Equity Focused Communities (EFCs), but it's unclear how those areas are prioritized for infrastructure. Past RTPs made similar commitments, but transit frequency, sidewalk improvements, and bike infrastructure still concentrate in wealthier ZIP codes. Good intentions are not outcomes. Equity also requires meaningful input from affected communities. Planning decisions often happen behind closed doors or through inaccessible processes. Language access, working-class schedules, and lack of childcare often shut people out of hearings and workshops. Finally, equity is not just about access it's about ownership and power. Communities should have a voice in what's built, how it's governed, and who benefits from the jobs, services, and development that RTP projects bring. Recommendations: Require that at least 50% of new RTP project funding be allocated to EFCs Create a Community Oversight Council to track RTP equity outcomes with voting power on implementation Set clear, published equity performance indicators: frequency of transit, walk access to stops, affordable housing within ½ mile, air quality, and sidewalk/bikeway condition Fund participatory planning grants for community-led design and implementation Provide stipends, childcare, and food for all outreach sessions in EFCs Equity cannot be a footnote. It must be a framework. Without bold corrective action, this plan will repeat the exclusionary patterns it claims to fix.
S0099.L	Kesav Gupta	n/a	This RTP was created through a process that still fails to meet the real needs of public engagement. While SANDAG held hearings and sessions, most residents in working-class and immigrant communities had no idea this plan even existed. That is not participation that is performative outreach. Engagement can't just be held during work hours or in hard-to-reach places. Flyers in English-only, web portals hidden behind multiple clicks, and meetings hosted in government buildings all send the message that the RTP is not for the public it's for bureaucrats. Public outreach must be rooted in trust. That requires long-term relationships with community-based organizations not one-off info sessions. It also means returning to the same communities year after year to report back on what changed because of their input. Recommendations: Fund community partners to host workshops and collect feedback in EFCs Require multilingual outreach materials and staff, especially in Spanish, Tagalog, Arabic, and Vietnamese Host events in libraries, churches, rec centers not just government offices Use schools, food banks, and public transit hubs as information dissemination sites Commit to holding annual RTP accountability sessions open to the public The RTP is the most important transportation plan of the decade. People deserve to know about it and deserve to shape it.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0099.M	Kesav Gupta	n/a	Too often, SANDAG hides behind the excuse of state or federal limitations to justify inaction. But the reality is that bold regional planning has room to go far beyond minimum legal thresholds. The plan repeatedly points to SB 375, CEQA, and federal funding restrictions as limits on what can be done. But nowhere does it push for regulatory reform to enable climate-first, equity-based planning. SANDAG must stop using regulations as a ceiling and start treating them as a floor. State and federal regulations should be proactively used to demand better not to delay action. We need our regional agencies to advocate for reforms in Sacramento and Washington that enable faster project delivery, anti-displacement housing policy, and transit capital grants. Recommendations: Advocate for CEQA streamlining tied to climate and equity benefits not car-centric projects Collaborate with CARB, CTC, and CalSTA to pilot flexible VMT reduction strategies regionally Push for a new federal transit funding formula that prioritizes operations not just capital Build stronger compliance standards into RTP for Title VI, environmental justice, and civil rights Lead a regional coalition to propose new state legislation that aligns housing and transportation outcomes SANDAG should be a leader not a passive follower. This plan must reflect that.
S0099.N	Kesav Gupta	n/a	The 2025 Regional Plan lays out a bold vision but boldness on paper is not the same as transformation in practice. If we fund the wrong projects, delay the right ones, and fail to serve the communities most in need, then this plan will be a historic missed opportunity. Transportation accounts for nearly half of all greenhouse gas emissions in our region. We cannot afford incrementalism. Managed lanes are not equity. Highway expansions do not reduce VMT. Transit that comes every 30 minutes is not a lifeline it's a trap. Trolley lines must run every 7.5 minutes by 2029 at the latest. Youth Opportunity Passes must be guaranteed for the long term. High-frequency bus routes need capital support now not in 2035. Equity must be more than a label. The communities that SANDAG claims to center are the very communities that suffer most from delay, inaction, and broken promises. Until we prioritize real climate justice, real frequency, real housing near transit, and real reallocation of funds away from car infrastructure, we are not planning for 2050 we are planning for 1990. This plan must go further. And San Diego's future demands that it does.
S0100	Ruth Wallen	n/a	I am writing to urge SANDAG to continue to take efforts to decrease greenhouse gas emissions and increase transit options. The continued rise of greenhouse gas emissions threatens all life on this planet. 1.There should be no expansions of highways, including "managed lanes," if they are in effect adding new lanes. They increase air pollution and greenhouse gas emissions. 2. The projected reductions for both GHG and VMT for 2025 don't go far enough. Please understand that emissions are cumulative, carbon emitted into the atmosphere stays there for 1000 years. 3.Additionally Youth Opportunity Pass funding must be guaranteed. It is especially important for young people to develop the habit of using mass transit. Finally please accelerate the timeline for transit. We need rapid bus and microtransit routes now. It is hard to change personal habits, but every year we experience more climate disasters. Think of the floods in southeast San Diego last year, or the recent fires in LA. during which time there were many small scary fires in San Diego as well. My niece's home was gutting in hurricane Harvey. We must do all that we can do to promote mass transit in San Diego. We will all benefit by less air pollution and green house gas emissions.
S0101.A	Brisy Cisneros	Mid City CAN y miembro de la comunidad	Que el transporte público sea mas accesible, los horarios y rutas más eficiente y mayor seguridad ,el transporte público debe de ser un derecho no una opción y que mejore la movilidad urbanos y reducir el impacto ambiental *** That public transit would more accessible, and for schedules and routes to be safer and more efficient. Public transportation should be a right, not an option, and it needs to improve urban mobility and reduce environmental impact.
S0101.B	Brisy Cisneros	Mid City CAN y miembro de la comunidad	Que ofrezcan horarios y rutas que se adapten alas necesidades de los usuarios y pasajeros y menos estrés para los usuarios, ahorro en dinero el cobro de las tarifas *** They should offer schedules and routes that adapt to the needs of the users and passengers, and less stress for users, saving money on fare charges.
S0101.C	Brisy Cisneros	Mid City CAN y miembro de la comunidad	Que se tiene que proporcionar más fondos y recursos para la comunidad por qué hay demasiadas personas que requerimos todos los días del transporte público *** That more funds and resources need to be provided for the community, because there are too many people. We need public transportation every day.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0102.A	Ann Wellhouse	n/a	I'm a senior and within the next 10 years I will age out of driving myself and will need safe, reliable public transportation. Widened freeways will not help me or my huge baby boomer cohort. At that time it may not be as easy for me to walk several miles to a destination or wait in hot and cold weather for the occasional bus. What destinations? Balboa Park, beach access, the garden group in University Heights, Home Depot, Trader Joe's, and many more place I go to every week that are not served by the Trolley or predictable buses. We need more public transit including buses that run more often and small affordable electric vans like the one that runs between the trolley and Ocean Beach. Thank you for listening. Ann Wellhouse
S0102.B	Ann Wellhouse	n/a	The South Bay air and water is embarrassingly unhealthy. My senior friends and I like to frequent the businesses in Imperial Beach but have stopped going there because of the pollution. In a place like San Diego that is dependent on tourist dollars that level of pollution is eating away at tax revenues.
S0103	n/a	n/a	The bike facilities installed by SANDAG are far superior to those installed by San Diego. Please continue to construct these high quality bike facilities.
S0104	n/a	n/a	My name is Carl with San Diego 350. I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. NO to highway expansions: There must be NO highway expansions in SANDAG's plans for the future. This includes adding managed lanes, as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including last mile microtransit, and safe walking and biking infrastructure. Reduce greenhouse gas emissions: While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes. Guarantee Youth Opportunity Pass funding: SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. No-cost transit passes for under-18 youth encourage significant participation in public transportation, help shift expectations for how San Diegans use transit, and invest in our region's future. Given the current state of funding sources, SANDAG must take the lead on funding this critical program as a priority. Accelerate timeline for transit: 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible.
S0105.A	Bree	n/a	As a parent living in North County, I'm deeply frustrated by the lack of urgency in this draft plan. I support the long-term goals, but the timelines for real service improvements are far too slow. My family and neighbors need fast, reliable, affordable transportation now,not in 2035 or 2045. Take the COASTER, for example. Service every 60 to 120 minutes is unusable for working families or students. There's no reason clock-face service, every 30 minutes on weekdays, every hour on weekends, can't be implemented by 2029. The demand exists. It's a matter of prioritization, not technology. Same with the SPRINTER. Running it every 30 minutes all day is not enough. It should run every 15 minutes during peak times and at least every 30 minutes midday and evening. These improvements should be part of your early action items, not long-term aspirations. Local buses across Vista, Escondido, and San Marcos don't come frequently or reliably enough to be useful. The ten busiest routes in the region should be funded to operate every 10 minutes during weekday peaks and every 15 minutes on weekends. Riders shouldn't wait until the 2030s for that kind of service, it needs to happen by 2029 at the latest. You also need to fix the PRONTO system. Forcing riders to carry a physical card or scan a QR code is outdated and inconvenient. By 2026, PRONTO should be fully integrated with Apple Wallet, Google Wallet, and smartwatches, with more reload options in schools and libraries. These are basic accessibility upgrades that should already be underway. The Youth Opportunity Pass has been a huge success for my kids and their classmates, but I'm concerned that funding ends in 2026. The Final Plan must guarantee stable funding for free youth transit through 2029 and beyond. It's one of the most effective equity and climate programs we have. Finally, it's baffling that freeway expansions are still prioritized while basic transit service lags. Build the frequent bus service, all-door boarding, signal priority, and bus lanes first, then we can talk about managed lanes. Let's stop investing in the past and start delivering what people need today. This plan talks about climate, access, and equity, but the actual timelines don't reflect any urgency. Shift your focus to deliver these core improvements by 2029. North County families can't wait another decade.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0105.B	Bree	n/a	I'm writing as a North County resident and parent to strongly oppose the continued inclusion of managed lane and freeway expansion projects in SANDAG's Draft 2025 Regional Plan. You can't claim this is a climate-forward, equity-driven plan while pouring billions into expanding freeway capacity. The "managed lanes"· branding doesn't change the reality: they are still highway widenings. Whether they're tolled, carpooled, or mixed-flow, they continue the decades-long pattern of displacing communities, increasing emissions, and incentivizing car dependence. SANDAG's own data shows that adding lanes induces more driving and undermines mode shift. The science is clear, and so is the lived experience. Meanwhile, the urgent transit improvements our region actually needs, high-frequency bus routes, all-day rail service, true signal priority, and safe bike infrastructure, are pushed into long-term implementation timelines or vague funding categories. Why are freeway interchanges shovel-ready, but Coaster upgrades, SPRINTER frequency boosts, and basic PRONTO improvements still, unfunded concepts? We don't need more freeway capacity. We need reliable, frequent transit. We need bus-only lanes that are physically protected and camera-enforced. We need a real regional bike network, not scattered segments. We need high-capacity service every 10-15 minutes on the top transit corridors. Tha's how you achieve climate goals and real access, not by doubling down on the same car-first strategies that caused this mess. If SANDAG is serious about reducing VMT, meeting SB 375 targets, and creating a truly regional system, the Final Plan must remove all general-purpose and managed lane widenings from the Early Action Program. Those dollars must be redirected into near-term transit service, transit speed upgrades, and zero-fare programs that actually improve people's ability to move without a car. We cannot build our way out of congestion. We must build a different system, one that centers access over vehicle throughput. Managed lanes are a political compromise, not a mobility solution. Please revise the Final Plan to reflect this: No new freeway lanes. Fund transit first.
S0105.C	Bree	n/a	This plan lacks the urgency and specificity needed to build a functional, equitable, and climate-aligned transportation system in the 2020s. As a North County resident and parent, I'm asking you to fully adopt the 10x29 framework, ten clear, achievable investments that must be completed by 2029. These are not abstract goals. They are the core infrastructure and service upgrades needed to make transit and active transportation viable in people's daily lives. Please incorporate the following ten priorities into the Final Plan as funded, committed projects with delivery deadlines before 2030: 1. 7.5-Minute Trolleys by 2029 Upgrade all Blue, Green, and Orange lines to 7.5-minute peak service and 10-minute midday/weekend headways systemwide. 2. 10-Minute Peak / 15-Minute Weekend on Top 10 Bus Routes Guarantee this service standard on the region's ten highest-ridership routes, including 7, 10, 215, 929, and 905, by 2029. 3. Clock-Face Coaster & Sprinter Implement 30-minute all-day weekday and hourly weekend COASTER service, and 15-minute peak / 30-minute off-peak SPRINTER service. 4. Countywide All-Door Boarding Equip all buses with off-board validators and rear-door readers by 2029, paired with unobtrusive onboard fare verification to reduce dwell time and improve reliability. 5. Next-Gen PRONTO by 2026 Redesign the PRONTO system to support Apple Wallet, Google Pay, smartwatch tap, and improved app/web onboarding, with reload kiosks in schools and libraries. 6. Permanent Youth Opportunity Pass Funding Fully fund zero-fare youth transit through 2029 and simplify sign-up processes to guarantee long-term access for all students. 7. Transit Signal Priority at 250+ Intersections Expand TSP with true preemption and far-side stop logic at key locations across Equity Focus Communities and high-frequency corridors. 8. 100 Miles of Camera-Enforced Bus Lanes Build 100 miles of physically protected, camera-enforced bus-only lanes to improve average speeds and reliability by 10-20%. 9. Countywide Bike-Share System Launch a unified, affordable bike- and e-bike-share program by 2029 with PRONTO integration and equitable station density across all communities. 10. Real-Time Accountability Dashboard Create a public dashboard updated quarterly with real-time data on headways, missed trips, TSP progress, fare usage, equity metrics, and project delivery timelines. This is what a real short-term mobility transformation looks like. These are the kinds of clear, specific, user-centered commitments your plan is missing. Please revise the Final Regional Plan to adopt the full 10x29 platform, not as aspirations, but as funded, scheduled projects with delivery deadlines.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0106.A	Andrew	n/a	I live in the City of San Diego, and I'm honestly furious reading this plan. You say all the right things about equity and climate, but when it comes to actual investments, you're still prioritizing freeway widenings and long-term wish lists while basic transit doesn't show up on time. Stop wasting our money on highway projects. Put that money into the things riders actually need. We don't need another $22.5 million on freeway corridor studies. We need actual service. Riders are telling you what we need. Community groups are telling you. Everyone is saying it loud and clear: do the 10x29 plan. Deliver these ten projects by 2029, not 2045. Here's what it looks like: 1. Trolleys every 7.5 minutes, system-wide. Right now the Green and Orange lines are stuck at 15-minute headways even during peak hours. That's not rapid transit. Upgrade service by 2029. 2. Buses every 10 minutes on your busiest routes. Routes like the 7, 10, 215, and 929 move thousands of people a day and still come every 20-30 minutes. You want ridership? Fund frequent service by 2029. 3. Coaster and Sprinter you can actually use. Coaster shouldn't run once every 1-2 hours. Sprinter shouldn't drop to hourly on weekends. Make both clock-face and reliable by 2029. 4. All-door boarding and off-board validation. You already know this works. Your own pilots show it reduces dwell time by up to 32%. So why are we still boarding at one front door in 2025? 5. Fix the PRONTO system. Riders shouldn't have to carry a plastic card or scan a broken QR code. Enable Apple Wallet, Google Pay, and smartwatch tap by 2026. Improve the app. Add more reload spots. 6. Lock in the Youth Opportunity Pass. It works. I's popular. Why is it still a pilot? Make it permanent through 2029. Remove barriers to sign-up. Fund it in the Final Plan. 7. Transit Signal Priority at hundreds of intersections. Right now buses wait at red lights while cars fly through. Get real TSP with preemption at 250+ intersections in Equity Focus Areas. 8. 100 miles of protected, camera-enforced bus lanes. Not paint. Not signage. Actual protected lanes with real enforcement. You say transit is a priority, prove it. 9. A real regional bike-share system. San Diego still does't have one. Where is it? Include a countywide e-bike share system with PRONTO integration and equitable station placement. 10. A public-facing accountability dashboard. Riders deserve to know when service is late, when projects are delayed, and where funding is going. Make this public, updated quarterly, and tied to real metrics. These aren't dreams. They're minimum standards for a functional transit system in a growing city. If you can find hundreds of millions for freeway ramps and managed lanes, you can fund this. Stop delaying. Stop deflecting. Fund these 10x29 priorities now and get them done by 2029.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0106.B	Andrew	n/a	This plan is full of the right values, equity, sustainability, access, but the actual investments and timelines don't reflect those values in practice. There is a major disconnect between the bold rhetoric and the slow, vague delivery schedules. Residents across the region, especially those who rely on transi, need reliable, fast, and affordable alternatives to driving now, not in 2035 or 2045. Climate change is not waiting. Our communities can't wait. This plan needs to move from "vision"· to implementation, and it must be revised to prioritize specific, funded, near-term actions by 2029. I urge you to revise the Final Plan to include these clear priorities: 1. High-frequency transit service by 2029: - Trolleys every 7.5 minutes on all lines during peak - Buses every 10 minutes on the top 10 ridership routes - SPRINTER and COASTER upgraded to usable, clock-face headways 2. Fare modernization and access: - Full PRONTO integration with Apple Wallet, Google Pay, and tap-to-pay - Improved sign-up and reload options, especially at schools and libraries - Permanent Youth Opportunity Pass funding through 2029 3. Faster, more reliable buses: - 100 miles of protected, camera-enforced bus-only lanes - Countywide all-door boarding with off-board validation - Transit Signal Priority at a minimum of 250 intersections 4. Micromobility and first/last mile access: - A regional, unified bike-share program with equitable station access - Improved sidewalk, bike lane, and transfer infrastructure in Equity Focus Communities 5. Accountability and transparency: - A public-facing dashboard updated quarterly with metrics on transit headways, missed trips, project delivery, fare program usage, and equity outcomes Meanwhile, the continued prioritization of freeway expansions and managed lane projects, especially in the Early Action Program, is deeply concerning. These investments directly contradict the climate and VMT-reduction goals of the plan. They must be deprioritized, and the funds reallocated toward transit and active transportation upgrades that deliver benefits in this decade. San Diego has been talking about transformation for decades. Now it's time to deliver. Please revise the Final Regional Plan to focus on 10x29-style priorities, real improvements, real timelines, real funding.
S0107.A	n/a	n/a	More frequent transit now. 7 and a half minute service on all trolley lines by 2027. Finish 5 rapid bus line during this regional plan.
S0107.B	n/a	n/a	No more managed lanes, no more highway widening, no more of that stuff. We are done widening highways--its not 1970.
S0107.C	n/a	n/a	NO to highway expansions: There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes" as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure. Reduce greenhouse gas emissions: While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes. Guarantee Youth Opportunity Pass funding: SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. No-cost transit passes for under-18 youth encourage significant participation in public transportation, help shift expectations for how San Diegans use transit, and invest in our region's future. Given the current state of funding sources, SANDAG must take the lead on funding this critical program as a priority. Accelerate timeline for transit: 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0108.A	n/a	n/a	I used to think the bus "worked" in San Diego, until I had to rely on it every day. When my car broke down last year, I started taking the 7 and the Orange Line from my neighborhood to work and to get my daughter to daycare. That's when I realized how fragile the system is when you depend on it. A missed bus means you wait 20, 25, sometimes 30 minutes. If a trolley is late or packed, you're standing there stressed out, knowing you're going to be late for work or that your kid might miss breakfast at school. We live in the City of San Diego. It shouldn't feel like you're gambling every time you leave the house. But that's what low frequency does: it makes the whole system unreliable. And when it's unreliable, people who have a choice stop using it, and people who don't have a choice suffer. I'm not asking for luxury. I'm asking for a bus or a train that comes every 10 minutes. That one change would transform everything: it means you don't have to plan your entire life around a schedule. It means you can trust the system to work. And it means fewer people give up on transit out of frustration. When we talk about frequency, we're not talking about an abstract number. We're talking about dignity, about showing people that their time matters. About building a city where transit is the first choic, not the last resort. Please fund frequent service now, not in 2035. We ca't keep waiting.
S0108.B	n/a	n/a	I'm going to keep this simple: No more managed lanes. You can call them"managed"· you can call them "carpool" you can add tolls or BRT branding, but at the end of the day, it's still a freeway widening. And we've done that for decades. Has it fixed traffic? No. Has it helped people without cars? Definitely not. Has it made our air cleaner or our streets safer? Not even close. We need to stop pretending that adding lanes is a climate or equity solution. It's not. It's the same old playbook that got us into this mess. If you're serious about reducing emissions, reducing car dependence, and making our transportation system work for everyone, then fund transit first. Not freeway studies. Not "future mobility corridors"· Not more pavement. This plan needs to focus on buses that come on time, trains that run often, safe streets to walk and bike, and real options to get around without a car. That's what people are asking for. That's what we need now. So again: no more managed lanes. Put that money where it matters.
S0108.C	n/a	n/a	If there's one thing that should be crystal clear in this Regional Plan, it's that frequency is freedom, and we need it now, not in 2035. You don't need to wait for a new study, a new blueprint, or a new grant cycle. You need to fund better service with the resources you already have. In the next two years, SANDAG should commit to significantly increasing frequency on core routes throughout the region. That means: - Buses every 10 minutes during peak hours on your busiest corridors: Routes 7, 10, 215, 929, 905, and others should not be running every 20-30 minutes while carrying 40% of the region's ridership. - 15-minute weekend service minimum on those same high-ridership lines. Transit doesn't stop mattering on Saturdays and Sundays. - Trolleys every 7.5 to 10 minutes on all lines, not just the Blue Line, especially during school hours and commute times. - SPRINTER and COASTER service that's usable, with predictable, clock-face schedules that don't leave people waiting 60-90 minutes between trains. If you want to build back trust in the system, people need to be able to show up to a stop and know something will come. Frequency is the foundation for everything else, reliability, access, safety, and equity. Without it, none of the other improvements matter. We know it's operational money that's needed, not just capital. So prioritize it. Reallocate money from freeway projects and environmental review for things you shouldn't be building anyway. You can make these changes in the next two years if you choose to. Don't let another planning cycle pass with riders stuck waiting. Build frequency now.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0109.A	n/a	n/a	It's worrying to see the Purple Line back to being labeled "Light Rail"‧ as opposed to Heavy Rail, and equally worrying to see it not extending all the way to Sorrento Valley. SV is a massive job hub and a huge reason why traffic on the 805 gets so bad in the afternoons, and the Purple line's main goal needs to be speed over all else to be a viable alternative to 805 commuting, which favors Heavy Rail despite the cost. Please bring back service to Sorrento Valley/Mira Mesa in the Purple Line plans via Heavy Rail. Let's swing for the fences on this one. The COASTER/Surfliner tunnel under UTC is massively important. As a person who regularly rides both services, shaving 10ish minutes off travel times would make both transit services a viable alternative for commuting as opposed to just a fun thing to ride sometimes. An underground station there at UTC would also be great. Please fast-track this project to the greatest extent possible, the benefits are stellar. Del Mar Train Tunnel - I noticed this was left off the Regional Plan entirely, but it is something that still should be considered. In lieu of all the previous concepts I've seen proposed though, I would like see the route widen a bit to be able to build a Coaster/Amtrak station at One Paseo, which would be a huge boon to the entirety of North County, while avoiding the angry Del Mar homeowners stifling the project. Special event Coaster station at both Petco Park and the Fairgrounds please. Airport Transit Connection: I prefer a trolley extension as opposed to a people mover. Despite lower frequencies, trolley to SAN would save a lot of money on fleet and a yard, which is important without a new transit tax in place. I like the Concept 6 alignment from the July 2023 study - my only recommendation is to add an extra station between Hawthorn/Grape and Pacific Highway, in the cut-and-cover portion, to serve northern Little Italy+Bankers hill better. And remove the Harbor Dr Station, no one needs it. The Balboa Park Perimeter Streetcar is a great idea and would spur more housing development in the area (see: Portland Streetcar). Unlike the Portland Streetcar however, please make sure it's in it's own transit-only right of way, because if not, it might as well be a bus with extra steps. Again, if we're spending money, let's swing for the fences. Please make sure the Rapid Bus routes from Balboa Trolley Station to central PB are in transit-only lanes, otherwise the routes are worthless. The speeds of Blue/Orange lines along C Street/Park Blvd in Downtown are too slow. Please remove traffic lights and add in train crossing gates to match how the Green Line along Harbor Dr is treated. Let's treat the trolley as LRT everywhere, and not as a streetcar. Grade separations in Chula Vista would also be great. A centralized Rapid Bus Transit Center Downtown would be fantastic. Right now they all just live haphazardly along Broadway, and that's not useful for signposting and advertising the service.
S0109.B	n/a	n/a	San Diego needs more bike lanes (Mira Mesa in particular is an area that strikes me as needing some), and it's good to see that more are planned. Do not listen to people who say no one uses them - I do, and I've seen many others who do as well. And it helps out drivers too because it gets bikes previously blocking their way on the streets *out* of their way. I would like to see easier Bike Access to the airport (there is a bike lane nearby but no easy way to get from there to the airport), and more Bike Lockers at the airport, that could be configured for longer stays than normal Bike Lockers would allow. The airport is so close to downtown, and I feel like that uniqueness should be capitalized on more.
S0109.C	n/a	n/a	The Qualcomm Way/Texas Street intersection with I-8 is one of the worst intersections in San Diego. I think I saw plans some time ago to redo this completely - that idea is absolutely worth following through on, because as it stands today that intersection is a civil engineering joke. There are so many people constantly turning left at the Mission Bay Dr/Garnet Ave and Mission Bay Dr/Grand Ave intersections in eastern Pacific Beach, and the land use surrounding these intersections are so disposable, that it would be worth studying a couple massive roundabouts in this area to fix the constant traffic jams.
S0109.D	n/a	n/a	Upzoning housing around train/trolley stations is extremely important. Tecolote Road and Balboa Trolley Stations have huge potential.
S0109.E	n/a	n/a	Please submit a new transit tax proposal ASAP, and do a HUGE advertising push for it. I never saw any positive press for measure G, and that needs to be remedied, because a new transit tax proposal materially benefits everyone who exists in San Diego even if they don't ride the new/improved transit themselves.
S0110.A	Benji	n/a	I am a Chula Vista resident who is a regular user of public transit provided by MTS. I think that many of the bus services currently offered are sufficient to my travelling needs. I do have a few comments. On Rapid route 225, I feel as if though it would be worth considering adding an infill stop near Veterans Park/Sunbow Plaza. It is near a shopping area and recreational space that many would likely use, in addition to providing rapid-transit access to the Sunbow area, one which continues to lack such access despite having a dedicated BRT route through the area which only stops at a mostly-empty stop near the I-805. I also wholeheartedly support the two proposed Otay Ranch circulator routes as it would provide transit service to areas very underserved by transit already. Considering the region is growing rapidly as an urban center, it is only right for transit options to treat it as one. Additionally, as a former student of Olympian High School, a high school which has been deprived of mass transportation for many years following school bus route cuts, my only option would have been to travel to Millennia, a mile away, which was very inconvenient. It would provide students with an easier option to get to school, which has already faced enough traffic in the morning. Finally, I would like to entertain the idea of a north-south bus route likely terminating at Southwestern College and Otay Mesa or the Cross-Border Express. There is a significant lack of north-south routes throughout the eastern South Bay currently and on the Regional Plan which inhibits intra-regional travel.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0110.B	Benji	n/a	I would like to make a simple comment that many of the on-street bikeways currently in eastern Chula Vista are very inconvenient to use and unsafe. Most are located on high-speed arterial roads and are inconvenient to cross. The sidewalks on said roads are small, poorly-maintained, and also underused. There should be more prioritization of off-street dedicated bike paths instead of creating new on-street ones along arterials, or instead making current on-street ones sufficiently sheltered from high-speed vehicle traffic.
S0110.C	Benji	n/a	I would like to make a comment on the East Palomar Transit Station along the current Rapid route 225. In my opinion, the land use surrounding the station is very poor, mainly consisting of single family homes and a large, mostly unused park-and-ride lot from my observations. This is in great contrast to the other stations along East Palomar which provide more retail spaces allowing passengers and fellow residents. If it is as big of a transit station as it is made to be, then it would be better to make the area it is in much more accommodating to passengers than it is now and consider investing in some sort of retail or food space near the station, especially considering the fact that the nearest shopping center (Sunbow Plaza) is nearly half a mile away from the station.
S0111.A	Al van breukelen	n/a	Sanbag should be abolished, it's goals are to destroy and replace transportation with a illusionary vision of the world, there are no concrete visions to accomplish anything but consolidate power in to another corrupt agency like CARB.
S0111.B	Al van breukelen	n/a	Same, no one uses the coaster or the sprinter and when I see them they are empty, billions wasted
S0111.C	Al van breukelen	n/a	What does that have to do with anything, backs up my thoughts that you are a nonsense entity that needs to be done away with
S0112.A	n/a	n/a	Trolley ridership is down because homeless can enter free & take shelter on trolley until forced to get off. A cheap chain link fence needs to enclose each trolley entrance & an employee standing @ the entrance to require each passenger to purchase a trolley ticket. More paying customers will then use the trolley because it won't feel unsafe & be gross. (so sad but true) The cost to fence in & pay an employee to stand @ the trolley entrance will probably be paid off soon as ridership soars.
S0112.B	n/a	n/a	Biking is a near experience on every San Diego road. In the bike lane, death from car door opening on rider. How about placoing the bike lane next to the curt & with cheap vertical separators. Park the cars next to the car lane. This will slow traffic as an added bonus. Might need to reduce the number of lanes to make space -- That will be worth it as people will begin biking & feeling happier & healthier.
S0112.C	n/a	n/a	Gas pollution must be reduced for endless reasons -- main cause of ocean death (acidification), causes cancer, etc.... Currently biking is not safe enough for parents to let their children out of the car. Bike & pedestrian safety should be #1. Air quality must be protected -- change to electric buses.... People think Gas is OK to breathe. "Natural Gas" is not good to breathe. Take signs off buses that say "Powered by Natural Gas" . People need to get educated not tricked by marketing from the gas companies. All humans benefit from good science. Don't let profits & consumerism be the priority over health.
S0113.A	n/a	n/a	Whenever I'm going someplace new, I look it up on Google Maps to see if I can get there by transit. Sometimes there is no transit option at all. For example, there is no bus or rail between my workplace and the One Paseo mall in Del Mar only three miles away. Other times, there is a transit option, but it would take three times longer than driving. I make a big effort to take public transit instead of driving, but the thing that would help the most is reducing travel time for transit routes. My wishes for public transit in San Diego: (1) I wish the trolleys and buses ran more frequently; (2) I wish the trolley ran later at night; and (3) I wish there were more trolley and bus routes to provide faster and better connectivity.
S0113.B	n/a	n/a	To get around my neighborhood, I mostly bike. For example, I bike to my workplace, the grocery store, the library, the rec center, and the dentist. Sometimes my friends worry about me and say things like, "Is it safe?" or "Get home safe." A lot of people think biking is not safe. They are too afraid to bike. And the thing they're afraid of is getting hit by a car. I'm afraid of that, too, and it's not right. We should not be building roads to be dangerous for cyclists, any more than we should be building roads to be dangerous for motorists, or sidewalks to be dangerous for pedestrians. If SANDAG is serious about getting people out of cars and onto bikes, we need to upgrade and expand our bikeways to make it safer, faster, and easier for people to get around by bike. When people ask me, "Is it safe?", I should be able to say, "Yes! It is safe to bike in San Diego."

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0114.A	n/a	n/a	I am requesting that public transportation get funding required to expand and properly update our public transportation system to make it more accessible throughout San Diego. I am a huge supporter of public transportation as it frees up roadways, and lowers carbon in our air. It's important to stay on top of it because when it falls behind the upkeep becomes too costly. Having spent years on the East Coast and using public transit for New Jersey and New York City, I have always found public transit when property set in place is the best way to travel. But now as New York has not put money in their subway systems, it is starting to fall apart and has fallen way too far behind and we don't want that to happen to San Diego. Let us be proud of us City that has great public transit.
S0114.B	n/a	n/a	Again, funding for public transit is very important as it keeps it updated and running smoothly. Public transit is a huge part of San Diego and is widely used throughout the city and will continue to be used as long as it is properly funded to stay updated.
S0115	n/a	n/a	I am writing to urge SANDAG to move away from all forms of highway expansion (including 'managed lanes') and commit to making the city and the county more accessible for all commuters. I am a regular rider of the trolley and bus system with a monthly rider pass, even though I have a car. As San Diego's density increases, we have an opportunity to make the city and the county more friendly and accessible to bike and public transit commuters. Not only is this inclusive of all San Diegans but it also helps support greening efforts to reduce carbon emissions and cars on the road. We are at a pivotal moment when we can make the choice to create a city that is more accessible, regardless of car ownership, and more environmentally sustainable.
S0116.A	n/a	n/a	Please accelerate transit expansion and service improvement plans. Cars have a high cost to society through traffic delays, pollution, traffic accidents, and climate change. San Diegans need better non-car options. More transit will make life easier, cheaper, cleaner, and more pleasant for both transit users AND drivers. Please do not let our community to double down on cars by slowing transit plans.
S0116.B	n/a	n/a	Please encourage more housing near transit to boost the usability and frequency of transit.
S0117	n/a	n/a	My name is Jazz and I'm writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes," as highway expansions in disguise. These only increase air & noise pollution (and water pollution from runoff), VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure that is accessible! 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible. As a person with a disability, car culture can be limiting to those that dont want or cant afford cars and all the expenses that car-ownership comes with (gas, insurance, maintenance)- car ownership is often the second-largest purchase any individual will make in their LIFE. The ability to own a car or be physically able to drive one should not dictate the quality of your life. Cars are polluting (both conventional and electric) AND they're dangerous! We need to move away from our car-centric culture for the sake of safety, quality of life, and the health of the environment. Efficient, reliable, and safe public transit and active transportation is the future I want to see for san diego. Please also keep those with physical disabilities in mind as you draft and execute this plan. As wheelchair user, accessible transportation can be a differentiator in our quality of life and the ability for us to fully participate in society.
S0118	n/a	n/a	There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes," as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure.
S0119.A	n/a	n/a	We need to prioritize the passage of a 2-cent sales tax, similar to what Los Angeles has successfully implemented. This funding would enable bold investments in regional transit, including a metro (underground) rail system connecting major destinations like Coronado and Temecula via I-15 through Escondido from Downtown San Diego. A direct rail connection to the airport is also essential to meet growing travel demand and reduce congestion. San Diego County should also implement at least one gondola system to serve hard-to-reach areas or tourist-heavy zones. Freeway expansion is not a sustainable long-term solution. We must invest in modern metro and heavy rail infrastructure to move people efficiently and future-proof our transportation system.
S0119.B	n/a	n/a	none
S0119.C	n/a	n/a	continue investment
S0119.D	n/a	n/a	Equally important is educating the public: without a dedicated local funding source, our federal and state tax dollars are being used to build projects in other cities that do have local matching funds. If we don't step up, we'll continue to fall behind. In order to build a major transportation project, a local sales tax measure is essential - it provides the local match required to secure state and federal funding. These projects not only improve mobility but also boost the local economy, as government agencies hire private-sector firms for architecture, engineering, and construction services. It's an investment that delivers both infrastructure and jobs to our region.
S0120.A	n/a	n/a	Residents of Ramona need better means of public transportation to other parts of the county, especially for senior citizens and college students who don't drive.
S0120.B	n/a	n/a	During past fires, it was a nightmare getting out of Ramona and many died attempting to evacuate. Since then the population has grown but the roads have not improved much. We've been made promises to widen Hwy 67 but that has not happened
S0120.C	n/a	n/a	Roads in and out of Ramona need to be improved for evacuations. Ramona needs some type of transportation service.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0121	Jonathan West	n/a	I'm writing regarding the Del Mar Tunnel, in support of Alt 4, the Crest Canyon tunnel. This is an important transit corridor that we must not only save, but take a pragmatic approach to future proofing it. The Crest Canyon alignment allows for fast travel times and saves the line from future risk of erosion. Furthermore, it's important we leave room for overhead catenary. Our rail lines will eventually be electrified, and leaving room to do so will save us from costly retrofitting in the future.
S0122.A	Brian Hoffman	Bike Rebellion Podcast	Over the past 75 years San Diego has heavily invested in automobile transportation. The days of the every citizen having a car to get around are drawing to a close. We must re-imagine our transportation systems and design for the future rather than expanding roads and highways and parking into eternity. Sandag and San Diego residents must and will embrace meaningful mass transit as it is the only sustainable way forward. We must take away traffic lanes to build commuter trains and trolleys. We have the technology and the geology to build an underground train system in San Diego, but Sandag continues to feed our destructive addiction to the automobile hereby continuing to increase GHG emissions. Busses on surface streets are obviously not the long term answer to our transportation issues. Anyone who uses MTS busses in San Diego can tell you that because they are so slow (because they are regularly stuck in traffic with cars) they are not a realistic mobility option for most residents, hence busses run empty. Investing seriously in rail infrastructure is something that Sandag will eventually do, only when the board starts thinking long term and starts standing up to climate deniers and fossil fuel culture warriors. Unfortunately many of our elected officials and Sandag board members are "climate deniers and culture warriors" intent on preserving the status quo of bad transit and car centric mobility. This must and will change.
S0122.B	Brian Hoffman	Bike Rebellion Podcast	San Diego could be a world class cycling city, instead we are a city with deadly, disconnected bike infrastructure and great weather. We have been waiting for Sandag and the City of San Diego to invest in cycling for the 25 years that I have lived here. We have gotten a few bike lanes here and there but that is not even close to what we need. To meet our climate goals and to avert major mobility issues in the near future, we need to invest significantly more in active transportation plans that have been on the books for decades. Two percent of the Sandag/City transportation budget goes toward active mobility, this will not get us anywhere. We should be investing at least 25% of the transportation budget on active transportation in order to connect and build out a truly safe, world class cycling city. There is lots of data to back up the idea that if you build safe bike infrastructure, it is the best investment you can make in a city. Sandag employees and planners all know this but unfortunately the board is beholden to a loud, well funded minority intent on ruining the climate and driving us off of the climate cliff in a Cadillac Escalade.
S0122.C	Brian Hoffman	Bike Rebellion Podcast	No more capital investments in new auto infrastructure, transition all new build funding to rail and bike infrastructure. Existing roads and auto infrastructure in San Diego are in terrible shape and in need of repair. We must fix what we have and start the transition to sustainable transportation on a 10-15 year timeline now!
S0122.D	Brian Hoffman	Bike Rebellion Podcast	The City of San Diego should be managing its own infrastructure projects, not the surrounding cities or communities.
S0123.A	Dr Ciara Dooley	n/a	I currently do not own a personal vehicle and get around San Diego exclusively using transit and walking/biking. I made this decision because of both chronic health issues that make it difficult for me to drive, and because I wanted to reduce my carbon footprint. The reaction I get when I tell my neighbors, coworkers, and friends that I don't own a car is usually disbelief and admiration. They often express they would like to reduce their driving, but find public transit in San Diego to be so inaccessible, slow, and expensive that they simply cannot find a way to make it work for them. It is true - I spend an hour each way commuting to my job and it would take roughly 17 minutes to drive. I would like to see the 2025 regional plan prioritizing transit to allow our communities to enjoy safer, healthier, and more environmentally friendly travel. The current timeline of 2035 is too long to wait for more rapid bus/micro transit routes, and current services require more frequent service and more comfortable and accessible stops. No-cost youth and senior passes are also essential.
S0123.B	Dr Ciara Dooley	n/a	Bikeways and walkways in San Diego are limited and unsafe, which is a tragedy due to the ideal climate and beautiful environment we live in. Roughly 15 years ago, my father was involved in a bike accident in San Diego while commuting home from work and he was hospitalized with several broken bones, a punctured lung, and a concussion - this was not a case of unsafe riding, but a result of the poor condition of bike paths around the city. Cyclists are often forced to ride in a bike lane un-separated from traffic, with debris and obstacles frequently present, and with vehicles driving as fast as 40-50mph next to them. Commuting on a bicycle should be a safe, healthy, and environmentally friendly form of transit, and yet many San Diegans feel the risk is too great. Let's prioritize making walking and cycling more accessible and safe so that we can enjoy San Diego without the climate impacts, pollution, and noise of even more highways and vehicles. I don't want my friends and family to be worried every time I get on my bike.
S0123.C	Dr Ciara Dooley	n/a	Overall, I want to see SANDAG prioritize a shift from a car-centric San Diego to a public transit centered San Diego - we need it for our health and environment, particularly under the growing threat of climate change.
S0124	Xiayu Gao	n/a	Please enhance walkability in Convoy district by widening sidewalks, providing shades and shortening crosswalk distance. The enhancement will mitigate the current parking stress and improve connectivity in the business district. I hope to park once and explore multiple businesses with a satisfied and safe walking experience.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0125	n/a	n/a	The southbound offramp on I-15 at Rainbow Valley Blvd is hazardous when the California Highway Patrol S15 Truck Scales are open and truck traffic is backed up the entire length of the offramp. There is no room for cars to pass on the left side to avoid the trucks due to the narrow necking down of the offramp and the steep slope down to the main lanes of the Interstate. There is no extension of the offramp lane onto the actual freeway as is the case for another heavily backed up offramp on Southbound I-5 at exit 23 (Balboa / Garnet). Additionally, the visibility is very poor at freeway speeds when approaching this offramp because of the curve in the roadway.
S0126	n/a	Mountain Empire Collaborative	The existing transit program in the Mountain Empire Area is not reliable enough to be used. The lack of transportation in the rural East County remains to be an obstacle for community members to reach needed services and resources. The current transit routes are too long and impractical to be used. Recommend that perhaps smaller routes be created within the communities to access the larger routes. The smaller routes could have more frequent stops which could increase the utilization of the transit service. The smaller routes could also be provided by smaller vehicles which can reduce cost. Since the cost would be minimize, then the fare cost could also be more affordable for those in the impoverished areas.
S0127.A	n/a	n/a	More Frequent Trolleys and Buses Now! Not by 2035! NOW. Stop delaying transit projects.
S0127.B	n/a	n/a	NO more highway construction. We dont want any more managed lanes. Stop building managed lane/hov lane connectors, build transit instead, dont worry there are plenty of transit projects to choose from. Stop with the highway expansion, it doesnt work.
S0127.C	n/a	n/a	No more highway/managed lane construction in San Diego.
S0128.A	n/a	n/a	Fund more frequent trolley service, coaster and sprinter service by 2029. All door boarding on all our buses, bus lanes. Bring back the bus from La Jolla to Balboa av Transit Center.
S0128.B	n/a	n/a	No more managed lanes. No more HOV connectors. No more freeway expansions disguised as "mobility improvements." Our region is already choking on traffic, bad air, and rising temperatures - and the last thing we need is more pavement and more cars. Every single time you widen a highway, you induce more demand, more sprawl, and more emissions. We've known this for decades. Stop pretending that adding "managed lanes" is a climate solution. It's highway expansion, period. If SANDAG is serious about climate, racial equity, and giving people real alternatives to sitting in traffic, then put your money where your mouth is: fund frequent, reliable transit. Build safe bike routes. Improve walkability. Don't pour billions into infrastructure that locks us into car dependency for the next 50 years.
S0128.C	n/a	n/a	I honestly don't understand how SANDAG still doesn't get that managed lanes don't work. Like, have we not done this over and over again? You widen the freeway, add an HOV or "managed" lane, and then traffic gets worse anyway. The data is everywhere - induced demand is real. We're spending billions on projects that just make the problem worse in a few years. Meanwhile, we're told to wait until 2035 for decent transit? Why not flip the script? Invest in frequent buses, rail, bike infrastructure - stuff that actually gives people a choice not to drive. It just feels like we're stuck in this cycle of "expand now, regret later," and I don't get why SANDAG keeps doubling down on that. We deserve better. This isn't working.
S0129.A	n/a	n/a	It shouldn't take two hours and three transfers to get across the county. We need a real transit network - fast, frequent, and reliable. That means way more high-frequency bus routes that actually connect to each other. No more 30-minute waits or buses that just stop running early in the evening. The trolley is great, but it needs to come more often and run later. The Coaster and Sprinter should be true regional rail - not something that feels like a limited commuter service. Why can't we have frequent all-day trains that actually work for students, workers, and families? People want to use transit. But it has to work. It has to be dependable. That's how we cut traffic, cut emissions, and make it possible for people to live their lives without being stuck in a car all day. Please start treating transit like a real priority.
S0129.B	n/a	n/a	I'm really not sure why we're still talking about managed lanes and HOV expansions like they're the solution. They're not. They haven't worked, and they're not going to start working now. Adding lanes just leads to more driving - it's been proven again and again. What we should be talking about is healing the damage our freeways have done. Let's cap the 5 through downtown and Barrio Logan and reconnect those communities. That's the kind of project that actually improves lives. Also, we need to start thinking bigger when it comes to space on our roads. There's no reason so many lanes should be dedicated just to cars. Reclaim some of that space for transit, bikes, scooters - things that actually move people efficiently and don't wreck the planet. We have a real opportunity here. Let's not blow it doing more of the same.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0129.C	n/a	n/a	If we're serious about climate and clean air, we have to stop acting like electric cars alone are the answer. Freeway expansions - even with EVs - still mean more driving, more sprawl, and more pollution in the communities that are already overburdened. The best way to tackle all three - climate, energy, and air quality - is by giving people real alternatives to driving. That means a massive investment in fast, frequent public transit, walkable neighborhoods, and bike infrastructure that actually feels safe. We need to reduce vehicle miles traveled, not just change what powers the cars. We can't keep saying the right things and then funding the opposite. If SANDAG wants to lead on climate, that has to show up in the budget, in the projects, and in the timeline. Not 2045 - now.
S0129.D	n/a	n/a	At this point, it's really clear what people want: a transit system that actually works. Not in 2045. Not in theory. Right now. We need buses and trains that come often, connect across the county, and actually get people where they need to go without long waits or confusing transfers. We need to stop pouring money into managed lanes and highway expansions that just make things worse. And we need to start treating transit, biking, and walking like real priorities - not just add-ons. SANDAG has the power to make this region healthier, more connected, and more livable. But it has to start with listening to what communities have been asking for, over and over again. Better transit. Less car dependency. A future we can all actually thrive in.
S0130	McGarrah Wilson	n/a	My name is McGarrah Wilson-[redacted]. I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. I want a San Diego that's accessible for all and not the current state of car-reliance and sprawl. I want a walkable city with good public transit and low air pollution. There must be NO highway expansions in SANDAG's plans for the future. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure. While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes. SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. I work with youth and this is really important to me and them! 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most.
S0131	n/a	n/a	It is essential that San Diego expands its public transit and bike-ability. I want to trolley, the bus, and to bike places, but it is extremely difficult. For example, I have to drive to my nearest trolley stop (Mission San Diego Station) because there are not safe bike paths from my home in Kensington. We need more trolley routes, more bus routes, and more frequent options. I would love to live in a city without massive traffic jams every single weekday. I would love to be able to conveniently take public transit to work and stop contributing to climate change by driving a polluting car. I have asthma that is triggered by tailpipe emissions. 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. This is essential for me. Thank you.
S0132.A	n/a	n/a	We used to have a direct bus route from La Jolla to the new Balboa Avenue Transit Center, but it was discontinued. That connection is critical - many people live, work, and study in La Jolla, and restoring this route would make the trolley far more accessible. It should return as a Rapid-style line with all-day frequent service. This isn't just about convenience - it's about connecting one of the region's most important job centers and educational hubs to our broader transit network. People would ride it, if it actually existed.
S0132.B	n/a	n/a	No More Managed Lanes! No more new HOV lanes! No More Highway expansion, we are done with the highway expansion, managed lanes, and all of this new lanes miles. No one wants more highways, just listen to us. No more highways use that money to build transit faster, and sooner instead.
S0132.C	n/a	n/a	You are betraying the envierment by building more highway lane miles. No more managed lanes, no more HOV lanes we are done. Build more transit now, sooner and faster.
S0132.D	n/a	n/a	Build more transit faster and sooner. This plan has us waiting too long.
S0132.E	n/a	n/a	Improve transit to La Jolla.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0133	Sai	n/a	Hello, my name is Sai and I was made aware of this public comment opportunity through San Diego 350. I am writing to urge SANDAG to push forward improvements to San Diego's quality of life by decreasing greenhouse gas emissions and increasing transit options instead. Born and raised in the San Carlos suburbs, I've always had long commutes to my middle and high schools in La Jolla (1990's-2000's). And because my college years were spent in the SF Bay Area, and because I've traveled extensively in Europe and Asia, I also know how good transit systems can be. Finally, I happen to be a sustainability major, so I'm personally invested in reducing my footprint and advocating for positive change. Currently I work downtown at the San Diego Convention Center and decide to take the trolley about half the time, dependent on various factors. My public transit options actually influence where I apply to work and how I might spend my free time. It's ridiculous that when I stay in North Park with my friend, public transit to the convention center takes me LONGER from her house than from mine. I also aid out-of-towners on how to use the trolley to get around. In secret, I'm painfully embarrassed by the god-awful state of our trolley system where every trip is guaranteed to reek of homeless urine/sweat and be shared with crackheads, schizophrenics, and/or rude passengers with a disturbing disregard for those around them. I will NEVER take my mother on the trolley with me. Before this sounds like an argument in favor of highway expansions, I'll mention that I get a great view of San Diego's summer smog from Del Cerro. In fact, it looks astonishingly bad just these past few days, worse than I can remember. So, all the money for road expansions that will invariably increase the city's air pollution, gas guzzling habits, and public health issues, please please please just invest it in improving our public transit system instead. San Diego is chock full of Gen Y's and Z's who know exactly what we're robbed of by not having a better public transit system. Neighborhoods dense with popularity and population -- e.g. North Park, South Park, University Heights, Convoy -- desperately need more public transportation to ease traffic and parking nightmares. It should not take an hour to get somewhere you could drive in 15 minutes. It should not be an disgusting, off-putting experience to ride the transit. Please.
S0134	n/a	n/a	Please extend the Oceanside Quiet Zone for the Sprinter through Crouch Street. The horns are so loud and unnecessary and will only become more disruptive to more people as the residents in the new complex at Crouch Street move in.
S0135.A	n/a	n/a	7½-Minute Trolleys System-Wide by 2029 As of today, only the Blue Line between American Plaza and San Ysidro operates at 7½-minute peak frequencies, while the Green and Orange Lines still run 15-minute headways throughout peak, midday, and weekends. We demand that SANDAG upgrade ALL Blue, Green, and Orange lines to 7½-minute peak headways, and guarantee no more than 10-minute waits midday and weekends by 2029 - delivering truly rapid light rail service across the network. 10-Minute Peak, 15-Minute Weekend on Top 10 Buses Today's ten highest-ridership bus routes average 12-15-minute headways in peak periods and can slip to 30 minutes or more on weekends, yet they carry over 40% of all bus boardings in the region . By 2029, SANDAG must fully fund a high-frequency grid that locks in 10-minute peak service and 15-minute weekend service on routes 7, 929, 10, 215, 905, and the other top five lifeline corridors-making the bus a reliable choice for every community. Clock-Face Coaster & Sprinter by 2029 Currently, COASTER trains run every 26-120 minutes on weekdays (about 30 trips) and 58-100 minutes on weekends, while the SPRINTER operates every 30 minutes seven days a week, dropping to hourly outside 10 a.m.-6 p.m. on weekends . We demand transforming the COASTER into a true clock-face schedule30-minute intervals at :00/:30 on weekdays and hourly weekends-and boosting the Coaster Connection at Sorrento Valley to 15-minute, all-day service. The SPRINTER must run 15-minute peak and 30-minute off-peak service throughout each weekday by 2029. Countywide All-Door Boarding Off-board validation and all-door boarding pilots have cut dwell times by 32% (1.39 seconds per passenger) and shaved 6-7.5 seconds per stop, translating to up to an 8% reduction in total travel time on high-ridership corridors . By 2029, SANDAG must equip every MTS and NCTD bus with off-board validators and rear-door readers, and pair them with unobtrusive camera checks-slashing dwell times, boosting speeds by an average of 5-10%, and making door boarding seamless and ADA-compliant. Transit Signal Priority at 250+ Intersections Today's TSP deployments are limited to a handful of Rapid corridors, leaving most buses stuck at lights timed for cars. We call for activating true preemption and far-side stop logic at 250+ Equity Focus intersections-University Ave, Broadway, South Bay Rapid, and beyond-so that signals automatically adjust to let buses through, improving on-time performance by up to 15% and reducing delays for all riders. 100 Miles of Camera-Enforced Bus-Only Lanes While a few Next Gen Rapid corridors have dedicated lanes, most "bus lanes" are mere paint and get ignored by cars. By 2029, SANDAG must build 100 miles of physically separated, camera-enforced bus-only lanes-fully funded with onboard enforcement tech-so that violations are ticketed in real time, buses never get boxed in, and average speeds jump by 10-20% on these priority streets.
S0135.B	n/a	n/a	No new expansions of highways that have not been previously approved in the fiscal year.
S0135.C	n/a	n/a	Build more dense housing near transit. Have the courage to build taller and with less parking.
S0136.A	Blake	n/a	Transit should connect the city more efficiently than cars. More routes in neighborhoods. Designated streets or lanes for transit (reduces the cost of building new infrastructure). Reliability. Safety. Affordable.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0136.B	Blake	n/a	Flexible fleets should be used to connect neighborhoods with transit hubs. Again using designated roadways, paths, or lanes to facilitate speed & efficiency
S0136.C	Blake	n/a	Bikeways and walkways should be 100% protected from traffic. All bike lanes should be protected because, roads with sharrows have speed bumps to encourage drivers to slow down. Road should also be wide enough where a car could safely pass a cyclist. Walkways, sidewalks should have permenat barriers or bollards to protect pedestrians from vehicle danger.
S0136.D	Blake	n/a	Housing and land use should prioritize efficiency. Efficient use of space. Think higher density housing (condos) that are affordable and effectively have the same amenities as a single family home. Land use should be maximized. Eliminate surface parking lots in favor of vertical parking structures. Dramatically Increase greenery and urban gardening. Planting native plants, flowers, vegetables and fruits. Establish community gardens at recreation centers and parks.
S0136.E	Blake	n/a	Safety & security should be prioritized over profits. Ensure the public spaces are safe for everyone,
S0136.F	Blake	n/a	Funding shouldn't be a concern. Poor financial management of the city & county is what gets us in this mess. A budget review should occur with potential solutions for optimization presented to the public
S0136.G	Blake	n/a	Climate, energy, and air quality should be major decision factors in community projects. Increasing ground level shade cover to reduce heat islands on the surface, improved air quality with plants. Reduced energy costs for ground floor buildings. Improved air quality. All energy project should be focused on green renewable sources. Solar fields in the desert, nuclear power plants, wind farms.
S0136.H	Blake	n/a	Social equality could be addressed by implementing these solutions. Add in guard rails for new projects to protect social equity.
S0136.I	Blake	n/a	The public should engaged more. But on a smaller level. Community's or zip codes should be more cohesive. Accomplish by establishing community outreach groups. A representative for each community is physically there and accessible for the public. Is required to engage with individuals and businesses with less than 50 employees. Those are who should be represented.
S0136.J	Blake	n/a	Projects should be evaluated based on wha value it adds to the community.
S0137.A	n/a	n/a	Trolley/rail, up the 15 to Escondido and maybe beyond
S0137.B	n/a	n/a	Trolley/rail eliminates car pollution
S0138	Alex Jarrell	n/a	The 10x29 is a fantastic outline for improving mass transit in San Diego, which should be a higher priority than continued support of individual car infrastructure.
S0139.A	Andrey Uvarov	n/a	More trolleys please. The purple line idea was great. Direct to the airport would be nice as well
S0139.B	Andrey Uvarov	n/a	Build more houses and condos and apartments. ADUs are meh but fine.
S0140.A	Jennifer Carr	n/a	Increasing public transportation, especially trolley service, should be the TOP PRIORITY. More neighborhoods, especially the major neighborhoods just north of Balboa Park, should have trolley service.
S0140.B	Jennifer Carr	n/a	More protected bike lanes -- separated from traffic and safe from parked cars -- should be a priority.
S0140.C	Jennifer Carr	n/a	More housing and resources for homeless folks, end cruel practices of destroying homeless encampments.
S0141.A	n/a	n/a	7 1/2 minute trolleys system-wide by 2029. 10-minute peak, 15-minute weekend on top 10 buses. Clock-face Coaster & Sprinter by 2029. Next-gen Pronto by 2026.
S0141.B	n/a	n/a	Build multi-use properties that connect directly to transit.
S0142	Ryan Kirby	n/a	Please prioritize increasing the frequency of busses and giving them automatic green lights. There needs to be a bus loop all the way around the perimeter of Balboa Park with all green lights.
S0143.A	John Beutter	n/a	We need to expand access to trolleys and trains. As our city grows, we are rapidly outgrowing our roadways. Forward looking transit planning should prioritize railways and public transit rather than expanding roads and highways.
S0143.B	John Beutter	n/a	New housing is great, but parking should be mandatory for new construction.
S0144	n/a	n/a	Safe, timely & extensive public transportation is so very important to me. Not only do I prefer taking public transport when possible to get a break from the stress of traffic, I also dig the thought of community that is fostered in a community that has good transport. As a new SD city resident, I LOVED the option of taking a ride downtown to enjoy dinner & drinks.... but realized when a man attacked a woman on the trolley and help took 4 minutes that I don't know how strongly I should keep suggesting the trolley to my visually impaired adult daughter. Having a variety of routes with frequent times with safety intact is far more important to me than more freeway lanes.
S0145.A	D. Cortez	n/a	Need more trolleys and busses and better routs faster times.
S0145.B	D. Cortez	n/a	Need more affordable housing rent control.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0146	Jim Carretta	n/a	There is latent demand for more fully separate bikeways, such as the bike route along Route 52. Any time a transit project is undertaken, such as recent work on Highway 8 east of Alpine, the default should be to include a separated bike lane as part of the project. The lanes dedicated to MTS bus traffic should have, by default, included bike way infrastructure.
S0147.A	n/a	n/a	Transit is terrible to those people who don't own cars. Uber and Lyft are expensive to take during off peak time. I work late at night. By the time I get off, there is no more public transportation.
S0147.B	n/a	n/a	Housing is expensive.
S0148	n/a	n/a	1) Please improve bus service around North Park. #6 bus should run more frequently to facilitate car-free errands. Add Rapid Bus service to Blue Line UTC-bound to facilitate car-free commuting. 2) Upgrade Pronto app to use NFC (Apple Pay, Google Pay). The QR code readers at trolley stations are unreliable in sunlight. Since it's sometimes necessary to try several readers at a station before one will successfully scan, I've sometimes had to choose between risking a citation or missing the trolley. This also creates a safety issue, as riders sometimes have to rush back and forth across the tracks in search of a reader that's not in direct sunlight. 3) Consider increasing peak-hours frequency on Blue line between Old Town and UTC.
S0149.A	n/a	n/a	Extend the trolley to San Diego Airport NOW! Easily the highest volume of rider potential and huge way to alleviate TRAFFIC downtown.
S0149.B	n/a	n/a	Add solar panels to all government owned buildings.
S0150.A	n/a	n/a	A train to the airport, more public transportation!
S0150.B	Trenten E.	n/a	Don't let trump sell our BLM land please
S0151	n/a	n/a	While I appreciate the efforts being made to public transit already, it is my belief that slow and incremental progress is always inhibited as people see it as a hindrance to their car-centric lifestyles. I would love to see two things from SANDAG in this regard: 1. Drastic changes that force people to interact with public transit. Parking garages at transit centers that don't already have them. Reduce lanes across the entire county in favor of dedicated bus lanes. Residential and all. Increase trolley frequency and push for more big extensions like the Blue Line UTC option. 2. Get people on buses and trolleys. That means making events and marketing the use of the trolley across the county so people see what they can use it for. Grocery stores, libraries, and as much as I hate the dystopian ads at gas stations those too! I believe people need to see what transit can do. That might even mean comparing it to other places and showing how good it could be. I want to know that people in SANDAG are just as opinionated around public transit as those who are commenting on these plans. Don't get me wrong. I know small improvements are great and they are sometimes the only way to get things done but humans have changed blindness. People won't see the improvements unless they are actively interacting with them.
S0152.A	Eric Sawyer	n/a	Please support a better transit network by planning for expanding our trolly network and increasing the frequency of service. I've been very impressed by the trolley on the times I have used it, but it does not go enough places to be useful to me as an everyday means of transit, in particular in getting to and from my work. Please consider how we could fast-track new trolley lines and better connectivity. A connection to the airport is a no-brainer, but we should also have connections to balboa park, north park, Convoy, and the huge job centers in Sorrento valley and Caramel Valley/Del Mar.
S0152.B	Eric Sawyer	n/a	Please push for more protected bike lanes. A line of paint does not assure people that they will be safe riding beside bigger and bigger trucks and SUVs. Even a curb provides a clear delimitation between cars and bikes and a feeling of protection against accidental drifting of cars. I would be happy to give up street parking if it meant I could bike around the city in a safer way.
S0152.C	Eric Sawyer	n/a	San Diego spends far too much money on its roadways. We could do so much better spending that same money on expanding the reach of the trolley or building better infrastructure for active transit like biking and walking.
S0153	n/a	n/a	Highways and local roadways should be your number one priority. Transit and Bike Lanes are not options for the vast majority of residents in this county. It unfairly benefits the City of San Diego over everyone else in the County.
S0154.A	n/a	n/a	More frequent and expansive trolley and bus service.
S0154.B	n/a	n/a	Tap to pay on busses and trolley
S0155.A	n/a	n/a	Please build a trolley or streetcar line where the people are: North Park, Hillcrest, Balboa Park, University Heights, Normal Heights, City Heights. It is crazy that we can't get to work except by car or a bus that takes an hour. What about a line along the 163? Or a line down park all the way to the trolley stop at the bottom of Texas? This area is continually getting more dense, and mass transit is not adequate.
S0155.B	n/a	n/a	We need more trolleys or streetcars!
S0155.C	n/a	n/a	We need more trolleys or streetcars!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0156	Andrew Lombardi	n/a	Please build a tunnel south of sorrento valley so the coaster and Amtrak can get thru that pass in a few minutes and cut down the trip time from north county to Sd by 15 min. It would be a game changer!
S0157.A	n/a	n/a	The current PRONTO system forces riders to carry a physical card or navigate an outdated QR interface that slows boarding. We demand a ground-up redesign funded by 2026 that lets you add PRONTO cards to Apple Wallet or Google Wallet, tap to pay with a phone or smartwatch (no more QR scans), vastly improves the app and web sign-up experience, and installs reload kiosks at schools and libraries. This will cut dwell times, reduce errors, and make fare payment intuitive for all riders
S0157.B	n/a	n/a	we need to promote climate-friendly decisions!
S0158.A	Jordan	n/a	There aren't late options for transit. You get abandoned after 11pm. I know there's a lot of folks working on it and I'm grateful for what we have but San Diego is lacking in public transportation as an efficient way to get around. Not having a car is a huge disadvantage for someone in San Diego. From grocery shopping to commuting and any recreational or entertainment travel.
S0158.B	Jordan	n/a	Have to connect the trains to neighbors. And have to have options after 11pm
S0158.C	Jordan	n/a	Please help me feel safer out there.
S0158.D	Jordan	n/a	We don't want to pollute our air as much
S0159.A	n/a	n/a	Transit is like the field of dreams; if you build it, they will come. One of the biggest deterrents to using transit in San Diego County is that the frequency is lacking and it can take 10 times as long to get to a destination compared to driving. It should not take an hour with transfers to get from downtown to a beach. It seems insane that there aren't "rapid" (under 20-minute) options that take passengers to the center of popular neighborhoods. For example, there should be busses that take people back and forth between two popular points such as Downtown to Liberty Station, Liberty Station to Pacific Beach, Hillcrest to Mission Beach. Downtown would likely be the largest hub, but this could create a model that people would actually use and be willing to build a travel schedule around. It would be critical to prioritize high tourism areas first to earn revenue. Downtown near 5th Avenue to Mission Valley, Liberty Station, Hillcrest/Balboa Park and the end of Garnet or Grand Avenue would be instant money makers due to tourists who would avoid renting cars. Busses should leave no less than every 30 minutes so people can plan their days easily. Busses should run from 7 a.m. until midnight or later.
S0159.B	n/a	n/a	Flexible fleets would be necessary to be a last-mile solution if SANDAG were to move closer to a hub model between major neighborhoods. They can be cost effective if used as advertising opportunities, similar to the Free Ride Everywhere Downtown.
S0159.C	n/a	n/a	With E-bikes growing in popularity, particularly with youth, it is critical to provide infrastructure to keep everyone, cyclists and car drivers alike, safe and comfortable on the road. San Diego needs to take a proactive approach to help more people and choose bikes over cars. Walkways need to be evaluated in areas where individuals are currently forced to take a car but could be serviced by E-bikes instead.
S0159.D	n/a	n/a	SANDAG should consider a study on the amount of maintenance required for bike lanes vs. car lanes to help demonstrate the cost effectiveness of investing in infrastructure. Target improving transit in high tourism areas first to earn needed revenue and make the changes more cost effective.
S0159.E	n/a	n/a	Do not let the loudest voices win. Most San Diegans have full time jobs and families that keep them from participating in the public process. The people who comment are often those who are already engaged in civic life and do not represent an average person. Besides conducting formal outreach, SANDAG staff would benefit from talking to people in their lives and getting a better handle on lived experiences. Don't just listen to those who have already decided to make the time to tell you what they want. Trust that you are experts and that you are San Diegans too. Make the choices that will benefit the highest number of people possible and shut out the noise from ignorant haters who come with zero solutions or constructive feedback.
S0160.A	n/a	n/a	Our train frequency and reach is embarrassing for a city of our size. We need more regular trolleys; 15 minutes per train wouldn't even be super off peak in Asian or European metros. We also need more trolley lines. Obviously the airport should be connected and it's beyond embarrassing that it isn't. It reflects the corruption of the city to accept bribes from the taxi and parking lobbies over the years, ignoring the easiest win it could do for the public. There should eventually be trolley tracks on every major thoroughfare: Genesee, Park, University, Garnet, Balboa, Claremont Mesa, Mira Mesa, El Cajon bld, etc. get people where they need to go and you will have less parking, traffic, and commerce issues.
S0160.B	n/a	n/a	Mixed use development is what is done around the world and needs to happen here. We also need to ban Airbnbs and non-primary home ownership. Housing a human right, not a portfolio piece.
S0161.A	Katerina	n/a	A trolley line to north park/hillcrest would be immensely beneficial to both communities because they are both impacted by lack of parking. I love taking the trolley downtown for that reason, and strongly believe have better public transport to those areas would help bring money to local businesses. In general, trolley line expansion would reduce traffic and help ease parking congestion in San Diego.
S0161.B	Katerina	n/a	I really like that San Diego is expanding bike lanes, and would like to see bike lanes on busier roads such as La Jolla village Dr in UTC to improve biker safety!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0162.A	n/a	n/a	The transit situation in San Diego excludes non-drivers like myself from participation in local commerce. Prioritising highways and car infrastructure exacerbates the problem and does not improve the situation for drivers either. Expanding car infrastructure tends to both make driving more compulsory, and by creating a transient reduction in traffic congestion, encourage more commuting and less public-transit utilisation, thereby eventually reversing any improvements achieved. As a north Poway resident, I can reach most locations in Poway and Rancho Bernardo more quickly by walking than by taking the bus (and this is not because this is a walkable area by any means). It's not surprising that the majority of San Diegans would view the personal and collective expense and risk associated with car ownership as necessary (in many cases even more necessary than home-ownership).
S0162.B	n/a	n/a	We need better-protected bikeways (improvements like those recently implemented in Carlsbad are needed throughout San Diego) and walkways, more pedestrian bridges, and we urgently need more crosswalks.
S0162.C	n/a	n/a	The congested state of our highways and roadways led me to sell my car and switch to 100% remote work. Rather than complain about traffic I prefer to avoid contributing to it. The overall situation could be majorly improved by a highly publicised expansion of direct bus lines. For example, it would be very helpful if multiple bus transfers were not needed to travel between the inland and coastal areas, or even to get from Poway to 4S Ranch. There used to be an MTS Rapid Bus that went straight from the RB transit station to UCSD and I used this frequently when I was a student. However that line no longer exists, presumably due to insufficient ridership. Efforts to increase ridership (e.g., incentive programs, PSA strategies) should be considered to ensure that lines like the RB-UCSD Rapid are sufficiently utilised.
S0163.A	Sherinna Paguio	n/a	Run all trolley lines at more frequently. Blue Line is the only one that operates at 7.5 mins. All lines should run more frequently at peak times. Additionally, lower low peak wait from 15 mins to 10 minutes or less. Buses should also run more frequently. They run 15-30 mins apart on some routes. Buses should run at 10 min frequencies to ensure they're reliable transport for the community. Creation of more priority bus lanes to encourage public transit use, decrease personal vehicle congestion, and cut down on wait for bus transit/travel. Overall, add more bus stops and expanding trolley line if possible. Bike lanes are being expanded but traffic makes it unsafe. Even if bike lanes are protected, work/grocery/home locations are too far apart for most people to utilize bikes for meaningful daily commute.
S0163.B	Sherinna Paguio	n/a	More security or support on public transit for potential aggressive individuals or confrontations.
S0164	Myra Lerma	n/a	- Higher bus and trolley frequency - every 10 minutes or less. - Trolley to the airport - Trolley extension along the 15 fwy to meet green line
S0165.A	Jun T	n/a	Trolley station within Mira Mesa and another trolley station in the airport. Security cameras to be monitored in each vehicle for safety.
S0165.B	Jun T	n/a	Bus stops to have more shade
S0165.C	Jun T	n/a	Building trolley stations with retail opportunities such as restaurants or shops. Similar to train stations in Japan.
S0165.D	Jun T	n/a	It is not a secret that the affluent neighborhoods hold negative stigma towards public transit and are generally in favor of roads. Not everyone in the community, specifically working class, will have the means to have ALWAYS have a functional car. The working class relies on public transportation.
S0166.A	n/a	n/a	Public transportation should be more frequent, so more people would choose taking the bus/trolley, relying less on their cars.
S0166.B	n/a	n/a	All bike lanes should be physically separated from roads. Painted stripes are not bike lanes.
S0166.C	n/a	n/a	Public land should not be for sale.
S0167	n/a	n/a	Dear SanDag, Rising costs of living are touching every part of daily life especially transportation- cars, gas, vehicle upkeep, parking fees, and more are creating many financial burdens that could be lessened by local investment in affordable transportation options. We owe it to our residents in San Diego to improve public transportation options and invest in ways to make the city more public transportation friendly. NOT dumping money into more freeways, creating more congestion and poor environmental outcomes. San Diego could truly spearhead improved public transportation in a state that has neglected this need for way too long.
S0168.A	n/a	n/a	Please make a separated bikeway on Pacific Highway from Laurel St to SeaWorld Drive. This would fill a missing gap from downtown to Old Town Train Station where there is right now no way to bike there. A bike trail on Pacific Highway would also connect to the existing bikeways to OB, PB, La Jolla and UCSD. Make more good bike lanes like the one in Enicitas.
S0168.B	n/a	n/a	More safe bike lanes so that I don't have to pollute the air with my car.
S0169.A	n/a	n/a	Connect the trolley to the airport. Don't overthink it. It makes too much sense and would be massively popular. It will pay for itself.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0169.B	n/a	n/a	More density is needed in San Diego for a more affordable, walkabke and liveable community. As a homeowner, I support more neighborhood density in my area (PQ) as well as the rest of the city.
S0170.A	n/a	n/a	There has been some progress, but too many high speed streets still don't have safe bike lanes or safe alternate routes. We need more bike lanes that have real concrete barriers so that people feel safe.
S0170.B	n/a	n/a	Please, please, please fix the train to LA.
S0171	n/a	n/a	please work to expand public transit in SD!! It will help traffic so much. i commute using the train daily instead of driving 30 miles and it's a blessing. should be an option for more people
S0172.A	Erica	n/a	I think a trolley connection to the airport should be prioritized. There's been many times I've seen tourists struggling with lugging their suitcases along Harbor Drive. Recently, I had to take a Lyft to/from the airport that totaled $100 and after discussion with other San Diegans realized this price was "normal"! There should absolutely be alternative options available to both tourists and residents to get to/from the San Diego International Airport. Not sure this is very feasible, but a trolley line that connects East Chula Vista/Eastlake area to the Blue line would be fantastic as someone who hates driving in traffic. There's a ton of traffic on Telegraph Canyon Road/Otay Lakes Road, East H Street, and Olympic Parkway that could be mitigated with some kind of trolley option. Also, even some kind of light-rail transit within the larger Chula Vista itself would be great as it is quite spread apart. Something connecting East Chula Vista to even Third Ave in West Chula Vista would be amazing!
S0172.B	Erica	n/a	I think more protected, separated bike lanes would be ideal and make me feel more comfortable being on a bike. Vehicles along Telegraph Canyon Road, East H Street, and Olympic Parkway are constantly about 20 miles over the speed limit. I've been seeing more teenagers on bikes lately which is good, but I do worry a lot for their safety because there are so many reckless drivers.
S0172.C	Erica	n/a	I think there's enough single family homes especially since less people are choosing to have children. More middle housing, and medium density neighborhoods would be great especially in Chula Vista. I've been seeing this a little more in East Chula Vista which is good to see. Also, mixed-use developments would be a great direction to go towards to help unify the community and create more third spaces.
S0173	n/a	n/a	Bus systems tend to lag behind and even the more popular lines can have significant delays. Please increase availability and punctuality, targeting 10 minutes on weekdays, and 15 minutes on weekends. Also, the Pronto system is very outdated, please work on replacing or at the very least improving the current system to include tap-to-pay systems and include pay-as-you-go systems instead of pre-loading the account.
S0174	n/a	n/a	We always need more transit. Our public transit, compared to places like NYC, Chicago, Japan, and Europe, is laughable. We don't even have a trolley that goes to the airport. Since it would be way too difficult to build new trolley lines, I propose at least expanding the bus system. Where I live, I have to walk over 1 mile to get to a bus stop, and the sidewalks are not even ADA accessible. The bus lines should be expanded and also run more frequently. In Japan, we rarely had to wait more than 10 min to board a bus or train going to where we needed to go. Transfers were quick and easy. In NYC, there's a shuttle bus that goes straight from La Guardia to a busy transit center. In San Diego, it takes over 2 hours for me to travel from my house to the airport.
S0175	n/a	n/a	Trolley to the airport Increase frequency of trolley during and after padres games. I shouldn't have to wait for 30+ mins with my 74 year old dad at 12th/imperial at 10pm. Also a bathroom there, he has to pee a lot
S0176.A	Jay Robinson-Duff	n/a	The trolley should go to the airport. Trolley needs to be elevated in downtown at minimum. Bus stop distancing needs optimization. Buses should have better bus lanes and signal pre-emptive priority. Trains need to be electrified.
S0176.B	Jay Robinson-Duff	n/a	SANDAG must launch an affordable, countywide bike share with e-bikes, PRONTO integration, tiered pricing, and equitable station density in every neighborhood and campus. This system should utilize a docking system similar to Citi bikes. The county should investigate partnering with the implementers in New York or Washington DC to allow for quick implementation of this improvement.
S0176.C	Jay Robinson-Duff	n/a	Bikeways need better protection and connectivity. The lack of an interconnected network needs to be a priority to fix.
S0176.D	Jay Robinson-Duff	n/a	Pronto needs tap to pay, and integration with Google and Apple wallets.
S0176.E	Jay Robinson-Duff	n/a	SANDAG should support massive upzoning of spaces near their transit locations instead of opposing bills that will help support more ridership for the organization, such as SB79.
S0176.F	Jay Robinson-Duff	n/a	Public outreach and engagement needs to take into account a holistic approach to listening. Listening sessions regarding what should happen with the Del Mar bluffs shouldn't only happen in a room, but also with riders on the train. These are the people who will actually be affected by what changes happen. The listening sessions should be focused on these people.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0177.A	Jon Leo	n/a	For transit, the addition of many rapid bus routes by 2035 is great, but I do think the following should be implemented if we can before 2030: 1) 7-8 minute trolley frequencies throughout the day on all lines. This really helps with connectivity over the trolley system and make it closer to a true metro system. 2) 5-10 minute frequency on the top 10 used bus routes in the County across MTS and NCTD with 15 minute frequencies on Weekends. This will help allow better connections and convenience for riders. More frequency on other routes through denser areas towards employment, entertainment and commercial centers would also encourage usage. 3)Clockface scheduling and increased frequency for Sprinter (15 min) and Coaster (20-30 minutes). 4)Transit Signal Priority for all rapid and top 10 local bus routes at 250+ intersections to help speed up travel and decrease delays or needs to pad the schedule. 5)100+ miles of camera enforced bus lanes, which will help our buses especially on rapid routes travel faster. Queue Jumping can help too. 6) Airport connection could work by just extending the Orange Line from Courthouse to the Airport. That can provide frequent, reliable rail service to the airport and connect it to the wider trolley and rapid network. 7) Purple Line needs to be extended to Sorrento Valley for a true connection to the South Bay.
S0177.B	Jon Leo	n/a	Could it be implemented in more neighborhoods and cities? Mira Mesa, for example, would heavily benefit from flexible fleets like the NEVs that currently serve downtown.
S0177.C	Jon Leo	n/a	More bike lanes please! And not just Sharrows unless in roads with a 25 mph speed limit or less. Mira Mesa would be a perfect place for bike routes, since the neighborhood is pretty much bikeable but lack of lanes does make it dangerous.
S0177.D	Jon Leo	n/a	Bonus ADUs and more building besides transit stops should be streamlined.
S0177.E	Jon Leo	n/a	Can fare gates work for SD? It could help increase safety as passive and in person fare enforcement can reduce disturbance numbers.
S0177.F	Jon Leo	n/a	Integration of schedules at least with MTS and NCTD does matter. It's good that a chunk of improvements are going to North County. For Mira Mesa specifically, more frequency and microtransit/NEV along with more bike routes especially on Mira Mesa Blvd. would really make living there without needing a car much easier.
S0178.A	n/a	n/a	Connect them please. Rose creek and sorrento valley are both fantastic. But Gilman share the road at 45 mph and cross I5 south freeway on ramp is terrifying. I know it's "approved" and all that nonsense but 4 years after rose creek opened it's still a 45 mph share the road crossing a freeway on ramp to get to it. Zero improvements have been made in the most dangerous section. No one will use or vote for bike ways if you spend the money painting green and install bollards on the relatively safe I5 underpass leading to the path while ignoring the horribly dangerous part 100 feet up the road. I'm surprised there aren't any ghost bikes at Gilman and I5 south ramp.
S0178.B	n/a	n/a	Rose creek is scary since there's no lights in the under passes. There's lots of homeless, abandoned carts/possessions and broken glass lurking in the dark. At the least install or fix the lights so I can see the dangers I need to avoid. Some days I just have to pray as I drop into the dark that I don't hit a rocking guy, unleashed dog, cart or random shelter.
S0179.A	n/a	n/a	Timing trolleys and buses would be a huge improvement. Balboa and old town the buses are infrequent. Sitting at either alone at night because the buses and trolleys are both infrequent and not coordinated has led me to drive instead. Not only is it way faster, neither station is inviting as a woman alone.
S0179.B	n/a	n/a	I feel like every so often we make a big show about security and I feel confident waiting for trolleys and buses at the stations. Then we stop. As soon as security is gone we go right back to a homeless person yelling at himself, shaking and wandering into the tracks or someone laying on the handicap ramp with all their stuff so you have to step over them : it's scary things to a woman alone at a transit station. And then I'm like you know last time I took the blue I had to wait 20 mins for the bus while some guy stumbled around mumbling to himself and shadowboxing something I couldn't see, think I'll drive.
S0180.A	n/a	n/a	Extremely shameful but predictable that after hiring a CEO from caltrans, SANDAG would abandon it's commitment to the climate crisis and shifting spending to widening highways.
S0180.B	n/a	n/a	Stop spending money on widening highways which are destroying our climate.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0181	n/a	n/a	Dear SANDAG Board Members, My name is Edgardo Arroyo, and I'm a San Diego resident who believes in public transportation. I'm submitting this comment to urge you to prioritize three critical improvements that can drastically improve mobility in our region: 1. 7½-Minute Trolley Frequencies System-Wide by 2029: Only the Blue Line currently meets this standard. Extending 7½-minute headways to the Green and Orange lines will make the trolley a truly rapid and dependable option for more residents. This is essential for reducing wait times and making public transit a first-choice option. 2. 100 Miles of Camera-Enforced Bus-Only Lanes: Painted lanes are not enough buses get stuck, delayed, and lose reliability. We need physically separated, camera-enforced lanes to ensure that buses move efficiently and on schedule. Let's reduce congestion and improve service for tens of thousands of daily riders. 3. Real-Time Transit Accountability Dashboard: Riders deserve better than static PDFs. A publicly accessible, real-time dashboard with data on missed trips, route performance, and equity outcomes will build transparency and rider trust. It's time for honest, ongoing accountability. We need bold action. These investments aren't just technical upgrades they are moral and economic imperatives for a region struggling with affordability, climate change, and disconnected communities. Please fund and implement them without delay. Thank you.
S0182.A	Cameryn Yow	n/a	1) increase the frequency of the trolley lines from 15 minutes to 7.5 minutes during peak hours. 2) expand the trolley system to service more San Diego areas 3) expand the bus frequency such that it's viable commuter option
S0182.B	Cameryn Yow	n/a	Increase bike lanes, add more protected bike lanes
S0182.C	Cameryn Yow	n/a	Do not waste money on expanding the freeways. It has been shown that expanding freeways does not reduce traffic. Expand the public transportation options (trolley, bus routes).
S0182.D	Cameryn Yow	n/a	Focus on expanding public transportation in order to reduce people's reliance on cars. Make the city more bike friendly, so people can bike as an alternative to drive.
S0183.A	n/a	n/a	Who made this absolutely shitty regional plan? It's garbage. Prioritizing more highway expansions in 2025? Really? I live on the I-5 corridor and what we actually need is an upgraded Coaster fully electrified, double-tracked, and running every 15 minutes. That's how you pull cars off the road. Not more concrete. Not more traffic. This plan completely fails to meet the moment. Stop building highways. We're sick of this car-first mentality. Scrap the plan and start over with real climate goals and real transit investments.
S0183.B	n/a	n/a	No more highway expansion. Stop the interstate 5 managed lanes! Upgrade the coaster instead.
S0183.C	n/a	n/a	This is a shitty plan. We dont want anymore highways, any more expansions of managed lanes. Build transit that works now.
S0184.A	Chelsea	n/a	The Sprinter should run every 15 minutes during peak hours. More people would take it. Likewise, the Coaster should have a more consistent schedule. Escondido could stand to have more bus stops.
S0184.B	Chelsea	n/a	More highways and car infrastructure = more cars = more suburban sprawl = more damage to the climate. Our climate future is already looking grim. Why can't California be more of a leader in environmental damage mitigation?
S0185.A	n/a	n/a	More protected bike lanes in Barrio Logan and South Bay
S0185.B	n/a	n/a	More frequent trolleys
S0186.A	Matthew	n/a	There should be way more trolley lines around the city, especially downtown - we should have lines circling balboa park. Additionally, trolley wait times are absymal, we shouldn't wait more than 7 minutes for a trolley stop to circulate! I want to see the bus system also be way faster and have more routes. We should be encouraging density and build up around downtown, uptown, NP, SP, etc. It's a shame. If we can't get trolleys to do it, at a minimum a street car system being reintroduced, this city has 4 mil. people in it, there's no reason we can't do this and do it fast. Waiting until 2040+ is ridiculous.
S0186.B	Matthew	n/a	I want to see more protected bikeway systems similar to what we have on 4th and 5th streets, those have been perfect and encourage me to ride often to get to little italy. However, most of the city remains disconnected in awkward spots, would love to see better protected transitions so we're not competing with cars.
S0186.C	Matthew	n/a	Focus on paving and maintenance, no more expansions. We should have tons of roundabouts, better intersections etc. There should be no more lane expansion, in fact, there's areas where reduction makes more sense.
S0187.A	n/a	n/a	Please expand route 944 schedule (Southbound direction in the evenings too)
S0187.B	n/a	n/a	Please add more protected bike lanes. Paint is not infrastructure

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0187.C	n/a	n/a	More housing needed. Please allow more density
S0188.A	n/a	n/a	Transit needs to prioritize mass transit ridership over private vehicles. Bus lines broadly need transit signal priority, not limited to Rapid corridors. Many areas outside of downtown qualify for both road dieting and creation of limited bus lanes in the absence of trolley lines
S0188.B	n/a	n/a	As above, many arterial or subarterial local roads would benefit from road dieting and establishment of limited bus lanes in concert with transit signal priority. Highways would also benefit from a protected bus-only lane in areas not along extant train or trolley lines, including along the 15 corridor.
S0188.C	n/a	n/a	Infill development in commercial areas needs to be prioritized, as creation of dense mixed-use neighborhoods allows for more efficient rollout of transit options.
S0189	n/a	n/a	Don't charge disabled veterans with a VA ID card that shows they have a service connection. The entire state of Minnesota has done it. Might require a state action but no issues allowing my tax dollars go towards that even in localities I don't live in.
S0190.A	n/a	n/a	I would like to expand the current public transportation we have in San Diego. I use the buses and the trolley all the time to get around, but sometimes certain neighborhoods are difficult to get to because of how limited options are. By 2029, I'd like to see more trolley construction and an extension of the bus lines. I'd also like there to be buses that run later in the night and on the weekends. These changes could bring about less fuel emissions, more foot traffic in the streets which helps local business, and most importantly, less traffic.
S0190.B	n/a	n/a	I'd like to see more clearly defined bike paths and maintenance of sidewalks. Just the other day I attempted to walk from University City to Mira-Mesa, and it was disgusting. Sidewalk filled with trash and junk, overgrown with bushes and trees, and no buffer or protection from cars in the roadway. I think these changes could increase the quality of life of low-income San Diego residents who don't have access to cars or other transportation methods. It also just makes our city respectable, clean, and dignified.
S0191.A	n/a	n/a	Protected bike lanes on Grand ave in Pacific beach and from Pacific beach through Miramar road , from the 5 fwy to Pomerado Rd (Poway)
S0191.B	n/a	n/a	Speed bumps added on Grand Ave in Pcafic beach ,before Olney street light. Too many cars speed to get past the light causing pedestrians and bicyclist to veer away from the speeding vehicles which run the red lights constantly.
S0191.C	n/a	n/a	Adding protected bike bike lanes to and thorugh Miramar road.
S0192.A	n/a	n/a	Rapid trolley lines for commuting, keeping them safe, expanding to major work centers. Expand HWY 52. Have an ordinance for large trucks to not be on the road during peak commuting times. Make developers contribute more to meet transportation needs and fix on /off ramps for the amount of cars trying to access.
S0192.B	n/a	n/a	Roads lack maintenance Highway don't have carpool loans and are not built for the volume of cars utilizing the roads. On ramps back up for miles and can take up to 30mins to get into a fwy during rush hour. Not built well for the demand. For most people in San Diego, there is zero options to get to work without owning a car. No public transportation options.
S0192.C	n/a	n/a	It is non existent. Light are not mapped correctly to keep cars moving, trolley does not offer commuter options. Public transportation would take me 3.5 hrs to get to work, car is an hour and total distance from home to office is 22 miles. Something is wrong here.
S0192.D	n/a	n/a	Infrastructure needs to align with growth and housing. Developers should pay for expansion to roads not citizens. This growth is scary because we can not address moving people safely in event of a natural disaster. It can not be an afterthought.
S0192.E	n/a	n/a	Scary. If there was an evacuation the infrastructure does not support citizens safety. And more housing is coming out to make this even worse than it is now. This city is not set up to move people in the event of an emergency. It is a high priority to fix.
S0192.F	n/a	n/a	Sandag operates poorly. Salaries are out of line with market and exceed what taxpayers should be paying to top level employees. Operational costs exceed what should be paid by taxpayers. Most citizens of San Diego do not trust sandag to work in their best interest either. I would like to see a full audit of financials and waste within the organization before asking any citizen to contribute so much as a penny more to this organization. Developers should be paying for the growth and maintenance of city roads like most cities do.
S0193.A	Clancy Smith	n/a	Transit needs to be prioritized. It is very sad to see the ambition Hassan brought being dropped. For example, changing the purple line to light rail. San Diego needs heavy rail, light rail, and commuter rail. We need to electrify the coaster, build more lines in the dense neighborhoods, and build lines to job centers in La Jolla. Please please please emphasize transit
S0193.B	Clancy Smith	n/a	they're [Flexible Fleets (NEV or Microtransit)] good but need to be de prioritized for transit
S0193.C	Clancy Smith	n/a	We need to continue the momentum we have made with building bike lanes. This will help the last mile problems with many commuters
S0193.D	Clancy Smith	n/a	So sick of you guys spending billions of dollars on highway expansion that will do nothing to alleviate traffic. Stop expanding highways

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0193.E	Clancy Smith	n/a	Prioritize transit
S0193.F	Clancy Smith	n/a	Please build more dense housing around stations, for example, spring at station in La Mesa is an empty parking lot that is ripe for mixed use development. Build the density and transit
S0193.G	Clancy Smith	n/a	Fund transit not highways
S0193.H	Clancy Smith	n/a	Stop giving NIMBYs 10x the say vs transit advcoates
S0194.A	n/a	n/a	Two things could be rolled out for low cost in just a few years that would drastically improve transportation and quality of life in San Diego: 1) A public ferry that doesn't cost $9/ride and has stops in Chula Vista, Coronado, downtown San Diego, harbor island, and shelter island 2) A gondola system that connects the green line stations to USD, Hillcrest, University Heights, and Normal Heights. We also need an express bus to Temecula and another from the North Park area to North County (Encinitas).
S0194.B	n/a	n/a	We should eliminate parking requirements and allow 4-plexes citywide.
S0195.A	n/a	n/a	Please improve public transit and trolley system. Improve bike lanes and sidewalks for beach city access
S0195.B	n/a	n/a	Need improved sidewalks with less cracks and obstructions for walking, pushing strollers.
S0195.C	n/a	n/a	Need more housing supply
S0196	n/a	n/a	As a rider of NCTD's Sprinter, I would be interested in more frequent service to the Sprinter system and PRONTO integration with mobile wallet apps such as Google Wallet and Apple Wallet. Better PRONTO integration would allow for a smoother riding experience since people don't have to fiddle with the QR code system on their phones as often. Sprinter frequency increases would allow me to travel to the station stress free and not have to worry about timing my train right before I miss it. I hope that us Sprinter riders are not left in the dust in favor of drivers and riders of other systems such as the Trolley. I thank you for your time reading this.
S0197	Madison Mooney	n/a	Please create more railway options (above or below ground work too!) so the lines reach more areas in san diego.
S0198.A	n/a	n/a	We need more transit lines and expanded trolly please!
S0198.B	n/a	n/a	More bikeways and walkable neighborhoods
S0198.C	n/a	n/a	More mixed use zoning
S0198.D	n/a	n/a	Fix the Nuclear Power Plant PLEASE
S0199.A	n/a	n/a	We need to connect the communities to build a strong network by public transportation. San Diego should strive to be the leader in the US for public transportation, especially subways or trains to quickly connect neighborhoods and beach towns. This is how the community and city of San Diego will flourish, and be more economically prosperous in the long term. We need to connect to the airport and populous neighborhoods to really flourish. It's embarrassing how far behind we are compared to the rest of the world. We have the opportunity to build something great and instead we want to be a more individualistic society by building more highways and roads.
S0199.B	n/a	n/a	Bikeways and walkways should be more protected and more accessible. San Diego has the best climate and natural beauty to be one of the best walkable and bike friendly cities in the US and instead we prioritize everything but making the city and county more accessible. I'm afraid to bike because we out green paint on the ground instead of encouraging people to bike and walk with dedicated protected bike lanes and walking pathways and sidewalks.
S0200.A	Robert A Pearson	n/a	We need 7.5 Minute frequencies on the entire trolley network, more frequent bus service, full double tracking and increased frequencies on the SPRINTER and COASTER services, All door boarding, Google Pay and Apple Pay compatibility with PRONTO, Permanent Free Youth Transit, Transit Signal Priority, Camera enforced Bus Lanes, a Unified Transit Dashboard, and a Real Time Transit AccountabilitY Dashboard.
S0200.B	Robert A Pearson	n/a	We need more dense and transit oriented housing
S0201.A	n/a	n/a	All of our traffic is north south and the blue line extension is not good enough. More Trolleys that go more places, more often. If you expect the coaster to meet this demand, it must run every 30 minutes not every hour and a half or more.
S0201.B	n/a	n/a	Protected bike infrastructure county wide. It's the bare minimum.
S0202.A	Hannah Lewack	n/a	I would really like Sandag to one expand trolley lines to places that lack it such as east county and the Mira mesa area. Additionally, I would like bus only lanes that are camera enforced so the commute time on buses goes down and encourages people to use public transportation instead of their own personal vehicle.
S0202.B	Hannah Lewack	n/a	Finally, I would love a bike share in San Diego. I used to live in Oregon and having a bike share they improved my livelihood exponentially. I didn't need a car because I could bike to work, and I didn't need to worry about my bike being stolen in the process. Especially in high density areas like downtown and UTC having a bike share would encourage students to bike the campus instead of using personal vehicle vehicles bringing down carbon emissions and reducing the car traffic on the Ucsd campus.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0202.C	Hannah Lewack	n/a	Right now, Sandag has the opportunity to make a real difference in the amount of carbon that San Diego residents put into the atmosphere. The current climate crisis is happening, whether we like it or not, and we need to make drastic cuts now to help quality of life for our children and grandchildren in the future. I believe that if sandag does improve access to public transportation people will 100% use it. Additionally, the bike share might actually turned profit if you charged the right amount. Ticketing from the bus only lanes with cameras would also be a source of revenue. I am a graduate student at Ucsd and I teach Ucsd's introduction to ecology and evolution class. We talk about the climate crisis in our classes, and I have 300 students. most of them expressed frustrations with the lack of public transportation in the city, and how it has been an obstacle to them leading a less carbon heavy lifestyle
S0203.A	n/a	n/a	Just adding more busses and giving them automatic green lights would massively boost ridership. Those two things alone would be enough to make taking the bus equal to (or faster!) than driving in most cases, would help alleviate a ton of traffic, and wouldn't cost nearly as much as building out physical infrastructure like roads or tracks. Absolute no brainer. Transit signal priority county wide please.
S0203.B	n/a	n/a	no more highway expansions, no more managed lanes.
S0203.C	n/a	n/a	Just adding more busses and giving them automatic green lights would massively boost ridership. Those two things alone would be enough to make taking the bus equal to (or faster!) than driving in most cases, would help alleviate a ton of traffic, and wouldn't cost nearly as much as building out physical infrastructure like roads or tracks. Absolute no brainer.
S0204.A	n/a	n/a	1. 7½-Minute Trolleys System-Wide Today, only the Blue Line operates at 7½-minute frequencies and only on a limited stretch. By 2029, all Trolley lines (Blue, Green, Orange) must run every 7½ minutes during peak hours, and every 10 minutes midday and on weekends. This is the bare minimum for a truly "rapid" light rail network. 2. 10-Minute Peak, 15-Minute Weekend on Top 10 Buses Routes like the 7, 10, 215, 905, and 929 carry 40% of all riders, yet often come every 20-30 minutes. These lifeline corridors must have 10-minute peak and 15-minute weekend service, fully funded and guaranteed. 3. Clock-Face Coaster & Sprinter The Coaster's erratic 26-120 minute gaps make it unusable. It must run every 30 minutes on weekdays at :00 and :30, and hourly on weekends. Sprinter must reach 15-minute peak and 30-minute off-peak headways all weekday long. 4. Countywide All-Door Boarding All buses must be equipped with rear-door validators, paired with camera-based fare checks and off-board payment. This cuts dwell times, speeds up trips, and makes boarding more accessible for everyone. 5. Next-Gen PRONTO by 2026 PRONTO must be upgraded to allow tap-to-pay with phones and smartwatches, integrated into Apple/Google Wallet, and supported by better apps, kiosks in schools/libraries, and streamlined sign-up. 6. Permanent Youth Opportunity Pass Funding YOP has enabled over 20 million free youth rides. Make this program permanent through 2029 and simplify verification to reach every eligible young person. 7. Transit Signal Priority at 250+ Intersections Signals must adjust for buses at 250+ equity-priority intersections, Broadway, University, South Bay Rapid, improving speed and on-time performance. 8. 100 Miles of Bus-Only Lanes Bus-only lanes must be physically separated and camera-enforced. No more painted suggestions. Let's keep buses moving, fast, free, and fair. 9. Unified Countywide Bike-Share Launch a public-private bike-share system that works across the region, integrates with PRONTO, and places stations in every community, not just wealthy ones. 10. Real-Time Accountability Dashboard Create a public dashboard showing headways, missed trips, TSP rollouts, YOP stats, and corridor performance. Riders deserve data and accountability, not vague promises. Let' s build a transit future that works for everyone. The people are ready. The time is now.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0204.B	n/a	n/a	1. 7½-Minute Trolleys System-Wide Today, only the Blue Line operates at 7½-minute frequencies and only on a limited stretch. By 2029, all Trolley lines (Blue, Green, Orange) must run every 7½ minutes during peak hours, and every 10 minutes midday and on weekends. This is the bare minimum for a truly "rapid" light rail network. 2. 10-Minute Peak, 15-Minute Weekend on Top 10 Buses Routes like the 7, 10, 215, 905, and 929 carry 40% of all riders, yet often come every 20-30 minutes. These lifeline corridors must have 10-minute peak and 15-minute weekend service, fully funded and guaranteed. 3. Clock-Face Coaster & Sprinter The Coaster's erratic 26-120 minute gaps make it unusable. It must run every 30 minutes on weekdays at :00 and :30, and hourly on weekends. Sprinter must reach 15-minute peak and 30-minute off-peak headways all weekday long. 4. Countywide All-Door Boarding All buses must be equipped with rear-door validators, paired with camera-based fare checks and off-board payment. This cuts dwell times, speeds up trips, and makes boarding more accessible for everyone. 5. Next-Gen PRONTO by 2026 PRONTO must be upgraded to allow tap-to-pay with phones and smartwatches, integrated into Apple/Google Wallet, and supported by better apps, kiosks in schools/libraries, and streamlined sign-up. 6. Permanent Youth Opportunity Pass Funding YOP has enabled over 20 million free youth rides. Make this program permanent through 2029 and simplify verification to reach every eligible young person. 7. Transit Signal Priority at 250+ Intersections Signals must adjust for buses at 250+ equity-priority intersections, Broadway, University, South Bay Rapid, improving speed and on-time performance. 8. 100 Miles of Bus-Only Lanes Bus-only lanes must be physically separated and camera-enforced. No more painted suggestions. Let's keep buses moving, fast, free, and fair. 9. Unified Countywide Bike-Share Launch a public-private bike-share system that works across the region, integrates with PRONTO, and places stations in every community, not just wealthy ones. 10. Real-Time Accountability Dashboard Create a public dashboard showing headways, missed trips, TSP rollouts, YOP stats, and corridor performance. Riders deserve data and accountability, not vague promises. Let' s build a transit future that works for everyone. The people are ready. The time is now.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0204.C	n/a	n/a	1. 7½-Minute Trolleys System-Wide Today, only the Blue Line operates at 7½-minute frequencies and only on a limited stretch. By 2029, all Trolley lines (Blue, Green, Orange) must run every 7½ minutes during peak hours, and every 10 minutes midday and on weekends. This is the bare minimum for a truly "rapid" light rail network. 2. 10-Minute Peak, 15-Minute Weekend on Top 10 Buses Routes like the 7, 10, 215, 905, and 929 carry 40% of all riders, yet often come every 20-30 minutes. These lifeline corridors must have 10-minute peak and 15-minute weekend service, fully funded and guaranteed. 3. Clock-Face Coaster & Sprinter The Coaster's erratic 26-120 minute gaps make it unusable. It must run every 30 minutes on weekdays at :00 and :30, and hourly on weekends. Sprinter must reach 15-minute peak and 30-minute off-peak headways all weekday long. 4. Countywide All-Door Boarding All buses must be equipped with rear-door validators, paired with camera-based fare checks and off-board payment. This cuts dwell times, speeds up trips, and makes boarding more accessible for everyone. 5. Next-Gen PRONTO by 2026 PRONTO must be upgraded to allow tap-to-pay with phones and smartwatches, integrated into Apple/Google Wallet, and supported by better apps, kiosks in schools/libraries, and streamlined sign-up. 6. Permanent Youth Opportunity Pass Funding YOP has enabled over 20 million free youth rides. Make this program permanent through 2029 and simplify verification to reach every eligible young person. 7. Transit Signal Priority at 250+ Intersections Signals must adjust for buses at 250+ equity-priority intersections, Broadway, University, South Bay Rapid, improving speed and on-time performance. 8. 100 Miles of Bus-Only Lanes Bus-only lanes must be physically separated and camera-enforced. No more painted suggestions. Let's keep buses moving, fast, free, and fair. 9. Unified Countywide Bike-Share Launch a public-private bike-share system that works across the region, integrates with PRONTO, and places stations in every community, not just wealthy ones. 10. Real-Time Accountability Dashboard Create a public dashboard showing headways, missed trips, TSP rollouts, YOP stats, and corridor performance. Riders deserve data and accountability, not vague promises. Let' s build a transit future that works for everyone. The people are ready. The time is now.
S0205.A	n/a	n/a	We should have an airport connection with the San Diego Trolley, and we could extend the trolley network to other areas, like beaches, Liberty Station and Balboa Park. It would also be cool if it went to the Del Mar fair, because traffic is always horrible there. I am 15 years old and live in Poway, and I feel trapped in my house somedays because I don't have a car. Although suburbs have different zoning, and public transit might not have to be as good, I still believe better public transit leads to stronger cities.
S0205.B	n/a	n/a	Zoning should be mostly mixed use development around trolley stations, so that people could live, work and enjoy themselves next to a trolley station. It also helps the environment, because less people are required to own cars.
S0206.A	n/a	n/a	Extend the trolley to the airport
S0206.B	n/a	n/a	Fix potholes in a timely manner and prevent them from returning
S0206.C	n/a	n/a	Expanding the trolley would help air quality
S0207.A	Katie Frizzi Lynch	n/a	We needed more density and the city responded. Now we have more people in our neighborhoods. Northpark is already considered a walkable neighborhood. Let's lean into that! More busses, a trolley stop over the 15 and El Cajon, and slow car traffic down. Let's continue to build dense livable spaces and support those spaces with functional non-car centric transportation services.
S0207.B	Katie Frizzi Lynch	n/a	Flexible feet's may be the solution for short trips through the neighborhood. They should be slower than auto traffic and not require traditional parking.
S0207.C	Katie Frizzi Lynch	n/a	Our bikeway expansion is great! My family uses the lanes all the time. But they don't all connect and they sometimes disappear mid street. People park in them and do not leave space for the bikes. They are still too dangerous for my 5 year old to use. Let's make our streets safer for all our citizens, including the ones too young to drive cars.
S0208.A	Jakob Davis	n/a	We need sufficient rental E-bikes, an efficient public transit system and to have a 24 hour 7 days a week train and bus system, we are a city of 1 million people. This shouldn't even be a debate

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0208.B	Jakob Davis	n/a	We need better biking infrastructure
S0208.C	Jakob Davis	n/a	We need rental e-bikes throughout the whole city
S0209.A	Brent Altomare	n/a	I think the following items should be prioritized: 7 ½ minute on all trolley during peak, 10 minute peak and 15 minute weekend peak on top 10 bus lines, community-wide all-door boarding, improve (or replace) PRONTO, permanent funding of youth opportunity pass, more transit signal priority, more bus only lanes, and an online real-time transit accountability dashboard.
S0209.B	Brent Altomare	n/a	My partner uses a wheelchair, and we bike as a family. Protected bike lanes are critically important to both our enjoyment as well as our ability to get around. In addition, sidewalks that are in disrepair make it incredibly difficult for my disabled partner to live her life.
S0210	n/a	n/a	The trolley needs to be extended to the airport. This is ridiculous and long overdue.
S0211.A	n/a	n/a	More transit
S0211.B	n/a	n/a	More mixed use housing
S0212.A	n/a	n/a	There isn't enough focus on how to diversify movement.
S0212.B	n/a	n/a	Roads should allow for the weight.
S0213.A	n/a	n/a	Please implement 7 1/2 minute peak service for all trolley lines, as well as 10 minute, midday and weekend service. The trolleys running more frequently nake them.more useful, and encourage more people to leverage them..
S0213.B	n/a	n/a	The youth opportunity pass is a great program that helps a lot of young people. Please work to secure permanent finding for this.
S0214.A	Tony Woodruff	n/a	Bus 11s route needs a minor change Eastbound, after going through Kensington on Adams avenue, it should continue down and up Aldine and then down Madison through Talmadge and on to SDSU via Collwood. Talmadage and the college area would greatly benefit from this minor change, and Bus 11 doesn't really currently serve very many people on the current eastern end of its route Thank you for your consideration on this.
S0214.B	Tony Woodruff	n/a	It's fine to eliminate parking, but until we have 10-15 minute waits for busses citywide, we don't have an effective transit system
S0215.A	n/a	n/a	The more trolleys we have the less single passenger cars on the road. It provides flexibility for young people and security for all us commuters navigating dense roads
S0215.B	n/a	n/a	We need infrastructure planning alongside housing development. I live in a 1930s neighborhood where we have apartment buildings go up all around us but now updates to sewage, water flow and roads
S0216.A	Scott	n/a	I would like to see an emphasis on expanding our trolley system (more destinations and more frequent trains) while also making the trains feel safer. My family would love to ride the trolley, but I sometimes don't feel safe bringing my small children on the trolley outside of baseball game trains. I would also like to see more efficient trains out of Petco Park after the games. More frequent trains and/or express trains that skip the first few stops (like CalTrain in SF) would do wonders for increasing ridership in Clairemont/UTC
S0216.B	Scott	n/a	I would like to see dedicated safe biking / walking paths / green space in the Clairemont area.
S0216.C	Scott	n/a	Focus on electrification / green energy
S0217	n/a	n/a	Trolley / Coaster Train both need to extend / connect to the San Diego International airport or the rental car terminal. This would be a huge improvement tp getting people in/out of the airport. For example: AirTrain from JFK to the NYC subway system or BART connections from SFO
S0218	Joe R	n/a	Please connect the trolley to the airport
S0219.A	n/a	n/a	Transit needs to be faster from areas with high density where people are less likely to need a car like downtown, north park, city heights to places of interest such as offices in Sorrento valley, beaches, and the airport
S0219.B	n/a	n/a	Dockless bike sharing works in so many other cities and there's no reason shared ebikes would not be a popular option in tourist and high density areas. Scooters have a bad wrap and regular bikes don't tackle the many hills we have well. Ebikes can connect to transit in our spread out infrastructure
S0219.C	n/a	n/a	We have many great bike ways that often dump out onto an unsafe area with little bike infrastructure. If you take the 15 bikeway or the new Bachman place down to mission valley you're fighting people who can't find their hotel or are getting on and off the highway. Securing main arteries like this would make bike commuting much more feasible

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0220.A	n/a	n/a	A trolly or people mover connection to the Terminals at the Airport with the current transit is a non negotiable must. We are one of the few major metropolitan city's without this system and the people will be voting thusly.
S0220.B	n/a	n/a	Funding should be approved for the above mentioned plans [A trolly or people mover connection to the Terminals at the Airport with the current transit is a non negotiable must.].
S0221.A	n/a	n/a	This city is made for cars and it makes it hard for citizens of San Diego to live happier and healthier lives. We are far behind other countries, and even other cities in California, when is comes to available transit. This needs to change!
S0221.B	n/a	n/a	Bikeways and walkways in San Diego are few and very dangerous in some areas. This needs to change! Please shy away from the car culture this country is built on!
S0221.C	n/a	n/a	Less highways and roadways and more bike and walkways!
S0222.A	Garrett D	n/a	We need more! SoCal/sd is way too car dependent and it is isolating to natural human nature! More transit would reduce traffic, reduce pollution, give more freedom to those who have are unable to drive, add more social aspects in everyone's daily life, and increase physical mobility/health in the populous.
S0222.B	Garrett D	n/a	More bikeways primarily. Have the option to bike on a safe, designated bike path instead of a white painted line on the side of the road where people drive 60 mph right next to you.
S0223.A	n/a	n/a	none of what you're demanding is reasonable lol
S0223.B	n/a	n/a	You people are retarded
S0224.A	Reid Siglin	n/a	Expanding trolley lines would be my top priority. Would love to see transit lines to the beach and even streetcar like transit around beach communities.
S0224.B	Reid Siglin	n/a	Would like to see more transit centers built with more housing surrounding them.
S0225.A	James Apple	n/a	Thank you for including bus rapid transit on Balboa Avenue. This is much needed.
S0225.B	James Apple	n/a	Most of the on-street bikeway projects in Clairemont Mesa and Kearny Mesa are planned for 2050. This is too late. I'll be retired by then! Please prioritize these sooner. I try to ride my bike where I can, but roads like Balboa Avenue and Clairemont Mesa Avenue don't feel safe on a bike.
S0226	Andrew Smith	n/a	I'd like the vast amount of money available spent on public transit and bike infrastructure. Look at cities around the world and find the best of their design. Make our city absolutely the best place to transit possible. Thank you.
S0227.A	Zakaria	n/a	Make transit convenient and less traffic on roads.
S0227.B	Zakaria	n/a	Make [Bikeways and Walkways] prevalent for people and much safer. Added bollards and vegetation. Weather is suitable for it.
S0227.C	Zakaria	n/a	More traffic enforcement and no expanded highways. Less traffic jams.
S0227.D	Zakaria	n/a	Make it [Housing and Land Use] easier to build.
S0227.E	Zakaria	n/a	More enforcement for safety
S0227.F	Zakaria	n/a	Lessen urban sprawl.
S0227.G	Zakaria	n/a	More communities.
S0228.A	n/a	n/a	It is difficult to take public transit to anything that isn't on a direct route. I know large scale infrastructure is unlikely, but I'd love transit between north county and San Diego and better options on non-trolley route areas. Due to route timing mismatches, it can take 2+ hours to go what take 15min in a car. I wouldn't mind mixing options (like bike and bus) if the bike routes felt safer. I really appreciate the separated bike lanes that have been popping up on some main streets, but would love to see more.
S0228.B	n/a	n/a	Flex fleets are a great idea, but need expanded areas. They are piloting the program in Vista and it is great within the area, but they also largely follow bus routes and don't go to some close areas. I wouldn't be opposed to having flex drop off points to get from vista to Carlsbad or Rancho Bernardo.
S0228.C	n/a	n/a	Really like the separated bikeways with parking and berm protection. I have started biking more in areas with them.
S0228.D	n/a	n/a	Increasing public transit options helps to reduce need for private transit making air quality better. Having healthier air encourages people to go out and walk or bike.
S0229.A	Caitlin Baron	n/a	Please offer more frequent busses. It takes 15 minutes to drive from City Heights to downtown, but takes over an hour when factoring waiting for the bus to arrive. Often you arrive at the transfer point to see your connecting bus drive away, meaning you are waiting at least 15 minutes. A bus every 5 or 10 minutes will help the workers of San Diego save time every day.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0229.B	Caitlin Baron	n/a	More modest apartments to be built. Two and three bedrooms, washer and dryer hookups. No fancy materials needed. Just a suitable place to live with a young family that doesn't cost $3,000. A modest older studio costs $1,900 in 92120.
S0230	n/a	n/a	We absolutely need more trolley stops and lines. At the bare minimum SAN airport needs to be serviced.
S0231.A	n/a	n/a	More buses and bus routes. We need proper and safe bus stops, with plenty of space and shade. Even downtown some of the bus stops leave much to be desired. More bus routes connecting neighborhoods without the need for private vehicles. More bus routes leading to trolley stations. More wide sidewalks that accommodate people with disabilities.
S0231.B	n/a	n/a	It is a great strategy, but I don't think most people know about this option. I would use it if I had the opportunity.
S0231.C	n/a	n/a	We don't have enough. We need more bikeways and walkways that protect pedestrians and cyclists. Car drivers are (often) rude and impatient.
S0231.D	n/a	n/a	We need to stop relying on oil. We have enough public founding to have electric/hybrid buses. That also would help with the traffic congestion.
S0231.E	n/a	n/a	WE NEED TO MAKE SURE EVERYONE HAS AFFORDABLE ACCESS TO HOUSING. Houseless people are the proof that we need to change the way our society is "working". Gentrification is getting worse in San Diego County. We need to have accessible payment for first time homebuyers, REGULATIONS for real state companies that are building towers that only few people can afford to pay.
S0231.F	n/a	n/a	NO MORE HIGHWAY LINES. WE NEED EFFECTIVE AND EFFICIENT MASS PUBLIC TRANSPORTATION! we have the right to chose how to transit in our communities, not just relying on our cars. We -regular people- don't pollute our cities in the same way that oil, agriculture, farming companies (etc) and billionaires does. We need more regulations and make them accountable for their actions.
S0231.G	n/a	n/a	Protections for all, not just for those with money and lighter skin.
S0232.A	n/a	n/a	We need electric trolley down major streets like El Cajon and Park to reduce tire wear waste and improve accessibility/clean air in Mid-City Neighborhoods. Trolley would incentivize people to spend time in the El Cajon Blvd and adjacent business districts, and reduce car travel from Mid-City neighborhoods to Balboa Park.
S0232.B	n/a	n/a	It's dangerous to walk and bike with the traffic patterns in Talmadge, Kensington, City Heights and Normal Heights; we need better protected sidewalks and bike lanes. Additionally, improving water run off in high urban flood areas along El Cajon Blvd with green embankments would improve the community.
S0232.C	n/a	n/a	Buses aren't enough to take cares off the road; we need Trolleys.
S0233.A	n/a	n/a	I support 7.5 minute headway trolleys systemwide by 2030, as that would make my commutes for work, groceries and leisure far more convenient, as well as 10-minute headways on the top 10 buses in the system. These are the most important immediate changes you could make to improve my quality of life as a car less commuter. I am also strongly in favor of expansions to the light rail system, especially an extension to the airport, the purple line (especially if it extends to UTC) and the proposed balboa park streetcar. Making Kearny Mesa and City Heights trolley accessible would greatly improve my quality of life.
S0233.B	n/a	n/a	I strongly support increasing housing density around transit lines, particularly trolley stops.
S0234	n/a	n/a	Inland San Diego is underserved by public transit, especially north county inland. Connections from the sprinter to the trolley and having a route down the 15 and across the 56 would decrease traffic congestion and allow residents to commute to major employment centers by public transit
S0235	n/a	n/a	If we want to decrease traffic, please consider making the buses have more frequent and predictable times and expand public transit in North Park. Having every 30 min buses on weekends and the arrival times of the buses being inconsistent with the schedule is unacceptable if we want to encourage public transit use. As a resident of North Park (an area where apartments are increasing but parking is not), I would love to be able to use public transit to commute to work downtown or visit other neighborhoods. But due to the current structure I cannot trust I would be able to get to my destination in time.
S0236.A	n/a	n/a	We need 7 1/2 minute wait times for all trolley lines, starting with Blue, Green, Orange lines. Guaranteed 10min max wait times on midday and weekend trolleys. This should be implemented by 2029 or earlier.
S0236.B	n/a	n/a	Significant infrastructure improvements to build seperated bike lanes away from roads. We need more safe avenues for bike transit and protected bike lanes are the fastest way to ensure this.
S0236.C	n/a	n/a	I demand that SANDAG establish dedicated and camera enforced bus lanes. These bus lanes must connect north county to south county and encompass 100 miles minimum. I want to see these changes implemented by 2029 or before.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0236.D	n/a	n/a	Install fare validation on ALL trolley and bus entrances and exits. This will improve on-bording times increasing speed for transit. Enable tap to pay function in PRONTO. Enable tap to pay with creditcard/apple pay etc. Fare incentives could be enacted to encourage riders to use PRONTO over CC/apple pay, ex. $2.50 for PRONTO users, $3.15 for CC/apple users. But regardless, fares are still being collected at a faster rate with tap to pay.
S0237.A	Michael	n/a	Must build a transit link to airport. It is ridiculous this link is missing. I just returned from Chicago, where I took a $5 subway from downtown 20 miles directly into OHare terminals! Can easily be done by having a trolley station at the Rental Car Center, and an underground train from there to the terminals.
S0237.B	Michael	n/a	Bikeway needed from UCSD to downtown. Could run along existing trolley path.
S0238.A	n/a	n/a	There is too much focus on highways and roads. The future of a growing city is to make it traversable without needing to finding a place to park a vehicle. Expansion of Trolly services to decrease transit time and making neighborhoods more walkable with a variety of close by businesses should be the focus here.
S0238.B	n/a	n/a	There is too much focus on highways and roads. The future of a growing city is to make it traversable without needing to finding a place to park a vehicle. Expansion of Trolly services to decrease transit time and making neighborhoods more walkable with a variety of close by businesses should be the focus here.
S0239	n/a	n/a	more bike lanes
S0240.A	n/a	n/a	We love using the bike trails made by SANDAG! Especially the ones that keep us away from cars. We never used to ride bikes, but now we ride down Pershing Dr to go to all the Padres games. It's so much better not to have to pay for parking. Keep them coming!
S0240.B	n/a	n/a	Please make it safer to cross the street. The green walk signals are too short.
S0241.A	n/a	n/a	More frequent transit!!!!! All trolley lines 7.5 minutes. Busses every 10 minutes, everywhere
S0241.B	n/a	n/a	Do not use Teslas, it is an unethical company and I would never use this service if that was the case.
S0241.C	n/a	n/a	More protective lanes for bikes.
S0242.A	n/a	n/a	We need to change from the model of build what is easy to building what is most useful and closing the loop on projects. Balboa station is super nice but how from pb or clairmont mesa are you supposed to get to it? Buses are limited, infrequent and not timed to trolleys so long connection waits. There's no bike lanes from PB and nobody is biking balboa on that 45mph drag racing hill. The sidewalks from either side are destroyed or missing (the sidewalk isn't just in horrid shape, within 2 blocks the sidewalk is actually gone, there a 5 foot long dirt hole where it used to be). It just seems so short sighted to put the station there with no even okay infrastructure to get people to that station except to drive.
S0242.B	n/a	n/a	We need to change from the model of build what is easy to building what is most useful and closing the loop on projects. We seem to have a hodgepodge of unconnected transit. You can put the worlds nice bike path but if the road way to get to it is a terrifying share the road at 45 mph then cross a freeway on ramp, everyone thinks you wasted money and are shortsighted (That's Gilman from UCSD to rose creek). Or sorrento valley to that brand new 56 connection. Carmel valley road at sorrento valley road. That 110% should have been fixed when you put in this multi million dollar connection. It's more holes road leading to a road bike cycling path.
S0242.C	n/a	n/a	The homeless situation in the bike paths is really dangerous: not that I think they'll attack. But that there's so much crap from tents and shopping carts to dogs and people tripping to trash and broken glass. And the underpasses where a lot of the dangers are don't have any lighting. It's very dangerous to bike on the bike paths with all the obstacles.
S0243	n/a	n/a	The trolley and bus lines additions have been great over the years. I hope to see the trolley lines grow with higher frequency. The blue and green lines, departing 5 to 7 minutes would be even better so we can get to where we need faster. If possible, a line from UTC to Solana Beach AmTrak that does not take an hour to get there, would be very useful as well or a platform along the Blue Line in-between.
S0244	Bryan Mayberry	n/a	We need to have a light rail station at the airport. Literally any other city that has a worthwhile public transportation system has a stop at the big locations that people need to travel to, airport, stadiums, downtown, etc.
S0245.A	n/a	n/a	More trolley lines are needed to connect to other areas of the county so we do not rely on private transportation.
S0245.B	n/a	n/a	More bike paths are needed to make biking a viable option. If people can bike to work through snow in winter time in Amsterdam, why can't we in San Diego?
S0245.C	n/a	n/a	Having a robust public transportation system, coupled with more bikeways will reduce the cities energy dependency, increase the air quality, and positively affect climate change by reducing pollution.
S0246.A	n/a	n/a	Trains. Major cities around the globe have extensive, wonderful public train systems. Why don't we have that?! Given our expansive this area is, I'd argue that we need it more than anyone. Use Boston as an example! This will also reduce traffic congestion if more people have better public transportation access.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0246.B	n/a	n/a	Walkable cities are healthy cities.
S0246.C	n/a	n/a	Wildfires aren't going anywhere. We should be building buffer zones & planting species that can help us hedge against their occurrence.
S0247	Steven Ellison	n/a	Why does the Purple Line terminate at SDSU? It's absolutely insane how little rail there is in the north part of the city. Given the number of people that live in Mira Mesa, and how far away the rail options are, there really ought to be a plan to run some sort of connection from the closest trolley across Mira Mesa Blvd. Even the aerial skyway would have been better than what's currently planned. The city is planning massive amounts of housing in Mira Mesa, soon it'll be like UTC area with high rise apartments, and the fact there's so little transit is insane. Buses are ok, but Mira Mesa really needs rail. The Purple Line going to Sorrento Mesa would have been a good start, but the lack of planning for Mira Mesa will add tons of congestion as housing gets more dense.
S0248	n/a	n/a	Realizar un proyecto con números de emergencia para cuando suceda un incidente en los autobuses o trenes, para reportar al momento y en las estaciones se pueda actuar de inmediato.. *** Do a project with emergency numbers for when incidents occurs on buses or trains, so that they can be reported as they are happening and the stations can act immediately.
S0249.A	n/a	n/a	Por favor pongan más atención a las ciclovías para motivar a la gente que use ese medio de transporte y así evitar más la contaminación del medio ambiente. Mejorando así el cambio climatico *** Please pay more attention to bicycle paths in order to motivate people to use that means of transportation, thus better avoiding environmental pollution. Improving climate change.
S0249.B	n/a	n/a	Debe planearse muy bien la vivienda en los próximos años pues el crecimiento global esta muy acelerado y la necesidad de casas también es tan importante como cualquier otra necesidad *** Housing needs to be very well-planned in the coming years, because global growth is rapid, and the need for housing is just as important as any other need.
S0250	n/a	n/a	Realizar talleres más continuos en la comunidad y escuelas sobre eventos de emergencia, ejemplo Terremotos, incendios , inundaciones y en las escuelas Realizar simulacros de supervivencia. Como actos de violencia etc *** Have more frequent workshops in the community and schools about emergency events, e.g., earthquakes, fires, floods, and do survival drills in schools, such as acts of violence, etc.
S0251	n/a	n/a	Mostrar dentro y fuera de las unidades de transporte numeros de telefonos para reportar emergencias y mas seguridad especialmente en las horas de mas flujo de gente *** Show phone numbers inside and outside transportation units for reporting emergencies, as well as increased safety, especially during hours when there is a higher flow of people.
S0252.A	n/a	n/a	Me Gustaria ver un numero Teléfonicp Encada Vagon para reportar a gente que va fumando, tirando basura y dulces donde alguien puede tener un accidente *** I would like to see a phone number in every car to report people who are smoking, throwing garbage and candy, which could cause someone to have an accident.
S0252.B	n/a	n/a	MAs recursos o viviendas para residentes con bajo recursos *** More resources or housing for low-income residents.
S0252.C	n/a	n/a	Por favor numeros que marcar en las estaciones *** Please have numbers at the stations that we can call.
S0252.D	n/a	n/a	Ayuda a pagar la tarifas *** Help for paying fares.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0252.E	n/a	n/a	Que aya estaviones de agua para tomar *** Have drinking water stations.
S0252.F	n/a	n/a	Estaciones limpias *** Clean stations
S0253.A	Paty	n/a	Hay lugares en el área de la ciudad CV y south SD que se necesita marcar bien las líneas de bicicletas. También se ocupa más educación para el ciclista y automovilista *** There are places in the CV and south SD areas of the city where bike lanes need to be well-marked. More education is also needed for cyclists and motorists.
S0253.B	Paty	n/a	En el zip code 92154 está muy olvidado, baches, las calles les falta delinea o repintar las líneas. Está sucio. Se siente inseguro para caminar *** The 92154 zip code it is pretty much forgotten; potholes, the streets don't have lines, or the lines need to be repainted. It's dirty. It feels unsafe to walk.
S0253.C	Paty	n/a	Creo que viviendas hay lo que pasa que las rentas están ridículamente altas, una persona no dos personas viviendo juntas con un sueldo promedio-bajo es capas de pagar una renta de un mini apartamento de 1 recámara. El uso del suelo no es equitativo, se construyen mucho apartamentos pero no suficientes estacionamientos, esto está creando mucho stress y conflictos entre vecinos *** I think housing. What's happening is that rent is ridiculously high; one person, not two people living together, with an average low salary is able to pay rent for a 1-bedroom mini apartment. Land use is not equitable. A lot of apartments are built, but not enough parking lots; this is creating a lot of stress and conflicts between neighbors.
S0253.D	Paty	n/a	La seguridad es pésima, y una de las causas creo es la falta de policías. No puede ser que se permita robar a personas sin poder tener una sanción, tristemente esto se está volviendo tan cotidiano que ya se volvió normal, salir de compras y ver a personas salir como si nada con los brazos llenos de ropa hasta dejándola tirada y salir como si nada sin pagar. Ya no asusta eso, y da el mensaje a los jóvenes que está bien ROBAR, mientras no te pases de lo "permitido" no pasa nada. *** The security is terrible, and I think one of the reasons is the lack of police. People can't be allowed to steal without being penalized. Sadly this is becoming such a daily thing that it's become normal to go shopping and see people walking out with their arms full of clothes like it's nothing, even throwing them everywhere, and leaving without paying like it's nothing. It doesn't scare people anymore, and it sends the message to young people that it's okay to STEAL; as long as you don't go beyond what's "allowed," nothing happens.
S0253.E	Paty	n/a	La calidad del aire en el sur de SD es pésima, con la problemática de la contaminación del río Tijuana esto se a vuelto un problema de salud pública. *** The air quality in the south of SD is terrible; with the issue of pollution in the Tijuana river, this has become a public health issue.
S0253.F	Paty	n/a	No hay esquinas social. Como comenté antes, las rentas están fuera del alcance de la gente joven, y comprar su propia casa aun teniendo estudio universitarios y trabajo es un sueño incansable. *** There are no social corners. As I mentioned before, rent is out of reach for young people, and buying your own home, even with a university degree and a job, is an endless dream.
S0253.G	Paty	n/a	Hace falta la participación pública, para que las autoridades vean la realidad de lo que está pasando *** Public participation is needed so that the authorities can see the reality of what's happening.
S0253.H	Paty	n/a	Hacen falta alumbrado, por ejemplo en la. Calle Naples en chula vista, donde está Castle Park Middle, no hay alumbrado y en las tardes/noches vandalizan los autos que se quedan en la calle toda la noche *** Lighting is needed; for example, on Naples street in Chula Vista, where Castle Park Middle is, there's no lighting, and in the evenings/at night they vandalize cars that stay out on the street all night.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0253.I	n/a	Sí	muy descuidado, las calles falta bacheo y marcar bien las líneas. Pusieron una glorieta por la del sol, Gracias por eso por que usaban la avenida para carreras de autos. *** Very poorly taken care of; the streets aren't repaired and the lines aren't well-marked. They put a roundabout at Del Sol. Thank you for that, because they used to use the avenue for street racing.
S0254.A	n/a	Sí	Trolley por exemplo Un cupo normal que llegue acumulamientos de gente, hay peligros sobre todo cuando familia numerous as y problemas al bajarse *** Trolley, for example. With a normal-capacity trolley that arrives with a mass of people, there are dangers, especially with numerous families and issues when getting off.
S0254.B	n/a	Sí	Si es un incidente de mal comportmiento no de emergencies a 911 con quien o a quien y en donde llamas. si voy en el trolley? Gracias *** If it's a case of misbehaving, not a 911 emergency, who and where do you call if you're traveling by trolley? Thank you.
S0254.C	n/a	Sí	Personas de segura Supervision *** Security people Supervision
S0255.A	n/a	n/a	Aver trasporte mas tarde por la noche porque ay persona que salen muy tarde de su trabajo y es muy peligroso de andar caminando y ya no ay trasporte... *** Provide transportation later at night because there are people who get out of work very late and it is very dangerous to be walking once there's no more service.
S0255.B	n/a	n/a	Tener todo más de emergencia para vien de todo. *** Having everything for an emergency for the good of everyone.
S0256.A	Ethan	n/a	Please reduce trolley and bus headways. I am someone who has ditched the car whenever I travel downtown, or whenever there is decent bus coverage for my destination. Reducing bus headways will tip the scales and encourage more people to do the same. I realize that a 35 minute bus trip is actually more convenient than a 15 minute drive, because I don't have to find and pay for parking, or deal with the headache of driving. But many google maps users will compare the ETAs and opt to drive. Bringing down headways, and allowing people to catch transit confidently without checking maps will help people make the right choice of using transit.
S0256.B	Ethan	n/a	Please support neighborhood bikeshare. We used to have bikeshare, and we got rid of it, and that is dumb. When I travel to other cities like SF, or Seattle I am constantly jealous at how easy and pleasant it is to travel compared to SD, even though SD has better weather. Bring back bikeshare. I know people complained about bikes taking up public space. But they fail to apply that same perspective to cars and parking spaces which take up many times more space. Bikes reduced traffic, reduce parking demand, and give us a way to get around sunny San Diego.
S0256.C	Ethan	n/a	Biking in San Diego has much improved over the last decade. But we still have many areas where bikelanes terminate unsafely, and high speed roads protected by nothing but bike gutters. Please add more bikelanes protected with concrete dividers or parked cars. There are also many areas where there is no safe way to bike between nearby neighborhoods. Please add dedicated bike paths to connect neighborhoods North and South of the 8 Highway. Hillcrest, NorthPark, Mission Valley. And Connect Hillcrest to Midtown with a separate dedicated bike path along Washington Street. Please prioritize walkable neighborhoods community spaces, and plazas over parking and urban driving. Please make periodic road closures like those for the North Park Farmers Market, Hillcrest Farmers Market, and Little Italy Farmers Market permanent. Those roads are not important for vehicle travel, but provide a small refuge of community space in a city of sprawling lots and highways. Please bring similar spaces to other neighborhoods as well. San Diego has the best climate in the world. It is depressing that outdated urban design forces us to spend so much time in cars and parking lots, simply because we lack proper walking and biking infrastructure.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0256.D	Ethan	n/a	Please stop expanding highways. It's expensive, and ineffective. I know everyone with a civil engineering degree knows this, but many of us voters know this as well. Please use the money on expanding buslines, improving frequencies, laying track, expanding bus lanes, and implementing Transit Signal Priority. Dedicated bus lanes in my neighborhood have not only made taking the bus easier and more convenient. It has been making walking much safer. It is much easier to determine when a car is going to make a right turn. This means I can cross without gambling on someone else's accurate blinker usage. This has made me feel safer in my own neighborhood. Local roadways should prioritize bike and pedestrian traffic. Cars should be encouraged to drive slowly using techniques such as lane narrowing.
S0256.E	Ethan	n/a	As a San Diego home owner, I want my government to prioritize the construction of housing above all else. We need housing and we need it yesterday. I expect the SANDAG Regional Housing Needs Allocation to surpass the legally required housing construction. I am tired of plans being held up by petty concerns like parking, "neighborhood character", views, and faux-environmentalism. I am disappointed in the city councils recent decision to reverse the ADU program that was showing much success. I do not consider the construction of large affordable housing developments as a negative consequence that needs to be addressed. If plentiful affordable homes result in my home value decreasing, I will consider that a win.
S0257.A	n/a	n/a	I want more public transit options that can reduce the amount of traffic on the surface roads. I want to have the option to use public transit to commute to work. I don't want congested freeways highways and surface roads to and from work.
S0257.B	n/a	n/a	Stop building more lanes on the highways they don't help our congestion problems. Stop neglecting our roads they're full of potholes and make our county drive and look like crap!
S0257.C	n/a	n/a	Use modern technology to better design plan and implement. Don't use old standards for today's tech!
S0257.D	n/a	n/a	If roads are this congested and we rely on the freeways and highways so much there is no way we'll be able to evacuate to anywhere safe should a major disaster strike this area! Plan better!
S0257.E	n/a	n/a	Reduce dependence on driving for all purposes and increase options for public transit will help our air quality big time. This will in turn improve the environment we live in while also reduce our impact of using fossil fuels on climate change.
S0258	n/a	n/a	Addressing road surface quality should be a high priority. Rough roads greatly exacerbate tire wear, which significantly contributes to air and water pollution. Smooth roads have been shown to produce over 2/3s less tire rubber particles versus rough roads (pavement condition index under 60%).
S0259	n/a	n/a	Need added frequency for all buses, trolleys
S0260.A	n/a	n/a	BUILD MORE FREAKING TRAINS!!! PURPLE LINE WHEN?
S0260.B	n/a	n/a	Bring back circut shuttles in neighborhoods
S0260.C	n/a	n/a	BUILD MORE TRAINS!!!
S0261.A	n/a	n/a	Please expand the trolley service to provide routes to the beach, balboa park and more places where people live. Also more frequent trains would help immensely.
S0261.B	n/a	n/a	I feel unsafe walking and biking in many parts of san diego, particularly point loma and ocean beach where I have been almost hit by cars multiple times in walking in crosswalks. Better paths and lighting for pedestrians would make me feel much safer.
S0262.A	Chris Diaz	n/a	As a longtime Mira Mesa resident, I've witnessed significant population growth and increasing congestion throughout the community. Mira Mesa is strategically positioned near major regional employment hubs - including Sorrento Valley, UTC, La Jolla, and Torrey Pines - making it an ideal location for housing. However, the two primary east-west corridors serving these job centers, Mira Mesa Boulevard and Miramar Road, suffer from chronic traffic congestion and limited transit alternatives. To support sustainable growth, improve regional connectivity, and reduce vehicle dependency, I urge SANDAG to initiate a feasibility study for a trolley extension or new transit corridor connecting the I-15 to the I-805 and I-5 via Mira Mesa Boulevard and/or Miramar Road. Enhanced east-west transit service in this area would relieve pressure on overburdened roadways, expand access to job opportunities, and align with regional climate and mobility goals.
S0262.B	Chris Diaz	n/a	In addition to long-term investments like a trolley extension, I strongly urge SANDAG to explore implementing flexible fleet solutions, such as electric neighborhood shuttles, on-demand microtransit, and NEVs, for the Mira Mesa and Miramar areas. These services could connect residents to major transit hubs like the Sorrento Valley Coaster Station or the UC San Diego Blue Line, reduce car dependence, and provide critical mobility options for seniors, students, and families without access to a private vehicle. Flexible fleets are a cost-effective, scalable strategy to close first- and last-mile gaps while aligning with SANDAG's Regional Plan goals around equity, sustainability, and innovation.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0262.C	Chris Diaz	n/a	As a longtime Mira Mesa resident, I've watched our neighborhood expand while infrastructure for walking and biking remains inadequate - especially along key corridors like Mira Mesa Boulevard, Miramar Road, and Kearny Villa Road. These roads are wide, fast-moving, and heavily trafficked, with inconsistent or unsafe bike lanes, fragmented sidewalks, and limited crossings. To support safe, sustainable mobility, I urge SANDAG to prioritize investments in protected bikeways, widened sidewalks, and pedestrian improvements along these routes. Connecting Mira Mesa to nearby employment centers, transit stations, schools, and parks via safe active transportation routes would reduce car dependency, improve community health, and align with the Regional Plan's vision for climate resilience and equitable access. Kearny Villa Road in particular offers an opportunity to create a north-south bikeway connection between Serra Mesa and Miramar while relieving pressure on I-15 and surface streets. Improving these corridors for all users - not just cars - would be a transformative step forward for Mira Mesa and the region.
S0262.D	Chris Diaz	n/a	As a longtime Mira Mesa resident, I support a balanced approach to improving our highways and major roadways, not just for current congestion relief, but to support long-term sustainability and innovation. Mira Mesa Boulevard, Miramar Road, and Kearny Villa Road are key east-west and north-south connectors that face mounting traffic pressure. Targeted upgrades like signal optimization, better freeway interchange design, and dedicated bus or carpool lanes would help move people more efficiently. Additionally, I urge SANDAG and regional policymakers to advocate for the extension of EV HOV lane access programs. Many residents have made the switch to electric vehicles in support of clean air and climate goals, but face uncertainty as carpool lane sticker privileges are set to expire. Extending these incentives - especially in high-congestion areas like I-15 and I-805 - would continue to reward sustainable choices while reducing overall vehicle emissions and congestion. We need road improvements that prioritize smart mobility, cleaner air, and equitable access, not just more asphalt.
S0262.E	Chris Diaz	n/a	As a longtime Mira Mesa resident, I've witnessed significant population growth and rising traffic congestion, especially along Mira Mesa Boulevard and Miramar Road, which serve as primary corridors to major employment centers in Sorrento Valley, UTC, La Jolla, and Torrey Pines. Despite being ideally located near these job hubs, our community lacks robust transit infrastructure to support sustainable commuting. The recently developed Casa Mira View apartments represent a prime example of transit-oriented housing, situated directly along the I-15 and within reach of both Mira Mesa Boulevard and Carroll Canyon Road. This high-density residential area would be an ideal anchor point for a future trolley extension or dedicated transit corridor between the I-15 and I-805/I-5. I strongly urge SANDAG to initiate a feasibility study to evaluate a trolley or light rail line connecting these critical freeway nodes via Mira Mesa Boulevard and/or Miramar Road. Such a line would not only ease pressure on our overburdened roadways, but also support regional housing goals, climate action targets, and first/last-mile connectivity.
S0263	n/a	n/a	Trolley needs to connect Hillcrest/north park area.
S0264.A	n/a	n/a	WE NEED MORE FLEXIBLE, AFFORDABLE, AND CONVENIENT PUBLIC TRANSIT. I live in North County, and to get to the airport with public transit requires four transfers before actually getting to the airport. This is a 2 and a half hour endeavor according to Google Maps. Due to time constraints, I am forced to take an Uber or Lyft to the airport, costing about $100 each way. Additionally, the available public transportation does not adequately connect San Diego city nor county. There are no direct ways in or out of the city into North County. The city and county is in dire need of more train/trolley routes. BUSES ARE NOT SUFFICIENT. They do not address traffic concerns and often result in much longer transit times due to the need to make stops and getting caught up in traffic. TROLLEYS/TRAINS ARE PREFERRED. San Diego is a beautiful city, make it more accessible and enjoyable by providing proper public transit infrastructure.
S0264.B	n/a	n/a	Bikeways on the side of the road are not ultimately safe nor bike-forward. There are many countries around the world that have quality bike-forward infrastructure that does not put the cyclist at risk of being hit nor impedes the quality and efficiency of the car-based infrastructure. Quality walkways and bikeways need to be prioritized.
S0264.C	n/a	n/a	DO NOT DIVEST FROM LIBRARIES AND PUBLIC FACILITIES. The libraries are a cornerstone in San Diego county, removing these as available resources will harm San Diego's quality and thus its reputation and image.
S0264.D	n/a	n/a	DO NOT CLOSE CRITICAL PUBLIC FACILITIES EG FIRE PITS AND PUBLIC BATHROOMS. We need more public utilities, not less. The entire area around City Hall in San Diego smells like urine. It is an embarrassment and a stain on San Diego's image.
S0264.E	n/a	n/a	More infrastructure to support the homeless population is critical. San Diego is"the finest city"• , but how can that be the case if I witnessed a man on drugs taking a dump on the trolley platform outside City Hall? Much of our homeless population needs critical support and places to go where they do not impede the daily operations of the city and its occupants. They need safety and an opportunity to re-enter society OR appropriate mental health services. The homeless crisis is costing the city and the county exorbitant amounts of money. More preventative action must be taken to bring costs down and improve the quality of the city.
S0265.A	Jonathan R	n/a	Please accelerate the implementation of transit projects. The city needs them now more than ever. For example, the Balboa Park circulator sounds great, but aiming for 2050? Or similarly, the Airport Transit Connector has been stuck in studies for decades. Bus only lanes are proving very effective, please continue expanding bus only lanes.
S0265.B	Jonathan R	n/a	Please aggressively expand the bikeway network. A bikeway network with holes in it does not being many new riders out. Please continue repairing and adding sidewalks everywhere in SD. The return on investment for sidewalks vs roads is extremely high! Better health, lower GHG emissions, more $ spent within the community, etc.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0265.C	Jonathan R	n/a	Please focus the budget on expanding any and all transit options that are not car-focused. Highway expansions and studies are a drain on vital resources. The budget is incredibly lopsided.
S0266.A	Mikal	n/a	Truthfully, public transit in San Diego is not very good. I recently moved back after being in Montreal for 6 years. In Montreal public transport is incredibly popular to use (trains and busses), so much so all social classes and occupations use them. In San Diego taking public transit is often considered "poor"· or "uncool"· so there is clearly a mindset issue we have here, but there's also an issue with availability and timing. In Montreal trains run until just passed midnight (depending on the day of the week) and there are 24 hour busses when the train stops running, so there's always a way to take public transport and get home. This severely increases safety as people are fat less likely to drink in drive if they know they can get home without a car. There's much more to be said about the frequency and times of other SD public transportation methods such as the sprinter and coaster, across the board there needs to be improvements. San Diego also continually expands the highways which is only a temporary fix. I've been driving in San Diego since 2009 and traffic is the worse it has ever been. More lanes means more traffic. Just look at Houston - https://knowyourmeme.com/photos/2417131-one-more-lane-bro-one-more-lane-will-fix-it Even LA has been expanding its public transport tremendously in the last 5 years.
S0266.B	Mikal	n/a	They are necessary and should be expanded. Bikeways should have a physical barrier but at the very least need to have color painted lines. In Montreal the mayor commutes via bike daily and her administration has expanded by the bike lanes by over 130 miles since 2017. Walkways also need to be widened, and any area that lacks a proper walkways needs to be renovated.
S0267.A	n/a	n/a	We need a more robust trolley/train system. End of story.
S0267.B	n/a	n/a	Build denser, more walkable communities.
S0268.A	n/a	n/a	We want public transit!
S0268.B	n/a	n/a	Sounds great to me, electric is great
S0268.C	n/a	n/a	Walkways are a big one, shade and separate from loud busy streets, well lit
S0268.D	n/a	n/a	We want more electric!
S0268.E	n/a	n/a	More mixed use and more trees and walkable we have walking weather all year
S0268.F	n/a	n/a	These things need to be able to withstand earth quakes and heatwaves
S0268.G	n/a	n/a	We need more walking, shade and trees. And more solar to stop the sun from beating down onto our homes causing even more expensive ac
S0268.H	n/a	n/a	Affordable housing
S0268.I	n/a	n/a	Community bulletins and things like this!
S0269	n/a	n/a	Please build more light rail including light rail to the airport, North Park area, and Mira Mesa/Sorrento Valley
S0270.A	n/a	n/a	I would like San Diego to be more walkable, bikeable and more metro lines. Look at San Francisco as an example.
S0270.B	n/a	n/a	I would like San Diego to be more walkable, bikeable and more metro lines. Look at San Francisco as an example.
S0270.C	n/a	n/a	Housing prices are far too high. No one can even consider purchasing a home. Why are there so many airbnbs taking away from places for people to live?
S0270.D	n/a	n/a	I am concerned about clean air and water
S0271.A	Arthur Reading	n/a	Please remove the train tracks between San Diego and LA. They are a waste of beachfront space and the train is barely used.
S0271.B	Arthur Reading	n/a	Please stop adding bike lanes. They discriminate against elderly, families, and the disabled. The only people using them are for sports/recreation in our area (Carlsbad) and it is not a sensible use of public funding. PLEASE PRIORITIZE ACTUAL CITIZENS instead of climate change ideology and wishful thinking.
S0272.A	n/a	n/a	1. Trolley directly to airport terminals, please and thank you. 2. Please support YIMBY policies everywhere; more density is easier to serve with transit & our homeless problem is directly related to housing expenses. 3. Is there any reason Metrolink Orange line can't continue all the way to Santa Fe Depot, and the Coaster terminate in Tustin? 4. Build a big tunnel under Del mar for electrification of the LOSSAN corridor. It's obviously needed, and soon, so plan for it now.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0272.B	n/a	n/a	1. NEV's should be available for rent in every SANDAG city. Put automated rental kiosks at every Coaster &Sprinter station, and at some trolley stations. Run it at cost, user fees should be able to cover it. 2. NEV's are also ideal for exploring beach regions, but in some NEV parking & charging infrastructure at/near beaches instead of car parking spaces. coastal Commission can eat my shorts.
S0272.C	n/a	n/a	1. Paint is not infrastructure. If we are going to have bike lanes, throw in some bollards too please. 2. EBikes should also be available to rent at Sprinter, Coaster, and larger Trolley stations. 3. It's okay to shrink roads to make wider sidewalks and separated bikeways. It's okay to remove street parking to make it happen.
S0272.D	n/a	n/a	1. No more road widening anywhere , ever again, please. Roads cost too much money. 2. Can we get some automated speed cameras? 3. Can we also get some cameras to enforce front license plates, plate covers, cracked windshields, etc?
S0272.E	n/a	n/a	1. LOSSAN needs to be widened to 2 tracks for the full length of San Diego county. 2. Long Beach and LA frequently have issues of backlog, we should see if we can put in some automated gantries at Port of San Diego and steal some of their business 3. We need more enforcement of weight limits on trucks, they are destroying our surface streets near warehouses & freeway onramps.
S0272.F	n/a	n/a	1. Please do NOT buy any techbro nonsense: pods, monorail, gadgetbahn, self-driving busses, "AI", etc. Always be skeptical of technology promoters. 2. Can there be an addition to the sdmts.com website where users can drop a pin where they wish a bus would pick them up or drop them off?
S0272.H	n/a	n/a	1. Transportation and land use are just different names for the same thing. Do not be afraid to ask people like myself to support land use reform to enhance transportation. 2. All SANDAG communities need to greatly simplify zoning & permits for housing construction asap.
S0272.I	n/a	n/a	1. Climate change is real, accelerating, and going to kill a lot of people. Coastal San Diego is going to be one of the more habitable places in California, we should build for it. 2. If 1/2 the commercial rooftops in San Diego had solar installed, we would be energy independent. Find a way to make that happen please. 3. if all the rooftops in San Diego had solar installed, we could produce enough energy to also be water independent. This may turn out to be critically important. 4. Air quality is improved with less driving (EV or no). Find a way to get rid of cars and you'll improve air quality.
S0272.J	n/a	n/a	1. Be bold, the time for placid changes is past. 2. Be coordinated, the cities of SANDAG face a "prisoners dilemma" when it comes to things like making zoning changes. If the all go together, it reduces the perceived risk that one community or another will get especially screwed.
S0273.A	n/a	n/a	We need significant transit system expansion. Trolley expansion, Coaster electrification, more frequent service, all of it. I live less than a mile from a transit station and ride transit whenever I can, but it does not run frequently enough nor go to enough places. The 15 freeway corridor houses a lot of people and employment centers now, it is desperately in need of a regional rail connection.
S0273.B	n/a	n/a	We need more bicycle and pedestrian infrastructure. More walkable streets and neighborhoods. Safer roads that slow down vehicle traffic and encourage walking and biking.
S0273.C	n/a	n/a	Adding more lanes all the time is a huge waste of resources. I'd rather see those funds go to expanding rail infrastructure so I don't have to drive as much in the first place.
S0273.D	n/a	n/a	I live in north county and the Coaster is fantastic for some trips. But service is still too infrequent and the slow winding climb up the hill from Sorento Valley around La Jolla absolutely kills transit times to the city proper. I understand it's a large project but this critical connection needs to be straightened out to better integrate the Coaster into the Trolley system. Why not run the track elevated down the middle of the 5 freeway from Sorento Valley through La Jolla? UCSD/UTC/Nobel Dr could get a transfer station and it would cut significant time off the route, encouraging more ridership.
S0274.A	n/a	n/a	Please prioritize transit funding for new projects and operational funding. Increase frequency and install bus-only lanes to have better transit reliability.
S0274.B	n/a	n/a	Implement a bike share system in the region that is built around our transit system. I live in Hillcrest and would take transit way more if the last mile option was available
S0274.C	n/a	n/a	Please prioritize concreted/curb protected bike lanes.
S0274.D	n/a	n/a	Do not widen any more highways and local roads. That is a waste of money and will cripple the region for decades to come. We can not acknowledge climate change while widening highways

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0275.A	n/a	n/a	San Diego urgently needs better and more frequent transit. I work in Torrey Pines and having only one bus route in this area every 30 minutes adds significantly to our travel time.
S0275.B	n/a	n/a	We need a better bike network, there are too many roads without bike lanes, or with lanes that are shared with vehicles at high speeds which is unsafe. There needs to be more protected bike lanes and protected intersections
S0276.A	n/a	n/a	All of San Diego County should be connected to mass transit by now. The city is sprawling and many events take place in the western parts of SD. Please consider how to connect San Diego as a whole.
S0276.B	n/a	n/a	Flexible fleets sound awesome, please inform the public on what it is, and how it can work in conjunction with mass transit
S0276.C	n/a	n/a	There are too many empty lots across San Diego! Lots that have been abandoned for over 2yrs should be confiscated by the city and developed for AFFORDABLE HOUSING and or Public Parks
S0277.A	Jonathan Mendez	n/a	We need more, easy, access to prime locations like Balboa park, especially if we are going to be paying for parking there. Having safe, and efficient, modes of public transit to get around the city is important.
S0277.B	Jonathan Mendez	n/a	Along with public transit, we need more safe bike paths and walking paths to get around the city. The less we need to rely on cars to get around, the better.
S0277.C	Jonathan Mendez	n/a	We need more housing, especially high and affordable housing, near areas with public transit stations (especially by the trolley).
S0277.D	Jonathan Mendez	n/a	Focus on renewable energy vehicles and efficient buildings.
S0278	n/a	n/a	Fix the pot holes. FIX THE POT HOLES. We don't need more bike lanes. Stop removing parking spots. Stop listening to reddit. Stop punishing people for driving a car. Thanks.
S0279.A	n/a	n/a	we need MORE trolley and bus frequency not fewer! more lines will increase ridership because people will be able to go get on a ride without concerning themselves with whether or not they'll miss a trolley by 3 minutes which only comes once an hour.
S0279.B	n/a	n/a	No opinion, but sounds good
S0279.C	n/a	n/a	Beyond just building more of them, please also make them more protected by curbs/trees/etc. plastic bollards are a nice start but don't actually protect anyone from distracted/reckless drivers
S0280.A	Arthur	n/a	More trolleys, build the streetcar to Balboa Park, airport extension very welcomed in San Diego, purple line built underground the whole way.
S0280.B	Arthur	n/a	More little 25 mph cars welcomed.
S0280.C	Arthur	n/a	More separated bike lanes like in Europe, more trees on the street level, more wide sidewalks welcomed.
S0280.D	Arthur	n/a	Transit priority welcome.
S0280.E	Arthur	n/a	New apartment, high rises, ADUs near transit
S0280.F	Arthur	n/a	New officers in stations
S0280.G	Arthur	n/a	More money for projects
S0280.H	Arthur	n/a	Better air quality
S0281.A	n/a	n/a	Transit is a great way for me to get around the city. I often visit from the Amtrak and I'm happy to take the light rail system around. I wish the rail was expanded and had more frequent departures.
S0281.B	n/a	n/a	Microtransit is a very efficient way to get around the city. This system supports tourism in the area and it makes getting around that much more memorable. I wish this was a little less expensive to use and more widely available.
S0281.C	n/a	n/a	The bikeways around San Diego are a gem of the city. Some times, paint may be enough, but often times it's not. We must ask ourselves the question of who are we building these bike lanes for? Does the current design enable new users on the bikeway? Or are we painting lanes just to meet some government requirement? It is vitally important that bike lanes make the users feel safe because if they do not feel safe, the bike lane is a waste of time and money.
S0282.A	n/a	n/a	The Blue Line Extension has seen an increase in ridership, some reports show as much as 73%. This indicates that public transit is not just underserviced, but that there is an implicit need for more transit options.
S0282.B	n/a	n/a	Housing is a right, and the model for weighing "affordable" rent should not be measured by AMI but rather adjusted for cost of living in each neighborhood.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0283	n/a	n/a	We want to see more bus routes, an expansion of the trolley, and other forms of public transit. Make it easier to get around the city without a car, which is cheaper, improves traffic, and better for the environment
S0284.A	n/a	n/a	Most people who use the roads have cars, most of our budget should be used to help improve the roads for cars. This allows families to get to work on time and reduce repairs to cars caused by road damage
S0284.B	n/a	n/a	The cost of living is too high here. Helping improve cargo and shipping will help bring prices down
S0285	Francis R	n/a	Lots of bikers and scooter riders are now using the bike lanes in Paradise Valley Road from Munda Road to Jamacha Blvd. The current bike infrastructure is decent, but needs improvements. There is a dangerous part of the bike lane between Woodman Street and Briarwood Rd. The bikelane suddenly disappears and the bicyclist is forced to share the lane with 50+ mph traffic while biking uphill. This deters a lot of people from trying to bike from the neighborhoods above and the strip mall at the bottom. A separated bike lane should be created in the unpaved gap between the sidewalk and the curb. There is an awkward gap close to Meadowbrook Drive where the bike lane turns into street parking. This creates a dangerous situation because a lot of bikers go through the area, but parked cars force them to either go into the also commonly used sidewalk/bus stop or into a car lane inside a semi-blind curve. The median could be reduced to add a bike lane while maintaining the parking spots. Barriers should be placed along most of the route, since the route is high speed with few driveways. The route between Munda Road and Potomac St especially needs some. That section sees 50-65 mph cars that often drift into the bike lanes especially at the curve. A highly visible bike lane needs to be added between Elkelton Blvd and the 54 West entrance. This is a significant conflict point, since the expected bike route conflict with the cars crossing over into the right lane for the highway entrance. Cars usually start to cross over to the right turn lane inside the Paradise Valley Rd/Elkelton Blvd intersection, so the bike lane should be clearly marked inside that intersection. Bike lanes also need to be completed between Woodman St and Potomac Street and Plaza Blvd to Munda Road.
S0286	Dexter	n/a	I enjoy the protected lanes that exist, but I do wish there were longer sections. Also, the bike lane in Sorrento valley is extremely degraded, and becoming dangerous to ride on.
S0287.A	Chris Bonilla	n/a	Trolley: the blue line needs to eliminate the American Plaza stop. It makes no sense anymore and it adds a few extra minutes just to stop there. The route should be optimized or potentially streamlined. Bus: the bus route 27 has a ridiculously low frequency of 30 minutes. It doesn't even quite line up with the blue line of balboa. This could be looked at either to improve frequency or line it up better with the trolley.
S0287.B	Chris Bonilla	n/a	We need more housing, and not supporting ADUs. Instead, support higher density housing in more areas, or town homes. Prices need to come down and this would help.
S0287.C	Chris Bonilla	n/a	The homeless population is growing. Something needs to be done here. Some of them need treatment whether that be treatment for addiction, or psychiatric treatment. This would make San Diego safer and hopefully lessen the population. Just kicking them out doesn't do anyone any good.
S0288.A	n/a	n/a	San Diego is in desperate need of more public transportation. Public transit would enhance to quality of all communities in San Diego by increasing accessibility and cost savings. In addition, it would solve some of the issues related with finding parking in certain areas of San Diego, which is truly a plague to the area. Increased public transit will also help to reduce traffic congestion.
S0288.B	n/a	n/a	We NEED more bikeways and walkways. When it comes to walkways, there are TOO many areas of San Diego that are made completely inaccessible to all people, not just disabled people, because of a lack of walkways. Increasing bikeways and walkways makes areas safer for pedestrians and reduces traffic accidents. Bikeways and walkways also help reduce traffic congestion, much like public transit.
S0288.C	n/a	n/a	The quality of roadways in MANY areas of San Diego is absolutely tragic. The amount of people that incur damage to their cars because of poor roadway quality is extremely disappointing. We need serious repairs and we need them fast. When it comes to highways, what we DON'T need is bigger ones! We need more public transportation and higher quality local roadways instead. Huge highways INCREASE traffic and are not beneficial to the community.
S0288.D	n/a	n/a	WE NEED MORE HOUSING. AFFORDABLE HOUSING. STOP RESTRICTING OUR ABILITY TO BUILD AND BUY HOMES. I HAVE LIVED IN SAN DIEGO MY ENTIRE LIFE AND WILL NEVER BE ABLE TO AFFORD A HOME HERE IF THINGS STAY THE WAY THAT THEY ARE.
S0288.E	n/a	n/a	NONE of these comments or any changes requested by the people will matter if we don't do something about CLIMATE CHANGE. WE NEED CLEAN AIR. WE NEED WALKABLE COMMUNITIES. WE NEED MORE BIKE LANES. WE NEED ACCESS TO AFFORDABLE ELECTRIC VEHICLES.
S0289.A	n/a	n/a	Can we please discuss adding more trolley lines to connect the rest of san diego?
S0289.B	n/a	n/a	Would like to see better designs of bike ways and walkways throughout the city, not just certain parts

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0290.A	Kam	n/a	Please expand on trolley lines. i take the trolley every change i get. There are so many times I decide to skip out on an event at bars / restrouarants or stores because i check the map and see there is little parking or it would take over an hour by bus to go 8 miles. I wish the trolley went to northpark then i might stay longer than one drink at dinner if i didnt have to drive, and maybe less people would feel inclined to drive drunk if the trolley went to where there was more nightlife. even in el cajon the trolley drops you off blocks away from the mall. i would spend more time (and money) in local areas if i didnt have to think about parking, traffic and the drive home.
S0290.B	Kam	n/a	san diego gas an electric should be investigated for criminal business practice.
S0291.A	n/a	n/a	Need to have security on board. You have sometimes people that respect others
S0291.B	n/a	n/a	Being safe when riding the trolly at night cause homelessness
S0292	n/a	n/a	Please establish a train whistle quiet zone around the Crouch Street station in Oceanside.
S0293.A	Michelle L	n/a	Hello! I LOVE TROLLIES AND BUSES, and I say this as a car owner. I, along with thousands of other San Diegans, want 1. More frequent transit. 7.5 minute trolley frequency, system wide & 10-minute peak for buses- this would be so impactful to my life. I live fairly close to a Trolley line, but have found I can't always depend on it for my day to day activities because I don't want to be late for a dinner, an event. Having to wait an extra 15 minutes is crazy!! 2. BETTER BIKEWAYS . I CAN technically ride to my trolley stop, but there's no bike lane on the northern part of Morena Blvd, so I don't feel safe to do so. There's also no continuous sidewalk, so I and many of my neighbors are forced to walk on the side of the DIRT ROAD to get to the trolley stop. This is crazy. There's so many residences near the Balboa Ave line and yet we're forced to put ourselves in unsafe situations to get to the trolley station. 3. Permanent youth opportunity pass funding - public transit is a right and KEY to quality life. I've never been to a city I loved that did not have great transit. Let's ensure youth have access + get in the habit, so we can have transit-riders for life! Lol maybe they'll get off those pesky dangerous e-bikes too. 4. Connect Pacific Beach, La JOlla, and Clairemont & Kearny Mesa (including Convoy area) to the trolley PLEASE! These are the areas that I go every day and I'm forced to drive a car because they are not fully connected.
S0293.B	n/a	n/a	1. BETTER BIKEWAYS . I CAN technically ride to my trolley stop, but there's no bike lane on the northern part of Morena Blvd, so I don't feel safe to do so. There's also no continuous sidewalk, so I and many of my neighbors are forced to walk on the side of the DIRT ROAD to get to the trolley stop. This is crazy. There's so many residences near the Balboa Ave line and yet we're forced to put ourselves in unsafe situations to get to the trolley station. 2. County wide bike share - THIS WOULD BE SO AWESOME! Cities like SF, NYC have bike share programs that make it easy to get from place to place, and I've used those very frequently. I could get around in Clairemont better, or near Balboa Park. Having to lug your bike around when you want to go somewhere on transit is not easy to do, and bike share programs remove this need! 3. Please ensure that all trolley stops have sidewalk connections to the residences within 1 mile radius. People want to walk to their trolley stop, but are prevented from doing so because they are forced to walk on dangerous road shoulders. Check out the northern morena blvd route above Balboa Ave station - that is the bain of my existence. I see teenagers walking on dirt patches with cars racing by them at 45mi/hr. THAT IS DANGEROUS! I want to walk to my trolley stop with ease, and not be worried after sunset....
S0294	Christopher Dahringer	n/a	More rail transit
S0295.A	n/a	n/a	Decrease wait times on major transit lines and rapid lines by increasing service. Often transit takes much longer than other modes because of waits between transfers.
S0295.B	n/a	n/a	Connect the fragmented bike network so it becomes a valid alternative to driving. Many places in the network go from bike way to shared lane which is much less safe and inhibits how much people will use them.
S0296.A	n/a	San Diego 350	The 2025 Plan should be prioritizing more transit and as quickly as possible. Rapid Bus Routes with more frequency seems to be the easiest and cheapest way to increase service and ridership. However, trolleys are popular and trains are faster (no car traffic to deal with on regular lanes). Suburban areas of sprawl need options too. The Circulator Loops look like a good idea as long as they run frequently during busy times. Microtransit and neighborhood NEV's are a great addition to connect people to transit for the long distances. Bikeways and Walkways must be safe for people to use them. People complain a lot about bike paths taking away parking spots, but the paths have to be there and be safe before people will use them at scale. Surface street need to lower their speed limits and need to be enforced, too! Make transit and active transportation more desirable than driving a car! Some cities are working toward making transit free!
S0296.B	n/a	San Diego 350	Please give flexible fleets enough time to be successful. Is SANDAG allowed to advertise?
S0296.C	n/a	n/a	Separate bike paths from roads whenever possible. Safety first!
S0296.D	n/a	n/a	The required GHG emissions reduction is 19% and the Plan is claiming a 19.3% reduction. OK, that's better than the 2021 claim of 19% which only achieved that by rounding up. However, SANDAG should do better whenever possible. Big Reductions NOW should be the primary objective.
S0297	n/a	n/a	Please add transit routes to Sorrento Valley. There are a lot of offices there and it would relieve congestion on the 805.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0298.A	n/a	n/a	A few comments: 1. Please invest in better scanners. I spend a good five minutes trying to scan my phone and it never works consistently. A lot of people give up and hop on. I don't have this problem in the Bay Area or Chicago, your app/scanner combo is costing revenue. 2. Trains are more attractive than buses to most people. The excessive amount of connections people need to make to get from the airport to our main tourism areas is overwhelming and discourages both locals and visitors from transit. The micro transit options are interesting but when you have to catch the Flyer and then a train or a bus or another one it's too much. 3. In an ideal world, there would be a streetcar or light rail option all the way up Park- connecting Downtown to Balboa Park and the Zoo, to University Heights. A second light rail would run along University, ideally connecting Mission Hills, Hillcrest, North Park, and City Heights. Ideally Washington Street Station would connect at Mission Hills side and the City Heights side would connect to the eventual Purple Line. These areas are densely populated and also attractive to locals and tourists. Overall, more regional and light rail are the way to go. I've appreciated the increased security and feel at ease traveling on the Blue Line. The Blue Line extension has been a game changer for many, and I hope SANDAG can continue to grow our transit system.
S0298.B	n/a	n/a	When possible, especially on busy roads, a physical barrier to separate bikes from cars would be helpful. It can be as simple as a few bollards to start but it should be made safer to reduce vehicle and cyclist collisions.
S0298.C	n/a	n/a	The social media (Instagram) has been very engaging lately and is memorable. It seemed inspired by the Amtrak one. Community outreach is good, but I think the lack of tangible action since the Blue Line is annoying people. If you look through regional Reddit communities, people regularly post their dream transit options. I understand it's a lot of planning, but I think a lot of people see a good amount of time on inaction while other cities are actively working on transit projects.
S0299.A	n/a	n/a	It would be great if the old system, or a new system of street cars were installed in the city/county. To be able to leisurely go about San Diego on the weekend without having to use a car would seriously de-stress the majority of people in this area.
S0299.B	n/a	n/a	More public parks, skateparks, common areas where walk ability is key. Sections of downtown that are blocked off for pedestrians only, or PB, MB, etc.
S0300.A	n/a	n/a	The embarcadero path around the Waterfront downtown is too narrow even for all the pedestrians who want to use it, nevermind people on bicycles. Make it wider and make different trails for people walking and people biking.
S0300.B	n/a	n/a	I thought the mileage tax was a good idea. They did it in New York and it's working to reduce pollution, traffic congestion and even traffic accidents.
S0301.A	Kenneth ZunigaDiuguid	n/a	We need more transit, especially in North County. We need light rail. We need an I-15 tolly or monorail, san Diego absolutely needs to reduce the traffic on the 15 and not rely on the toll road aspect of it.
S0301.B	Kenneth ZunigaDiuguid	n/a	We need more class 4 protected bike lanes
S0301.C	Kenneth ZunigaDiuguid	n/a	Eminent domain, on abandoned building and make more housing!
S0302.A	Ashley B	n/a	We desperately need to expand the trolley north. So many people commute from North County to other parts of San Diego and are forced to go by car or bus which not only makes more traffic, but also increases pollution, the wear of the road and necessity to maintain the freeways often.
S0302.B	Ashley B	n/a	We need to change our zoning laws. We need more mixed use neighborhoods
S0303.A	Chris	n/a	More. I should be able to take a bus or trolley to the beach from Normal Heights
S0303.B	Chris	n/a	More, I don't have any in normal heights
S0303.C	Chris	n/a	More density is good
S0304	n/a	n/a	More money should be put to transit to improve the bus and trolley networks. Creating a more efficient transit network would cut down on car commuters and reduce the need to expand the highway system.
S0305.A	n/a	n/a	I am writing in support of a light rail project along the I-15. Light rail is a critical part of the green transition. It's better than a bus because a bus also can get stuck in traffic. People need a compelling reason to choose transit over driving. We should strive for a transit system that gets you to your destination faster than driving, at least during peak traffic
S0305.B	n/a	n/a	You should be able to build apartments with no setbacks and no parking requirements, with "shall issue " permitting, within 1 mile of a transit station
S0306.A	n/a	n/a	safer, cleaner and more efficient transit
S0306.B	n/a	n/a	SAFER STREETS less homeless people downtown and more regulated crime
S0307.A	Ryan Ford	n/a	I would like more see more electric busses and high speed electric rail between the border and LA.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0307.B	Ryan Ford	n/a	Connected bike networks are more walk-able streets are key for an enjoyable transit experience.
S0307.C	n/a	n/a	Stop building and expanding highways, we should narrow streets to give more room for pedestrians and save money on upkeep.
S0307.D	n/a	n/a	More density, more public parks
S0308	Mina Sardashti	n/a	Public life would improve drastically with efficient transportation along the I-15. Having a reliable light rail or train to help with worker commutes between central and north county San Diego would completely reshape and improve weekday worker experiences and livelihoods. Furthermore, it would improve the environmental footprint of San Diego county, something our region should constantly be prioritizing as leaders of sustainability in our country.
S0309.A	n/a	n/a	I wish public transit was more comparable to car transportation in CA. Taking public transit takes 4x the time a car takes to get places. If the time it takes to get somewhere on public transit was comparable or took less time I would use public transit more often.
S0309.B	n/a	n/a	I think we need to invest more resources into caring for the unhoused. Housing, rehabilitation and Mental health and career services. Legal services.
S0310.A	Vaibhav Shetge	n/a	Expanding Trolley as to connect neighborhoods from Escondido - Rancho Bernardo - Rancho Penasquitos - MiraMesa -Serra Mesa down along the I-15 corridor to the Green line. And Escondido - Rancho Bernardo - Rancho Penasquitos -Torrey Highlands - Caramel Valley west along the S56 route to the Sorrento Valley station. These will help connect these highly populated area to the rest of the system.
S0310.B	Vaibhav Shetge	n/a	A lot of time there are three legal crosswalks at a junction. If you happen to be at the corner where you have to cross all three to get to the one that's right across, it takes a long time. Especially since most of these occurrence are also at major intersections. Besides that each cross walk, regardless of size of intersection, should prioritize and be able to have green to cross within 20s of the first press of button by the pedestrian. My thought is more towards improve walkability and accessibility with less dependence on cars.
S0311.A	n/a	n/a	I really like the MTS system we have. They are very reliable and I like how they work. The system is inexpensive, and extremely reliable.
S0311.B	n/a	n/a	It would be good to introduce small shuttles to give people rides around the town. This would be a best option for our elderly who may not be able to walk the distances they used to.
S0311.C	n/a	n/a	I think Linda Vista should have better roads to encourage more people to cycle.
S0311.D	n/a	n/a	There are a lot of houses being built without any consideration of the parking situation in Linda Vista, and it's egregious to see homes being built without consideration for those who've lived here for years, who may already struggle finding places to park. Also gentrification is becoming a HUGE problem.
S0312.A	n/a	n/a	Please increase bus and trolley frequency! Please run an additional late-night Coaster train!
S0312.B	n/a	n/a	More protected bikeways, please! Let's made San Diego a safe and healthy city
S0312.C	n/a	n/a	Let's build more housing, everywhere!
S0313.A	n/a	n/a	The bike lanes are great, but cars keep parking in them. There needs to be some kind of wall between bikes and cars to keep the cars out of the bike lane.
S0313.B	n/a	n/a	Electrify the Coaster.
S0314	Anthony Collins	n/a	I fully support continued investment in our rail projects, such as the airport connector, purple line, Balboa park streetcar circulator, and improvements to our existing system. I also support future expansion discussed as part of the longer term regional plans (ex: downtown transit hub/central station). From conversations I have with friends and neighbors, we'd love to have a well-connected, robust rail system. To me, part of what can help accelerate that is shifting away from bus rapid transit and expansion of freeways as alternatives to rail. They are short-term solutions that can end up costing taxpayers more in the long run. As a taxpayer, I would much rather have that money go toward more permanent solutions.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0315	Danielle Johnson	San Diego 350	My name is Danielle with San Diego 350. I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. I live on Adams in Normal Heights and am a regular user of public transit. I take a bus/trolley every time I go downtown and have recently started using the rapid 235 line to get to work. I love having alternatives to driving and enjoy biking and walking. Despite having nearly the best case scenario for transit access, I have to go out of my way to utilize it. I live only a couple of miles from the green line, but have to drive to a station if I want to take the trolley. I live about a mile from the transit plaza on El Cajon, with no way to get there by bus. If I were to walk, it would nearly double my commute time. I don't make the once a week use requirement for bike lockers, so I either have to take my bike with me to work or, once again, drive my car to the bus stop. Public transit is ineffective if I need to get in a car to use it. I support the following actions. NO to highway expansions: There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes," as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure. Accelerate timeline for transit: 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible.
S0316	Jenny Parker	n/a	My name is Jenny Parker. I am writing to urge SANDAG to continue to push forward improvements to the quality of life of San Diegans by decreasing greenhouse gas emissions and increasing transit options. There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes," as highway expansions in disguise. Studies show these only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction. Traffic always grows to fill the void. Shift funding away from highways to public transit operations, including "last mile" microtransit, and safe walking and biking infrastructure. Reduce greenhouse gas emissions: While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes. SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. No-cost transit passes for under-18 youth encourage significant participation in public transportation, help shift expectations for how San Diegans use transit, and invest in our region's future. Given the current state of funding sources, SANDAG must take the lead on funding this critical program as a priority. 2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible.
S0317.A	n/a	n/a	Please add a bike lane on the Coronado bridge. The ferry has gotten too expensive for locals.
S0317.B	n/a	n/a	Too much money is being spent on freeways instead of going towards green transportation.
S0317.C	n/a	n/a	Too much money is being spent on freeways instead of going towards green transportation.
S0318	n/a	n/a	Finally connect the Rose Creek Bikeway to UCSD, by installing a Class I separated and protected bikeway on Gilman Dr.
S0319	n/a	n/a	Need more bike lanes
S0320	n/a	n/a	Keep building protected bike lanes, they help our family stay active.
S0321.A	n/a	n/a	Really hope a trolley or some sort rail line gets extended to the airport in the future. The shuttle bus to old town works, but is far from ideal. Especially when it gets busy.
S0321.B	n/a	n/a	Would love if a program like Los Angeles Metro Micro program were piloted in San Diego serving regions with gaps in bus coverage to our transit hubs. I would use it regularly and pay extra for the flexibility it provides. There are lots of areas I struggle to reach by bus and regularly pay for ride shares.
S0321.C	n/a	n/a	I would like police to issue warnings and fines for blocking bike lanes. It would be good to place fine enforcement signs in areas where cars regularly block bike lanes, forcing cyclists to move onto the dangerous road. I would also love if there were more 2 way bike lanes with curbs extending out from trolley and bus transit centers. I would appreciate if they connected to to the bayshore bikeway. I would appreciate if the gaps along the bayshore bikeway continue to be addressed. Especially along Frontage Road, between Main St and Palomar St. The new lanes in San Ysidro are wonderful.
S0321.D	n/a	n/a	I appreciate that SDAPCD has made efforts to improve air quality. I hope the local government and other agencies will further support efforts to improve air quality along the ports and border.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0321.E	n/a	n/a	I really appreciate the improved effort that has been made to reach out to the community in recent years. I know I wouldn't have commented if it weren't for the posts on social media and other outlets.
S0322.A	n/a	n/a	-7½-Minute Trolleys System-Wide by 2029 -10-Minute Peak, 15-Minute Weekend on -Top 10 Buses -Clock-Face Coaster & Sprinter by 2029 -Countywide All-Door Boarding -Next-Gen PRONTO by 2026 -Transit Signal Priority at 250+ Intersections -Real-Time Transit Accountability Dashboard -Permanent Youth Opportunity Pass Funding
S0322.B	n/a	n/a	-Flexible fleets around busy neighborhood (downtown, north park, city heights, convoy)
S0322.C	n/a	n/a	Unified Countywide Bike-Share by 2029
S0322.D	n/a	n/a	High density housing near Public transit hubs
S0322.E	n/a	n/a	Lighting at bus stops
S0323.A	n/a	n/a	Please heavily invest in South Bay Rapid routes. To get from east South Bay/Otay Ranch to El Cajon, you have to go all the way through downtown when a 125 rapid route would fix this. Additionally more rapid options between east and west Chula Vista is necessary. Is it possible to make transit lanes on H street for Rapid 709?
S0323.B	n/a	n/a	Please invest in more transit oriented developments
S0324.A	n/a	n/a	Please budget for better security on public transit and stations (buses and trolleys). I will not use public transportation in San Diego because the stations, buses, and trolleys have no safety measurements in place to prevent harassment from individuals suffering from mental illness and/or substance abuse. Why don't the trolley stations have ticket turnstiles like every other major city's public transit to only allow entry to paying customers?
S0324.B	n/a	n/a	Highways and local roadways throughout San Diego are filled with trash and litter. Please work with CalTrans to keep our highways and roadways clean.
S0324.C	n/a	n/a	Ticket turnstiles and security enforcement at trolley stations would prevent fare evasion and raise funding needed to sustain operations.
S0325.A	Alexia M	Bayside Community Center	Vivo en el area de North Park/Normal Heights y hay muchas calles que tienen baches, ocupan repavimentar. *** I live in the North Park/Normal Heights area, and there are many streets that have potholes; they need to be resurfaced.
S0325.B	Alexia M	Bayside Community Center	Ocupamos menos viviendas sin estacionamiento. En North Park estan haciendo muchos edificios de apartamentos y la mayoría no tiene estacionamiento o es muy escazo. *** We need fewer homes that don’t have parking. In North Park they’re building a lot of apartment buildings, and most don’t have parking, or it's very limited.
S0326	Maria Carmen Mata	n/a	I've used public transit for over 25 years and I've had a good experience. Therefore, improvements proposed are great and will make service more efficient.
S0327	Margaret Austin	n/a	Like the accessibility of bus / train stops
S0328	Eloisa C. Serafin	n/a	Como una sugerencia que aumentan las rutas del servicio MTS y que bajen las tarifas para personas mayores por favor. Gracias *** As a suggestion, that they increase the MTS service routes, and that they lower the fares for the elderly, please. Thank you.
S0329	Lilia Rodriguez	n/a	I use the bus and trolley, and I find it good. I like to use the trolley to Tijuana border. Connection to SANDAG should be faster.
S0330	Orquidia Contreras	n/a	Inland rail trail! I use it often with my family and see other families walk and bike routinely. I started using it in 2020 (during early phase) and made it part of my daily walks when my children were not allowed to go to school in person. I saved our sanity to have an outlet.
S0331.A	Emma Weibel	n/a	Please protect access for young people to transportation by continuing funding for the Youth Opportunity Passes!
S0331.B	Emma Weibel	n/a	Prioritize climate in all your decisions. We need more public transit and no more highway expansion. Down with car dependence!
S0332.A	Rosa Maria Ponce de Leon	n/a	I support more transportation reach in senior communities, as well as better accessibility for mobility users

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0332.B	Rosa Maria Ponce de Leon	n/a	Escondido needs flexible fleets to seniors
S0333	Robert Thomas	n/a	I have listened to the overview and think a logical trolley extension would be out of Escondido and down along the I-15 to link up in a trasporation hub where exitsting track serves East County. There could be park and rides along this trolley route and would help ease commuting traffic into Poway, Rancho Bernardo and offices along the corridor
S0334.A	n/a	n/a	Our communities deserve safer, low-cost ways to move around our city. Not everyone wants or can afford a car.
S0334.B	n/a	n/a	Currently, our walkways and bike ways are dangerous because vehicles don't obey basic traffic laws, like stopping for pedestrians crossing the street, not stopping at signs and lights, driving with opaque windows, driving while phoning and texting, and driving too fast. Basic traffic law enforcement of existing laws would go a long way to reducing this behavior. Now there is not consequence for ingnoring basic traffic safety laws because they are unenforced.
S0334.C	n/a	n/a	We need transportation options that are non-polluting, don't require storage of large vehicles (parking), and enforcement of existing laws reduce risk to users.
S0335.A	Coalition for Safer Train	Coalition for Safer Trains	A cohesive Regional Transportation Plan should bring transportation to all residents in SD County, not just the far western extreme of the county on the coastline. The train presently runs down the eroding coast in Del Mar, and through all of the coastal communities from Oceanside down to Sorrento Valley. SANDAG should not be double tracking through these cities, given your number one goal is to eliminate road grade crossings. I have sent to SANDAG a separate letter showing the incident report, of deaths down this area of the track. One death is too many. It any other company put this risk into a community and had these deaths as a result of their operation, they would be shut down. Also how to people in Fallbrook, Bonsall, and other communities in east county commute downtown other than crawling on the I-15? Are they expected to drive west to the coast, then take the train south? The cohesive transit plan should be easy for commuters to access from all over SD County. The rail plan should take advantage of autonomous, green technology, electric, and hydrogen etc. for both passenger and freight. The issue with the present transit plan is low ridership, because it is not easy to get to work or to home. The overall transit system should take advantage of existing transportation corridors over or next to our large freeways.
S0335.B	Coalition for Safer Train	Coalition for Safer Trains	We should be utilizing our transportation corridors as our communities are growing and we have less space in our towns. You cannot expect to take resident's homes by eminent domain each time you build a piece of freeway. You cannot put portals near homes or tunnels under towns and when you could utilize the transportation corridors of our large 10 lane freeways. Adding a lane beyond the 5 each way we have now, is not the remedy for the future 100 years. Regarding our roads, SANDAG could expand the lanes on the 52, 163, 78 and 76 to help alleviate the traffic we see in the morning and evening during commuting hours. More and more communities are being build east and west of the I-15 and there is space there to add lanes.
S0335.C	Coalition for Safer Train	Coalition for Safer Trains	Cargo and shipping should be utilizing an autonomous, electric freight system, that is built like lego (fast to be built), over the freeways (taking advantage of the Fast Act). This multi-model system should be built from the BNSF Barstow Freight Depot down the I-15 to the Border and to the Port of San Diego. This freight system will take trucks carrying heavy cargo (which destroys our roads) off our roads further opening up for more commuters.
S0335.D	Coalition for Safer Train	Coalition for Safer Trains	SANDAG should be looking at autonomous, electric, hydrogen, battery, and elevated rail over freeways. Trains and cars are huge polluters to our commuters, so utilizing these technologies will help our planet, our communities, and our health.
S0335.E	Coalition for Safer Train	Coalition for Safer Trains	When building infrastructure, SANDAG should not expect to take people's homes and businesses by eminent domain. These residents pay taxes which helps fund these projects. When planning routes especially for rail, SANDAG should not put portals near resident's homes, or put tunnels under entire towns, inflicting noise, vibration, and documented health impacts. We cannot put this risk of derailment, explosion and road grade crossings in our communities. I have seen the incident report from 2018 to 2025 and there are far too many deaths and incidents on the road grade crossings in our communities. SANDAG's priority is to eliminate road grade crossings yet SANDAG wants to double track through the middle of all of the coastal towns. This is the opposite of SANDAG's goal. SANDAG should use public land where ever possible for construction.
S0335.F	Coalition for Safer Train	Coalition for Safer Trains	If Safety is truly a priority of SANDAG then you should not put double tracks through the middle of the coastal towns where adults, children and animals can easily walk across the tracks. Even cars have been stuck and hit on the track. There is no safety or security in the current transportation plan where the tracks are in the middle of the community. When SANDAG is building freeways or rail road tracks, it is decades of construction and noise for the communities. Where there are small communities like Del Mar, and SANDAG is proposing to put portals at each end of town, emergency access is a major problem. We have met with the Fire Chief and they are concerned how to access Del Mar for any emergency including fire in Del Mar during over a decade of construction.
S0335.G	Coalition for Safer Train	Coalition for Safer Trains	SANDAG needs to get the tracks off the bluff as we cannot control the weather, climate, sea level rise, earthquakes, fire, increased storm activity, water run off, hydrology changes in our fragile hillsides, 6" per year of erosion on the bluffs. Del Mar and many other areas of SD County are not in the highest fire zone rating. We have small windy streets where a fire truck can barely fit, and cannot turn around, and you will impose major destruction and construction in these communities for over a decade. This is not sane, when you can move in phases the train over to the I-5 and I-15. The air quality will be better n our communities as you won't have freeways or rail in the middle of our communities. SANDAG states you want safe, resilient rail yet you propose to keep the rail on the eroding bluffs. SANDAG proposes to put the rail in other LOSSAN options in floodplains which will be subjected to flooding, which will increase the cost and maintenance of the infrastructure for the build and ongoing expense for 100 years. How is this common sense? SANDAG cannot put portals in the middle of communities and state you want better air quality in our neighborhoods. This is contrary to your goals.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0335.H	Coalition for Safer Train	Coalition for Safer Trains	Regarding social equity, the public already calls Del Mar and Solana Beach the White priviledged NIMPYS, yet we have the rail going through our towns. We only ever hear that the rail goes through poor neighborhoods in the mid west and east. If we truly want social equity then SANDAG needs to bring transportation to all communities in SD. Hence put rail down the I-15 and I-5. People in east county cannot be expected to access the rail on the coast.
S0335.I	Coalition for Safer Train	Coalition for Safer Trains	SANDAG's public outreach is seen in the communities as just ticking a box to state you did it. It isn't really perceived as truly listening to the public.. The overlying thoughts of the public is that SANDAG will smile, show up present then leave. It doesn't matter what the public states or wants, as the public feels SANDAG will do what is on their agenda. This is the same in your Board meetings. When the public is only given 3 minutes to speak this is offensive when you are talking about taking someone's home away. Given SANDAG's past background of recent times, the public feels SANDAG isn't interested in listening to the public, and there is a lack of transparency, which doesn't promote trust in our communities. The public feels based on SANDAG's past and present actions that you only listen to the rail stakeholders. NCDT, BNSF, Amtrak, Sprinter etc. Even though the public pays taxes to help fund these infrastructure project, the public feels SANDAG is a large monolith and your engineers don't really care about what the public wants. There is a perception your engineers just love having a job, a project to work on, and that can be any project, not necessarily the best one for the public. SANDAG needs to build a better more transparent relationship with the public, just stating on your literature and your website that SANDAG is transparent is not enough, because the public doesn't see it in your actions.
S0335.J	Coalition for Safer Train	Coalition for Safer Trains	The public wants a cohesive transit plan for all of San Diego County. You need to move the rail off the eroding bluffs, and using public land more it over in phases to the I-5 for passenger and use the I-15 for passenger and freight. You need to have connectors going east west running over or near the 76, 78, 52, 163, and 94. You cannot expect people from east county to drive to the coast to take the train downtown. You could use the parking lots next to the freeways as stations and also parking lots for commuters. Commuters don't want to multiple modes of transportation to their location.
S0336.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0336.B	n/a	n/a	SANDAG needs to push cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0336.C	n/a	n/a	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0337	n/a	n/a	Sandag should prioritize making bikeways more continuous. Too often bike lanes start and stop, andswitch between curbside and traffic side. Not only is this dangerous for bikers, but it is confusing for drivers. Bike lanes often disappear near intersections where a dedicated left turn lane forces the through lane into the space otherwise occupied by the bike lane. Often these left turn lanes are not necessary, for example at intersections controlled by stop signs.
S0338.A	n/a	n/a	Please consider providing transit routes for residents close to the olympic training center, especially to help kids get around and to and from their high school/middle school.
S0339	Kristine Gotta	n/a	Please prioritize the addition of safe bike lanes including over the 56 overpass on Carmel valley road and on village center loop drive.
S0340.A	n/a	n/a	Yes to more light rail on the urban mesa in central sd. Light rail in the already most dense and continuing to densify areas of the city will have the greatest impact. A system that loops around Balboa park would have huge impact. A system that ran up park blvd and down El Cajon blvd would also be huge. Yes there is already the 215 bus on this route, but for some reason buses have a stigma. Maybe we need to redesign buses to eliminate that stigma? A global bus design competition to redesign buses specific to the San Diego culture?
S0340.B	n/a	n/a	Yes more [Flexible Fleets]. But let's be smart about when people are actually using these. Scheduling should align with need. The mid city and north park system that is being tested out is an only available from 9-5. In what world does that make sense?. People need it during morning commute 6-10 and evening commute/after work 4-10
S0340.C	n/a	n/a	Yes more [Bikeways and Walkways]! and connect the network. Let's also be realistic about safety. It doesn't make sense to add an unprotected bike lane on a road with cars going 40+ mph. The death rates are too high at those speeds and people are smart enough to know that. If you want increased usage, lets create safe connected networks, and at sections in those networks that require lanes on heavy traffic high speed roads, then the proper infrastructure needs to be added. Plastic posts are not adequate! Concrete barriers guys. Let's also connect the Meade bikeway to sdsu!
S0340.D	n/a	n/a	Yes more housing at transit
S0340.E	n/a	n/a	You want people to vote on transit measures then you need to have a sexy project people care about. The Airport connector is not the sexy project. That project is not going to make people excited to vote on a tax measure bc it doesn't impact people in their day to day life. The new transit line going up the 15 is also not sexy. A line that circles balboa? Sexy. A line that goes up park blvd and El Cajon blvd. A little less sexy but still sexy.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0341	n/a	n/a	The bike lane system would be pretty great, if the lanes were more separated from cars and if it were safer to cross freeways. You have to cross a freeway no matter where you are and crossing by bike is usually terrifying. They make you cross in front of high speed cars. There must be a better solution, either traffic signals for bikes or over/underpasses for bikes.
S0342	Sofia Carrasco	n/a	Hello, my name is Sofia Carrasco. I am here to push SANDAG towards increasing transit options in San Diego in order to improve quality of life and reduce greenhouse gas emissions. It is difficult in my area to access public transit and thus access opportunities I would otherwise reach on my own, particularly as I do not yet have a driver's license. As a person with family members' health issues that can be exacerbated by air pollution, my family is saving up for an electric car to reduce our emissions, but many San Diegans (including us) cannot afford one. They will not be our city's solution towards net zero: Transit will. As SANDAG has exceeded emission reduction limits, you are certainly aware of the importance of reducing pollution in our city, which CANNOT be done with further highway expansion and must instead prioritize a faster timeline for transit. This should include microtransit, cheaper services (such as free YOPs), and safer biking infrastructure, especially with eBiking on the rise. By moving this funding away from highways, we are benefiting our loved ones in environmental justice communities, improving our healths (literally saving lives), and increasing employment for workers/school attendance for youth!
S0343.A	n/a	Resident Leadership Academy (Bayside Community Center)	- The trolleys should be warpped in their corresponding color (e.g., green, blue, orange, copper) instead of red. - We need more frequent busses and late night connections - Shorten the time it takes to be on public transportation - Ensure the elevators at the elevated trolley stations are functioning
S0343.B	n/a	Resident Leadership Academy (Bayside Community Center)	We want shuttles in Linda Vista! And we want the drivers to be hired locally from Linda Vista
S0343.C	n/a	Resident Leadership Academy (Bayside Community Center)	Improve hiking trails and pathways to get to and from canyons and parks so that kids and families can use them more
S0343.D	n/a	Resident Leadership Academy (Bayside Community Center)	- We need better enforcement on speed - We like how the highways/freeways have the painted signs directly on them. This is important for tourists to see. Example: On the 8 west approaching the I-5 split, there's signs painted showing 163, 8, 5, etc. - The 163 intersection with Friars Rd is terrible! A lot of tourists drive through there and they don't know the roadway. It has been improved a lot for pedestrians but it's still terrifying and needs to be rethought
S0344.A	Mika	n/a	- Waste is produced from MTS cards and there's not enough support for the PRONTO app to be user-friendly - Public transportation is the cleanest. At some point in time, there were unsafe environments created.
S0344.B	Mika	n/a	- MTS is incredibly unfair and unjust, especially towards women with children, minorities, and the unhoused population
S0345	Daniel	n/a	- One cool way of transportation would be light rail; not so fun would be buses - Buses can be very crowded
S0346	Cathy Souto	n/a	Necesitamos mejores connexiones entre autopistas. Lo freeway no alcanzan bastante autos. *** We need better connections between freeways. The freeways don’t reach enough cars.
S0347.A	Mary Guerin and Alex Cohn	n/a	- We like the convenience of the trolley and its affordability. It's safe enough! - I like the coaster too.
S0347.B	Mary Guerin and Alex Cohn	n/a	- I'm interested in microtransit but need to know more about it
S0347.C	Mary Guerin and Alex Cohn	n/a	I like managed control of lanes and the busses, and that we're prioritizing people using transportation instead of their cars

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0348.A	n/a	Senior Lunch Program at Bayside Community Center	PRO / GOOD: - Routes 41 and 44 frequencies are good :) - There's good bus connections - Bus seats are comfortable - Drivers are nice and they wait if they see someone running late - Transit is on time - Services and drivers are accommodating for seniors and people with disabilities - We like the trolley system. It's fast and clean. CON / BAD: - The 120 bus needs to run every 15 minutes - We need safer and cleaner bus stations - The 25 bus route needs to come back - Add a direct bus route to Tierra Santa - We need more safety. Think of cameras, police presence at stations, etc. - Bring back the old 44 bus route! - Add a bus route from Linda Vista Road to Osler - Add more 44 route options at night - We need more shelter / shade at bus stops
S0348.B	n/a	Senior Lunch Program at Bayside Community Center	- We want the shuttle service in Linda Vista!
S0348.C	n/a	Senior Lunch Program at Bayside Community Center	- We need more discounts for seniors riding transit - Better signage is needed for pedestrians - Simplify access to the Access routes and services
S0349.A	Erin Fransen	n/a	I enjoy taking the trolley.
S0349.B	Erin Fransen	n/a	I would like easier bike lines for my kids to ride bikes around Linda Vista.
S0350	Chad Evans	n/a	I'm writing to express strong support for the proposed streetcar connection linking Downtown, Hillcrest, North Park, and South Park as shown in the 2050 Regional Plan. This route would provide a critical transit option for some of San Diego's most vibrant and densely populated neighborhoods - areas that are currently underserved by reliable east-west transit. However, 2050 is simply too far away. These communities need better transit now, not 25 years from now. Advancing this project to an earlier phase would not only reduce traffic and emissions, but also support small businesses, increase mobility for residents, and help San Diego meet its climate goals sooner. Please prioritize this streetcar connection in the near-term planning horizon. The demand and infrastructure readiness are already there - let's not wait decades to build what we needed years ago. Thank you.
S0351.A	n/a	n/a	Looking for a bus that goes from La Playa/near the military base to central Balboa Park-The Prado. Concerned about having to pay for parking in Balboa Park and my safety with our bus system. Barely can get there now and it would take forever if we go through old town. Please advise a bus down Rosecrans, right on Harbor Drive and up Laurel street to the center of the park would benefit so many. Or even better start with it up Talbot for the PLNU to be able to get to the park without a car. If you start at PLNU please don't ignore the lower section of Rosecrans and solely go down Catalina.
S0351.B	n/a	n/a	Old Town is unsafe for women.
S0351.C	n/a	n/a	More public announcements for where busses go.
S0352.A	n/a	n/a	We need more trolley lines across the county, expanded coaster and sprinter service. 7 and a half minute SERVICE NOW! We dont want to wait anymore if youre interested in ideas of how to improve transit look up the "10 demands to SANDAG)

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0352.B	n/a	n/a	NO MORE HIGHWAY EXPANSION this means managed lanes too, we are done with managed lanes, get rid of the state route 52 expresslanes. expresslanes are a scam. More transit now, faster and sooner.
S0353	Naomi	n/a	San Diego would greatly benefit from growing itss public transportation system. If the city could start with adding more buses and bus routes that go through the neighborhoods that surround Balboa Park, it would be a great start. First the city could start with bus routes since it would be faster to implement. Then the city could build trolleys routes. Both are possible and can work together, I've seen it in other cities around the world. I think an important part of growing the public transportation system is advertising and marketing the new bus routes (and future trolleys). People are used to driving, it is culturally engrained in southern California as well as American culture. We can teach people to appreciate public transportation through smart marketing campaigns. Please don't let San Diego turn into LA!
S0354.A	n/a	n/a	He notado que en muchas calles no es tan necesario la ciclovía dado que no hay tránsito vial con bicicletas y sin embargo si caminamos en vehículo por ahí, y obstruimos nos pueden hacer una sanción. *** I have noticed that on many streets, the bicycle path isn't as necessary since there's no bicycle traffic, but despite that, if you're in a vehicle and you obstruct it, you can be fined.
S0354.B	n/a	n/a	Que todos los vecinos sean amables y no laven desechos en la calle. Pueden hacerlo en un área donde la basura se pueda colocar en su lugar *** That all neighbors would be kind and not wash waste into the streets. They can do that in an area where waste can be put in its proper place.
S0354.C	n/a	n/a	En algunas habitaciones lavan vehículos con mucho aceite de automóviles en lugar de hacerlo en los lugares específicos para ello *** In some living spaces, they wash vehicles with a lot of motor oil instead of doing it in places that are meant for that.
S0355.A	n/a	n/a	The bike paths in the San Ysidro 92173 & San Diego 92154 are inaccessible due to the lack of bike riders. The four way streets were reduced to two. There is a lot of construction of apartment buildings and street parking was eliminated. Bike lanes in this community are not needed due to a high number of residents being senior citizens and others that live in apartment complexes where storage for bikes is non existent and far from grocery stores.
S0355.B	n/a	n/a	Too many apartment complexes being made in communities where streets are being reduced.
S0355.C	n/a	n/a	The community needs more security in and near public spaces.
S0355.D	n/a	n/a	The community needs better air quality especially in the 92154 & 92173 areas.
S0355.E	n/a	n/a	The community needs to be involved in decision making when changes are made. There should be a majority of residents before changes are made.
S0355.F	n/a	n/a	More community engagement and workshops need to be implemented.
S0356	Jackson Hurst	n/a	I approve and support SANDAG's Draft 2025 Regional Plan especially the SR-78 Managed Lanes Project because this project will reduce congestion and improve travel times on CA-78 from I-5 to I-15 by building Managed Lanes.
S0357.A	n/a	n/a	San Ysidro and Otay Mesa continue to experience infrequent and inconvenient transit service, especially for cross-border workers and students. Expanded service - particularly microtransit and Rapid bus routes - should be fast-tracked in these areas, not deferred to distant timelines. We urgently need ADA-accessible sidewalks, proper lighting, and traffic calming measures in high-pedestrian zones. This is not only a matter of convenience - it's a matter of safety and dignity for those who walk, bike, or rely on public transportation daily. The Youth Opportunity Pass program has made a real impact, and I strongly support permanent funding for it. Additionally, border community voices - especially resident leaders - should be actively involved in transportation decisions beyond surveys. Authentic engagement means recognizing and uplifting the expertise that already exists within these communities.
S0357.B	n/a	n/a	Many bike lane projects remain unfinished or neglected in our area. Residents routinely encounter abandoned gates, debris, and neglected landscaping, which create unsafe conditions and undermine community trust. Please complete and maintain these corridors - not just on paper, but in real, usable form.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0357.C	n/a	n/a	Our community faces some of the worst air quality in the region, and it's not just a local issue - it's a binational problem. The high volume of idling vehicles, commercial trucks, and industrial emissions from both sides of the border, including Tijuana, contributes to elevated pollution levels. Residents regularly experience smog, odors, and respiratory health risks. While air purifiers have been distributed to some households as a temporary measure, they are not enough. We need long-term, systemic solutions - including targeted emissions reduction strategies and stronger collaboration between U.S. and Mexican agencies - to protect the health of families living near the border. Environmental justice must also include access to clean water. Our youth deserve to enjoy San Diego's parks, beaches, and public spaces without fear of contamination. The ongoing sewage crisis from the Tijuana River has impacted water quality and recreational areas. We urge SANDAG to work with regional and federal partners to ensure safe, clean water for all communities - especially those most affected.
S0357.D	n/a	n/a	Public Comment - 2025 Regional Plan Submitted by a resident leader from San Ysidro near Otay Mesa I support the overall goals of the 2025 Regional Plan and appreciate its focus on improving transportation access, equity, and sustainability. However, to bring real, visible change to our border communities - particularly San Ysidro and Otay Mesa - I urge SANDAG to prioritize the following: Completing the bike lane network! We are ready to collaborate and bring our lived experience to the table. Let's make sure the 2025 Regional Plan delivers tangible, lasting improvements for those of us who depend on it most. Thank you.
S0358.A	Ted G	n/a	If the linkage for the trolley is not completed to east Chula Vista soon, we will never relieve traffic congestion along 5 and 805. Make it a priority now.
S0358.B	Ted G	n/a	All trucks and shipping should be moved to otay mesa immediately. Then we can build housing along the bayfront in National City where we deserve equity in economic development and housing opportunity.
S0359.A	Mariela Fonseca	Resident Leadership Academy (Bayside Community Center)	En San Ysidro creo que es necesaria una ruta de transporte de la calle Smythe, que pase por San Ysidro Muddle School, Adult School y San Ysidro High School. También porque en un futuro sercano por allá tendremos un parque y así las personas podrían llegar a estos puntos importantes en la ciudad. *** In San Ysidro, I think they need a Smythe Street transportation route that passes by San Ysidro Middle School, Adult School and San Ysidro High School. It's also necessary because in the near future we'll have a park there, and that way people can reach these important places in the city.
S0359.B	Mariela Fonseca	Resident Leadership Academy (Bayside Community Center)	Creo que sería muy bueno para la comunidad sembrar árboles frutales y plantas medicinales en las calles y parques. *** I think it would be very good for the community to plant fruit trees and medicinal plants in the streets and parks.
S0360.A	Jeannette Aguilar	n/a	Precios más accesibles en pase mensual para adultos *** More affordable prices on the adult monthly pass.
S0360.B	Jeannette Aguilar	n/a	Precios más accesibles en vivienda *** More affordable housing prices.
S0361.A	Taras Balabanoff	n/a	I live in Carlsbad, Poinsettia to be specific, it's been 6 years (That's 6 Big Years) that High Way 5 was to be completed in 3 years. Currently you are still working on highway 5 Poinsettia You work at Night not during the day Please call me [redacted] [redacted] When will you be done?
S0361.B	Taras Balabanoff	n/a	Pleas have the cargo coming up the coast from Mexico Checked for exhaust
S0361.C	Taras Balabanoff	n/a	Check trucks from Mexico for exhaust

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0362.A	Isaac	n/a	Balboa perimeter tram is game changer for me! Please get it built faster than 2050 if possible. The bus from La Mesa to OB is also pretty convenient for me as long as it is frequent (10 mins frequency). I would also like better transit connection to/from Convoy cultural district and PB. Having a direct connection between UCSD to Convoy/PB, and Uptown/MidCity to Convoy/PB would be pretty awesome. I live in Hillcrest and I think connectivity is already pretty great - I bike to work in Bankers Hill and to hang out with friends in North Park, take the bus to downtown/Old Town/etc. I'd say 70% of all my travel is non-car. Having better transit to North Park, OB, PB, and Convoy would basically hit all the major places I travel to and would get me to be completely car free!
S0362.B	Isaac	n/a	I use the 4th and 5th bikeways nearly every weekday to get to work, and use the bridge over Washington by Trader Joe's to get to North Park. It's amazing and the quality of bikeways that I hope all future bikeways have. Please don't take out any bikeways! They are precious to me as I use them regularly. I feel safe and speedy in them. When I drive and see cyclists in the bikeways, I feel so happy. Ever since I've started biking myself I have been more aware of how well the bikeways are used around Uptown. I would also like to have bike buttons as well. When I have to make a left turn on my bike, I am too scared to merge into car lane, so usually I cross the street using crosswalks on my bike. It would be nice to have bike buttons to trigger changing lights for this and also because idk where to put my bike to trigger the light change in the car lane sometimes (See how Vancouver does it)
S0362.C	Isaac	n/a	More mixed-use please! Everywhere! Encourage it! Make permitting easier!
S0362.D	Isaac	n/a	I missed the workshop on June 9th! Please have another workshop! One workshop for such a large area seems kind of limited. The Instagram content is cute and well animated, but also not very informative because it keeps redirecting me to the website to read the plan. I think if you made social media content summarizing the plan, it would be a lot more effective in getting the word out. I was expecting the video to do that actually and when I found out I had to go to the website to learn about it I immediately lost interest and put off learning about the plan until later - and I am someone who is passionate about this as someone who majored in urban planner! I'd imagine for the average San Diegan, convincing them to read the plan would be even harder. Make a bunch of short video summarizing the different projects in each geography!
S0363	Rosa	n/a	Debería haber más seguridad debió a que personas en estado de ebriedad, drogadictos y oliendo muy mal se suben al transporte y abecés se ponen violentos, también más sombras y bancas en las paradas de autobús ya que muchas no tienen ni banca para las persona de tercera edad y deshabilitadas están de pie y sin sombra a pleno rayo del sol. *** There should be more security, because drug addicts who are in a drunken state and smell very bad get on the transit, and sometimes they get violent. Also, more shade and benches at bus stops, since many of them don't even have a bench for the elderly, and disabled people are standing out in full sun with no shade.
S0363	Michi Galindo	n/a	I would like the copper and green lines to go a bit later into the day, as well as El Cajon bus lines to run more frequently on the weekends.
S0364	n/a	n/a	Passenger trains/trolleys should go down the I-5 to the airport and downtown, and freight down the I-15 to the border and Port. We need connectors going east west, using the 52, 56, and 94. People in Fallbrook, Bonsall, Poway, East Carlsbad etc are not going to drive all the way west down to the coast to take a train downtown. Look into utilizing elevated autonomous electric freight moving technology and put it over the I-15, using the FAST ACT from Obama. Putting the rail down the freeways meets SANDAG's stated priorities. 1. Eliminate road grade crossing, by taking the rail out of the center of communities 2. Eliminate and decreases green house gases by implementing electric technologies 3. Takes infrastructure out of the lagoons 4. Will increase ridership by bringing 1 cohesive transit plan to the county 5. Gets trucks off the freeways by using elevated autonomous electric system 6. Creates a resilient long term solution that is not in a floodplain that will last for 100 years.
S0364	Tasneem Alkarthy	n/a	Transportation can be better by being everywhere since people that take it have to walk a lot. It can also be better by being
S0365	Kelly Henwood	n/a	SE needs safer sidewalks, walkways, trees, streetlights in walkways, dog parks, low income/affordable housing. Protect Chollas watershed, careful on erosion control
S0365.A	Artie	n/a	Look into more bus only lanes and brt systems. Buses take too long currently.
S0365.B	Artie	n/a	These [Flexible Fleets] are very helpful in local communities. They should run fixed routes and connect to trolley and express bus stop. You could have an uptown west and east golf cart shuttle like the downtown circuit that connect to Washington trolley and Texas st trolley and connect to each other to get from mission hills to Kensington and down to South Park.
S0365.C	Artie	n/a	More protected bikeways please. More people would ride in the metro area, but it still doesn't feel safe because the cars have free reign. Remember Vision Zero? That means making cars less convenient to make cycling and walking safer.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0365.D	Artie	n/a	Less highway expansion. Safer streets. Follow the models and best practices from other cities around the world.
S0365.E	Artie	n/a	More housing please. I want my kids to live here.
S0366	Guillermina Rico	n/a	I will like the meetings open to public and community. Community input is very important.
S0366.A	Guthre Leonard	n/a	Transnet lasts through 2050. In that time, San Diego deserves more than 1 new rail project (at least in the plan). Putting a streetcar in Balboa Park is not going to shift mode share (part of the requirement of the plan). We need to make rail competitive with driving, because as much as I like buses, the people who are driving now are not going to get out of their car for a bus that's just as slow. SANDAG needs to stop trying to prioritize everyone (nobody is taking a bus to Poway) and start focusing on the corridors that align with its stated goals. That might mean turning one of the rapid buses into a rail line, etc., but ultimately it means finding places that have potential demand for transit, and providing a project that fulfils that demand. This plan doesn't seem to reflect that.
S0366.B	Guthre Leonard	n/a	I understand that there are seriously underserved neighborhoods in the county, but I would really appreciate an agnostic cost/benefit analysis of this program. We could be funneling this money toward MTS expanding frequency and hours, as well as service (including those fancy *27* new rapid bus lines that are coming..... sometime). I just want to be honest about when a program is appeasing a community, and when it's worth the money. In a time when operating budgets are in the red, we can't spend money willy-nilly. If I'm wrong and this program is worth it, then I'll eat my words. As it stands, it seems more like trumped-up golf carts bleeding money.
S0366.C	Guthre Leonard	n/a	This is just easy money here. Start putting 4th/5th avenue-style bike lanes everywhere. Compared to any other type of permanent infrastructure, these are cheap, and they make a great difference in encouraging casual and commute riding (I love competitive cycling, but we should be encouraging mode share change, not sports). The safety benefits are huge; they last forever (compared to an asphalt road), and they require minimal operating expenses. One I can think of specifically, put them on the full extent of Montezuma (don't leave out the spots where it intersects with the neighborhood). Focus on connecting the fully separated bike paths. I would not need to drive (and honestly, I would rarely need to use transit) if I felt it were safe to bike. San Diego has the best weather in America... don't waste it.
S0366.D	Guthre Leonard	n/a	Stop building more lanes. It doesn't work. 70 years of evidence says it doesn't work. Heaven knows we still have traffic, and our highways are wider than ever. It doesn't matter if they're managed lanes... they're still *more lanes.* If you want to have managed lanes, replace a normal lane with a transit/carpool lane. This is a waste of money, and it is frankly embarrassing that SANDAG is pretending otherwise. This will make it more difficult to meet our mode share, climate, housing, and safety goals. The only solution to car traffic is viable alternatives to driving. Stop expanding highways, and send the money literally anywhere else.
S0366.E	Guthre Leonard	n/a	It is embarrassing that SANDAG, the regional transportation planning organization, had the gall to oppose SB 79, which would enormously enhance our affordable housing, ridership, and transportation funding. TOD is the easiest way to get more riders, reduce VMT, and reduce sprawl. SANDAG should be doing more.
S0366.F	Guthre Leonard	n/a	Maybe talk to Bechtel about a P3 for the purple line (like they're doing with the Sepulvida line in LA). Oh, and stop funding highway expansions; they're a waste and they degrade life.
S0366.G	Guthre Leonard	n/a	Highway expansions will lead to more air pollution, light pollution, noise pollution, energy usage. How is moving people out of cars not the #1 priority on the climate front? Stop building more lanes, start building more trains.
S0366.H	Guthre Leonard	n/a	I found it very concerning that there was no meaningful way to ask difficult questions at the learning sessions. If SANDAG is going to present the plan as a good thing, they had better be ready to answer for its problems. There should have been actual Q&A time; it felt like SANDAG was intentionally avoiding the risk of embarrassment.
S0367	n/a	n/a	the lack of ambition in San Diegos transit planning is crazy, we are being passed on projects by Fresno and the far outskirts of the bay area. We have the funds to build rail transit however Sandag again and again decides to build nothing. This lack of ambition makes me depressed. I love this city and I want to keep living here yet LA and the bay area will have way better public transportation forever if we don't build anything.
S0367	Elizabeth Castao	n/a	we need more buses during the night/around the clock for people working diff shifts
S0368	Zhenxi Zhong	n/a	I would love to see more pedestrian friendly spaces for families and community members to come together and enjoy. Would love to see more public transit services for seniors to use so they can get around.
S0368.A	Felicitas Morales	n/a	Para mi es interesante porque toda la semana pasa y nos ayuda mucho *** It’s interesting for me, because it happens all week and it helps us a lot.
S0368.B	Felicitas Morales	n/a	Que le pagué lo mismo para que le alcance para la renta porque la renta esta muy carra,comida. *** That they’re paid enough to make their rent, because rent and food are very expensive.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0368.C	Felicitas Morales	n/a	Yaa s abemos y estamos preocupados qué vaa pasar *** We already know, and we're worried about what's going to happen.
S0369	Naomi Bea	n/a	Need more help for seniors for transit/transportation
S0370	Raiden Hunter	n/a	I think having a live view of bus locations would be beneficial in keeping track of delays they may have. Also I'd like to see more trolley routes going into eastern San Diego.
S0371	Alejandro Meraz	n/a	Necesitamos mas transporte publico efectivo. *** We need more effective public transportation.
S0372	Sherry McElroy	n/a	Very excited about microtransit (I'm old)
S0373	Carla Martinez	n/a	Free rides for 18 and under support our youth
S0374.A	n/a	n/a	Please simplify the monthly passes! How about have one reasonably priced $20 monthly pass for all. I guarantee more people will buy a pass and use the public transportation more. I don't qualify for any discounted monthly passes, but if it was $20, I'd used the trolley way more often! The standard priced monthly pass just encourages people to drive.
S0374.B	n/a	n/a	This seems like such a waste money and every time one drives by they are empty. Often I see them parked, empty, and the driver on their phone. Use this money to build free public parking lots and garages.
S0374.C	n/a	n/a	Please stop wasting our tax dollars painting bicycles all over the roads. Such a waste of money, resources and paint. That money and staff could be used to fix the damn roads!
S0375.A	Alan	n/a	LESSEN THE CARBON FOOTPRINT OF BOTH EV AND FUEL BUSES. DURING NON PEAK HOURS, MANY BUSES ARE NEAR EMPTY A WASTE OF USING THE DOUBLE TRAILOR STYLE BUSES. SUGGEST FOR NON PEAK HOURS WHEN BUSES ARE NEAR EMPTY USE SMALLER BUSES OR SHUTTLES SIMILIAR TO AIRPORT,
S0375.B	Alan	n/a	THIS RELATES TO PERSONAL ELECTRIC VEHICLES. EVS THAT DO NOT PAY A GAS TAX SHOULD BE TAXED PER KILOWATT CHARGE. ALL EVS HAVE SMART DATA THAT RECORDS CHARGE SENT BACK TO MANUFACTURER; THE TAX CAN APPLY PLUGGED IN ANYWHERE IN CALIFORNIA.
S0375.C	Alan	n/a	THE BIKE LANES COST WAY TOO MUCH AND SERVICE SO FEW. IN A SENSE OF FAIRNESS LEVY A TAX TO HELP FUND THE BIKE LANES. A FEE ON ALL RETAIL BICYCLE EQUIPMENT SUCH AS TIRES, HELMENTS AND BICYCLE; HAVE THE USERS OF BIKE LANES HELP PAY THE COSTS.
S0375.D	Alan	n/a	NO TO MANAGED LANES REMOVING FREEWAY LANES ALREADY BUILT PAID BY OUR GAS TAX. THE TRANSNET TAX HAS PROMISED FOR DECADES EXPANSION OF FREEWAYS; NOT CONSTRICT TRAFFIC TO MANAGED LANES THAT ONLY THE RICH CAN AFFORD. RESULT MOST PEOPLE CANNOT CAR POOL WILL BE STUCK IN MORE TRAFFIC RESULTING IN MORE CARBON FOOT PRINT.
S0375.E	Alan	n/a	PLEASE REPRESENT YOUR CONSTITUENTS AND PLEASE STOP CATERING TO UNIONS PRESSURES AND NON PROFIT GROUP INFLUENCE SUCH AS BIKE COILITION WHO DO NOT RPRESENT THE MAJORITY OF THE TAX PAYERS AND VOTERS.
S0376.A	Peter Ward	n/a	Ensure that transit runs on regular reliable schedules and are safe and secure.
S0376.B	Peter Ward	n/a	Ensure that walkways are pedestrian friendly
S0377.A	David Barber-Dunham	Childhood Obesity Initiative	San Diego is doing a good job
S0377.B	David Barber-Dunham	Childhood Obesity Initiative	Let's go!
S0377.C	David Barber-Dunham	Childhood Obesity Initiative	Good job!
S0377.D	David Barber-Dunham	Childhood Obesity Initiative	You're working hard. Thank you
S0377.E	David Barber-Dunham	Childhood Obesity Initiative	We need the business
S0377.F	David Barber-Dunham	Childhood Obesity Initiative	One step at a time
S0377.G	David Barber-Dunham	Childhood Obesity Initiative	Let's create housing
S0377.H	David Barber-Dunham	Childhood Obesity Initiative	Let's be ready
S0377.I	David Barber-Dunham	Childhood Obesity Initiative	Let's feed the poor

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0377.J	David Barber-Dunham	Childhood Obesity Initiative	Air quality is critical
S0377.K	David Barber-Dunham	Childhood Obesity Initiative	Food housing and medical for all
S0377.L	David Barber-Dunham	Childhood Obesity Initiative	Dialogue and communication is necessary
S0377.M	David Barber-Dunham	Childhood Obesity Initiative	California good. God protect us from Trump
S0378.A	Linda Oman	n/a	If you elevated the tracks at Old Town Transit Center, drivers would not have to wait over ten minutes at the Rosecrans/ Taylor St. traffic light in the afternoon. It is an industrial area along those tracks. A pickup area for rideshare drivers and a commercial bus area should be created for riders on Congress St. at the Old Town Transit Center. Getting picked up and dropped off on the side of the road is not safe. Move the taxi zone to the inside of the bus area. Taxis are needed, and the amount of space allocated to MTS is overkill and creates confusion for riders.
S0378.B	Linda Oman	n/a	Will the airport ever have a route to the 5 Freeway that doesn't have to go through the side streets of Little Italy? The need for it is dire. The Balboa Park entrance to the 163 and the 8 East exit from Point Loma need to be expanded because there are huge back ups at both places daily. Funneling all drivers down to one lane at both locations is ridiculous.
S0379.A	n/a	n/a	We have lived by the bus stop in Carlsbad for 20 years. We commend the drivers who are always on time, put up with unruly passengers and bad weather all year long. We have noted that there are usually only one or two passengers on the buses on any given day. It would be interesting to know the statistics of people who utilize his service. A huge high density complex is being finished on Avenida Encinitas near our home on Ponto Road. We notice that the developer (or City of Carlsbad) has installed two benches and trash cans in our neighborhood. But it is our opinion, based on the above. observations, that the people who will live in the new high density project will probably drive cars and not use the bus system. it is just a fact, that isn't going to change.
S0379.B	n/a	n/a	As taxpayers and homeowners in Carlsbad and Encinitas, we have not supported the bikeways, berms, bollards that caused multiple bike and vehicle accidents. Note that the City of Vista is now removing many of theirs at another huge taxpayer expense. The City of Encinitas bikeways on Highway 101 are an extreme hazard and we oppose any more dangerous bikeways such as those.
S0379.C	n/a	n/a	We support the transportation of essential goods by trucking and rail throughout our community. Trucking is the backbone of America and is highly regulated by the DOT. Given the critical role of truck drivers in supply chain logistics, we support the improvement of infrastructure and incentives for this industry.
S0379.D	n/a	n/a	As homeowners and taxpayers in the City of Encinitas , we have seen the negative impact of the many high density housing projects have impacted public safety, emergency response time and traffic. Because of CA law, many of the worse projects have bypassed environmental impact and traffic studies. Almost all of Encinitas streets such as La Costa Blvd., Highway 101, and Santa Fe Rd, are obstacle courses and impacted negatively. We feel this was poor city planning and a gift to developers. It is criminal to see the amount of taxpayer funds that were wasted for these projects that were passed by the former mayor and City Council.
S0380.A	Kina	n/a	San Diego County needs to invest in its public transportation for the future. Making improvements to MTS and NCTD routes will allow people to rely less on cars and promote safely and comfortable commuting throughout the region. I would like to see the tunneling done in Del Mar and La Jolla to ensure a rapid rail commute from Oceanside to downtown San Diego. Also I would love to see a bus route that runs through the Carmel Valley area stopping near the Carmel Valley library or recreation center and connecting Carmel Valley residents to Solana Beach or La Jolla to connect to other parts of the county. Investing in public infrastructure is vital to meet our climate goals and ensure a community that is built for people and not cars.
S0380.B	Kina	n/a	We should be promoting public transportation and rewarding those that use it.
S0381.A	n/a	n/a	The biggest impediment for me personally using busses more often is frequency. Knowing that a slight delay in getting to a bus stop can, in some cases, cost me an hour of waiting by the side of the road is something I have to consider whenever I think about going somewhere. Even a 1/2 hour or 20 minute wait is a burden, especially when it's at a stop with no seating or shelter. I feel that including a focus on improving transit frequency should be a priority. Also, rail access to the coastal cities and LA by the LOSSAN corridor is a huge asset to the county. The decades long time frames for any real improvement of the corridor and the weird instance on locking in slow and untested technologies like hydrogen power are terrible. I encourage SANDAG to make LOSSAN improvements a priority and to, at the very least, make electrification of the route a possibility.
S0381.B	n/a	n/a	As a very frequent bicyclist, my biggest issue with the local bike infrastructure is the number of gaps in the network. Riders often finds themselves on a great bike path or separated lane, only to find themselves dumped into absolutely no protection once the lane ends. People based on their entire trip. An unprotected intersection or a stretch of dangerous road on their route is enough to make them chose another mode of transportation - even if SANDAG has spent millions making a part of that route nicer. Also, local governments do not have the capacity to build up these sorts of integrated networks. Even if they want to support active transportation (which many absolutely do not) it's expensive and difficult for them to coordinate projects to build the sort of coherent system that actually encourages people to ride. This is supposed to be the sort of problem that SANDAG was created to solve. Please don't abandon it.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0381.C	n/a	n/a	I hope SANDAG's planning will support the sort of transportation infrastructure that encourages people to build inside of our current infrastructure rather than planning new greenfield developments. Widening freeways and encouraging people to drive farther and farther causes so many long term problems that I don't even think it counts as a short term solution. San Diego is a sprawling region and that makes a lot of our problems very challenging to solve - but doubling down on that sprawl only makes those challenges worse. We will not get through the next century doing the same things we did during the last one.
S0382.A	Joseph Warmus	n/a	Please focus on increasing quality of existing transit, improving rapid bus speed (fast boarding, dedicated bus lanes, synchronized stoplights etc), increasing trolley frequency, and putting in more useful bus/trolley lines (getting to and from North Park/Hillcrest Area is very difficult considering how dense it is, I wish it was better connected to the rest of the city). This will help take pressure of the highways - if I could take transit to and from work, I would, and I think this is borne out by research as well.
S0382.B	Joseph Warmus	n/a	I love the bike ways in North Park - it makes the streets safer and more bike friendly, and helps contribute to a neighborhood feeling, while again taking pressure of the roads for cars.
S0382.C	Joseph Warmus	n/a	For highways - please don't overexpand lane capacity - it increases cost, doesn't meaningfully improve traffic, and causes more environmental damage. As for local roads - please consider narrowing streets in areas like North Park, University Heights. Converting a street like 30th to one way like in Hillcrest would give more room for outdoor seating, lower the speed of cars on the road increasing safety, and preserve street parking while improving the experience for pedestrians and bikers.
S0382.D	Joseph Warmus	n/a	I hope that state level regulations can get out of the way to allow San Diego to be more affordable and transit forward by cutting through a lot of the red tape the state is famous for. I would love it if transit and urban density were stronger in neighborhoods it's well suited for, and getting from place to place becomes far easier. I would love it if someday the trolley connected North Park to La Jolla, or the airport to Sorrento Valley. It's not as far fetched as it sounds if housing/transity regulation and NIMBYism got out of the way and people banded together to make the San Diego of the future a more livable, affordable, safer, and environmentally friendly city.
S0383.A	n/a	n/a	The current transit situation in the plan is atrocious. More rapid fast transit, just the basic experience of using rapid buses that run in the middle of the highway, is not a funner and more enjoyable experience at all. We need more trolleys. We need coaster trains that come every 15 minutes. We need to electrify the LOSSAN corridor. And I feel like we should electrify the Sprinter corridor too. We don't want any more highway expansion. If you have any questions or if you need to know any ideas, please let me know. To 10 demands of sandag
S0383.B	n/a	n/a	network of bike lanes that work now the current plan is too small and takes too long. SANDAG should also pay for a countywide bike share network. Look at the 10 Demands for ideas.
S0383.C	n/a	n/a	NO MORE HIGHWAY EXPANSION. No more managed lane expansions, unless the convert existing lanes. I'm done with highway expansion with managed lanes etc. Stop you are making a mistake.
S0383.D	n/a	n/a	NO MORE MANAGED LANES NO MORE HOV LANES NO MORE HIGHWAY EXPANSION BUILD MORE TRANSIT INSTEAD
S0384.A	n/a	n/a	SANDAG is way too focused on freeways as the only method of transportation. Adding more lanes to the freeways has been proven to induce more traffic and more Vehicle Miles Traveled and burns more fossil fuels. The enormous amount of funds used up on freeway expansions should be going instead to public transportation.
S0384.B	n/a	n/a	Our climate doesn't have a future if the majority of our infrastructure is spent on fossil fuel burning cars.
S0385.A	Chris Prier	n/a	Overall, I applaud the plan's ambition to strengthen and expand transit in San Diego, especially rapid transit. This work is so critical to quality of life here, and to San Diego's future. Some ideas for the trolley network seem misguided though. A loop around Balboa Park does not help to link the whole city together. It would be much more useful to connect those neighborhoods with downtown while also connecting to more distant neighborhoods, and making a connection to another trolley line - for instance, a route from downtown to Bankers Hill and Hillcrest, and then east along El Cajon Boulevard to serve North Park, Normal Heights, and City Heights before linking with the Green Line at SDSU (similar to the 215). The proposed Purple Line also needs to be better though-out if it is going to actually serve the neighborhoods between National City and Mission Valley. And if there is going to be a new trolley in the neighborhoods around Balboa Park, it would be crazy for that line and the Purple Line to not connect. I'm also excited to see the Miramar tunnel in the Regional Plan - this would transform transit connections in the area - but UTC is not the best choice for a station. It would have much more impact if a Coaster/Amtrak station were located under the Nobel Drive trolley station. This location is better connected to UCSD, jobs, and housing in the area, and would allow for better connection with the Blue Line by intersecting the line at a midpoint rather than the terminus. According to the recent report on the Miramar tunnel options, the Nobel Drive option is both less expensive and provides slightly more time savings for riders.
S0385.B	Chris Prier	n/a	Love all the bikeways, thank you for including bikes in transportation planning. Biking can be a huge part of San Diego's transportation future.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0385.C	Chris Prier	n/a	We do NOT need more ramps and lanes on freeways, even if they are for buses and carpoolers. While I love the rapid bus routes, and love adding more bus lanes on highways, these should take over existing lanes and not build new ones. The Regional Plan proposes to add many lanes to many highways in the region - this is insanity. More lanes will always encourage more driving overall, and will harm residents and communities on either side of ever-expanding freeways. Turning existing car lanes into managed lanes, without adding any new lanes, would be a bold positive step forward for San Diego. Direct access ramps are also just more highway infrastructure - we don't want them! The suggestion of a DAR at Voigt Drive is a terrible idea and completely unnecessary. The nearby DAR in Sorrento Valley has been a huge waste and gets little use. The cost for the "Managed Lane Connectors" is also extremely high, and unnecessary. "Transportation technology" or SIS that only accelerates car trips is also a poor use of funds.
S0385.D	Chris Prier	n/a	Building more housing in San Diego while reducing emissions requires building strong urban neighborhoods where people want to live. High-quality transit and reducing car reliance are essential to these goals. People want to live in quiet neighborhoods well-served by nearby transit, and not in the vicinity of polluting, ever-expanding freeways.
S0386.A	Alexander Lange	n/a	Introduce targeted rapid trolley lines that do not stop at all stations. Run a special line from UTC Stations (Nobel) direct to Convention center station and one direct from Gaylord into the Gaslamp to increase access for conventions and to Petco events. Prioritize the street car loop around Balboa Park; there are a lot of apartments in North Park that are going to struggle without parking and having access to this would alleviate mobility via roadways. Create a split railroad for freight and passenger. Run freight up (or under?) I-15 instead of trying to negotiate with coastal cities. Electrify pax rail up coastline?
S0386.B	Alexander Lange	n/a	Don't need these NEVs with the private sector working on driverless and the existing bus networks san diego has tried to do. Added equipment, maintenance, and incremental liability on the city doesnt seem worth the mobility especially if it's intra-neighborhood.
S0386.C	Alexander Lange	n/a	prioritize cleanliness and maintenance. Seems like we create these and then allow them to fill with debris thus creating limited desire for use. Extend a rail trail down through morena alongside tracks similar to Encinitas and the lanes through sorrento.
S0386.D	Alexander Lange	n/a	Elevated/median express lane between South Bay and MCRD on I-5 that allows quicker access north/south without getting caught in downtown/94 traffic.
S0386.E	Alexander Lange	n/a	Stop installing bike counters and wayfinding screens in downtown. They are ugly, not useful, and most people have a hand held device that they can use to find their way around.
S0386.F	Alexander Lange	n/a	Lower the charge for conventions to use convention center space. The uptick in traffic during weekdays to backfill days without an event downtown will drive more sales tax/TOT revenue without an increase to bottom line. Incentivize the demolition of downtown office space; much of this space is not outfitted for a conversion and there is a risk of these biz plans failing due to costs. Downtown is not the office core it once was and dont see that coming back. Permit a ton of units along trolley line up and down commercial street. Allow developers to contribute to an offsite/inlieu fee that puts affordable units in this community. incentivize development of businesses in these trade zones to build community around them.
S0386.G	Alexander Lange	n/a	install more homeless-proof fencing along rail lines and public spaces to prevent access/destruction of city-owned/maintained spaces.
S0386.H	Alexander Lange	n/a	Do more to remove/prevent homeless from entering sensitive habitats. Their habits are destroying rivers/habitats and are killing vegetation. This presents elevated fire risk for residents making the cost of ownership even more unattainable.
S0386.I	Alexander Lange	n/a	Have neighborhood associations empty all trash/recycle bins at 11pm to prevent homeless from throwing trash all over the place.
S0387.A	n/a	n/a	Expand lanes on the 5, 56 and 805 !
S0387.B	n/a	n/a	Forget the woke stuff just focus on getting people and goods from point a to point B! Our economy and way of life depend on moving goods and people.
S0388.A	n/a	n/a	Build underground trolley
S0388.B	n/a	n/a	Add more protected bike lanes. Condition developers to make bike improvements as part of the discretionary review process.
S0388.C	n/a	n/a	Use existing ROW for improvements.
S0388.D	n/a	n/a	Keep historic neighborhoods historic. Encourage housing near existing rail & trolley lines.
S0389.A	Dave	n/a	Expand railways and other public transit as much as possible. In addition, when making a tunnel at Del Mar, expand it enough to fit overhead wires should the LOSSAN corridor be electrified.
S0389.B	Dave	n/a	Do NOT expand the highways. They are AT CAPACITY. Adding more lanes will ALWAYS increase traffic congestion.
S0390.A	Nguyen Vu	n/a	This will help people who don't live near a public transportation to easily, safely, and quickly get to bus stops
S0390.B	Nguyen Vu	n/a	Bikeways should be protected by placing them in between walkways and car parking spaces NOT between car parking spaces and traffic

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0390.C	Nguyen Vu	n/a	Invest in more electric trains on major roads and underground transportation systems
S0390.D	Nguyen Vu	n/a	More funding investment in safe walkways and crosswalks in poor communities. Paving roads in poor neighborhoods will help reduce costs of repairing damages to vehicles
S0390.E	Nguyen Vu	n/a	Build more parks and plant more trees that provide big shades and more spaces for community vegetable gardens
S0390.F	Nguyen Vu	n/a	Whatever infrastructure invested in affluent neighborhoods must also be invested 1.5 times in impoverished neighborhoods
S0391	Marcos Sigala	n/a	We had a presentation by SANDAG staff which was very good. It would be more helpful if there were more statistic graphics with actual future projections.
S0392.A	Steve Castrejon	San Ysidro Health	Please consider our senior population for free transit to provide a better quality of life.
S0392.B	Steve Castrejon	San Ysidro Health	Better services for seniors
S0393.A	n/a	n/a	*Last month we had a presentation from MTS and they covered their plans and talked about their budget challenges. Are you having challenges covering your budget through the Fair-Costing tickets? and what's your future plans? *What are you learning from other successful countries who have functional transit systems to use in San Diego?
S0393.B	n/a	n/a	*Safety is a huge factor that makes community use, or not use, public transportation in general buses or trolley. What are your plans to improve? *How (what are you planning to use your system during "God forbid" fire season for evacuation, shelters, and safety?
S0394.A	Angie Snyder	n/a	Looks great.
S0394.B	Angie Snyder	n/a	We had a presentation in El Cajon and it was great. Thank you.
S0395.A	Yasmin Davidson	n/a	Do you look to other regions (even out of state) for ideas on how to handle some of the discussed issues in our presentation in El Cajon?
S0395.B	Yasmin Davidson	n/a	What is the criteria you have for what gets addressed from the surveys/data gathering that you do?
S0396.A	Omar	n/a	we need a trolley going down university avenue. we need a road diet and concrete barriers for the bike path.
S0396.B	Omar	n/a	more concrete barriers on bikeway.
S0396.C	Omar	n/a	too much money and fund are allocated for highways and freeways.
S0397	n/a	n/a	Will highway 67 be widened to be 4 lanes for the entire highway from Ramona to Lakeside? Will separate bikelanes be added? Highway 67 remains the only road suitable for fire evacuation from Ramona.
S0398	n/a	n/a	Increased language accessibility in apps and website: Arabic Farsi/Dari Pashto
S0399.A	Christina Kaufmann	n/a	Materials available in more languages to meet the needs of our diverse community.
S0399.B	Christina Kaufmann	n/a	Increased number of routes.
S0400.A	n/a	n/a	Increased language access.
S0400.B	n/a	n/a	Better safety protocols and security while riding the trolley.
S0401.A	n/a	n/a	Cars will continue to dominate transit for many more years in San Diego so please do not forget to improve movement of traffic.
S0401.B	n/a	n/a	San Diego continues to have a shortage of truly affordable housing.
S0402.A	n/a	n/a	Look at other transit systems to see how they encourage more ridership in their community. Also, make transit faster so more people will use it.
S0402.B	n/a	n/a	Thank you for your presentation at the El Cajon Collaborative meeting today.
S0403.A	Zamzama Said	n/a	Better language accessibility. San Diego is very diverse and requires more information available in various languages.
S0403.B	Zamzama Said	n/a	Getting a Youth Opportunity Pass has become too difficult for non-English speakers to access the online application. We have several languages spoken in San Diego.
S0404.A	n/a	n/a	The Rapid 880 will be a great addition to the bus lines, making it easier for families in El Cajon to get to their jobs.
S0404.B	n/a	n/a	Great presentation today.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0405	Jacinto Perez	n/a	Thank you for continuing to reach out to community members to hear their comments on the Regional Plan. I have enjoyed learning more about the development of the project and El Cajon Collaborative has been great at keeping us updated.
S0406.A	Carmen Gamez	n/a	It has been wonderful to get a shuttle service in El Cajon. I'm looking forward to seeing more people be able to access services including healthcare.
S0406.B	Carmen Gamez	n/a	Thank you for presenting the Draft Regional Plan today.
S0407.A	Maria Abarca	n/a	The Rapid 880 bus will be helpful.
S0407.B	Maria Abarca	n/a	Also looking forward to more carpool lanes to keep traffic moving.
S0407.C	Maria Abarca	n/a	Great presentation by SANDAG and MTS at the Collaborative meetings.
S0408	Antonio Page-Kahn	n/a	A vast majority of the time and resources should be spent on expanding our trolley system (not buses, not bus lanes, not bike lanes, not bus stops). Trolleys. We are a mega city without a proper public transit system and buses will never be the solution. You will never convince the majority of the public to ride the bus as a main mode of transportation when the buses are stuck in the same traffic as if you drove your own car AND it takes 4x longer to get anywhere (which costs money in more hours not worked because you are stuck on a bus that is likely late). Again, bus lanes will not solve the problem. More highways will not solve the problem. For example, I live in city heights and it is not feasible to access the trolley to use as a viable mode of transportation. Expecting everyone to ride a bike is an elitist perspective and fails to account for the life of everyday people. I realize you expanded the trolley to the airport, but that doesn't help the residents living here.
S0409.A	n/a	n/a	The trolley needs to run to the airport and North Park also should have trolley service.
S0409.B	n/a	n/a	More concern needs to be shown to homeowners whose properties are being destroyed by zero zoning laws applying in so-called transit areas, especially North Park. The rest of the city needs to support more hapusing, it can't all be in North Park.
S0409.C	n/a	n/a	Bike lanes jave destroyed North Park and specifically Pershing. No more bike lanes! They are stupid and nobody uses them, except for maybe exercising. SANDAG is destroying San Diego and my quality of life in North Park. Between bike and bus lanes, it now takes me almost an hour to get to work and it used to take 10 minutes. That is a failure of planning on every level.
S0410.A	Afrah Abdulkader	n/a	Our newcomers are frightened to use public transportation. They have expressed they would like to see more security riding the trolleys. Bus drivers are not always patient to someone who is challenged with English.
S0410.B	Afrah Abdulkader	n/a	Thank you El Cajon Collaborative for keeping us informed on the Regional Plan.
S0411	n/a	n/a	Please fix the transition of the 8 West to the 67. There are weekly collisions and skid marks all over the road. People stop in the second lane to merge over at the last minute because traffic is backed up on the slow lane. It's very dangerous. Also, getting off of the 67 South to get on the 8 East is dangerous because you exit the freeway and merge with traffic on the road.
S0412.A	n/a	n/a	Expanding buses in public transit in San Diego is a waste of money 98% of San Diego drive to work and other places they need to go. This is nonsense!
S0412.B	n/a	n/a	Adding bike planes only takes away much needed parking spaces as it is trying to find parking in the city and county of San Diego is a challenge every time you create a bike lane you make that problem worse.
S0412.C	n/a	n/a	Your plan to take away lanes on the freeways and convert them into HOV lanes is absurd. Majority of people do not carpool. The majority of people do not own electric cars. This is just going to make traffic worse!!! frankly I'm gonna use those lanes anyways, even though I'm not carpooling and I do not own an electric car just out of spite I don't even care if I get fined!!!! Out of your entire plan, this is probably the worst part of it!!!!
S0412.D	n/a	n/a	Your plan to take away lanes and turn them into HOV lanes is only gonna make pollution worse because the traffic will get more congested in the remaining lanes because the majority of people do not own electric cars or carpool to work! So anything you do in this category is gonna be offset by that horrible decision!
S0412.E	n/a	n/a	Why do you have to inject woke ideology into everything you do? This is why Democrats are losing voters!!!! 23% of California voted for Trump in 2020 that jumped to 40% in the last election. Have you people not learned a single thing?
S0412.F	n/a	n/a	This plan is the most left-wing, woke, and ridiculous plan I have ever seen in my entire life. The entire plan needs to be revamped. This is a complete disaster. This plan is only going to make traffic worse, pollution worse, moving around San Diego more difficult, and cause us to lose more parking spaces. This plan was concocted so the left wingers can give themselves a pat on the back that they've done something good when in fact, all they're doing is making our lives more miserable, which is exactly what they do with everything!
S0413.A	n/a	n/a	Transit is non-existent on the 15 corridor north of MCAS Miramar, and I can see this will continue through 2050. No money should be wasted on transit if it doesn't benefit the entire region that is funding SANDAG.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0413.B	n/a	n/a	Only benefits the urban centers, waste of taxpayer dollars.
S0413.C	n/a	n/a	This is a waste of taxpayer dollars.
S0413.D	n/a	n/a	I do not see any expansions listed in this report. Cars are the only way many of us can commute, and I see SANDAG continues a long history of not funding expansion projects until it is way too late. We don't need 1 more lane at this point, we need 5 to keep up with demand. They should be segregated to allow traffic routing around any accidents that could slow traffic.
S0414	n/a	n/a	At068 - Market Street Bikeway. Please do not eliminate parking. This is an area with historic apartments that and single family homes with multiple cars, and eliminating them will cause substantial issues. There is already a bike lane on J Street that this duplicates. Surely we can spend our money better.
S0415.A	n/a	n/a	We have enough bike lanes. Use funds for pothole and street repairs. $7m for a colorful promenade and painted bike lanes when we are in debt and the streets are a hazard, is mismanagement.
S0415.B	n/a	n/a	Before more money is invested in more housing, let's see if the deportation of illegal immigrants opens up low income, subsidized housing.
S0415.C	n/a	n/a	Stop passing taxes and fees on fuel for road repairs. How many bills, fees and taxes have been passed and the money still does not fix the roads? Criminal!
S0416.A	Donald F. Billings, CFA	n/a	1. Coastal rail. You have displayed decades of contempt for the taxpayers by sinking funds into money-losing, environmentally-harmful, community-dividing, economically-irrational, "improvements" to a demonstrably failed ancient fixed heavy rail system that serves virtually no one (about 0.01 percent of the County residents actually use it on a regular basis. It is a failure. It is long past time to stop pouring good money after bad. And the ROW is about the worst use of coastal land: it generates no direct tax revenues for the impacted coastal cities, creates a pedestrian barrier to public beach access (which flies in the face of the Coastal Act), is a clear and present danger to the public (numerous deaths on the tracks every year), creates unmitigable noise, vibration, and pollution for the surrounding communities, reduces property values (indirectly reduces tax revenues to impacted cities), and so on. Worse, SANDAG has a long and sad history of grotesquely misrepresenting the "success" of these massive expenditures of public funds, to the extent that it exposes itself to legal risk for claims made in its public debt financings. SANDAG appears to not understand what a cost/benefit analysis is, or intentionally misrepresents its "value" analyses is the equivalent. SANDAG's new plan proposes to continue this reckless and harmful behavior. SANDAG's behavior is a major cause of the public's distrust of government. Recommendation: Immediately cease ANY further expenditures of the public's money on this failed experiment in ancient technology, that has proven for years to serve almost no one, and to immolate scarce funds that should be redeployed to actual transportation solutions. 2. Bikeways. Convert the failed SD section of the old rail ROW into a rails to trails transit solution. Contact me if you want more information, although I'm sure you know how the process works. It has been wildly successful with the public in many other parts of our country. Donald F. Billings, CFA Rancho Santa Fe, CA [redacted]
S0416.B	Donald F. Billings, CFA	n/a	See above.
S0417	Alex Wong	RideSD	Instead of spending money on Microtransit, let's spend it on maximizing Trolley and inner-city bus frequencies. For the cost of running microtransit, you could likely revise your plan from 7.5 min Mid-Coast and Green Line frequencies to 5-6 min Mid-Coast and Green Line frequencies. Microtransit is terribly inefficient. Downtown's FRED shuttle, which just folded. If Microtransit can't work in Downtown, where it should be the most profitable (due to high density), then it's going to fail even faster in less dense communities. First and last mile connections to Trolley stations should be primarily made by bus, biking, and walking, not by microtransit. If Uber wants to run its own microtransit, let them do it. But public taxpayer money should go towards mass transit, not glorified Ubers.
S0418.A	n/a	n/a	Overhead electrification of the LOSSAN corridor needs to be a priority, as well as getting the railroad into public ownership. All new infrastructure investments need to keep this in mind. Look at how successful Caltrain electrification is up in SF! More emphasis needed on building out the trolley system. Most of the "Rapid" corridors should really be light rail. More precautions needed to prevent "BRT drift" for bus projects. Also Rapid corridors, if not built as trolleys, should be served by trolleybus systems as they will be far cheaper and quieter to operate in the long-term The Copper Line trolley needs to be extended to downtown lakeside in the future; the area is up-and-coming and will benefit from it immensely.
S0418.B	n/a	n/a	All new bike lanes need to be Class I or IV protected bikeways. Bikeways need concrete protection not paint or flimsy plastic posts. Expedite road diets. Sometimes you have to make unpopular changes that taxpayers will thank you later for. You need to be aggressive; naysayers can't oppose all the bike lanes at once; do a surge in construction to overcome barriers.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0418.C	n/a	n/a	Instead of new express freeway lanes, converting existing lanes to bus lanes and carpool lanes would reduce VMT and GHG. It's also substantially cheaper. Adding new "managed" lanes just adds capacity for those rich enough to pay while freeing up capacity in general purpose lanes. So-called managed lanes are just a way of greenwashing freeway widening (and yes it's still widening if you're adding lanes in existing right-of way!). They waste valuable funding that could go to improving our transit system and active transportation facilities. Invest in our people, not freeways. No new car capacity!
S0418.D	n/a	n/a	More efforts needed to build mixed-income social housing. The private sector alone cannot be relied upon to actually build their way out of the housing crisis.
S0418.E	n/a	n/a	Regional wealth tax is needed to fund these projects. Reallocate funds from car infrastructure to bikeways and transit.
S0418.F	n/a	n/a	I'd like to see less emphasis on expensive "high tech" solutions and more emphasis on getting people out of cars and onto bikes/transit. Our greenhouse gas emissions are not a tech problem, it's a priorities one. SANDAG really needs to go "all-in" on transit and active transportation; I get the sense from this plan that cars' convenience is still a priority while active transport and transit are just a "wish list" that "might" get built depending on the grant-funding hunger games. To be clear building more freeway lanes, "managed" or not, is not a helpful way to spend taxpayer dollars.
S0419	n/a	n/a	I am from San Diego 350 and I am writing to urge SANDAG to improve the quality of life of individuals living in San Diego, in California, in the United States, and on Earth through expanding public transportation to decrease greenhouse gas emissions (GHG) and increase public transit options. Reducing GHG emissions is one of the most important things, if not the most important, to consider when making this plan. While I celebrate SANDAG's success in reducing more GHG emissions than was required by the state in 2020, the projected reductions for both GHG and VMT in the 2025 plan do not do enough. The climate crisis is rapidly accelerating and actively causing mass destruction from more extreme weather patterns, rising sea levels, and warmer temperatures that threaten human survival. No one is exempt from this, and the RTP must aggressively reduce 25% of GHG and VMT by 2035 through ending all highway expansion projects. Increasing managed lanes is unacceptable because they will encourage the usage of highways and therefore increase the amount of GHG emissions from vehicles. By adding more managed lane projects, you are speeding up the already rapid acceleration of climate change. I urge you to think about the future of everyone, including yourselves, when creating the plan and follow through with actions that will actually slow down the progression of climate change. The world is incredibly interconnected, and action taken, or a lack thereof, in one part of the world can drastically change what happens in another part. If more aggressive action to decrease 25% of GHG and VMT by 2035 is put into the RTP, hundreds of thousands of people would benefit.
S0420.A	n/a	n/a	Your idea to covert multiple lanes on our freeways into HOV lanes will cause MORE traffic congestion and more pollution!! This is a HORRIBLE idea!!! I don't even like the idea of ADDING HOV lanes, but taking away lanes is absolutely unacceptable!!!
S0420.B	n/a	n/a	Enough with the wokeness ideology, nobody supports it, just 20% of the idiot democrats, independents and Republicans do NOT support this nonsense!!!
S0421	n/a	n/a	It is tragic, appaling, and heartbreaking that the organization (SANDAG) is continuing to widen and expand highways when peer-reviewed research establishes that these projects induce demand, produce more air pollution, greenhouse gas emissions, and tire particulate matter, not to mention further anchoring a car-obsessed culture and reinforcing outdated beliefs that transit and active transportation can't work in Southern California. The disparity between highway investments and investments in transit is maddening. Had we invested anywhere close to equally, we'd have incredibly high-speed rail and robust urban subway systems in our large and medium-sized cities. This regional plan fails the people of San Diego County. It is not the future-proofing visionary leadership we need to turn the county into a place where people and communities thrive without the financial burden of car ownership, the physical burden of long commutes, and the emotional burden of isolation and limited time for community (due to long commutes).
S0422.A	IBEW 569	n/a	Deeper investment in capital improvements for transit must continue to be a focus in the RTP. We simply cannot build or repair freeways to the extent that we need to impact increasing traffic. Only transit can do that. Higher frequency, Zero-Emission Buses, Youth Opportunity Passes, and a light-rail/people mover airport connection.
S0422.B	IBEW 569	n/a	De-emphasize highway expansion of any kind. We need a strong focus on transit.
S0422.C	IBEW 569	n/a	More funds need to be focused toward the transit agencies -- NCTD and MTS
S0423	Robin Joy Maxson	Association of Planning Groups - San Diego County	Representing the Unincorporated Area of our region it is disappointing to see the empty project space east of Interstate 15; especially when compared to the project rich coastal area. The health and safety of residents outside the urban zone should be at the top of SANDAG's list as these people and their communities have been and continue to be left out. Safe evacuation routes for thousands of people is a basic taxpayer expectation. Safe evacuation will benefit everyone who travels throughout our beautiful County for weekend recreation and work. Safe commutes for a population that is geographically-locked in a car-based environment is essential and fair. Public transit options will work for a few, but will not address those in the trades whose living is based on a mobile vehicle that holds both job materials and tools. People, both residents and visitors, have a right to expect that they can travel within our County and will return home safe at the end of the day.
S0424.A	n/a	n/a	Currently I know of only two areas that utilize these: Dontown San Diego, & Chula Vista. I would like to see these in other areas of the county, such as Santee, Lakeside, La Mesa, etc.
S0424.B	n/a	n/a	$67 million for 2.3 miles of Bikeway on University Ave?!? STOP putting bikeways in areas that don't want or need them. PSpend the money for Bikeways ONLY AFTER receiving community input FIRST!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0424.C	n/a	n/a	WIDEN SR52 into Santee. The current widening from I15 to Santo Road, provides minimal relief. The real congestion is going up / down the hill to / from Santee, & the "choke points" where it narrows from 3 lanes to 2 lanes.
S0424.D	n/a	n/a	Get Community input & feedback PRIOR to initiating a project.
S0425.A	n/a	n/a	Until a few years ago, MTS operated Route 140--a direct bus connecting La Jolla with the Balboa Avenue Transit Center. It wasn't perfect: the frequency was low, the travel time was long, and it lacked bus-only lanes or signal priority. But it existed. And more importantly, it recognized that connecting La Jolla to regional transit infrastructure mattered. Since the elimination of Route 140, we've taken a major step backward. There is now no direct service at all between La Jolla and Balboa. Instead, riders are forced to take multiple transfers through routes like the 30 and 27, or detour through UTC, adding 30-45 minutes to what should be a 10-minute trip. This makes the system functionally useless for daily commuters, especially those who work irregular hours or rely on transit for multiple trips a day. Removing the 140 created a service desert in one of the densest, highest-demand areas of the region. This decision undercut SANDAG's own goals for mode shift, climate action, and equitable transit access. If we were serious about getting people out of their cars, we would've replaced the 140 with a better version--something rapid, frequent, and protected from traffic--not nothing at all. We need a 21st-century replacement for the 140. A true Rapid Bus route from La Jolla to the Balboa Transit Center, with frequent service, bus-priority infrastructure, and direct connections to the UCSD Blue Line, must be funded and implemented immediately. The precedent was already set with the 140. The demand has only grown. Now it's time to build the system this corridor deserves.
S0425.B	n/a	n/a	Public Comment: Prioritize La Jolla Bikeway & Walkway Upgrades The Mobility Master Plan already includes crucial active transportation strategies in La Jolla that must be expedited: 1. La Jolla Village Drive sidewalks -- Construct continuous sidewalks on the north side between I-5 and Lebon Drive, addressing current pedestrian gaps along this key corridor 2. La Jolla Village Drive cycle tracks -- Implement one-way protected bike lanes along both sides from Torrey Pines to I-805. This requires removing on-street parking but would offer safe, direct connections to UCSD and local destinations. 3. Gilman Drive protected bikeway -- Advance the stalled Coastal Rail Trail project: convert existing Class-II lanes into Class-IV separated bike lanes on Gilman Drive, alongside continuous sidewalks west of Gilman. 4. Ellen Browning Scripps Park walkways -- Finalize design and permitting to widen sidewalks at this popular access point, improving safety and comfort for pedestrians and families. These enhancements are not theoretical -- they're already funded and designed. Completing them will close vital infrastructure gaps, enable safer biking and walking to transit, schools, parks, and the coast, and support broader regional goals on congestion, health, and equity. Delay is unacceptable. Prioritize construction on La Jolla Village Drive and Gilman Drive now, and finalize Scripps Park walkway improvements immediately. This area doesn't need more concepts; it needs execution.
S0425.C	n/a	n/a	The Draft Regional Plan proposes 93 miles of new managed lanes--essentially new highway expansions--at a cost of $2.1 billion. On top of that, it proposes converting 259 miles of existing lanes into tollable managed lanes, with another $2.1 billion price tag. That's more than $4 billion spent reinforcing the exact car-first infrastructure that created our traffic, climate, and equity crises in the first place. Let's be clear: managed lanes are highway expansions. Whether you carve out new lanes or rebrand old ones with tolls and HOV signs, the result is the same--induced demand, more cars, and delayed climate goals. Every major study confirms that building or widening highways does not solve congestion; it makes it worse. This region cannot afford another dollar spent expanding freeways. We need a full moratorium on new highway lanes--managed or not. Every cent of that $4 billion must be reallocated toward transit, safe bike infrastructure, walkable streets, and climate-resilient projects that serve people, not cars. Stop calling this "managed mobility." It's freeway expansion with a PR campaign. No more expansions. Build transit.
S0425.D	n/a	n/a	If SANDAG is serious about delivering a "bold transit-first future," then the funding must follow. Prioritize permanent, stable funding streams for high-frequency, all-day transit: bus-only lanes, Blue Line upgrades, and citywide bus rapid transit corridors. Voters and the public will not support another tax measure if they see it used to widen freeways and subsidize solo drivers in Lexus lanes. New revenue must be raised through progressive, climate-aligned sources: VMT fees, regional gas taxes, congestion pricing (especially on I-5 and I-15), and reallocations from local road overdesign budgets. Funding should not depend on regressive flat sales taxes that disproportionately hurt low-income communities. Additionally, SANDAG should require strict administrative spending caps (no more than 5%), transparent cost controls modeled after Nordic procurement standards, and full public reporting of cost overruns and per-mile costs on capital projects. Without this, trust erodes. The climate clock is ticking. We cannot fund freeway expansions and call it climate action. Redirect all discretionary dollars from highway widening into transit operations, electrified regional rail, and safe streets infrastructure.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0425.E	n/a	n/a	The Draft Regional Plan fails to meet the urgency of the climate crisis. The continued inclusion of freeway expansion and managed lanes undermines all other environmental goals. Adding 93 miles of new highway lanes ensures more driving, more emissions, and more sprawl--locking the region into car dependency for decades. To meet AB 32, SB 375, and CARB's greenhouse gas reduction targets, vehicle miles traveled (VMT) must fall significantly. That can't happen while simultaneously funding new highway capacity. The plan must adopt a hard cap: no more lane miles, period. Transit, biking, and walking infrastructure--not freeway "optimization"must form the core of any legitimate climate plan. Transit must be zero-emission, frequent, reliable, and accessible across the entire county, not just along the Blue Line. Energy efficiency and electrification are not enough if people still drive the same number of miles in private vehicles. This plan should also include: A binding VMT reduction target Mandated mode shift goals with timelines Investments in adaptation, not just mitigation (urban cooling, shaded corridors, wetland restoration) Integration of transit into wildfire and extreme heat emergency response planning Air quality remains a racial justice issue. Low-income communities of color, especially along the 805 and 94 corridors, suffer the most from PM2.5 and NOx emissions tied to vehicle traffic. Continued freeway widening only entrenches this harm. A plan that expands highways cannot credibly claim to support climate or clean air. Scrap the managed lanes. Invest in people, not pavement.
S0425.F	n/a	n/a	The Regional Plan is being written at a time of deep social transformation--rising inequality, a global climate emergency, and generational demands for justice. Yet the plan still prioritizes outdated, 20th-century approaches: highways, sprawling subdivisions, and overbuilt arterials that divide and damage communities. Transit must be treated not as an alternative, but as the primary mode of transportation for this region. That means giving it priority not only in funding but in street space, political attention, and urgency of implementation. SANDAG must stop planning as if future ridership depends solely on individual choices. Transit ridership depends on the system you build. If you build fast, frequent, accessible transit--people will ride it. But if you continue widening highways while underfunding bus operations, you send a clear signal: driving remains the default. We need a planning framework rooted in racial equity, youth mobility, and community power. This means shifting from top-down decision-making to participatory budgeting and community-led design processes, especially in historically underserved neighborhoods. Finally, a note on youth: This plan affects an entire generation that cannot yet vote but will inherit the results. Our future should not be determined by car-centric decisions made to appease political donors or outdated models of growth. Build the future we've asked for--frequent transit, protected bikeways, affordable housing near jobs, and walkable neighborhoods. Not another 93 miles of highway.
S0426	n/a	n/a	I-8 needs additional vehicle capacity to accommodate current demand heading to all the jobs near the coast. Traffic is really slow in the afternoons. Please do not convert free lanes to paid lanes. Affordability is already a problem in San Diego County. Transit that takes an hour to get from East County to Downtown is not a reasonable alternative. Adding lanes does not worsen congestion if you add enough to meet the demand.
S0427	n/a	n/a	While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes.
S0428	n/a	n/a	Guarantee Youth Opportunity Pass funding: SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. No-cost transit passes for under-18 youth encourage significant participation in public transportation, help shift expectations for how San Diegans use transit, and invest in our region's future. Given the current state of funding sources, SANDAG must take the lead on funding this critical program as a priority. As a fourteen-year-old, I use the YOP all the time to get to my internships, in which I am educated about the environment, and for many other opportunities that enhance both my academic and social lives. The YOP is the main reason I can afford this transportation in an eco friendly way.
S0429.A	Yihan	n/a	As a residents of North County SD I applaud SANDAG's attempt to make public transit more accessible in the northern part of the county. There are some key mobility hubs here (Oceanside, Vista, Escondido) and am in support of the rapid buses planned in the regional plan. However, I urge SANDAG to find ways to make them come online sooner than 2035, by doing extensive research and outreach into the needs of the communities, schools, and especially businesses in the area so that they are are also on board with these projects. Having Rapid buses would greatly help in helping folx choose transit.
S0429.B	Yihan	n/a	I do not encourage the use of highway expansion of the 76 or 78 with manages lanes. I fear that having any type of freeway expansion that does not support transit expansion will only encourage further sprawl in the North County communities. Sprawl is choking our north county communities. We need more density close to urban centers and work centers, and sadly many communities don't allow for buildings over 5 stories! This is outdated and we need to modernize with more dense housing types.
S0430.A	Jonathan Moore	n/a	Prioritizing more East/West light rail (Trolley, Sprinter-like) lines and more Pacific Surfliner, Coaster regularity (more trains, night trains, fewer schedule disruptions) might be more effective than widening freeways and intensifying gridlock.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0430.B	Jonathan Moore	n/a	Please prioritize better connectivity for bicycle-based transportation across the country via complete East/West connectors of complete inland and coastal North/South bike paths (Class I). An example is the opportunity to connect the Coastal route (Rose Canyon, etc) to Santee and to Scripps Ranch, via Class I path continuity to the south of University City and Miramar Base (52 corridor) and to the north (Rose Canyon Open Space-Nobel-Miramar Rd corridor. I think elements of this have been long considered and should be prioritized. Additionally, more Class I connectivity filling in, with safer intersection and on/off-ramp crossing for bikes and pedestrians. Roads and other ways are for people first, not cars first.
S0430.C	Jonathan Moore	n/a	The greatest that to road safety for all that I observe is from distracted (cell phone engagement!), aggressive/irresponsible motor vehicle use. Greater community presence by many (friendly!) bicycle-mounted safety officers, in concert with squad car-based officers, could provide effective, impactful systems change for real road safety.
S0431.A	n/a	n/a	As homeowners in Carlsbad, we are frustrated by the increase of high density housing in our area. La Costa Avenue is already overburdened and dangerous for vehicles, cyclists and pedestrians. The Railroad project to add another bridge has gone on forever. Not to mention the drainage project in Encinitas, which has created a hazardous condition and killed local business along Highway 101. Since a thorough traffic study was not done for any one of the projects along La Costa Avenue, we can only predict the huge impact on traffic and emergency response. As far as the bus system, they are reliable, but no one uses them. We see empty buses or ones with one of two passengers up and down Highway 101 all the time. Adding additional bus benches near these high density projects is not going to make people abandon their cars and bikes and take the bus.
S0431.B	n/a	n/a	The City of Encinitas made huge mistakes on their bikeways, use of bollards and roundabouts. We understand Vista is already taking out the dangerous bollards. Our observation is that the bike lanes are only used by the cycling clubs on the weekends, and then they don't obey traffic regulations.
S0431.C	n/a	n/a	Local roadways in Encinitas and Carlsbad have been highly impacted by poor city planning and CA regulations allowing big developers to bypass local plan review and EIRs. The older roadways like La Costa Avenue and Santa Fe cannot be widened, and have been narrowed down to one lane for vehicles causing traffic congestion and accidents.
S0432.A	n/a	n/a	SANDAG should be spending much more than 2% of the transportation budget on safe bike infrastructure. We need more people biking instead of driving. Our climate is in danger.
S0432.B	n/a	n/a	Spend less on highways and more on trains.
S0433.A	Craig B. Jones	San Diego 350	The draft 2025 regional plan/RTP recedes from needed the policies and focus of the 2021 plan by de-emphasizing and de-funding public transportation and neighborhood access, and increasing funding for conventional auto highways and streets. This is detrimental to controlling GHGs and saving the broad environmental value of this region's backcountry. See map exhibit submitted separately by email.
S0433.B	Craig B. Jones	San Diego 350	More funding for the key piece of neighborhood transportation access is vital to making public transportation competitive to the private car. Such funding is necessary in the near term rather than the long term.
S0433.C	Craig B. Jones	San Diego 350	The draft 2025 regional plan/RTP pulls back from the 2021 plan by eliminating the mobility hub areas and related policies to concentrate needed regional development in these efficient already-urbanized areas. This pull-back will encourage regional sprawl and endanger the ability to reduce GHGs as well as increase inequity in housing, access to services, etc. in our already-historically underserved communities. SANDAG should fully encorporate the Regional Decarbonization Framework as a foundation for the 2025 plan. See map submitted separately by email
S0433.D	Craig B. Jones	San Diego 350	See above comments; the result of these pull-backs from the 2021 plan will be to increase climate change GHGs, degrade possible improvements in air quality, and make our region significantly more energy inefficient.
S0433.E	Craig B. Jones	San Diego 350	See above comments. By encouraging more sprawl than the 2021 plan the result of implementing the draft 2025 plan will be to suck available resources away once again from historically disadvantaged communities, increasing inequity.
S0434	Lawrence Taylor	n/a	1. Add to your statement of goals: Affordable. 2. SB 79 is near adoption in Sacramento. That would override local zoning and allow high rises development in areas with transit. So your proposed bus routes would totally change the character of areas like Pacific Beach. Suddenly transit is not an agent for good. Instead transit will massively impact neighborhoods. 3. Your EIR must be revised to reflect the impact of both SB 79 and transit. Currently your EIR does not fully include the changed neighborhoods.
S0435.A	n/a	n/a	Create open air bus or van loop systems in North County cities such as Vista, Carlsbad, oceanside with connections to bus and train stations.
S0435.B	n/a	n/a	Create a bikeway and pedestrian way from Vista to Carlsbad along Buena Vista creek.
S0435.C	n/a	n/a	Use electric vehicles or hydrogen vehicles for busses, bands, open air vehicles.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0436.A	George Henderson	n/a	MidCoast Trolley Extension ... specifically the Balboa Station I attended a County Supervisors' Meeting where the Balboa Station was discussed. I raised this question, "Do you plan for the Balboa Station to Fail?" If not, "... then why are you satisfied with a postage-stamp sized park 'n ride lot that will be full with just a hundred daily riders?" That prediction is true today, the lot is bursting full during commuter hours and during downtown events. This is exacerbated by the lack of safe pedestrian access from the north. There are no sidewalks, and the path is made more treacherous by the need to dodge traffic while running across three on/off ramps. The station should not have received an occupancy permit because it is unsafe for access by pedestrians with disabilities. A pedestrian/bikeway over or under I-5 was shown in the original plans. This would have provided a safe path for residents of and visitors to the beach areas. We are left with a completely unsafe undercrossing and a ridiculous 70-foot switchback concrete ramp for disabled individuals. SANDAG held numerous meetings that envisioned people-movers to the beach and shuttles for the thousands of residents who live a short but un-walkable distance on and beyond the cliffs that form the east side of Morena Boulevard. My comment asks: What value is a "new" Regional Plan when SANDAG has not followed-through and completed its decades-old vision related to the Mid Coast Trolley. Thank you.
S0436.B	George Henderson	n/a	First Comment: It's uncomfortable to say this bluntly: sharing public transit with transient people is uncomfortable. Regrettably the members of my household know to expect the odors of uncleanliness, and to use a mask if there are health risks. But we also carry pepper spray whenever we ride the bus or trolley, and none of us make those trips alone after dark. Although this is part of a larger social issue, SANDAG has a role to assure that public transit is an island of safety and good behavior. Second Comment: Bathrooms. I'd much rather be in my own vehicle than trapped at a transit stop which does not have access to safe restrooms.
S0437.A	Sydney	n/a	I love the ideas to improve and expand transit, especially the inclusion of more advanced rapid bus options. I am a frequent bus user (I live in Hillcrest/North Park) so the bus is really our only transit option, and I love it. I would love to see a better bus connection between Hillcrest and Mission Valley, or just improve that corridor on Texas St/Qualcomm Way somehow -- I've been in several near accidents there over the years. I am in huge support of as much expansion and improvement to transit as possible, to where it can actually be a viable option to commute. Commuting via car is time consuming and stress-inducing -- so many people's worst part of their day is their commute. Access to public transit improves transportation for everyone, including those that drive in cars. I know many other young people in this city agree that transit is becoming more of a necessity. Parking availability is hitting a fever pitch, especially in my neighborhood. Parking is a barrier to beach access too. I think having transit be viable can make parking less of an issue. I know we have a large group of people in this city that constantly and loudly bemoan public transit, affordable housing, any (objective) improvement to public infrastructure -- I urge you to consider the majority of working people in this city that would greatly benefit from more transportation options that cannot come to community meetings or submit public comment. It's time for San Diego to become less car-centric and be a leader in transforming our city. Basically, the more transit and bikeways and microtransit, the better.
S0437.B	Sydney	n/a	Love that you're getting away from widening the roads, was so disappointed that they decided to widen the 52 instead of figuring out a way to connect East County better to employment centers. So many people in East County (I grew up in Santee) work in Sorrento Valley/La Jolla area and would benefit greatly from some type of fast transportation there without cars. Maybe someday we can use the land from the Weston estates to work on that connection, though I know some land is federally owned.
S0437.C	Sydney	n/a	I would love SANDAG to invest in some type of software or platforms that would help people match into carpools, for example, which could benefit schools and commuters. I really like that you can easily tap onto transit with credit cards, I think that removed a significant barrier for people. I also, in general, don't love the self-driving cars like Waymo --- that's still yet another car on the road taking up street space and adding to congestion (especially downtown). At least Uber/Lyft/taxi contribute to working San Diegans opportunity for gig work, Waymos do not.
S0437.D	Sydney	n/a	I am in support of as much housing development as possible, especially infill housing. As a young San Diegan, cost of living and rent is unsustainable. I like that SANDAG is looking into more housing projects, hopefully with transportation in mind as well. People need to live nearer where they work -- we don't want to become an endless sprawl like the Bay Area. I live in North Park and really appreciate the housing going up all around me, bring on more neighbors!
S0437.E	Sydney	n/a	I am a climate change educator, have worked in air quality advocacy, and now am an urban planner. Climate, energy, and air quality are some of the most important issues to me in my city. Affordable housing, sustainable/active transportation, and beach preservation are KEY to mitigating the climate crisis -- studies have shown this over and over again. Whatever SANDAG can do to address these issues, including environmental racism, I am all for. Would love to see some more urban forestry as part of active transportation -- street trees are essential in getting people to actually use active transportation, especially as climate change makes our city warmer. It can provide shade along walking and biking paths, all while being important defense against flash floods (as we've seen happen all over the US), defense against air pollution, and improve property value/aesthetics.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0437.F	Sydney	n/a	The way that local governments are currently set up, I understand why you do community meetings and outreach the way that you do. I understand you cannot reach everybody. However, time and time again I see the desires of wealthy property owners drown out the needs of working people, renters, young people in this city. At every turn, housing developments and sustainable transportation improvements are loudly critiqued by an unrepresentative group of people, despite that being what this city needs to keep up with the times. I want to point to a recent study from the American Journal of Political Science (but this fact has been studied many many times now) that public comment and engagement is largely UNREPRESENTATIVE of the public in all areas, including age, race, gender, and homeownership. Public commenters at these meetings are, on average, 27 years older than the actual population is meant to represent. That's an entire me older (I'm 25)! They don't represent communities best interest, they represent their own interests as property owners and only serve to delay vastly needed progress. The most recent study is here: https://onlinelibrary.wiley.com/doi/abs/10.1111/ajps.12900 by Alexander Sahn called "Public comment and public policy'. This has been reproduced ad nauseum not only in California cities, but all over the country. I urge you to consider what might be a 'silent majority'. Rather than be an opportunity where underrepresented residents can find their voice, planning meetings amplify the voices of older, white homeowners. Knowing this, members of zoning boards, city council, planning boards aren't under a particular obligation to listen to this unrepresentative subset of their communities. I am often the youngest person in the room, but I know so many people feel the same way as I do that can't make it to these meetings. My friends that are servers, teachers, healthcare workers can't make it. But retirees can. I hope there is some way to reform these laws that require public engagement in this way or laws that halt progress (like some zoning laws). It was a good idea originally so that developers don't just bulldoze over local government, but the process has become so convoluted the other direction. We've reached a point where the community input process is not necessarily being used to stop 'bad' things from happening, it's being used by people who don't want their property values hurt (even though more transit and housing usually raises property values anyway!). It's not to block things like toxic waste dumps, it's being used to block affordable housing and transportation. I appreciate all that you do to work with the public, and so many San Diegans agree with your mission, and I hope to see it come to fruition sometime in my lifetime. A goal of mine has always been to live comfortably in this city without a car. I know we have some ways to go.
S0437.G	Sydney	n/a	I live in between Hillcrest and North Park. I love the Pride Promenade, would love to see that bikeway continue up to Adams (through the SDUSD affordable housing development, mayhaps?). I've talked to my reps, but would love to fix the El Cajon Blvd/Park Blvd intersection mess. I use the 215 bus all the time, it's fantastic. Would love to see a rapid bus that connects us to the trolley.
S0438.A	Wade Pavlick	n/a	Increase public transit options. Speed matters. We love the 215 and 235, such great options for traveling but it's difficult to traverse University Ave from end to end and the distance between University and El Cajon is not walkable for those with mobility issues. A young student in our household rides the bus for 1 hour to get to school and home. The drive of that same distance takes 15-25 minutes, depending on the route. It would be great to have more efficient routes that take 15 minutes longer instead of doubling the travel time. Fill the holes in the routes so that more people feel like transit is comparable option to driving.
S0438.B	Wade Pavlick	n/a	We need more pleasant walkways and sidewalks. Increase tree plantings on pedestrian ways so that we feel invited to walk and lower traffic speeds. I have noticed that the parts of El Cajon Blvd that have a lower speed limit feel much more welcoming and have a lot more foot traffic than the parts (between 805 and Euclid Ave) with higher traffic speeds. we are thrilled with the expanded bike routes and ways but would appreciate more protected bike lanes.
S0438.C	Wade Pavlick	n/a	San Diego needs to be thinking about 50, 100, and 250 years from now. How do we build a resilient city that protects residents and welcomes visitors? We need an urban forest to help with the extreme weather our region could be facing in the future. We need to educate residents about the benefits of trees and vines and plants and discourage turf, asphalt, and concrete and the albedo changes and how we collectively can use gardening and other streetscaping to cool our county.
S0438.D	Wade Pavlick	n/a	All residents deserve parks, access to outdoor recreation, and beautiful spaces to enjoy the year round beauty of our county. Let's focus and the parts of San Diego that have red-lined and neglected for generations. Affordable housing to keep our neighbors housed should be of the highest priority.
S0439.A	Mary Oren	n/a	We have come a long way San Diego and have a long way to go!! Taking the Coaster, Blue and Green lines, most times I'm on board - they are full! It is working and we are very glad leadership made the move toward public rail options!! My family recently traveled to Europe and biked and took transit everywhere. Family didn't miss cars at all because transit works and we need to commit here! The tracks along Del Mar need to be moved quickly and that means above ground near the 5 Freeway pronto! Maybe after this weak link is fixed we can spend more time, funds and care going underground but for now - fast and safe and as affordable as possible is the way to go. While we're at it, please link a rail line to the airport. Let's not pretend a nice bus ride will meet the needs and encourage more transit. No one wants to risk road traffic when heading to the airport, no one! Please connect our rail options to the Airport immediately ! We do have an abundance of parking so obviously that is threatened (translation, revenue) but it's past time San Diego join the big boy cities, offering direct rail transit in and out of an airport, please make this a priority in the budget! When you do this, it will be all that's missing in expanding the whole rail potential and cars will be off the road, people will be getting places, faster, safer, cheaper and environmentally more responsibly. As of now - we are still dependent on your action, your ability to hear us when we say, link the rail to the airport with rail options, not busses, not roads that sound helpful but are not. LINK the Airport to rail options ASAP! Think big, do it fast and that means better everything, cost, better behavior, quality of life, safer planet, all of it. We are counting on you!! Thank you !!!
S0439.B	Mary Oren	n/a	More housing near transit ASAP! Multi level, with biking and pedestrian friendly designs. We know what to do, you've already done it all over the place just keep going!! Faster, and more is all we need to do, no more complicated reviews, let's not waste time!
S0439.C	Mary Oren	n/a	We can't pretend we have time to wait. We know what to do and how. Do it San Diego! Take cars off the road, plant more trees, provide more charging stations, take care of the unhoused and clean our pedestrian walk space. Just look at how it's done in other parts of the world and join the effort, the responsible leadership, we know what to do, please do it, no more delays or excuses.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0439.D	Mary Oren	n/a	Downtown has come a long way but is still in need of improved mobility and residential options - And all of our communities need to do the same. We have less land and more people and that means building up so residents can afford to live and work here. Your research has informed you of our situation. Just get going, build up, near transit all over the county and connect communities by rail and off road bike lanes when possible - like it's done all over the world these days. No need to delay or pretend we don't know what to do, do it, thank YOU!!!
S0440.A	n/a	n/a	The Draft 2025 Regional Plan prioritizes expanding rail connectivity to San Diego International Airport. However, the proposed Airport Transit Connector is currently envisioned as a terminus, with no westward continuation. This is a missed opportunity. I urge SANDAG to amend the Regional Plan to include a phased extension of the Airport Connector to Liberty Station and Ocean Beach via the Midway District. Strategic Justification Regional Access: Ocean Beach is one of the city's densest beach neighborhoods and a major recreation destination. Yet it is disconnected from regional transit. Current service via the 923 and 35 is infrequent and circuitous. Liberty Station is a dense, mixed-use hub with thousands of residents and workers and no fixed-route transit priority. Both areas are underserved. Existing ROW: The extension can leverage the wide rights-of-way along Harbor Drive, Laning Road, Womble Road, and Lytton Street. These corridors can support center-running bus or rail lanes with signal priority. A surface-level fixed-guideway extension from the Intermodal Transit Center at the airport to OB is technically feasible and does not require tunneling. Demand: Internal SANDAG mode shift models already show high latent demand for better coastal access. A westward extension would serve both residents and the millions of annual visitors to Liberty Station and Ocean Beach. This segment would also support all-day, all-direction travel, unlike a pure airport shuttle model. Scalability: A westward extension supports the Plan's long-term vision of a high-frequency, seamless regional transit spine. It also allows for a future loop or through-routing to serve Point Loma or reconnect to the Blue Line at the Morena District via a future circulator. Request Amend the Draft Regional Plan to: 1. Include a planning-level Airport Connector extension from the ITC to Liberty Station and Ocean Beach; 2. Allocate funding for an alignment and engineering feasibility study as part of the Connector's Tier 1 projects; 3. Flag the OB extension as a candidate for federal Small Starts eligibility and phased development post-2030. SANDAG's stated priorities--climate, mode shift, and coastal equity--require extending the airport line beyond the airport. The Regional Plan should reflect that.
S0440.B	n/a	n/a	Build out a bikeshare system paid for by SANDAG. You should be able to use your phone to unlock the bike lockers.
S0440.C	n/a	n/a	There is a group that put together the 10 demands to sandag, you should listen to them. 1. 7½-min Trolleys systemwide by 2029. 2. 10-min peak/15-min weekend buses on top 10 routes. 3. Clockface Coaster & 15-min Sprinter with full-day service. 4. Countywide all-door boarding on all buses. 5. Modern PRONTO with mobile pay and more reload sites. 6. Permanent Youth Opportunity Pass with easier sign-up. 7. Transit signal priority at 250+ intersections, especially in equity zones. 8. 100 miles of camera-enforced bus lanes, not just paint. 9. Unified, equitable countywide bikeshare with PRONTO integration. 10. Real-time public dashboard on reliability, equity, usage, and progress. Build fast, fair, frequent transit by 2029.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0441.A	n/a	n/a	1. 7½-min Trolleys systemwide by 2029. 2. 10-min peak/15-min weekend buses on top 10 routes. 3. Clockface Coaster & 15-min Sprinter with full-day service. 4. Countywide all-door boarding on all buses. 5. Modern PRONTO with mobile pay and more reload sites. 6. Permanent Youth Opportunity Pass with easier sign-up. 7. Transit signal priority at 250+ intersections, especially in equity zones. 8. 100 miles of camera-enforced bus lanes, not just paint. 9. Unified, equitable countywide bikeshare with PRONTO integration. 10. Real-time public dashboard on reliability, equity, usage, and progress. Build fast, fair, frequent transit by 2029.
S0441.B	n/a	n/a	No more managed lanes! Build more BUS on Shoulder Pilot programs.
S0441.C	n/a	n/a	We need a 25% reduction in greenhouse gases, not 19 percent do better sandag.
S0442.A	n/a	n/a	San Diego's bus riders are stuck in traffic while funding continues to prioritize expensive, multi-decade capital projects. We need faster results. SANDAG must make quick-build, camera-enforced bus-only lanes a central implementation strategy in the 2025 Regional Plan to achieve near-term mode shift, equity, and climate targets. Quick-build lanes made with paint, posts, signal timing, and enforcement can be deployed within 12-18 months at a fraction of the cost of full corridor reconstructions. These lanes immediately improve bus speed and reliability by 10-30%, especially when paired with transit signal priority (TSP) and all-door boarding. Combined, these interventions reduce total trip time, increase operating efficiency, and allow agencies to run more frequent service with the same fleet. This isn't theoretical. LA Metro's Flower Street lanes improved speeds by 29%. Boston's Washington Street lanes cut travel times by 20% during rush hour. Oakland's International Blvd. lanes reduced schedule variability by 42%. San Diego has already seen results on limited Rapid segments, but progress has stalled. Only a handful of corridors--like El Cajon Blvd and South Bay Rapid--have lanes, and many are peak-only or regularly blocked by cars. A goal of 100 miles of camera-enforced bus-only lanes by 2030. These should focus on equity-priority corridors where riders already rely on transit but suffer the worst service. Top candidates include: University Ave (Rapid 235, Routes 10, 7) Broadway & 3rd Ave (Chula Vista) Plaza Blvd & Euclid Ave Imperial Ave & Market St El Cajon Blvd (full buildout, 24/7) Palm Ave & Beyer Blvd Mission Gorge Rd (Routes 13, 14) Main St & Division St (Otay-SE SD) All lanes must be physically separated where possible, and enforced with automated license plate readers (ALPRs). Bus lane violations should be automatically ticketed, consistent with AB 645. Without enforcement, "bus-only" means nothing. To fund this, SANDAG should allocate a dedicated Quick-Build Transit Priority Fund within the Regional Plan, using existing authority under SB 1, CMAQ, and TransNet. Jurisdictions would apply for implementation grants with SANDAG providing design support, equipment procurement, and technical oversight. We do not have until 2050. If SANDAG is serious about reducing VMT, achieving equity, and meeting climate goals, bus-priority projects must move now--not after decades of EIRs and cost escalation. Quick-build lanes are the only viable path to rapid, measurable transit improvements at scale.
S0442.B	n/a	n/a	Cap over the state route 94 and build a centerline station.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0442.C	n/a	n/a	1. 7½-min Trolleys systemwide by 2029. 2. 10-min peak/15-min weekend buses on top 10 routes. 3. Clockface Coaster & 15-min Sprinter with full-day service. 4. Countywide all-door boarding on all buses. 5. Modern PRONTO with mobile pay and more reload sites. 6. Permanent Youth Opportunity Pass with easier sign-up. 7. Transit signal priority at 250+ intersections, especially in equity zones. 8. 100 miles of camera-enforced bus lanes, not just paint. 9. Unified, equitable countywide bikeshare with PRONTO integration. 10. Real-time public dashboard on reliability, equity, usage, and progress.
S0443.A	Monica de la Cruz	n/a	We need to work towards a goal of frequent buses (every ten minutes or less) with prioritized signaling, dedicated busways, and elevated, all door boarding throughout central San Diego, especially in city council district 3, 8 and 9. We are already moving towards prioritizing infill housing development along transit corridors and connected to job centers, but we need to ensure that transit is reliable and frequent as the central neighborhoods increase in density.
S0443.B	Monica de la Cruz	n/a	We need a vision of a connected bike network, rather than a few disconnected sections of protected bikeways. The level of protection on 5th Ave from downtown to Hillcrest should be replicated along Harbor, on 30th Street from North Park to Logan Heights, University Ave, Market, and El Cajon Blvd. But we also need to fill in the bike infrastructure downtown so that we can bike safely throughout the grid rather than being limited to just a couple of streets like J and 6th. Most of the 3 lane one-way streets downtown need to be narrowed so that traffic is slowed and we can use the space for wider sidewalks and bike lanes.
S0443.C	Monica de la Cruz	n/a	I am opposed to ANY additional freeway miles added in this plan. We know that expanding freeways does not relieve congestion and we should have an absolute zero tolerance for new freeway miles in any regional planning.
S0443.D	Monica de la Cruz	n/a	We need more infill housing development and we need to limit development in the unincorporated rural parts of the county as much as possible. These greenfield backcountry developments are only creating new commuter communities in east and north county that will increase individuals' VMT. Adding housing in villages like Fallbrook is acceptable, but the housing must be near jobs in town.
S0444.A	Jason Vance	n/a	I don't have a car and depend on transit to get around San Diego. I find it insulting that San Diego doesn't have more bus priority, such as bus lanes or transit signal priority. How come a person in a single occupancy vehicle gets just as much priority as a bus full of people. The bus should never have to wait in traffic or at traffic lights.
S0444.B	Jason Vance	n/a	The bike paths that SANDAG has been building are game changing. The Pershing Bikeway is phenomenal! We need many more projects like this if we want to get people out of their cars. Highway expansions are a waste of money since they simply induce demand and cause traffic all over again.
S0444.C	Jason Vance	n/a	We need transit oriented development! The infusion of thousands of people who live on transit lines will provide a reliable backbone to the network.
S0444.D	Jason Vance	n/a	City of San Diego needs many more Rapid bus lines. The few we have now do an incredible job, but the sooner we get projects like the 210 Rapid, the sooner we will be able to transition away from car dependency.
S0445.A	n/a	n/a	The convoy area is one of the highest density traffic areas with arguably (tied with Little Italy) some of the worst parking in the region. I don't feel the changes are adequate and they don't anticipate the increased density that will happen by 2050.
S0445.B	n/a	n/a	Within the Convoy area: - Flexible fleets need to have marked stops and hubs. Fleet capacity should be updated bi-yearly at minimum. - Transformation of the area into a pedestrian-friendly social hub. Multiple cross-walks, and strategically located parking garages that lead into the Convoy center.
S0445.C	n/a	n/a	Convoy desperately needs to address its parking problem via parking garages (two minimum) with 6-7 levels that lead into the central area. This will allow people to park their car once and rely on flexible fleets and Next Gen Rapid to get them to places within Convoy.
S0445.D	n/a	n/a	The city can offset the cost by charging in the garages I suggested (2 hours free, $3-5 minimum per hour after).
S0446.A	n/a	n/a	I think you should be able to get to the VA from the convention center without having a switch trolleys .
S0446.B	n/a	n/a	each board member sitting there looking the other way, knowing that the only way you can be elected is if the conglomerate supports you ! how are you supposed to represent the people fairly with a clear conscience when you know the bidding is being done for the wealthy and not the people who need the help the most. greed is an addiction which falls under mental illness. Need a mirror?
S0446.C	n/a	n/a	Transparency-accountability and decency is missing completely, by all!
S0446.D	n/a	n/a	You work for the people, not the entitled that prop you up in office, it's sickening!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0446.E	n/a	n/a	Island village is federally funded abusing folks see my videos , if you care about the people being abused, call me and I'll send you a link [redacted]
S0447.A	Joe Aguirre	n/a	For context, I moved to San Diego in 2001 from Imperial Valley and had a gas vehicle until 2018 when I bought a Tesla, which I sold a month ago for an e-bike instead. I own three homes in San Diego, two in eastern Chula Vista, and a condo in downtown. Despite owning an EV, I took public transportation majority of the time, specifically MTS Buses and Trolly. I highly advise against widening roads or freeways, instead doing the opposite: Removing a lane and dedicating it to transit, something common in Seattle. Transit from the seaside is impeccable, especially with LOSSAN and Coaster, but I believe a good investment is connecting eastern communities, like the Purple Corridor. Inter-county connectivity like the proposed Rapid 483 is a great addition and I wished it existed when I used to live in Hemet and would drive to Carlsbad everyday for work, a 3 hour roundtrip. The frequency in San Diego transit is great, especially busses and the trolley. One of the biggest grips with Coaster is spotty frequency. It's understandable that it's primary function is commuter rail but we use it to visit northern county on the weekends. Hoping for it to become more available as I seen many San Diegans tell tourists, external or native, not to utilize it as it's too unreliable for intra-city tourism, despite the quality of the transit being far superior to buses and trolley. It's shame since it's a line that hits all the tourist beach spots. I do hope we can fix the Sorrento Valley curve with a tunnel soon as a lot of time is wasted with the train slowing down to follow the circular track.
S0447.B	Joe Aguirre	n/a	With many people of across all ages getting e-bikes, consider emphasizing bikes lanes in lieu of flexible fleets for those last mile connections people can do on their own. Shuttles make sense when connecting two high traffic points, like the airport to the trolley which I hope gets connected soon. However, shuttles to points of interest, such as Gaylord hotel and convention center in Chula Vista, should be replaced with transit. Consider re-introducing scooter rentals, like how Seattle has, or pedestrian walkways, like how the Philippines has, for those quarter to half mile connections.
S0447.C	Joe Aguirre	n/a	I am biased, spoiled even, since I recently started biking and both Chula Vista, Carlsbad, and downtown San Diego have amazing bikeways and walkways. However, I cannot say the same with other cities, especially the older inner county cities. I can see that the regional plan has plan to build out more paths but I would like to note that when it comes to these expansions we should take into consideration the high e-bike ownership. With an e-bike, people can expand their radius of reachability, so 20 miles is no longer a daunting task. Consider connectivity with already implemented bikeways for more consistent path and for far longer. If there was a bike path from downtown to Otay Chula Vista, then I would ride it instead of using MTS Route 225. Speaking of the busses, most e-bikes are mid-fat (2in) or full-fat tire (3in+). The bus front rack cannot accommodate fat tire bikes, let alone heavier (60lb+) e-bikes. This is why I opted for foldable e-bikes but it's up the discretion of the driver if they will allow me to bring it onboard. On the other hand, because e-bikes generally have better tires to handle higher speeds bike paths. Consider the DG (decomposed granite) and dirt paths that eastern Chula Vista utilizes. Only when it heavily rains does it create potholes which can be refilled DG, rather than repaving.
S0447.D	Joe Aguirre	n/a	As mentioned previously, I own three houses in San Diego, with a 4th one in LA. I specifically purchased the houses near transit since most of my tenants do not own vehicles. I would like to see land secured for low-income housing or at least provide programs to lessen renter's burden. The only program I am aware of is Section 8 and there might be programs in place but that I not aware of. Vehicle ownership is expensive and thus if we can eliminate that burden through planning transit into housing then we can remove the people's need to procure a vehicle. The other topic is re-zoning commercial and housing to mix-use. One of the great things about downtown San Diego is that there are shops in the 1st floor of residential plots. Hoping to see something similar in other cities, like Chula Vista. After COVID, foot traffic into shopping centers have died down, which left vacancies. There should be a consideration on building on top of those vacancies to include a small to mid-size apartment or condo complex.
S0448	Robert	n/a	SANDAG is a corrupt and deceitful organization run by criminals and liars. NOTHING coming out of SANDAG is believable. They deceived the taxpayers 20 years ago, they used public funds for their own personal use and I will NEVER support any ballot measure or any proposal from SANDAG.
S0449.A	n/a	n/a	SANDAG must prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it must focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0449.B	n/a	n/a	SANDAG needs to push cities - especially San Diego, Chula Vista, and other coastal communities - to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety - especially where transit already exists.
S0449.C	n/a	n/a	SANDAG has built some of the region's best bikeways - like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego - and SANDAG has a key role in making that future real.
S0449.D	n/a	n/a	We do not need to continue expanding freeways.
S0450.A	n/a	n/a	The most important thing SANDAG can do is facilitate rail access to the airport- either trolley, train, subway, etc. DIRECT ACCESS-not involving extra buses or cars.
S0450.B	n/a	n/a	The condition of the highways and local roads in San Diego is pathetic. I've been waiting 25 years for the Villa Del Valle to be paved... Less spending mass transit projects that don't go anywhere and more on fixing the systems that we have.
S0450.C	n/a	n/a	The attempt to tax citizens on miles they drive seems like a money grab. Until there is comprehensive mass transit throughout the entire region accessible to all at a reasonable price, taxes like these are unreasonable.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0451.A	n/a	n/a	Improved east west route in north county. More park and ride on northern blue line
S0451.B	n/a	n/a	Friars Road has birth a protected and unprotected bike line. Why?
S0452.A	Michael Hampson	n/a	1) We need to act now for the high speed rail in California get the high speed rail to come to San Diego as soon as possible. We need to add California High Speed Rail tracks, freight train tracks and trolley tracks installed next to each other along the I-15 corridor will railroad tracks and rail stations. 2) Make all Rapid Bus Lines into trolley lines (or light rail). 3) We need light rail from 805 (close to the border) going north connecting to the 15 and going into Escondido 4) We need east to west light rail trolleys. That is, we need light rail tracks going east and west on the I-56, Mira Mesa Boulevard, Miramar Road, I-94, I-52, H Street and East H Street, Telegraph Canyon Road to Otay Lakes Road, Palomar Street, Olympic Parkway, Palm Avenue, Del Sol Boulevard and I-905. 5) We need to eliminate as many bus routes and replace with light rail (trolleys). 6) Rail is the best form of mass transit. When you install rail, you are committing to that community that public transit is important to everyone who lives there. Rail is much easier to use than buses, is more comfortable than buses, is quieter than business and is safer than buses.
S0452.B	Michael Hampson	n/a	1) We can house everyone in San Diego, if we put our minds to it. We need well-designed and well-built housing that anyone on a low salary could afford. 2) How do we do this? It's based on need. If you have an engineer making tons of money, then they don't need help. 3) If you have a server (a restaurant server) who needs housing, it should be cheap. 4) One house per person or family. 5) I would recommend to house single people first. Single people who never had children are helping to reduce climate change. The number contributor to climate change are people. Help the single people (who never had children), first. 6) There are multiple new ways to help the environment. We need to clean the San Diego Bay from the stale water, oil and plastic. There are many new technologies that can clean water, including removing plastic. 7) We need to start specifying items to purchase for buildings, to public transit, that is it NOT made from plastic. There are companies now that are making, for example, plastic-type bags or sandwich bags that is made from kelp. It looks like plastic and acts like plastic but it is NOT plastic but is made from kelp and is non-toxic and is biodegradable. 8) Change all city pools and schools pools to natural pools. Recommend that all people with pools do the same thing. Natural pools are cleaned by using water plants and good bacteria. There is no need to use toxic chemicals to clean pool water. 9) We need to clean plastic and garbage from all the beaches. There are multiple new methods to do this. 10) You can use special bricks that allow grow moss on buildings to clean the air and cool buildings. There are many ways to add plants to cities. From hanging plants high above roadways to making small city forests. 11) We need to add city farms in all communities. Imagine having a 10 story or higher building that uses glass, metal and wood (not plastic). Then people can walk to a city farm and purchase locally ground fresh produce.
S0453	Francis Redublado	n/a	Skyline Hills very strongly benefits from the upcoming changes proposed by the 2025 regional plan. However, it needs slightly more tweaks. The 962 needs to see higher frequencies and nighttime availability. Despite connecting two major bus terminals, the 962's last bus is at 10:27. This forces people in National City to take a detour towards Downtown to reach the 4 and the 12 in order to return to Skyline Hills. The 962's corridor is likely to see higher use and connectivity, as it will connect the Blue Line, the Purple Line, a densified Highland Avenue, I-805 Rapid Routes, Skyline Hills bus terminals, and La Presa's upcoming rapid and existing local bus routes, if the current plan is implemented in full. Therefore it will require 12 minute frequencies and service extensions into midnight. The 963 may also need increased frequency. Avoid skimping out connections to Plaza Blvd by the I-805 Rapid Routes. As stated earlier, National City is set to rapidly densify as upcoming transit improvements make it more attractive. Additionally, Skyline Hills needs better connections to destinations just south of it, like Rohr Park, Southwestern College, and Otay Ranch. Southwestern College is in most serious need for better connections to Skyline Hills. Currently, the fastest route is one hour, and only runs hourly (12/962->961->705). Alternative routes are at least an hour and 30 minutes. This, especially in the mornings, is unacceptable. There are several possibilities to remedy this. The most obvious one is simply to improve the frequencies of the 961 and the 705 such that the route described above has at least 30 minute frequencies. This would better connect Skyline Hills to Plaza Bonita, Rohr Park/Bonita, and SW College. Another alternative is to improve at least the morning frequencies of the 707 once the Rapid Route 292 is created. Otay Ranch transit might need changes. Otay Ranch may benefit from a dedicated bus terminal at the current Otay Ranch station, which can be feasibly accessed by all but 2 planned bus routes for the area. The transit guideway should be expanded farther along Eastlake Parkway, and perhaps provide a direct connection to SR 125. The 292's connections to Otay Ranch transit looks poor. It avoids most of Otay Ranch and meets with only a few rapid routes at a highway ramp. It would be better to have the bus use the transit guideway to better connect to the local bus routes. SR 125 is very likely to get congested once the toll disappears. The 292 and the 225 needs to have a dedicated way on the highway to avoid traffic.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0454.A	Richard Schwartz	n/a	As much as I would love to use light rail and trolley more often, it seems that a great deal of homeless and indigent population stay on the train and in turn I feel a lot less comfortable than I used to. The trolley's need to be kept cleaner and there needs to be more security or policing to ensure that those who ride can do so safely and comfortably. Those not paying and abusing the rail system should be excluded from using it as a place to settle and sleep. I wish so badly that San Diego and other cities in CA would take seriously the homeless issue and come up with a plan so that tourism and local businesses can flourish downtown.
S0454.B	Richard Schwartz	n/a	Long overdue. CA has been touted to be a "health conscious" state and it's time to act like one. That means adding new safe cycling routes and remedying those that are in need. Cycling has to be safe. Sadly, after riding Bike the Bay last year (and making a donation to the local program sponsor), I was disappointed in the second half of the ride having to cycle on very poor pavement and roads strewn with trash, excrement and debris. It was a poor showing for such a beautiful city with so much potential. Let's clean up our city and make it a memorable place to visit and live. That means number one priority is remedying the homeless issue downtown so that locals and tourists alike and businesses can flourish and feel safe. This has to be a number one priority. Accomplish that and I can only imagine how special the city will be. It will take action and someone who is dedicated and fearless to do so. In the long run, everyone will benefit.
S0455.A	n/a	n/a	Interstate 5's, MTS' Trolley Blue Line and the San Diego and Imperial Valley Railroad's (SDIY) combined traffic/transport noises are adversely impacting the neighborhoods of the Chula Vista Bayfront region. With the new SANDAG projects for the Chula Vista Bayfront regions, are there any plans for a SANDAG, noise abatement project for the Chula Vista Bayfront region in the SANDAG 2025 Regional Plan? Interstate 5, the MTS Trolley Blue Line and a daily San Diego and Imperial Valley Railroad (SDIY), 0115 (AM) freight train transport infrastructures abuts the Chula Vista Bayfront neighborhoods. I've lived on the [redacted] Chula Vista, CA [redacted] since 2023. During the work week (M-F), there is excessive levels of traffic noise (>75dB) from the vehicles utilizing the I5 freeway. This noise occurs consistently from 0430 to 0800 (AM) and 1700 to 2100 (PM). The Chula Vista Bayfront neighborhoods require a SANDAG/CALTRAN noise abatement project to address the current negative impact of the traffic/transit noises on the Chula Vista Bayfront neighborhood residents as well as property values.
S0455.B	n/a	n/a	The Chula Vista Bayfront neighborhoods that abut Interstate 5, the MTS Trolley Blue Line and the San Diego and Imperial Valley Railroad (SDIY), are rreported in the SANDAG 2025 Regional Plan as a minority community.
S0456	CW	Linda Vista	*left everything blank, only entered Linda Vista*
S0457	n/a	n/a	Fix the roads, damaging tires and car. Need to be redone.
S0458.A	n/a	n/a	More security on trolley
S0458.B	n/a	n/a	Safer public transport
S0459.A	Jesssica Helgesen	n/a	-As someone who is a resident of almost 9 years in North Park, Environmental Geographer and Urban Studies specialist i have the following suggestions. - Please continue to ensure the light rail trolley/train *purple line* moves forward soon as too much focus has been on the suburbs. -I love that the purple rail is finally being looked at to offer the core of the city smooth transit. In North Park I have noticed you're planning for long term solutions and not for our immediate needs in these communities. We have short term riders ready to go - the buses are packed everyday when I go to work downtown. Building the purple line by 2050 is offensive to the inner city community. If you want to make a 15 min city happen sooner rather than later, prioritize the urban city core and seek to have this built by 2030. -I have walked, biked and taken the bus for my entire time here and just recently purchased a car in September, bc the amount of time for me to move around for example to the beach from NP is over 1 hr instead of just 15 min by car. It just isn't the best use of my time to take that long of a trip (at least 2 hrs instead of 30 min round trip - 4 times as long). Therefore, it would be helpful to design neighborhood transit hubs in neighborhoods that have one stop- neighborhood to neighborhood to be faster. For example one stop in North Park, then Hillcrest, Mission Hills and then end stop is to the airport or the beach. Additionally, Beach to beach buses could reduce parking issues and would help with parking overcrowding/traffic. Suggest similar design for neighborhood-to neighborhood to the airport. There currently is an airport bus from downtown that is great. For the beach bus example mentioned prior, we could have a similar storage spaces that exist on the airport bus so folks could put their stuff. Suggest name to be 'beach buses' -Please have more park and rides, or better advertise them; ie the last mile -Consider innovative transit like a Single Rail Hanging Highway (Wuppertal's suspension). These can be artsy, smooth and reduce traffic. Location idea: Balboa park to downtown to mission over the highway. - love that with MTS we can now pay with a credit card tap. The metro app is great as well. Only suggestion is to integrate FRED lines to this system and include transit information from 'one bus away' into the same application. Bike rack locations would be great to add as well.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0459.B	Jesssica Helgesen	n/a	- As a non-native Californian, I don't love the "CA roll" at stop signs. Roundabouts can help keep the flow of traffic moving, push drivers to have better traffic etiquette and help bikers and walkers stay safe. We need more roundabouts that include bikes in the design as well as "walker stops " to keep pedestrians safe. Potential location examples at el Cajon and Park and el cajon and university; consider pedestrian bridges with shade shelters if needed to help with flow of traffic with roundabouts. I'm not sure why the costs on roundabouts appear to be so expensive. Consider piloting different sustainable designs at affordable prices for long term solutions. -I find it odd that we have very limited shade structures in the sunniest location in the US for our public transit. These shade structures could be a simple and cheap way to make public transit more pleasant, especially with extreme heat increasing. Overall we need more shade/cooling structures that include benches. This could be combined with placemaking/art and identity for SD neighborhoods! Make this FUN and make this happen FAST! Consider public-private sponsorships combined with local artists who get paid to share their talents with the community.I imagine this as "little, yet big changes." -Please keep pushing for the 15 min city! To do this we NEED more bike racks to encourage people to ride. Why can only business request bikeracks? why not neighborhoods/community members? It would be great to see these racks be artsy and maybe add a bench, or shade structures! Consider succulents or native plants that little to no water/support/maintenance. If they do, create community captains/care takers. Consider bulletin boards in these areas as well--- - these build community/connection. - Lastly we need more waste bins on sidewalks--- not just downtown. I've seen these connected to bus stops, let's do more of this!
S0459.C	Jesssica Helgesen	n/a	- Our highway on ramps need to be modernized for the time we are in. They currently cannot handle the amount of traffic and if we stay as is we will end up like LA in just 5 years with all the growth resulting in crawling traffic and worse air pollution. I'm not sure who engineered the highway near mission valley, but the amount of merging in one lane is dangerous. It seems obvious to create a double decker shift/merge ramp for folks who want to drive to the mall and those who are going towards LA and those that are going to beaches. Please make this area safer and reduce the environmental impacts from all the stalling. This entire zone is an engineering fail and driver nightmare. - As stated above more roundabouts with bikers/walkers in mind. - flooding is an issue on local roadways, please start building roads with basic drainage (example - brand new university stretch was damaged in north park and flooded absurdly bc climate change/rain is not being considered in the design)
S0459.D	Jesssica Helgesen	n/a	-when designing and planning please be considerate of historically redlined communities and not displacing communities who are already struggling to pay their rent. I didn't see redlining mentioned As things change I am worried about gentrification and not enough affordable housing units that are a livable size. For example, North park keeps designing shoe box apartments at prices that most people in the community cannot afford. The spaces with porches or communal outdoor spaces (we need outdoor space for healthy living), livable sizes and affordable are welcomed. Diverse communities are strong communities. We need to do and be better as a region to be more economically inclusive to our neighborhoods and community. Please discuss gentrification prevention in the updated plan with housing as well as transit improvements. Mixed use development with mixed income housing close to bus stops is also wonderful, just make sure there are ways to keep the local community there longterm. These low-income housing units should exist for the life of the building. We keep on having 'temporary' low-income housing and it is a bandaid on a longterm issue as the spaces don't stay. - In 2025 many apartments/condos developments are empty downtown while people live in our community unhoused. How in the region can we do and be better with landowners/landlords to not have empty living spaces for too long? These empty spaces are potential transit riders that don't exist bc they're vacant. It also just doesn't sit right to hear this when folks need spaces to live. - consider more pre-decisional input and notices in the languages of need
S0460.A	n/a	n/a	Stop expanding the darn freeways! All it does is induce more traffic and makes the San Diego region even more car dependent that it already is. This has been repeatedly proven by study after study for decades now. It's infuriating that we still have no direct rail access to the airport and the most densely populated walkable areas of the city have zero rail access (Hillcrest, Pacific Beach, North Park, etc.). "Express" buses are not a replacement for rail. Studies have proven that choose transit riders (those with a car readily available) will ride rail but won't ride a bus. Even with bus lanes, buses are slow and inefficient at moving significant numbers of people. Also, there is a psychological element with rail. With rail lines and stations you know this is where the transit vehicle is going to operate. With buses is there a reroute? Also bus stops are a very unpleasant place to wait for transit compared to a rail station with lots of space, seating, lighting, etc. HOV and "managed" lanes do not work unless they are fully separated like the express lanes on 15. The regular HOV lanes jam up and are just as slow when the adjacent lane is congested. A solid white line isn't enough to prevent cars from dangerously entering the HOV lanes, therefore HOV lane drivers are forced to go very slow.
S0460.B	n/a	n/a	There are vast amounts of non utilized or underutilized land in developed portions of San Diego that are not being used to their highest and best use. Also, current rail lines are b out being fully optimized. For example, there are several missing pedestrian bridges in Mission Valley at green line stations that effectively cut the trolley stations walking zone capture area in half. Just look at Fenton Parkway. There's a very large office complex directly across the river from the station and there's a lot of developable open land East and West of the office towers. If there was a pedestrian bridge across the river, hundreds of office workers would be within a 5 minute walk of their office from the trolley station. Instead the walking route is a very long circuitous, highly unpleasant and dangerous route. People won't do it. This means the huge public investment in the green line through mission valley is essentially incomplete.
S0461.A	Carla Pekin	n/a	The transit is inadequate, by adding housing and then possible transit is backwards . We need transit and then add housing. The current configuration of San Diego will not support light rail, rail or more buses. This document is garbled garbage , worded so most won't understand.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0461.B	Carla Pekin	n/a	We DON'T NEED more bike lanes. Not being used and displacing many who can't ride . Very discriminatory. Lawsuits are going to occur.
S0461.C	Carla Pekin	n/a	The housing and adu push is completely out of control! We are becoming Los Angeles 2 very quickly. Currently, traffic is getting very bad and too many apartments and condo are going up city wide, in very inappropriate areas such as Hillcrest, Point Loma , Pacific Beach. Too much, no ARKit and destruction of neighborhoods. The mayor and city council are completely incompetent and corrupt.
S0462	n/a	n/a	Trolley from downtown San Diego to San Diego Airport. Also, public bus service nearer arrivals at the CBX. Most major cities in Europe have easy, efficient trains, trolleys and buses connecting passengers between downtown central areas and airports. Why are so behind?
S0463	n/a	n/a	I don't like that the phasing for these projects puts most of the completion dates near 2050. In particular the bike route from the rose canyon bike path to the convoy area is slated for 2050. I live in the University area and UCSD Convoy St is the worst connection on bike out of any which I frequent. When heading north there is the nice I5 bike path, to Mira mesa Miramar road along the military base is nice. South there is the mission bay bike path. However heading to Linda Visa / Convoy is really bad since Genesee Avenue is very bike unfriendly. There are a lot of UCSD students that have bikes / electric scooters and frequent the restaurants in the Convoy area, however currently there is no option that makes them feel safe. As a result they drive or visit other locations with nicer bike paths / bike lanes with no curb cuts (such as along Sorrento Valley Blvd).
S0464.A	n/a	n/a	Expedite purple line.
S0464.B	n/a	n/a	Remove the toll on 125 highway
S0465	n/a	n/a	I did not see this in the plan, but the 5 south onramp from Gilman drive is extremely dangerous at rush hour, with cars coming to a complete stop to try to merge onto the 5 freeway, while those on the 5 are trying to merge into the same lane to get on 52E. Is there a way that could be improved?
S0466.A	n/a	n/a	in looking at the 5 and 15 at peak hours, i would suggest the development of large tasteful apartment complexes, along with high end valuable condos , in the downtown areas we have in this county, instead of getting people out of their cars and on to buses, bring a reality of ending the commute.
S0466.B	n/a	n/a	we pay enough in taxes in california. toll roads. a better allocation from the state and feds to bring back our tax dollars,
S0467.A	Emily Elliott	n/a	I previously commented on the need for safe bicycle infrastructure on Hwy 79, particularly from Warner Springs to Santa Ysabel. There are a number of established long-distance mountain bike/ bicycle touring routes that rely on this highway segment to connect trail segments. There is very little to no shoulder on which to ride a bicycle. The amount of large vehicles on this segment (RVs, travel trailers) associated with desert recreation leave even less room to "share the road". Shoulder widening through this section would greatly improve safety for non-motorized road users. Bicycle tourism is an economic driver is this area with cyclists making use of mom-and-pop businesses for food and lodging. Small rural communities depend on low-impact tourism for economic survival. Ensuring safe passage enables cycling-tourists to make more use of the area and further provide economic benefit. SANDAG should consider working with relevant parties (Vista Irrigation District, SD County) to allow bicycle access on the Pacific Crest Trail/ CA Riding and Hiking Trail segment between Warner Springs and Montezuma Valley Road at Barrel Spring. This would allow cyclists traveling known mountain biking routes to avoid a dangerous section of Hwy 79 to connect to biking trails in the Ranchita/ Anza Borrego Desert State Park area.
S0467.B	Emily Elliott	n/a	I previously commented on the need for safe bicycle infrastructure on Hwy 79, particularly from Warner Springs to Santa Ysabel. There are a number of established long-distance mountain bike/ bicycle touring routes that rely on this highway segment to connect trail segments. There is very little to no shoulder on which to ride a bicycle. The amount of large vehicles on this segment (RVs, travel trailers) associated with desert recreation leave even less room to "share the road". Shoulder widening through this section would greatly improve safety for non-motorized road users. Another segment of particular concern is the narrowness/non-existence of should on Hwy 78 between Banner Grade (Julian) and Borrego Springs Road. There is no legal way to avoid this segment on a bicycle due to wilderness designations and Anza Borrego Desert State Park rules. While trails and washes do exist that would allow people on long distance mountain biking routes to avoid this narrow, twisty, low visibility section of highway that is often choked with oversize recreational vehicles. Solutions could include widening of the shoulders (ideally to also accommodate road cyclists), and coordination with ABDSP to allow bicycles on certain sections: 1) through a 1/2 mile section of wilderness that would connect Mine Wash through Mine Canyon to Pinyon Mountain Valley. 2) Allow bicycles in Chuckwalla Wash between Yaqui Pass and Borrego Springs Road.
S0467.C	Emily Elliott	n/a	See my prior comments about coordinating with Anza Borrego Desert State Park, Vista Irrigation District and other relevant parties regarding trail access.
S0468.A	John Eldon	n/a	Please do not turn use the "Flexible Fleets" designation as a justification to cram high-density development into these established residential neighborhoods.
S0468.B	John Eldon	n/a	General comment: Do not destroy our established residential neighborhoods. Instead, rezone sprawling underutilized business parks and commercial centers for mixed use, stipulating emphasis on affordable housing.
S0469.A	n/a	n/a	Stop building things before you have riders.
S0469.B	n/a	n/a	If they are desired in a particular area let that be on the community groups to provide them through fundraising. The city money and grants should not be used to fund these fleets when more money is needed to make safe transportation for vehicles, bikes and pedestrians.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0469.C	n/a	n/a	Stop painting the streets with green plastic paint that slides out into our ocean as it ages. If you can't keep bollards looking nice, and don't have a budget to keep them well maintained stop throwing money at the projects that use them. Plastic is not a solution to safer bike and pedestrian walkways. It will not solve our Environmental Impacts that you claim to want to he solving.
S0469.D	n/a	n/a	Lower speed limits in small communities such as PB. Make the entire community a traffic calmed area of 25mph. And enforce it.
S0469.E	n/a	n/a	prioritize moving cargo quickly, stop forcing EV's to replace what was already working. Whatever rules cargo and shippers are held to with regards to plastic, paint etc be aware our street divisions should be held to the same or higher standards.
S0469.F	n/a	n/a	Not a fan and believe it to be an invasion of privacy. AI, driverless vehicles, vehicles that communicate with each other are a worry. As is a world of EV's and batteries that cannot be extinguished.
S0469.G	n/a	n/a	Help! Stop building developments at the expense of citizens who bought into single family neighborhoods. This is not creating Equality but rather more division.
S0469.H	n/a	n/a	Enforcement of laws and codes is essential. Give that to the citizens.
S0469.I	n/a	n/a	Too much money and time is spent on forcing people to come around to new thoughts. Tax paying money spent toward pet projects and certain groups doesn't feel inclusive. A message of all are created equal should prevail in civic duty.
S0469.J	n/a	n/a	That I stumbled across this survey is proof of the lack of your ability to properly engage the public. Seek input from outside your think tank. Your actions should be voted on after every citizen gets a chance to know what you are up to.
S0469.K	n/a	n/a	Stop going above what the state requires without vetting it with the citizens of each district.
S0470.A	n/a	n/a	Focus more and more on public transportation. Glad to see planning for another trolley line.
S0470.B	n/a	n/a	San Diego's climate is one of the best in the world, but we will still see the effects of climate change. Anything that can be done to cut back on car use and to create more green spaces will be very welcomed.
S0471.A	n/a	n/a	There should be a trolley that connects downtown to Balboa Park. The park's world-class amenities should be easily accessible on a fixed route. San Diego also needs better transit connectivity at the airport. For an airport so close to the city center, its connectivity to highly trafficked areas of the city is lacking. There should be a trolley or some sort of rail connection between the airport and downtown. For example, there could be a people mover running from the airport to the embarcadero. It could bring people straight from the airport to their hotel or the convention center. The region needs to invest in transit as a viable alternative to the car. In order to fix San Diego's traffic problems and relieve stress from the roadway network, San Diego needs a strong transit network that encourages people to go places without their car, and it needs that transit network yesterday.
S0471.B	n/a	n/a	The region should focus on implementing more bikeways and bike infrastructure, and improving existing bikeways for safety and connectivity. The San Diego region should be the perfect place for a robust bikeway network; it has perfect weather year-round for cycling. Bike infrastructure costs a fraction of the cost of roadway infrastructure and is much easier to implement. Expanding bike infrastructure will make cycling a viable alternative to driving and will reduce traffic. This will ease strain on the road network, meaning less maintenance will be required on our roads, and this will free up parking in urban areas as well. MPOs like SANDAG must be focusing on the future, and focusing transportation resources on sustainable forms of transportation like cycling will set up the region for the most success.
S0471.C	n/a	n/a	San Diego has some of the most expensive housing in the country. If SANDAG can use its influence as the regional MPO to encourage local zoning reform, such as abolishing single-family zoning in urban areas and demanding more mixed-use zoning in new developments in all areas, that should be a focus in the Plan.
S0472.A	n/a	n/a	I would like to suggest that State Route 76 between Interstate 15 and Valley Center Road be expanded to 4 lanes, (2 in each direction). With the increased population the traffic going though Valley Center on Valley Center Road has become unmanageable. Much of this traffic is going to Palomar Mt, Julian, or Desert locations and using Valley Center Road because it is 4 lanes rather then Route 76. We also have 5 casino's in the area that bring traffic to our little town. We have become a pass thought town, supported mostly by gas stations. We need your help in creating exit routes out of Valley Center as more house developments are plan, without the infrastructure to support them, especially connecting roadway. We do not have a grid design of roadways to choice from, we only have a few road can be used to travel in or out of Valley Center. Your help in funding more connecting roads is needed.
S0472.B	n/a	n/a	I would like the County to purchase more park land. I am aware of the budget restrictions and that the parks will not be developed anytime soon. If we do not plan for future parks we will not have land available for future generations as all the land will be developed.
S0473.A	Ben	n/a	It needs to be expanded, focused on and improved. We need more frequent buses, more routes to the beaches and areas in between southeast sd and north county for employment. We need later running buses for nightlife for the young people. There needs to be a major focus on public transport so we can build sd's economy back and get people working and moving around. We should be connecting the whole San Diego area with transit, right now we are sectioned off and bound to certain parts of the city.
S0473.B	Ben	n/a	Less police. More affordable housing.
S0473.C	Ben	n/a	Less police please.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0474.A	n/a	n/a	Priorities should be - direct one-seat trolley to the airport - double tracking Amtrak to LA
S0474.B	n/a	n/a	Fix the mess in Sorrento Valley. Try getting from Del Mar to UCSD across the train tracks in Sorrento Valley. It's very dangerous.
S0475	Craig Forman	n/a	Ask the California legislature and California Governor to stop funding High Speed Rail from Los Angeles to the Central Valley and use the state and federal funds for SANDAG projects. Also, we will NOT vote for a sales tax increase.
S0476.A	Morris A Renna	n/a	While public transit projects, such as trolley expansions and Rapid routes, offer long-term sustainability, they shouldn't take precedence over immediate road and highway improvements. We need to balance transit investments with the urgent need to reduce congestion and enhance mobility for drivers, as this affects a larger segment of the population. Focusing on road infrastructure first ensures an efficient and accessible transportation network, allowing for a phased introduction of transit projects.
S0476.B	Morris A Renna	n/a	Prioritizing highways and local roadways is crucial for reducing congestion, improving travel times, and facilitating the movement of goods and services. Expediting projects like adding express lanes on I-805, auxiliary lanes on SR-125 and SR-94, and enhancing freight corridors will address immediate transportation challenges, benefiting the population and supporting regional economic growth and mobility.
S0476.C	Morris A Renna	n/a	I strongly support the transportation technology focus in SANDAG's 2025 Regional Transportation Plan, including shared mobility, electrification, connectivity, smart mobility, integrated corridor management, and the Next Generation 511 system. Embracing these technologies will create a more intelligent, responsive, and resilient transportation system. I urge SANDAG to prioritize and expedite their implementation.
S0477.A	Ashley Harrington	n/a	I live near a trolley stop in central San Diego, and strongly support mode-shift planning and infrastructure. I hope that we can upzone and redevelop some of the areas near a trolley lines to increase density, create more housing, and ensure more ridership.
S0477.B	Ashley Harrington	n/a	I strongly support the increase in bike lanes across San Diego county. Too often public comment is done by older folks, or people who are unwilling to change to support their fellow neighbors and utilizing safe bike lanes. Protected bike lanes are an important piece of art, infrastructure network. Mode shift towards environmentally friendly transportation won't happen without safe and accessible bike ability across the county as part of the larger transit network. Please don't listen to the naysayers, and keep installing the bike lines. Our future as a city open to all ages and abilities depends on it.
S0477.C	Ashley Harrington	n/a	We must upzone and rezone (commercial to residential) some of the areas near our transit lines to support more housing. The areas where we have invested significant public funding in fixed rail, need to support far greater housing opportunities than they currently are zoned for.
S0478	Virgina Alvarado	n/a	En la parada de la tercera y J st ruta 29 en chula vista no tiene donde sentarse. Ruta 91 muy lenta *** At the stop at Third and J Street (route 29) in Chula Vista there’s nowhere to sit. Route 91 is very slow
S0479	Eva Garcia	n/a	Falta de banquetas en Naples st. y muy poco estacionamiento para los residentes. *** There are no sidewalks on Naples St. and there’s very little parking for residents.
S0480	Martha Rocha	n/a	mucha construccion poco estacionamiento los estacionamientos no estan marcados en varios lugares *** There is a lot of construction and very little parking; the parking spaces aren’t marked in many places.
S0481	Asuncion Lifback	n/a	Mas paradas de camiones en chula vista *** More bus stops in Chula Vista.
S0482	Susana Palomino	n/a	linias en la carretera no estan bien marcadas en via suspiro y en san Ysidro bulevar *** The lane markings aren’t clear on Via Suspiro and on San Ysidro Boulevard.
S0483	Jesus Talavera	n/a	Donna st y 16th tiene muchos baches y se inunda de agua cuando llueve *** Donna St. and 16th have many potholes and flood when it rains.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0484	Anita Ranirez	n/a	Luces de Beyer station y en las paras de las paradas del camion de del sol blvd, *** Lighting is needed at Beyer Station and at the bus stops on Del Sol Blvd.
S0485	Teresa Valenzuela	n/a	Muchas calles en San Ysidro ocupan pavimentarse otra ves por ejemplo dairy mart exit *** Many streets in San Ysidro need to be repaved again, for example the Dairy Mart exit.
S0486	Yolanda Hernandez	n/a	Linia Azul y linia ananjada de trolley esta muy sucia y llena de homeless ocupamos mas seguridad en los trolleys. *** The Blue Line and Orange Line trolleys are very dirty and full of homeless people; we need more security on the trolleys.
S0487.A	Linda Victorino	n/a	fines de semanas es muy dificil el transporte publico *** On weekends it's very difficult to use public transportation.
S0487.B	Linda Victorino	n/a	calles muy sucias y con ollos en san ysidro *** The streets in San Ysidro are very dirty and full of potholes.
S0488	Mizapata	n/a	calles muy feas y con baches en San Ysidro *** The streets in San Ysidro are in very bad shape and full of potholes.
S0489	A Zapata	n/a	area de Chula Vista muy insegura muchos ingijentes alrededor de palomar *** The Chula Vista area feels very unsafe; there are many homeless people around Palomar.
S0490	Audoro Galvan	n/a	Davis Way quedo muy bien con las nuevas actualizaciones que le hicieron gracias por su apoyo *** Davis Way turned out very well with the new upgrades you made; thank you for your support.
S0491	Maria Centeno	n/a	Dairy mart ocupa topes porque los caroos pasan muy rapido y siempre hay ninos jugando afuera y es muy peligroso *** Dairy Mart needs speed bumps because cars go very fast and there are always children playing outside; it's very dangerous.
S0492	n/a	n/a	Por la escuela Willow y Park Heaven apartments en San Ysidro esta llenos de hoyos *** Around Willow School and the Park Heaven apartments in San Ysidro the road is full of potholes.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0493.A	n/a	n/a	Las ciclovias considero no son lo mejor para mi comunidad, San Ysidro y Otay Mesa, han quitado espacio de estacionamientos para darle espacio a ciclovias, lo cual ha creado estres en los residentes ya que no encuentran lugares para estacionar sus automóviles y en ocasiones crean problemas entre los mismos residentes por pelearse por un espacio para estacionarse. Ademas si se pretende el uso de las ciclovias para que los estudiantes se transladen a la escuela en bicicleta no es factible en mi comunidad ya que el relieve del área es de colinas lo cual dificulta el traslado. La falta de educación vial de los ciclistas los ponen en riesgo de sufrir accidentes o provocar accidentes, ya que me ha tocado observar que no respetan los señalamientos de trásnsito y creen que tienen más derechos que los vehiculos. Y considero no es funcional, ni práctico, que se pretenda que para ir al trabajo usen la bicicleta aún interconectando los medios de transporte, la gran mayoria de los residentes del área trabajan al Norte del Condado lo cual les llevaria más tiempo llegar a su trabajo y regresar, aunado al cansancio y el malestar de llegar sudados a su lugar de trabajo. *** I don't think the bike lanes are the best for my community (San Ysidro and Otay Mesa). They removed parking spaces to make room for bike lanes, which has caused stress for residents because they can't find places to park and sometimes they fight over parking spaces. Also, if the idea is for students to ride bikes to school, it isn't feasible in my community since the terrain is hilly and makes travel difficult. Cyclists' lack of road safety education puts them at risk of causing or having accidents; I've seen them ignore traffic signs and think they have more rights than cars. And I don't think it's functional or practical to ask people to ride a bike to work even if it connects with transit. Most residents of the area work in North County, which would take them longer to get to and from work, plus the fatigue and discomfort of arriving sweaty at work.
S0493.B	n/a	n/a	Las calles locales de mi comunidad necesitan repararaciones, hay baches en varias calles de San Ysidro y necesitan reencarpetado. Se necesita más alumbrado y limpieza de calles y Freeway. (Fwy 805 Sur) (Fwy 905) (Fwy 5 Sur). *** The local streets in my community need repairs; several streets in San Ysidro have potholes and need to be resurfaced. More lighting and cleaning is needed on the streets and freeways. (I805 South) (SR905) (I5 South).
S0493.C	n/a	n/a	Las viviendas que se construyan recomiendo que cuenten con estacionamiento suficiente porque actualmente es insuficiente para los propios residentes; que exista un control en el incremento de las rentas . El precio de las casas, departamentos y townhome sean a precios asequibles y accesibles. *** New housing should include sufficient parking because there isn't enough for current residents; there should also be controls on rent increases. The price of houses, apartments and townhomes should be affordable and accessible.
S0494.A	Gabriela Hernandez	n/a	Me gustaría q se invirtiera en reparación de calles como en chula vista móvil house las calles eran muy dañadas, y las personas mayores no pueden andar en sus andaddras *** I'd like some investment be made in street repairs, for example at the Chula Vista mobile home park; the streets were very damaged and older people can't walk with their walkers.
S0494.B	Gabriela Hernandez	n/a	Enseña a la comunidad a ser buen uso de la tecnología *** Teach the community to make good use of technology.
S0494.C	Gabriela Hernandez	n/a	Más control en las rentas *** More control over rent increases.
S0494.D	Gabriela Hernandez	n/a	Acceso a recursos financiero par personas de bajos recursos. *** Access to financial resources for low income people.
S0494.E	Gabriela Hernandez	n/a	Invertir en la protección del medio ambiente poniendo basurero en las esquinas. *** Invest in protecting the environment by putting trash cans on the corners.
S0494.F	Gabriela Hernandez	n/a	Permitir llegas estas encuestas a más individuos en mi comunidad.. *** Let these surveys reach more people in my community.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0495.A	n/a	n/a	trolley de la Palomar es muy tardado y causa mucho trafico para los carros *** There's heavy traffic on Palomar because of the trolley tracks.
S0495.B	n/a	n/a	Trafico pesado en palomar por las vias del trolley ***
S0496	Rosa Vazquez	n/a	construcciones en san diego parecen no estar regulas porque hay muchas construcciones por todos lados . Aparte hay muchas construcciones que no se les hace estacionamiento y es muy dificil conseguir estacionamiento en las calles. *** Construction in San Diego seems unregulated because there's building everywhere. There are many developments that don't provide parking and it's very hard to find street parking.
S0497	Manuela Lara	n/a	Fines de semana es muy dificil usar el transporte publico y no hay consistencia en horario. Me ha tocado esperar hasta 2 horas para que pase el camion *** On weekends it's very hard to use public transport and the schedule isn't consistent. I've had to wait up to 2 hours for the bus to come.
S0498	Maria Guzman	n/a	muchos homeless en las paradas de los trolleys *** There are many homeless people at the trolley stops.
S0499	n/a	n/a	Calle Rienstra lso carros pasan muy rapido. ocupamos topes en la calle. *** On Rienstra Street cars go very fast; we need speed bumps.
S0500	Raquel Campos	n/a	Gracias por todo sus servicios y mantener los camiones limpios *** Thank you for all your services and for keeping the buses clean.
S0501	Ubaldine Carrillo	n/a	704 los fines de semana no pasa muy seguido y tenemos que esperar mucho rato *** Route 704 doesn't run very often on weekends and we have to wait a long time.
S0502	Matilde Jaramillo	n/a	Calle 2nd y orange en la parada del camion esta muy oscuro y solo neceita luz *** At 2nd and Orange the bus stop is very dark and just needs lights.
S0503	Juan Chavez	n/a	Calle Anita y Broadway en Chula Vista no encuentras estacionamiento por ningun lado *** On Anita and Broadway in Chula Vista you can't find parking anywhere.
S0504	n/a	n/a	La gente se sube al trolley con bicicletas y no dejan espacio para la entrada, tener un lugar designado para las bicicletas. *** People board the trolley with bicycles and block the entrance; there should be a designated place for bikes.
S0505	n/a	n/a	MUy feliz con sus servicios y la atencios de los choferes *** Very happy with your services and with the drivers' courtesy.
S0506	n/a	n/a	mas seguridad en las paradas del trolley, tener un telefono o un boton para emergencias. *** More security at the trolley stops; have a phone or emergency button.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0507	Marcos mancillas	n/a	Fines de semana muy dificil de usar transporte, que las rutas sean mas continuas. *** On weekends it's hard to use transportation; the routes need to run more continuously.
S0508	n/a	n/a	Ocupamos topes en calles en chula vista por las escuelas *** We need speed bumps on streets near schools in Chula Vista.
S0509	n/a	n/a	El alumbriamiento no es muy bueno en muchas calles de Chula Vista *** The lighting isn't very good on many streets in Chula Vista.
S0510	Maria Castro	n/a	En la parada dela 2da y orange esta un pasillo que esta muy oscuro y afuersas tiene que pasar uno por ahi *** At the stop at 2nd and Orange there's a very dark passageway and you have to go through there.
S0511	tere	n/a	Ocupamos topes o maneras de hacer los carros ir mas lento en las areas d e las escuelas de Chula vista *** We need speed bumps or ways to slow cars down in the school areas of Chula Vista.
S0512	Josefina Gonzalez	n/a	Los camiones necesitan pasar a su hora son muy tardados *** The buses need to run on time; they're very late.
S0513	Maria Lopez	n/a	necesitamos mas luces en las calles de chula vista *** We need more lights on the streets of Chula Vista.
S0514	Virginia cervantes	n/a	senalamiento en la calles ocupa ser limpiado como las paradas de camion unas no se ven bien *** The road signs need to be cleaned; at some bus stops you can't read them well.
S0515	sara Rodriguez	n/a	el trolley ocupa tener un lugar designado para las bicicletas por se ponen en la entrada y no dejan pasar ala demas personas *** The trolley needs a designated spot for bicycles because they block the entrance and don't let others pass.
S0516	n/a	n/a	cruce peatonal en las escuelas por ejemplo castle park middle *** Pedestrian crossing at the schools, for example at Castle Park Middle.
S0517	Enrique Morales	n/a	cruce peatonal en castle park middle school *** Pedestrian crossing at Castle Park Middle School.
S0518	Adriana	n/a	Donax st ocupa mucha reparacion en la calle y alumbrado *** Donax Street needs a lot of road repairs and lighting.
S0519	Rosa	n/a	Calle 2da esta muy maltratada y ocupa mantenimiento. *** 2nd Street is very deteriorated and needs maintenance.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0520	Gladys Lopez	n/a	Transporte no es constante en el area de chula vista y san ysidro *** Transportation isn't consistent in the Chula Vista and San Ysidro area.
S0521	n/a	n/a	la ruta de camion 704 no pasa muy seguido y los fines de semana no hay ruta o imposible de agagrrar. Bancas y sombra para las paradas de camion es necesario. *** Bus route 704 doesn't run very often and on weekends there's no service or it's impossible to catch. Benches and shade at the bus stops are necessary.
S0522	Judith Guerra	n/a	cruce peatonal en chula vista en la escuela castle park middle *** Pedestrian crossing in Chula Vista at Castle Park Middle School.
S0523.A	patricia luna	n/a	cruce peatonal en la escuela castle park *** Pedestrian crossing at CastlePark School.
S0523.B	patricia luna	n/a	Falta alumbrado en las paradas de camiones *** There isn't enough lighting at the bus stops.
S0524	n/a	n/a	Las banquetas en chula vista ocupan mucho cuidado hay muchas que no tienen ni cemento. por ejemplo Emerson st *** The sidewalks in Chula Vista need a lot of work; many don't even have concrete, for example Emerson St.
S0525	Bertha serna	n/a	muchos baches por todo chula vista *** There are many potholes all over Chula Vista.
S0526	n/a	n/a	cruce peatonal en castle park midlle y mas luz *** Pedestrian crossing at Castle Park Middle and more lighting.
S0527	Alma Rosa Zalazar	n/a	Ruta 712 de camiones necesita pasar mas seguido los fines de semana y mas frecuente *** Bus route 712 needs to run more often on weekends and more frequently.
S0528	Tomas Marquez	n/a	Calle Melrose y main los carros pasan muy rapido ocupamos topes para reducir la velocidad. *** On Melrose and Main the cars go very fast; we need speed bumps to slow them down.
S0529	Salvador B	n/a	En san Ysidro hay muchas calles con oyos y necesitamos la linias marcadas en la carretera. *** In San Ysidro there are many streets with potholes and we need the road markings painted.
S0530	Norma Diaz	n/a	Las ciclovias quitaron mucho estacionamiento de la calle broadway ocupamos un mejor sistema o manera de tener estacionamiento *** The bike lanes took away a lot of parking on Broadway; we need a better system or way to have parking.
S0531	Lorena	n/a	Faltan topes en la calle de Quintard y 2da por la secundaria Castle park Midldle los carros pasan muy rapido. *** There are no speed bumps on Quintard and 2nd by Castle Park Middle School; cars go very fast.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0532	Patricia Delgado	n/a	Cruce peatonal en la Castlepark middle y mas luces *** Pedestrian crossing at Castle Park Middle and more lights.
S0533	lilian Villareal	n/a	toda el area de chula vista hay mucha construccion y no hay estacionamiento por ningun lado me gustaria saber que se esta haciendo para mejorar esa situacion *** Throughout the Chula Vista area there's a lot of construction and no parking anywhere. I'd like to know what's being done to improve this situation.
S0534	Linda	n/a	Ruta 932 no es constante en su horario y los fines de semana no pasa ocupamos consistencia. *** Route 932 isn't consistent in its schedule and on weekends it doesn't run; we need consistency.
S0535	Rosa	n/a	Me encanta el servicio que tienen muy bien manejado gracias por todo *** I love the service you provide; it's very well run. Thank you for everything.
S0536	n/a	n/a	mas seguridad en las paradas del trolley no me siento segura *** More security at the trolley stops; I don't feel safe.
S0537	Margarita Delgadillo	n/a	Quintard enfrente de la secundaria ocupa un cruce peatonal es muy peligros los carros pasan muy rapido *** A pedestrian crossing is needed on Quintard in front of the secondary school; it's very dangerous because cars go very fast.
S0538	Griselda Martinez	n/a	Mas ilumunacion en ele parque de chula vista *** More lighting in the Chula Vista park.
S0539	n/a	n/a	Los que manejan los camiones aveces no son muy considerados de la comunidad siempre parece que llevan prisa Mas seguridad en los trolleys *** The bus drivers are sometimes not very considerate of the community; they always seem to be in a hurry. More security on the trolleys.
S0540	n/a	n/a	Poner un cruce peatonal en la secundaria castle park middle *** Install a pedestrian crossing at Castle Park Middle School.
S0541	Ricardo Leon	n/a	cruce peatonal enfrente de secundaria Castle park middle en calle quintard *** A pedestrian crossing in front of Castle Park Middle School on Quintard Street.
S0542	n/a	n/a	mucho homeless en las paradas de los trolleys necesitamos mas seguridad *** There are a lot of homeless people at the trolley stops; we need more security.
S0543	Ricardo pano	n/a	cruce peatonal en la escuela castle park *** Pedestrian crossing at Castle Park School.
S0544	Manuel Pano	n/a	castle park middle school ocupa un cruce peatonal para los estudiantes y padres. *** Castle Park Middle School needs a pedestrian crossing for students and parents.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0545	Madina Constantino	n/a	cruce peatonal en castle park middle y mejor alumbrado en las paradas de camion *** Pedestrian crossing at Castle Park Middle and better lighting at the bus stops.
S0546	n/a	n/a	Las paradas de camion no esta muy bien alusadas y sucias en chula vista *** The bus stops in Chula Vista aren't well lit and are dirty.
S0547	isabel rodrigues	n/a	una pista para patinar en los parques *** A skating track in the parks.
S0548	NICK DEILE	Accenture I &CP	Bikeways and Walkways have my support for early development of the San Luis Rey River Trail. Economic Benefits: I propose accelerated development of the San Luis Rey River Trail. It will boost local inland economies by attracting more cyclist. It may increase spending in local businesses such as restaurants and shops.. Environmental Impact: The planned trail highlights environmental advantages, including the promotion of non-motorized transportation, which can reduce carbon emissions and traffic congestion. It allows for the preservation and enjoyment of beautiful riparian habitats and open spaces. Health and Wellness: The planned trail underscores many health benefits, including increased physical activity and outdoor recreation opportunities for inland communities. The trail will encourage a healthier lifestyle and improve overall well-being. Community Connectivity: The plan should stress the importance of connecting growing communities through the trail. The trail will provide safe and accessible routes for pedestrians and cyclists, linking remote neighborhoods, parks, and other key destinations. Safety and Accessibility: The plan should address safety concerns by separating bicycles from traffic, providing well-maintained paths, proper lighting, and clear signage. It is also important to make the trail accessible to people of all ages and abilities. These arguments collectively make a strong case for the early development of the San Luis Rey River Trail.
S0549	n/a	n/a	Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on bikeways and walkways? Required The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....
S0550.A	Colleen Perone	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0550.B	Colleen Perone	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0550.C	Colleen Perone	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!
S0550.D	Colleen Perone	n/a	Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0551.A	n/a	n/a	transit in pt loma is difficult. rapid transit does not exist. a bus every 20 minutes or so does not constitute rapid transit. rosecrans is very overcrowded numerous times of the day. there is no way to make it wider. it would be a disaster in case of emergency.
S0551.B	n/a	n/a	all these bike lanes are lovely but very underutilized. they have in many cases seriously hurt small businesses because the bike lanes have eliminated parking needed for shoppers or clients. many bike lanes are where the residents are not of an age where they can still ride a bike safely
S0551.C	n/a	n/a	very upset with current so called road repairs. throwing slurry over large cracks and weeds is not repair it is just making street look a bit better. seems a hole is cut in streets right after they are sealed because agencies do not communicate and time projects efficiently
S0551.D	n/a	n/a	the mandated regulations that allow out of control ADUs is destroying neighborhoods. those of us who built within zoning regulations are now facing horrible eyesores in our line of vision. 23 units on one lot is crazy. the ADU was supposed to be AN additional unit not an apartment building. these are being rented out at market rates not helping out low income renters
S0551.E	n/a	n/a	the public is being overlooked . to many projects just happen without public notice. lack of transparency
S0551.F	n/a	n/a	state regulations are hampering local control
S0551.G	n/a	n/a	to many projects throughout region are going up with no regard for local public.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0552	Lisa Cuestas	n/a	1. A true vision and connections to San Ysidro Mobility Hub that is more than a hub, it needs to lead in design that acknowledges the volume and revenue generation from our transit system. 2. Faster transit. 3. Better and more equitable public bathrooms, not cages.
S0553	Nesta B	n/a	Make a new bus route that leads up to the San Ysidro High School
S0554.A	James Manning	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0554.B	James Manning	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0554.C	James Manning	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0555	n/a	n/a	1. Increase weekend frequency of the Blue Line Trolley. 2. More bus options to get to North Park, Little Italy, Downtown that don't take so long from Chula Vista

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0556	Tyler Andre	San Diego 350	Hi SANDAG! My name is Tyler "Dre" Andre. I live in Carmel Valley, an area drastically lacking in public transportation options. I am a volunteer with SanDiego350 and a local business owner. I love San Diego and want solutions that are best for everyone, especially those most impacted by our car-dependent systems. I'm submitting this comment because the 2025 Draft Regional Plan is a huge opportunity to shift the region in a more sustainable, equitable direction. I appreciate the work that's gone into the plan so far, but I have a few concerns and requests: The greenhouse gas emissions (GHG) reduction target of 19.3% by 2035 is not enough. That number barely meets the state mandate and falls short of what's needed to address the accelerating climate crisis. I urge SANDAG to raise the goal to at least 25% by 2035 and prioritize projects that will make that possible -- especially transit, biking, and walking infrastructure. Highway expansions labeled as "managed lanes" are still highway expansions. Adding new lanes leads to more vehicle miles traveled (VMT) and more emissions. Please remove all highway expansion projects from the plan and instead convert existing lanes to managed lanes if needed. Induced demand is real, and we can't pave our way out of congestion. The Youth Opportunity Pass program must be made permanent. It's one of the best tools we have to promote equity and reduce car dependence. Let's make sure young people always have access to free transit -- it's a long-term investment in ridership and opportunity. The Purple Line is essential. This project will connect communities to jobs and schools in ways that current transit does not. It must be prioritized and completed by 2050 -- and the sooner the better. Transit should be competitive with driving. A 45-minute bus trip that replaces a 10-minute car ride is not equitable. Transit needs to be fast, reliable, and convenient if we want people to shift modes. We need clearer metrics. Mode shift and VMT reduction targets should be included in the plan, as well as public tracking of health impacts like asthma rates and traffic injury data -- especially in communities most affected by pollution and unsafe streets. I want San Diego to be a place where public transit is not just available, but a real first choice. Where we fix past inequities and design for future resilience. Please make this plan bold enough to get us there. Thank you for the chance to comment, Tyler "Dre" Andre
S0557	n/a	n/a	To keep our communities safe, and livable, with a good quality of life for residents , do not move forward with the Complete Communities initiative. This initiative disregards the regulations put in place by other government agencies to ensure neighborhoods are protected. Those regulations were put in place for a reason.
S0558.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans St; two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0558.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0558.C	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! 3. What area in the San Diego region is your comment related to? (Optional) Entire region The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0559.A	n/a	n/a	The Point Loma and Shelter Island locations should be not included in your transit, bike lane and mobility group. The streets are narrow with two lanes only. There is not enough room to provide extensive transit buses along with bike lanes. Stop ruining our communities with density, over crowding and no thought to how residence will exit or enter the area without sitting in a "parking lot". No one in city hall thinks through these decisions and how they will impact current residence. All politicians have "pie in the sky" wants with no real idea how to achieve these wants. Wants does not always translate into real needs of the community. My husband and I strongly oppose including Point Loma and Shelter Island in this transit plan. Sincerely, Gordon and Jan Kugler
S0559.B	n/a	n/a	How is creating grid lock with traffic help with emergency services when the Fire Trucks and Ambulances can't reach homeowners due to density?
S0560	n/a	n/a	Transit to the airport should be buses or a trolley extension. Eliminate the elevated automated people mover. Too expensive for the limited ridership and duplicates the rail 1/2 a block away on the trolley.
S0561.A	Michelle	n/a	Transit works well in El Cajon but it is not convenient in our rural communities. For someone facing homelessness, it has been challenging to access services.
S0561.B	Michelle	n/a	The next opportunity for reduced rates should be for our homeless population.
S0562.A	Bobby	n/a	Bus lines are convenient enough in El Cajon but drivers are not always patient with persons with disabilities. Better training would help.
S0562.B	Bobby	n/a	PRONTO cards are expensive and when you are homeless, you have to rely on churches and organizations to provide transit cards for anyone experiencing homelessness. This should be a program of MTS.
S0563.A	Maricella	n/a	I don't have any complaints about transit but more rapid lines would speed up getting to my destination. I feel safe riding transit and appreciated learning about El Cajon's shuttle service today. More communities should have microtransit options.
S0563.B	Maricella	n/a	Free passes for homeless.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0564.A	Scott Stewart	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking.This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0564.B	Scott Stewart	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0564.C	Scott Stewart	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0564.D	Scott Stewart	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0564.E	Scott Stewart	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0565.A	Marcus	n/a	The trolley is easy to use and I appreciate the Wi-Fi. The buses could run more often to be more efficient to use. Trolley stops in El Cajon are not convenient so there should be free shuttle services to them.
S0565.B	Marcus	n/a	Seniors, low-income, and homeless individuals should have discounted fares.
S0566.A	Rafaela	n/a	ICE is an issue to I am not currently using public transportation. I would be interested in learning more about microtransit and appreciate the new shuttle that I learned about today in El Cajon.
S0566.B	Rafaela	n/a	Using ACCESS is very difficult and hard to sign up for. It is also challenging to get a senior discount card when you don't have access to a computer or a mailbox. Fares should be discounted for homeless as well.
S0567.A	Christine	n/a	More routes for buses, especially in Santee. I feel safe using the trolley and buses. We need more covers for the bus stops to protect against the weather in El Cajon.
S0567.B	Christine	n/a	Fares should be free for homeless.
S0568.A	Jose	n/a	Buses and trolleys work well for those of us who are homeless.
S0568.B	Jose	n/a	I ride my bike more often that using transit. Many of the bus lanes are not marked well and there are large areas where there aren't any bike lanes, and it is dangerous when people parked on the street open their doors.
S0569	Rick	n/a	I prefer riding the buses because I do not like crowds. The trolleys sometimes have too many people but it is a good service when I need it. I have only been homeless for 6 months so I am still learning how to navigate the buses when I have limited access to the internet.
S0570	Zekiyah	n/a	I only use the buses occasionally. There seems to be enough bus lines in El Cajon for me to use. The bus stops could use better lighting and more of them with covers. It gets really hot in El Cajon. The trolley is easier to use and really benefits many people. The blue line was a nice addition.
S0571	Deshaun	n/a	I am homeless so I rely on the bus and trolley. The drivers seem to be pleasant. I look forward to having the Rapid 880 bus so that I can get to some of my doctor's appointments in Kearny Mesa. There should be more rapid lines to make rides faster.
S0572.A	Mustafa	n/a	I haven't used the buses or trolleys very much but appreciate the service they offer. The transit needs to be advertised more to increase ridership. I see too many buses and trolleys with very few people on them.
S0572.B	Mustafa	n/a	It is nice to have the microtransit (shuttles) in El Cajon. It will be convenient for people to use but many people do not have credit cards so they should also accept cash.
S0572.C	Mustafa	n/a	El Cajon needs more bike lanes that are separated from traffic. There are too many cars parked along the busy streets.
S0572.D	Mustafa	n/a	Affordable housing is difficult to find, even in El Cajon where there are many apartments. Many of the apartments are old and dirty.
S0572.E	Mustafa	n/a	San Diego needs to address climate change especially with the air quality in El Cajon. We have very few charging stations for electric cars which keeps people from purchasing them. It is also expensive to charge your car and there should be more free charging stations for low-income apartments.
S0573	n/a	n/a	More housing and appropriate land use is great

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0574.A	Ginger Dethloff	n/a	The Shelter Island area of Point Loma must be removed from the Regional Transportation Plan (RTP). This neighborhood does not meet the necessary criteria to function as a Transit Priority Area (TPA) or Sustainable Development Area (SDA), and including it contradicts the intent and goals of the RTP and Complete Communities Housing Solutions. This is a narrow, two-lane corridor with no feasible room for road expansion or dedicated transit infrastructure. The community is located at the tip of a peninsula surrounded on three sides by water, with only one major ingress and egress Rosecrans Street. This route serves 12,000-22,000 people, including residents and Navy Submarine Base personnel, and lies within a designated Very High Fire Hazard Safety Zone. In the event of an emergency or wildfire, evacuation would be chaotic and unsafe. Transit Infrastructure and Service Incompatibility - This corridor cannot support dedicated bus lanes. Route 28 and 228 run infrequently (every 30-0 minutes) and have low ridership. Even with transit signal priority, congestion during peak hours makes reliable service impossible. - The area lacks major activity centers. The nearest one is Pechanga Arena, over 3 miles away. There is no viable location for upgraded transit stations or mobility hubs. - The closest major transit connections and essential services (like pharmacies and hospitals) are far removed, making walkable access unrealistic for many residents. Impact on Small Businesses and Quality of Life Unchecked development in this area without current infrastructure support will: - Force out local businesses due to parking removal and accessibility issues - Lower quality of life for current residents by reducing access to services, parks, mobility, and safety - Fail to meet the core goals of equity, health, convenience, or resilience State and Federal Regulation Compliance: Maintaining this designation violates California's requirement to reduce GHG emissions and VMT. It undermines the intent of both state climate law and local planning mandates. Transportation Technology Limitations - Rapid or high-frequency bus service is unworkable due to road size, congestion, and low demand. - No major intersecting routes exist. Route 84 is a limited-service mini-bus with minimal ridership. - MTS faces budget deficits and this area is not prioritized for upgrades or increased service. Climate, Energy, and Air Quality Leaving this area as a designated TPA/SDA will: - Increase car dependency, congestion, greenhouse gas emissions, and vehicle miles traveled (VMT) - Exacerbate parking shortages, health risks, and emergency evacuation concerns - Contradict the City's Climate Action Plan (CAP) goals
S0574.B	Ginger Dethloff	n/a	Bikeways and Pedestrian Safety - This area lies within Mobility Zone 4. According to the City's own data, it would take 27 miles of bike lanes in Zone 4 to equal the VMT reduction of just 1 mile in Zone 3. Yet no new bike infrastructure is planned here. - The narrow roadways are unsafe for shared use between cars, buses, and bicycles. Forcing this infrastructure into the area risks serious safety issues for all users.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0574.C	Ginger Dethloff	n/a	Transportation Technology Limitations - Rapid or high-frequency bus service is unworkable due to road size, congestion, and low demand. - No major intersecting routes exist. Route 84 is a limited-service mini-bus with minimal ridership. - MTS faces budget deficits and this area is not prioritized for upgrades or increased service. Climate, Energy, and Air Quality Leaving this area as a designated TPA/SDA will: - Increase car dependency, congestion, greenhouse gas emissions, and vehicle miles traveled (VMT) - Exacerbate parking shortages, health risks, and emergency evacuation concerns - Contradict the City's Climate Action Plan (CAP) goals Impact on Small Businesses and Quality of Life Unchecked development in this area without current infrastructure support will: - Force out local businesses due to parking removal and accessibility issues - Lower quality of life for current residents by reducing access to services, parks, mobility, and safety - Fail to meet the core goals of equity, health, convenience, or resilience State and Federal Regulation Compliance Maintaining this designation violates California's requirement to reduce GHG emissions and VMT. It undermines the intent of both state climate law and local planning mandates. Summary The Shelter Island/Point Loma peninsula does not meet the requirements to support high-density development or expanded transit infrastructure. Including it in the RTP as a TPA/SDA is unsafe, unsustainable, and inequitable. We urge SANDAG and the City of San Diego to remove this area from the Regional Transportation Plan and reevaluate it based on real-world feasibility, environmental risk, and community safety.
S0574.D	Ginger Dethloff	n/a	State and Federal Regulation Compliance: Maintaining this designation violates California's requirement to reduce GHG emissions and VMT. It undermines the intent of both state climate law and local planning mandates. The Shelter Island/Point Loma peninsula does not meet the requirements to support high-density development or expanded transit infrastructure. Including it in the RTP as a TPA/SDA is unsafe, unsustainable, and inequitable. We urge SANDAG and the City of San Diego to remove this area from the Regional Transportation Plan and reevaluate it based on real-world feasibility, environmental risk, and community safety.
S0575	Hilda Gomez	Mid City CAN	Please renew the Pronto cards for youth. It has been beneficial for my family as we are low-income.
S0576	Nathan Lacy	San Dieguito River Park Joint Powers Authority	The San Dieguito River Park JPA is requesting that SANDAG display and describe how the two coastal bikeway projects (Coastal Rail Trail and North Coast Bike Trail) would connect with the regional Coast to Crest Trail near the communities of Del Mar, Solana Beach, and San Diego.
S0577.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans's two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA: More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diego's quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. Home values will go down because it will be more congested/less desirable. This is NOT CONVENIENT, EQUITABLE, HEALTHY, OR SAFE FOR ANYONE!
S0578.A	Rhonda Harris	Mid City CAN	Extended buses. Like the ones in San Ysidro. Overnight buses in Encanto.
S0578.B	Rhonda Harris	Mid City CAN	Micro Transit in Encanto would help. Since the frequencies are very low

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0579	Vicente Sayas	Mid City CAN	I am in full support of additional bus projects, as they are currently in use. The financial burden that was lifted on me to take the bus and trolley to and from school when I couldn't afford it was greatly appreciated. Keep the youth opportunity pass going, and extend transit by adding more routes.
S0580	Elian Estrada	Mid City CAN	The Kearny Mesa to City Heights project is the one most worth your time because there are many people (including me) who take a long time on trips to get somewhere. I wake up at 6:30 am and get to school at 8:40 am. I know I won't be in school anymore, but it will help future generations.
S0581	Ian Hembree, San Diego County Bicycle Coalition on behalf of the Coalition	n/a	SANDAG must prioritize efficiency in our roadways by reallocating existing travel lanes to bus only lanes or managed lanes instead of adding lanes in existing right of way or acquiring additional right of way to achieve this goal. Adding additional lanes will be counterproductive to SANDAG's goal of reducing GHG emissions, as it will induce demand, cause more people to drive, and make choosing active transportation and transit harder and less appealing. It will also run counter to SANDAG's goal of prioritizing equity, as these projects will have disproportionate impacts on lower-income communities located near freeways.
S0582	n/a	n/a	This plan continues Sandag's long history of over-reliance on highway capacity. By focusing funding on roads, we only ensure people continue to have no choice but driving, locking us into a cycle of car-dependent transportation. Breaking free requires a bold move towards transit, which this plan is completely lacking. Rapid buses still compete with cars for space, ensuring people will continue to not use them. A bold plan would include modes of transportation that do not share infrastructure with cars, such as elevated rail, subways, and expansion of the light rail network. This plan includes no rail expansion at all, and is a massive disappointment.
S0583.A	n/a	n/a	pls don't defund the free bus pass i need it
S0583.B	n/a	n/a	pla fund the free bus pass and extend it to 21+ young adults
S0584.A	n/a	n/a	My feedback is specifically on the Regional Plan Draft. It would have been helpful to have this feedback form have the specific plan chapters to provide feedback on. I list my feedback per page on the Draft Regional Plan, and list off the specific section. pg.12 (second paragraph): this section needs research backed benefits of a 15 min, 30. min, and 45 min drive/travel time, or at least a comparison between two time frames, needs to provide a time frame when such results may be expected, at least in this section refer to the sections that touches on further research explaining these estimates; page 18(third paragraph): what about the jobs that pay well enough to live in the areas ? are these included with increased number of jobs? or categorized another way?; pg. 19 (on the first paragraph under "Housing and Land Use": Housing affordability is also a challenge for frontline communities and essential workers. Why aren't they included in this?; pg. 19 (on Figure 2.2 on population growth) On the map it could be good to clarify whether one housing unit per person is the scale used here, or what the ideal is (not everyone lives alone); pg. 19 (second paragraph on "Housing Technical Assistance Program") Where's the community spaces?; pg. 21 (second paragraph) on active transportation, and complete streets, and following terms - definitions within the plan?; pg. 22 (on Managed Lanes and Connectors) can managed lanes lead to complete coorridors? I imagine a world where there are managed sidewalks and bike lanes in close proximity to highways - since they cut communities off - since they make it harder to make friends, and communities bear this cost - https://www.kpbs.org/podcasts/san-diego-news-now/how-highways-can-make-it-harder-to-make-friends; pg. 22 (on Transportation Technology and Smart Intersection System) on "Technology can also provide people with real-time travel information to help them decide when, where, and how to travel" - where is this information accessible from? what webpage? is it the information we see on our phone via Google Maps or Apple Maps; on pg. 23 (on Regional Aviation Strategic Plan and San Diego Airport Multimodal Accessibility) hope it includes faster connections between north county and the airport (an airport shuttle service?) would be neat - are there studies on where folks travel from to reach the SD airport?; pg. 24 (on enhanced shelters)these needy shady areas, and trees planted where available and possible - tree canopies (aside from shaded bus stops) are important to cool down cities experiencing extreme heat; pg. 24 (on Smart Intersection System - Summary needs and expected date of roll-out, completion to get an idea of the impact
S0584.B	n/a	n/a	pg. 24 (on SANDAG exploring Emerging Technology) air mobility versus tick tracker for transportation (measure number of cars passing)? need to clarify what this means as an emerging technology? market? like food delivery by air????, need some metrics of the expectation too - why invest in this emerging technology? for ex. expected to be popular by 2030 or what year?; pg. 25 (on Respect bullet point on the right) "Help the public connect to and deepen their respect for nature, furthering conversation efforts in the region." understand the sentiment here. would also be helpful to ask folks (developers) to pay for intervention in natural space, also the goal should be to create a culture of care for the environment, preservation (which needs educational campaigns);
S0585	n/a	n/a	I am opposed to spending anymore money on toll lanes. All lanes should be general purpose. The toll lanes don't solve problems and simply disadvantaging the poor. Just build cheaper regular lanes and take the savings and put it towards improving bus and trolley service.
S0586	n/a	n/a	As an educator who works with youth, I see first hand how the YOP program helps the youth get to our after school programs. and give them a safe passage home.
S0587	n/a	n/a	All public transportation should have "ridership counters" and the ridership should be mandatorily published on the front page of the Union Tribune weekly or even daily. If a route has low ridership it should be cancelled. The extra large buses in North Country are never full. Smaller buses should be used for low ridership routes. The Coaster going south is only somewhat full when there is a Padres' game. Even the very small buses for Senior transport are rarely full. The county should work with Uber and Lyft to provide qualified seniors with a certain number of rides per month. This would be a much more cost effective way to provide transportation.
S0588	Gloria Maurin	n/a	I think there should be more Trolley lines such as all the way to North County and then Oceanside to Escondido. Also a type of shuttle for Gaslamp to parking lots after bars close. Connecting Trolley stops from San Ysidro to Otay Mesa.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0589	Guillermina Rice	Mid City CAN	We need to see results in a shorter time. The regional plan need to be updated because we need to see results sooner.
S0590.A	n/a	n/a	Please continue to carefully address the impact of warehouses and delivery trucks on local communities, and add a strong network on data gathering in this area, such as additional monitors for as air impacts and careful study of patterns and types of vehicles.
S0590.B	n/a	n/a	I am commenting on the PERFORMANCE Measures on page 29. Healthy communities and environment for everyone. This currently states the following measures will be used - Access to Basic Needs -Greenhouse Gas Emissions Measures -VMT Measures I suggest adding an additional performance measure - air quality improvements in impacted neighborhoods, to make sure that local air pollution hotspots continue to be a focus
S0590.C	n/a	n/a	Please consider the impacts of heat on residents and include shade structures in transportation projects
S0591.A	Bruce Cole	n/a	Plan as is fails to meet any of the goals mandated in this study. The Naval Bases are in a high fire prone area, thus emergency exit is all focused on Rosecrans. The peak traffic hours are completely congested. 92106 More congestion More greenhouse gases More parking problems More health and safety issues More evacuation issues
S0591.B	Bruce Cole	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. I travel Rosecrans most everyday for a two mile stretch. I probably see one bike going both ways. I do see cars bumper to bumper every morning and afternoon. 92106
S0591.C	Bruce Cole	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. 92106
S0591.D	Bruce Cole	n/a	Please study the routes of drivers on Rosecrans and develop transportation for that purpose. Go to the 20 largest employers and see how those employees can be congregated to reduce car usage.
S0592	Noel V. Garcia	Mid City CAN	Allow youthful or other vulnerable communities to gain more access with the Youth Opportunity Pass and the specialized transportation Grant Program. I would like to see these programs integrated into the purple line in 2050.
S0593.A	Rosario Martinez Iannacone	Mid City CAN	YOP is important - youth expand passes. They get access to schools, colleges, and jobs. We also need the purple line on time.
S0593.B	Rosario Martinez Iannacone	Mid City CAN	Mid City Go is a good program - it needs to be open for later.
S0594	Denisse Lopez	Mid City CAN	Extend youth opprotunity pass to be permanent with the inclusion of 24 and under. During large events such as San Diego FC include more trolley to more frequency. Complete the purple line quicker.
S0595.A	Maria Cortez	Mid City CAN	Do not extend the purple line passed 2050. It has been 47 years. We need the YOP to continue and extend it to 25 and under
S0595.B	Maria Cortez	Mid City CAN	Extend Mid City go from 9:00-6:00PM
S0596	Adrian Leon	n/a	we need lower fares

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0597.A	Kate Gray Siebert	n/a	Point Loma, specifically Rosecrans CAN NOT expand their streets to more lanes, nor give up a lane for dedicated bus or bicycle lanes; there simply isn't room. The traffic is horrendous especially from Liberty Station to the sub base, affecting neighborhoods already congested. The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0597.B	Kate Gray Siebert	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0597.C	Kate Gray Siebert	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0598.A	Chacon	n/a	Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on transportation technology? Required The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town.
S0598.B	Chacon	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0598.C	Chacon	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0599	n/a	n/a	The free student bus pass is incredibly helpful to the youth, allowing them to transport themselves without the need of a parent/guardian as well as money. Students have a way to go to school without having to worry about their guardians' work schedule or other factors. The downside is that public transportation could be incredibly dangerous for the youth because of various people. I hope that kids could ride the bus/train/trolley without being in a state of danger.
S0600.A	NAOMI BUCKWALTER	n/a	More a request than a comment as I see a paucity of transportation options in the Draft 2025 Regional Plan for the Blossom Valley area of East San Diego county (between El Cajon and Alpine), where I live. As a retired citizen looking for options beyond driving myself (which I still do), what choices do I have besides walking down to the nearest bus stop on Old Highway 80, taking an MTS bus to the El Cajon Transit Center, and then finally getting to the trolley to go downtown (and returning the same way)? This trip easily takes a minimum of a whole half day to complete. Will there be any rapid bus or other shuttles in my area to the El Cajon Trolley Transite Center in the future? I hope so! I think that we would see much more usage of the public transit system if this were the case. Thank you for the Zoom session: I enjoyed the format of breakout sessions with other participants and different facilitators. Bravo!
S0600.B	NAOMI BUCKWALTER	n/a	I am very pleased to see the above categories addressed in the 2025 plan and in SANDAG's programs.
S0600.C	NAOMI BUCKWALTER	n/a	SAA
S0600.D	NAOMI BUCKWALTER	n/a	SAA
S0600.E	NAOMI BUCKWALTER	n/a	SAA
S0600.F	NAOMI BUCKWALTER	n/a	SAA
S0601.A	Rebecca Falk	Borrego Springs Community Sponsor Group	Really glad to see expanded bus service from/to Borrego Springs as it is minimal now (twice a week but one bus each day and one return trip to and from El Cajon).
S0601.B	Rebecca Falk	Borrego Springs Community Sponsor Group	Also glad to see microtransit in the plan for Borrego Springs. We really need a neighborhood shuttle. All USPS mail is delivered to the post office only and we have many elderly and people who don't get around. Ability to call for shuttle service would be a life changer for many. Also, shopping is downtown but people live too far from there to walk.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0602.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base is located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegan's quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0602.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0602.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0602.D	n/a	n/a	Remove short term rentals and stop turning neighborhoods into make-shift mini hotels. Tourist can stay in hotels and pay hotel taxes.
S0603.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0603.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0603.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0604.A	M Rothman, and I live in the outhern portion of Rosecrans, near the sub base. Please consider these important comments from the community.	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0604.B	M Rothman, and I live in the outhern portion of Rosecrans, near the sub base. Please consider these important comments from the community.	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0604.C	M Rothman, and I live in the outhern portion of Rosecrans, near the sub base. Please consider these important comments from the community.	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away.The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0604.D	M Rothman, and I live in the outhern portion of Rosecrans, near the sub base. Please consider these important comments from the community.	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0605.A	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.
S0605.B	Michael E Winn	n/a	Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. "Flexible fleets" is a term that is meaningless, and it refers to the same old technology, not an idea that moves people out of cars.
S0605.C	Michael E Winn	n/a	Public spaces are the most important aspects of walkways and important for some bikeways. The plan is silent about public spaces in any meaningful way and for commuting purposes, bikeways must be considered differently.
S0605.D	Michael E Winn	n/a	For the most part, this is more of the same.
S0605.E	Michael E Winn	n/a	See the general comment above about the relevance of Baja.
S0605.F	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.

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ID	Commenter Name	Agency or Organization	Comment
S0605.G	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter, it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.
S0605.H	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0605.I	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.
S0605.J	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.

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ID	Commenter Name	Agency or Organization	Comment
S0605.K	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas, Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive.
S0605.L	Michael E Winn	n/a	For new infrastructure, we need to vote to raise taxes to repay bonds. This plan is a nonstarter -- it misses an opportunity to do something that inspires trust in government and faith in democracy, for instance, a vision of San Diego as a friendly, exciting, livable place. Transportation in large urban areas involves networks. In this plan, inter-, extra- and regional infrastructure, as well as pedestrian, roadway, highway and public transit are presented with the language of previously rejected ideas. Successful transit innovations begin with inclusive social priorities. Priorities and assumptions of growth in SANDAG's planning are derived from statistical projections, politically-tainted analyses and biased criteria. SANDAG views urban transportation in terms of numbers of housing units and related infrastructure. Public input is now sought about projects, but not what people want when they move about. Moreover, it's reasonable that those who might be affected by transportation projects should be informed and asked about their priorities and visions for the places where they live -- their communities. SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising. Some omissions due to a decision to draft a regional transportation plan without informing or consulting constituents seem indirectly related, but create significant vulnerabilities: climate-related weather, potential seismic events, water supply constraints, energy interruption and wastewater and solid waste disposal. When priorities of planning are not related to needs, desires, prosperity or even well-being of citizens, voters will not feel they own the plan (except for employees of contractors, developers or city employees that benefit directly.) We want to preserve our communities and nature, and to reduce vulnerability to seismic events, climate change, air and water pollution, housing cost volatility and unemployment. This plan was drafted without consulting the consensus of people in communities to design solutions salient to their needs, quality of life and desire to thrive. My experience regarding this is perhaps of interest. I produced media for SCAG that was instrumental in winning support of 106 local jurisdictions for the original Air Quality Management Plan (smog regulations). And today I am the founder of Own Your Government, LLC which has developed a software for including a majority of residents in creating consensus.
S0605.M	Michael E Winn	n/a	SANDAG drafted this plan with data samples and statistical modeling referencing abstract ideas. We have technology that can engage citizens in drafting a plan that serves them that wins popular support. A plan that is not the result of citizens' ideas is not only unsupportable by them, but also, it reinforces a status quo without a common vision, so it's impossible for citizens to judge proposals like the current ADU regulations and Midway Rising.
S0605.N	Michael E Winn	n/a	There are presently 4.7 million residents of the TJ part of the SD/TJ metropolitan area. There is no question about whether or not we are one community. We are one community with a wall that affects how we must relate. There are 3.5 million people on the San Diego side. The Baja side is growing faster. We need to be realistic about this relationship in our planning. SANDAG published this plan in Spanish, but apparently without addressing ecological, topological, sociological, economic, political and social impacts of San Diego's actual metropolitan region, as if there were no ecological, social and economic impacts of the border and transportation involving transborder residence and employment, vehicle traffic and air pollution, not to mention wage differential (income limitation) and pollution in common drainage areas,

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0606	LYNN ALIMENT	n/a	This proposal remains too light in the area of freeway and interchange upgrades. The 94/125 interchange, finalize first phase of Hwy 52 expansion from Mast to I-125, and HWY 67/Maple View. This last one is especially critical as the 67 is a wildfire escape route. Currently traffic backs up in all directions. It would be a deadly gridlock in an evacuation. Either the 67 needs to fly over Mapleview, or Mapleview must become a series of overpasses. I believe the 67 fly over would be the easier to accomplish. Either scenario would remove the traffic light on Hwy 67. Adding the third lane on I-8 east/west from Second street to east of Lakeside is another priority On November 5, 2024 the people voted against a tax increase to fund the $160 billion grand plan. San Diego is not laid out like a Paris, London, New York, Paris, or Bejing. Nor will the reagion ever have the population requirement to support mass transit. It is time to do what the voters want and not what you want to do. there are already conversations in the community regarding a ballot proposition to eliminate SANDAG. SANDAG lied 0ver 20 year ago when it was time to renew TRANSNET. SANDAG promised over a dozen freeway projects, and essentially abandoned them all for mass transit - that will always be a niche mode of transpiration in the County. It would be a shame to see SANDAG disbanded, but that may be the only path to logical responsive transpiration improvements. thank you
S0607	Michael Donovan	n/a	There is a strong need given rapidly increasing density to accelerate the Balboa Park Perimeter streetcar project. While the routing shown may or may not be aligned to current urban usages in the area, the need for hop on hop off permanent transit is increasing given the accelerating shortage of auto resources. Please return this to a 2035 target and engage with community groups to refine the proposal
S0608.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0608.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0608.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

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S0608.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0608.E	n/a	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0609.A	n/a	n/a	Design all roads with extra space for bikes and walking. Many roads out east have curves and when bikes are on the road (since there is no ample space for them off the road) it becomes very dangerous to drive and pass. Especially for bigger vehicles.
S0609.B	n/a	n/a	Julian and Mt. Laguna are heavy tourist areas. We have a fair share of walkers and bikers on Hwy 79 from I-8 to Santa Ysabel due to campsites and trails. Also, all along Sunrise Hwy S1.
S0610.A	Kimberli Grogan	Protect Point Loma	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
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S0610.C	Kimberli Grogan	Protect Point Loma	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0610.D	Kimberli Grogan	Protect Point Loma	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. There is no way to increase the street width in this area.
S0610.E	Kimberli Grogan	Protect Point Loma	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0610.F	Kimberli Grogan	Protect Point Loma	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0610.G	Kimberli Grogan	Protect Point Loma	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0611.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

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S0611.B	n/a	n/a	Historically SanDiego has been poorly planned for many decades. This kind of haphazard sprawl is unsustainable and frustrating. The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0612.A	n/a	n/a	Our public transportation system is inadequate. The bus system near my house doesn't run after 7 pm or on weekends, yet you claim we can build near a transit stop. It's a joke. They also set up our trolley system to be abused. People can get on without tickets and no one checks. This means you have homeless people riding all day for free, pooping and peeing and vomiting on the trolley. And guess who monitors it? No one. Waste of millions of dollars. You also didn't run a trolley out to Point Loma yet keep packing people in here. Why can't you set up a water transport system from Point Loma to Coronado? Point Loma to La Jolla?
S0612.B	n/a	n/a	See above.
S0613.A	Susan Soares	n/a	Some new bike lanes are confusing and makes them unsafe.
S0613.B	Susan Soares	n/a	The trash on the hillsides of our highways are a disgrace. It appears that homeless camps are removed but their trash is not cleaned up after departure. Between left over trash and new camps the hillsides along freeways are a bloom with trash. In some areas you see it blowing into roads
S0614.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG'S goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
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S0614.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0614.D	n/a	n/a	Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it. It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0615.A	Dianne Randquist	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it
S0615.B	Dianne Randquist	n/a	We do not need more housing unless there is parking spots. No more high rises. We are losing our neighborhoods. Our quality of life is going down hill concerned about evacuations in case of a disaster.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0616.A	Cindy Page	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0616.B	Cindy Page	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0616.C	Cindy Page	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0616.D	Cindy Page	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0616.E	Cindy Page	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0617.A	Cecilia Carrick	n/a	The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3
S0617.B	Cecilia Carrick	n/a	This Peninsula is at risk to become a complete ingress/egress disaster if traffic congestion is allowed to increase. The SD bus lines do not service the public well and the hills of Point Loma are NOT conducive to walking from A to B even for short distances.
S0618	n/a	n/a	The Shelter Island area of Point Loma should be removed from the Regional Transportation Plan. This two-lane corridor has no room for infrastructure expansion. The La Playa, Shelter Island, Wooded Area, Roseville-Fleet Ridge, and Sunset Cliffs neighborhoods sit at the end of a peninsula, with just one main access point Rosecrans Street. The area also contains the Navy Submarine Base and lies in a designated Very High Fire Hazard Safety Zone. In an emergency, evacuation for 12,000-22,000 people would be dangerously limited. There is no space for a dedicated bus lane, and Routes 28/228 cannot be upgraded to Rapid. Peak-hour traffic is already gridlocked, making transit signal priority unworkable. There are no major activity centers nearby (the closest is 3.3 miles away), and no room to install upgraded stations. Keeping this area designated as a TPA/SDA invites dense development where the infrastructure cannot support it leading to more traffic, emissions, parking problems, and safety hazards. This runs counter to the intent of Complete Communities and worsens residents' quality of life. Bikeways and Walkways: This area falls in Mobility Zone 4. According to the Complete Communities playbook, it would take 27 miles of bike lanes here to equal the benefit of just 1 mile in Zone 3. The roads are too narrow for safe bike, car, and bus sharing. Promoting development here under the TPA/SDA designation adds stress to already maxed-out streets and increases risks for cyclists and pedestrians. Transportation Technology: This area cannot support advanced transit. Streets are too narrow for a bus lane, and service is limited (buses run every 30-60 minutes with low ridership). There are no major transit hubs or destinations nearby. Old Town is 3.2 miles away, Pechanga Arena is 3.3 miles, and the closest hospital is 5.6 miles away. There is no space to add upgraded stations or reduce stops. TPA/SDA designation here only fuels development without solving real limitations. Climate, Energy, and Air Quality: Keeping this area as a TPA/SDA undermines climate and environmental goals. It leads to more cars, congestion, and emissions contradicting the City's Climate Action Plan. Without matching infrastructure, the impact is immediate and damaging. It reduces not improves access, health, and safety. State and Federal Regulations: State law requires reductions in greenhouse gases and vehicle miles traveled (VMT). Keeping this area in the plan works against those goals. Without infrastructure to support growth, VMT and emissions rise, violating state mandates and worsening air quality. Area Affected: Shelter Island, La Playa, Wooded Area, Roseville-Fleet Ridge, and Sunset Cliffs an isolated part of Point Loma with constrained access, severe evacuation risks, and no room to expand.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0619.A	Nicole Braun Cervantes	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0619.B	Nicole Braun Cervantes	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0619.C	Nicole Braun Cervantes	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobilityzone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to It It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0619.D	Nicole Braun Cervantes	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it. Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE. The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0620.A	James Downey	n/a	Creating alternative routes of transport is crucial for the future of San Diego. The city is in the process of densifying. There has been decades of car focused infrastructure. This has left people with only one choice to move around the city and surrounding areas. Even just 5 years of Transit and bike focused infrastructure would help alleviate road congestion and ultimately lesson the maintenance cost of those roads. There are many specific projects that could and should be the focal point of the Regional plan. There are two key projects that must be completed for San Diego to have a future. First, an extension to the airport is NEEDED. The most embarrassing mistake for San Diego planning has been not connecting the trolley to the airport. It is difficult to witness two complete renovations & two massive parking garages built, but no trolley connection. Second, would be a Purple line trolley extension to connect Clairemont-Kearny Mesa-Mission Valley. This would help alleviate the parking lot that is the 805. Connecting up to Escondido via commuter train is a dream and I understand that would take a lot of coordination with NCTD, but it is another crucial bit of infrastructure that would allow a brighter future for San Diego.
S0620.B	James Downey	n/a	San Diego weather is the best in the country, never too hot never too cold. This city has the potential to be the biking epicenter of the US. The natural beauty of the city & county draw bikers in droves. However, much of the time bikers are forced to share lanes with large automobiles endangering both bikers and drivers. An emphasis on creating separated bike lanes & bikeways is a win for all San Diegans. Aside from the individual mental, physical, and recreational benefits, bikeways are a huge benefit to the city's overall transportation. Each biker commuting to work, school, or doing errands is another car off the road. Less road maintenance due to wear and tear.
S0621.A	Richard Stakelum	n/a	The Point Loma peninsula must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. Rosecrans and other ingress/egress routes are 2 lane roads with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. Just recently there was an airplane crash just a few hundred yards from a major fuel depot - this would have caused an evacuation emergency where residents would need to run for their lives since the roads would be too congested. The ingress and egress for Point Loma residents is already over capacity. Try to drive down Rosecrans/Nimit/Catalina/SunsetCliffs during rush hour and imagine what an evacuation would look like! Continuing to say this is a Next Gen Rapid Route is a farce and will open the area to higher density buildings. This will cause catastrophic gridlock and open government agencies to major lawsuits much like in LA after the fires. The Peninsula Planning Commision is tasked with ensuring intelligently planned communities - please follow their recommendations.
S0621.B	Richard Stakelum	n/a	Stop infilling areas of the city that are zoned for single family homes. Also - respect the voter approved height limits in the beach areas. Stop the "affordable housing" swindle that has opened our city to unbridled development and is ruining our neighborhoods.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0622.A	Mary Katherine Reeber	n/a	The Shelter Island/Village of Point Loma should be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion or for a dedicated bus line. I live at the tip of Point Loma in the LaPlaya/ShelterIsland/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area next to the Navy Submarine Base,. We are located in a High Fire Hazard Safety Zone. The major ingress and egress for12,000-22,000 people is Rosecrans which at that tip is one lane each way. If a fire breaks out there will be serious evacuation issues for base personnel and local residents. I can testify that there is bumper to bumper traffic throughout the weekdays due to the Navy Base and it is not possible for a bus to pass even with a transit signal priority. Buses are infrequent and mostly empty. Implications if this area remains a TPA/SDA are totally negative and unrealistic. -congestion greenhouse gases, parking problems. and serious safety evacuation issues.
S0622.B	Mary Katherine Reeber	n/a	I travel Nimitz frequently. It has bike lanes on both sides of the road and at one point turns the major road of Nimitz from two to one lane so that the bike lane can be accommodated. Has anyone ever done study of its usage?. It is rare to see a biker on this road even on weekends when you would expect recreational biking. Our Point Loma roads are narrow and crowded, our parking limited. Adding bike lanes is totally unrealistic. and dangerous both for the biker and the driver.,
S0622.C	Mary Katherine Reeber	n/a	Putting bike lanes in without engaging the community for input has been a disaster.
S0623.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it.
S0623.B	n/a	n/a	There will be so much traffic on the Point. Should an emergency occur residents would not be able to get off the Point. Emergency personnel would not have be able to get in.
S0624.A	n/a	n/a	We have to stop considering a bus stop as a transit center in regards to issuing permits for ADU's and single family tear down to convert to condos.
S0624.B	n/a	n/a	We need to stop the growth in Point Loma. It's ridiculous trying to get out of here in the afternoon, way too much traffic for 2 lanes. Parking is a nightmare of you can even find it Roseville.
S0625.A	n/a	n/a	Please place a larger emphasis on transit investment instead of highway widening. I'm talking more bus priority lanes, the ones on Park Blvd and ECB are amazing! More of these! Paint them red to disincentivize drivers from using. Also extend the Purple Line to Sorrento Valley as initially planned. Mission Valley is not far enough. There was such success with the Blue Line extension because of its reach, please do not limit us! Keep the Purple Line as a light rail, do not reduce it to a bus. & finally with the LOSSAN Corridor- though far more expensive, do not close doors by setting constraints. This is just a planning document for now so go BIG. Underground the LOSSAN corridor and ensure that the tunnels are large enough for future electrification, even if it's 100 years out. Future generations will thank you. PLEASE improve San Diego traffic! Do not further incentivize car trips! Also implement automated enforcement systems on BRT busses to cite drivers in the bus lanes.
S0625.B	n/a	n/a	SANDAG has done an amazing job of building out the bike network in the 5 years I've been in San Diego proper. I've seen the opening up of 30th, 4th, 5th, Meade, portions of the Bayshore Bikeway. Keep it up! You're building it and more new cyclists every year are participating. One critique, the flex posts are not enough protection on wide, high speed roads, and even on low speeds like 30th drivers are OFTEN seen driving and parking inside them, while cyclists are in the lane. Please 1) use concrete barriers for enhanced protection and to discourage drivers; and 2) implement automated enforcement systems to deter drivers from blocking bike lanes.
S0625.C	n/a	n/a	Do NOT expand highways and freeways. There is SO much research on how this does not resolve traffic long term. As the regional transportation planning agency, SANDAG has an immense responsibility to invest in transit and reduce vehicle dependency. Please do not make it easier to drive, incentivize those who can to use transit and other means.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0626.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0626.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to It It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0627.A	ROBERT P CELESTE	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0627.B	ROBERT P CELESTE	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0627.C	ROBERT P CELESTE	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on climate, energy, and air quality? Required Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less
S0627.D	ROBERT P CELESTE	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0627.E	ROBERT P CELESTE	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0627.F	ROBERT P CELESTE	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0628.A	Samuel Sharp	n/a	SANDAG should invest in and fast-track Next-Gen Rapid as well as delivering targeted improvements to existing Rapid and Trolley routes. We've built out so much light rail along freight corridors, now it's time to connect those routes together and serve more trips with real, amenity-rich Bus Rapid Transit.
S0628.B	Samuel Sharp	n/a	Managed and transit lanes should always be converted from general purpose lanes - we are well past the time for freeway expansions in San Diego County. They only serve to increase VMT and destroy neighborhoods, and don't reduce traffic congestion. That being said, I support managed lanes that can keep both cars and transit vehicles moving on most freeways, along with expanding valuable pilot programs like part-time transit only lanes.
S0629	Elizabeth Peterson	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less,

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0630.A	Joe Manning	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0630.B	Joe Manning	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0630.C	Joe Manning	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0630.D	Joe Manning	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0630.E	Joe Manning	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0631.A	Paige Hazard	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0631.B	Paige Hazard	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it. Decrease San Diegans' quality of life, not improve it. Decrease access to resources and opportunities to improve the quality of life, not add to it
S0631.C	Paige Hazard	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.
S0631.D	Paige Hazard	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans quality of life, not improve it
S0632	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base is located in a very High Fire Hazard Safety Zone. Rosecrans, the major ingress and egress for 12,000-22,000 people is a two-way street which in an emergency situation would lead to horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities
S0633.A	Larry Brown	n/a	The Draft 2025 Regional Plan will be a disaster for Point Loma residents, students, businesses and safety. The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0633.B	Larry Brown	n/a	Building bikeways and walkways along Rosecrans would be stupid and extremely dangerous for walkers, bikers and drivers. Build these bikeways and walkways off other streets and byways going north and south along the Point Loma Peninsula so it doesn't cause further congestion and danger to the community. The entire Regional Transportation plan needs to be reconsidered. The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0633.C	Larry Brown	n/a	Many areas can physically incorporate dedicated bus lanes and technology. Much of the Point Loma Peninsula and Shelter Island can not. The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane as most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0633.D	Larry Brown	n/a	Recent California fires have taught us valuable lessons to assure easy, fast, efficient and effective escape routes for all forms of natural and unnatural disasters. Point Loma is a unique community. Envision major fires roaring through the tree areas of Point Loma, a major gas explosion, a major emergency disaster at the Naval Sub Base where fast evacuations can save lives. Clogging escape routes with dedicated bus lanes will lead to potential safety disasters.
S0634.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane road area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people is Rosecrans, a two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City and SANDAG's goals: * More cars, not less, * More congestion, not less, * More greenhouse gases, not less * More parking problems, not less * More health and safety issues, not less * More evacuation issues, not less * Increase vehicles miles traveled (VMT), not reduce it * Decrease San Diegans' quality of life, not improve it * Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (which will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. The planned actions will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE and needs to be completely discarded immediately.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0634.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in Mobility Zone 4. Per the Complete Communities website you would need to build 27 miles of bike lanes in Mobility Zone 4 to equal 1 mile of VMT reduction in Mobility Zone 3. Bike lanes will not be added to mobility zone 4, this area, per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions as well as the City's and SANDAG's goals: * More cars, not less, * More congestion, not less, * More greenhouse gases, not less * More parking problems, not less * More health and safety issues, not less * More evacuation issues, not less * Increase vehicles miles traveled (VMT), not reduce it * Decrease San Diegan's quality of life, not improve it * Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. The plan will cause small businesses to go out of business because there will be no parking. This plan is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE and needs to be completely discarded immediately.
S0634.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes (very inconvenient and undependable intervals) with a minimal number of passengers. One cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lanes in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4, which is this area. * There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena Blvd, 3.3 miles away. * There is no room to add upgraded stations in this area. * There is no way to limit the stops this route already has. * There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. * The closest major hub is 3.2 miles away in Old Town. * The closest pharmacy is 1.7 miles away. * The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035), the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: * More cars, not less,* More congestion, not less, * More greenhouse gases, not less * More parking problems, not less * More health and safety issues, not less * More evacuation issues, not less * Increase vehicles miles traveled (VMT), not reduce it * Decrease San Diegans' quality of life, not improve it * Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. This plan will cause small businesses to go out of business because there will be no parking This plan is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE and needs to be completely discarded immediately.
S0634.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035), the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, and the City's and SANDAG's goals: * More cars, not less, * More congestion, not less, * More greenhouse gases, not less * More parking problems, not less * More health and safety issues, not less * More evacuation issues, not less * Increase vehicles miles traveled (VMT), not reduce it * Decreases San Diegan's quality of life, not improve it * Decreases access to resources and opportunities to improve the quality of life, not add to it * It violates the City's and CAP goals.* It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.This plan will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE and needs to be completely discarded immediately.
S0635.A	n/a	BikeSD, YIMBY Democrats	SANDAG should prioritize realigning the LOSSAN rail corridor, investing in a rail connection to the airport, and advancing the Purple Line project to meet mode shift and climate action goals. At the same time, it should focus on increasing ridership and service reliability, through transit priority, increased headways, and safety measures, in our densest urban neighborhoods before expanding into suburban areas.
S0635.B	n/a	BikeSD, YIMBY Democrats	SANDAG should encourage cities especially San Diego, Chula Vista, and other coastal communities to implement interoperable micromobility systems (e.g., bikeshare and scooter share). Riders should be able to travel seamlessly between cities without switching vehicles or apps. While neighborhood electric vehicles (NEVs) have a place, SANDAG should focus public investment on improving bus/trolley frequency, reliability, and safety especially where transit already exists.
S0635.C	n/a	BikeSD, YIMBY Democrats	SANDAG has built some of the region's best bikeways like 4th/5th, Pershing, Rose Creek, I-5, and I-15. Keep it going. Expand regionally connected bike and pedestrian infrastructure that links cities and key destinations. Do not offload this work onto cities alone. SANDAG sits above local politics and must lead in building a countywide active transportation network that aligns with housing, labor, and commuting realities. Partner with cities, hold them accountable, and leverage the state if needed. We can build a more vibrant, walkable San Diego and SANDAG has a key role in making that future real.
S0635.D	n/a	BikeSD, YIMBY Democrats	Please reduce freeway expansion, which has been shown to encourage induced demand and greater GHG emissions. Convert existing general purpose lanes to transit- or HOV-only. We have all of this right-of-way prioritized for solo motorists, we should be re-allocating it to rapid buses if funding for new transit-only lanes is unavailable (which it appears to be).

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0635.E	n/a	BikeSD, YIMBY Democrats	The SANDAG executive board's recent rejection of SB 73 (which would allow dense housing near transit), despite its member cities' absolute failure to build adequate housing, is remarkable. It contradicts the housing requirements stated in the 2025 regional plan: "The SCS land use pattern results in nearly 80% of future residential development and employment growth occurring in areas with a high concentration of transportation options. " Given the magnitude of our housing crisis and the region's state RHNA requirements, we are long past the time when sprawl-embracing, anti-density cities should have had their exclusionary zoning overridden by the state.
S0636	Carol Schwenke	n/a	Hello. Thanks in advance for your attention to my comment. I have a minor in Urban Planning and BS in Environmental Systems from UCSD. I have not read the 2025 Plan in full, but understand it focuses on improving bus routes which I agree is a good way to maximize the return on investment. However, I feel there is one Trolley project that should be considered. I visualize a future rail connection in Chula Vista from the Blue line to the North Island Credit Union Ampitheater off Main Street in Chula Vista. Traffic to this venue is Horrible!!! I think it makes sense to invest in that project. Many people, including myself, enjoy taking the trolley to Petco Park for baseball games. I feel many people would much rather relax and enjoy the ride instead of driving in rush hour traffic for an hour to attend a concert at that ampitheater. Thank you for your attention to my suggestion. I realize this is a long-term project but feel it is in line with our regional goals. It might also facilitate future development in the Otay Mesa area. This location could support a new football stadium, which to me makes more sense in this underutilized area instead of the formerly proposed plan to locate another stadium downtown. Feel free to call or email me. Thank you again for your time and attention! Respectfully, Carol Schwenke Insurance Agent [redacted]
S0637.A	n/a	Neighbors For A Better San Diego	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans; a two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0637.B	n/a	Neighbors For A Better San Diego	See above for comment. Thank you.
S0637.C	n/a	Neighbors For A Better San Diego	Government must not only allow for public comment. Citizen comments (including planning boards) should be sought by elected officials.
S0638.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0638.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking
S0638.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane as most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0638.D	n/a	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans; quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0638.E	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0639	Martha Martinez	Mid City CAN	More frequent services on.
S0640	Rubi Potlinger	Mid City CAN	YOP should be supported! That is extra stress for young people to pay for transportation. Also, there should be more frequent bus stops.
S0641.A	Maria Hernandez	Mid City CAN	There should be bus stops closer to residential areas.
S0641.B	Maria Hernandez	Mid City CAN	My stop was moved further away, so microtransit would be helpful to get me close to the stop. I am a senior who needs it.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0642.A	Matthew Dathe	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0642.B	Matthew Dathe	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0642.C	Matthew Dathe	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0642.D	Matthew Dathe	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0642.E	Matthew Dathe	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0643	Brett Kerr	Mid City CAN	I work with youth and help with employment. Many of our youth ride public transit to and from school or their jobs. This is needed and well used. It would be great to see this expanded.
S0644.A	Margaret Mann - retired federal bankruptcy judge	n/a	I believe Point Loma and other areas that have transit because of the employment opportunities offered by the military should all permit high density housing.
S0644.B	Margaret Mann - retired federal bankruptcy judge	n/a	We need more affordable housing built and density along Point Loma's transit arteries is a good thing.
S0645.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0645.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0645.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0645.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0645.E	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0646.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....The plan for this area fails to recognize the actual circumstances of the actual route. Rosecrans is heavily impacted with Naval Base traffic twice a day. There is no space for a bike lane, given parking and two lane traffic. A proposed transit center is hardly the basis for mandating high density housing with virtually no parking, since the transit center will likely never materialize.
S0646.B	n/a	n/a	Traffic on Rosecrans is already a safety hazard, with residents often unable to enter or leave their driveways. Parents dropping off or picking-up their children at Cabrillo Elementary School already create long lines of cars waiting to safely deposit their students. Adding more traffic with an imaginary transit center as the wishful solution is dangerous and unrealistic.
S0647.A	n/a	n/a	Low percentage of use buses and trolleys. Main priority fixing roadways for all the traffic that is being created by over population. Car owners taxes on gas, license plates and other forms to help pay for roads. Bike lanes rarely get used waste of money for the taxpayers.
S0647.B	n/a	n/a	Highways and roadways need to be repaired with better materials and the quality is so poor they do repairs in an area and right next to it are holes or very uneven.
S0647.C	n/a	n/a	ADUs is creating problem after problem which is eventually going to be a disaster. Traffic, over crowding, ruin property values and no parking. Housing should be ownership for people to live in. Not renting it's causing a housing shortage.
S0647.D	n/a	n/a	The infrastructure is not keeping up for safety with the overbuilding of homes, ADU, apartments and condos. If any major disaster where to occur there is not enough evacuation routes people would be trapped.
S0647.E	n/a	n/a	Very little if any. City politicians don't listen to the public.
S0647.F	n/a	n/a	America's finest Citi is no more. The city politicians are ruining the city year after year. What they are doing is not working look at your city. It's filthy and disgusting and areas. Roads are a mess. Roads are overcrowded. Homelessness is still there not working either.

Table J6.3: Website-Sourced Public Comments Continued

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S0649.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people is Rosecrans- two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's, and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less, More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0649.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4. Per Complete Communities website, you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035). The devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less, More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0649.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane as most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with MINIMAL passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list. This area is in mobility zone 4. Per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with EXTREMELY LIMITED ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035). The devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0649.D	n/a	n/a	Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035). The devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less, More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0649.E	n/a	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less, More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0650.A	Felix Lopez	Logan Heights Community Development Organization.	We need bikeway projects that come through busy commercial corridors to be speed up and no delayed. Very often times communities like those in university avenue and imperial avenue have to suffer because of the deficiencies in planning ahead from this association and the local city government. SANDAG and the Cities need to be proactive and stop causing undue harm to these business corridors.
S0650.B	Felix Lopez	Logan Heights Community Development Organization.	We need public outreach that actually gets a % of the people in the area. Just because nobody showed up to your 2pm tuesday meeting does not mean that no one cares; these meetings are often held at times that are inconvinient for people. SANDAG needs to do door to door outreach and actually talk to people and get responses.
S0651.A	Robert LaRose	n/a	It would appear that the amount of attention and funding being given to bike lanes is way out of proportion to actual need for safety or transportation. I live on the Utah Street Bike Way and it gets very little limited use. The Landis Bikeway, with its expensive roundabouts, gets even less use. The new Pershing Bike Way appears to get a moderate amount of recreational use, especially on weekends, but actual commuting use appears to be very limited. In all cases there must be a firm commitment for ongoing maintenance. In the case of the Landis Bike Way, there is no maintenance for weeds in the roundabouts or on the shoulders. Some corners have never been maintained by the City and weeds are growing high. Similarly, the beautiful new Pershing Bikeway landscaping was left to go "wild" when SANDAG turned it over to the City and only now is receiving a minimal care. These should be attractive additions to the City, not eyesores!
S0651.B	Robert LaRose	n/a	It appears that not enough urgent attention is being given to I-805. The section from about the 163 to I-15 is often backed-up and crawling, especially during the extended morning and afternoon "rush hours". Travel times are very long, the resulting neighborhood air and noise pollution levels are very high. A "quick fix" would be to at least paint an HOV lane that connects the separated HOV lanes North of I-163 to I-15. A traffic light was added to I-805 where it intersects with North Park Way. While it improves traffic getting off I-805S, for people getting on the freeway there this situation is quite different. There are often long lines backed-up into the residential neighborhood along North Park Way and connecting streets. This will only become worse as more apartments with thousands of new residents are built in North Park.
S0651.C	Robert LaRose	n/a	To enhance safety and traffic flow, I recommend that SANDAG consider limiting large/heavy truck traffic on interstates during "rush hours". I understand this would require a major change in thinking and work habits, but such a change could have a significant positive impact on the quality of life for working and school commutes.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0652.A	Anita I Busquets	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans and Catalina, both two-way streets. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a NextGen Rapid Route for this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. Nor can ambulances currently navigate this quickly and safely. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings no infrastructure (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: more cars, not fewer, more congestion, not less, more greenhouse gases, not less, more parking problems, not fewer, more health and safety issues, not less, more evacuation issues, not less and an increase vehicles miles traveled (VMT), not a reduction. This will decrease San Diegans quality of life, not improve it. It will decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0652.B	Anita I Busquets	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lanes in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not fewer, More congestion, not less, More greenhouse gases, not less More parking problems, not fewer More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegan's quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0652.C	Anita I Busquets	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a NextGen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not fewer, More congestion, not less, More greenhouse gases, not less More parking problems, not fewer More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0653.A	Evan Strawn	San Diego Regional Chamber of Commerce	Efficient, well-connected, and safe transit is vital for our regional economy. We encourage SANDAG to prioritize these three pillars in future transit planning. We applaud SANDAG's bold vision for a future transit network. Future transit and boosts to current transit should connect to job centers in order to provide connectivity for our region's workforce.
S0653.B	Evan Strawn	San Diego Regional Chamber of Commerce	Cargo and shipping are important drivers of our region's economic growth. The Regional Plan should prioritize the free flow of goods across the border, within the County, and through the County to other destinations. This includes supporting the stabilization and increased performance of the LOSSAN Rail Corridor and building transportation infrastructure that is accessible for goods movement, including the trucking industry.
S0653.C	Evan Strawn	San Diego Regional Chamber of Commerce	SANDAG should remain highly focused on the agency's role in helping tackle our region's housing challenges. The Regional Plan explains RHNA allocation processes and the REAP program, but does not delve into other ways that SANDAG can support housing. The Plan could benefit from a more explicit focus on transit oriented development as part of both solving our region's housing crisis AND increasing transit ridership and revenue for transit agencies. Furthermore, there are a number of other co-benefits from TOD that are important to SANDAG, including a reduction in Vehicle Miles Traveled and progress toward meeting CARB mandated GHG reductions. The Plan could benefit from explicit action on transit oriented development and its co-benefits.
S0653.D	Evan Strawn	San Diego Regional Chamber of Commerce	We encourage SANDAG to collaborate with local agencies and partners to focus on improving transit safety. Community outreach has shown this is a top priority for transit riders. An enhanced focus on transit safety can lead to better public perception of local transit and increased ridership as a result.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0653.E	Evan Strawn	San Diego Regional Chamber of Commerce	We appreciate SANDAG's extensive public outreach, including to the Chamber and others in the business community. Regional transportation and infrastructure is crucial for a thriving local economy, and we look forward to partnering with SANDAG in finalizing the Regional Plan and providing our continued perspectives.
S0654.A	n/a	n/a	Please provide more rapid transit and first and last mile connections to transit. This should be a high priority for the region. Identify transit opportunities to deliver tourists to popular tourist destinations and limit parking to local residents. Be ambitious and do more to address the congestion of parking in beach communities. People flying into SD should be able to get around for their whole trip without a car. People who live inland should be able to park and ride to the beach.
S0654.B	n/a	n/a	Continue to be innovative with implementing options for EV charging, NEVs, and microtransit.
S0654.C	n/a	n/a	It is astounding how unfriendly San Diego's transportation network is to people walking and biking. Drivers have a disdainful attitude towards people walking and biking. Streets are incredibly wide, with unmarked crosswalks. Bike facilities are not well connected or not sufficient enough to reduce the level of traffic stress to a low stress level. A world class tourist destination, with access to miles of beaches, should have world class walking and bicycling facilities. This should be the NUMBER ONE priority for the region.
S0654.D	n/a	n/a	Reduce speed limits and implement road diets to overly wide streets. Prioritize the safe and efficient movement of all modes of travel and not just motor vehicles. Evaluate the removal of a highway to replace with more light rail.
S0654.E	n/a	n/a	Prioritize regional funding that will address air quality, safety for people walking and biking, reducing travel times for people taking transit and biking. Set aside funds for quick-build and demonstration projects to implement bike and ped improvements more quickly. Condition funds to resurface and widen projects to require that they include a bike/ped analysis. Prioritize funding to transform the region to maximize quality of life, safety and equity.
S0655	Parke Troutman (Mid-City CAN)	n/a	Mid-City CAN would first like to begin by acknowledging that, as a plan mandated by higher levels of government, the plan isn't necessarily written as SANDAG's board and staff would like and that uncertainty from those same governments makes it incredibly hard to anticipate what resources you'll actually have available when it comes time to carry out each step of the plan or what restraints will be placed on how you operate. The plan has good programs on transit that will make riding a bus or the rails more competitive with private transportation. The Youth Opportunity Pass supercharges youth mobility, spurring both their independence and making transit more viable versus cars for families in that a car costs the same to maintain regardless of the number of riders but if you have to pay for each monthly youth pass, each additional kid in a family makes transit less appealing. Further, the centrality of high-frequency Rapids to SANDAG's plans is encouraging. We believe that they are necessary for making mass transit a compelling option for much of the public. Together, they build a stronger transit future for the region, creating a culture of riding among the next generation of San Diegans and making a transit system that is appealing even when owning a car becomes an option. We are concerned, however, by additional highway funding. The addition of lanes to highways, even managed lanes, are sticky backwards, meaning that while bus route funding can be taken away, once a new lane is paved, it is unlikely that it will ever be removed. Those new lanes represent a permanent drain for maintenance, and any innovations that make mass transit more appealing will improve the level of service on those lanes, creating a negative feedback loop.
S0656.A	J PInhero	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities
S0656.B	J PInhero	n/a	Pt Loma has no room for bike ways as the Navy & Navy Submarine traffic needs all the lanes . Just the people that live in Pt Loma need all the lanes to drive to in and out of the Point. Rosecrans is a bumper to bumper congested roadway for early morning hours and now from 2PM on. If a fire or emergency vehicle is needed in the Shelter Island area, it would not be easy to get there with the growing traffic after taking away a car lane and giving it to bikes. Let bikes ride in the same lane as cars. Our forefathers rode bikes in car lanes.
S0656.C	J PInhero	n/a	Point Loma 92107 and 92106 is an old community. With the new ADU's being built without regard to single home, old communities it puts more people in the area that need parking and need to drive out of Pt Loma. The area is now congested. The main two roads in and out of Pt Loma are already congested with Navy and residents entering and exiting twice a day for 2-3 hours in morning and now by 2PM in afternoon. Leave old Point Loma alone. The Midway district is going to bring more congestion to the Point so let it stop there. All I can say is if that Navy jet that crashed into the water by Harbor Police station on Shelter Island had flown into the Navy storage tanks just a few hundred yards away from the crash, the whole south end of Point Loma would have become a fire ball. The explosion would have taken out homes the fires would have spread. There would have been no way for outside fire trucks to enter Pt Loma with people trying to get out of Pt Loma. The more the city allows more apartment housing in Pt Loma the less safe Pt Loma becomes.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0656.D	J PInhero	n/a	NO ADU's or breaking the height limit in the Pt Loma area. The area is to capacity for single family homes. It's a treasured old community. Take your Midway project and leave the rest of Pt Loma alone.
S0657.A	Thomas Peterschmidt	n/a	I am a daily rider of public transit in the San Diego county and downtown SD. Through the use of public transit I have been able to connect safely and easily between. School, work and padres games. I have been able to see first hand how many people it can move and how provides a more safe road experience by removing myself from traffic. Public transit improvements are a large investments and so are roads. Road contruction has its place but if we want a future where San Diego can grow and allow all of its citizens to have access to things like me imagine how much more productive our city can be. My main focus is on trains and all forms on non single use cars. That is the future it provides more accessibility, opportunities, is a larger factor in economic growth for the community and is a greener way to move. Transit is so critical to our way of life and by building in more option on how to travel only more people will join in. That requires full budget. Smart partnership with the city and private members and also timely demeanor. Public transit saves lives and will help our planet. Please listen to the people. Listen to people who use and love the public infrastructure. Listen to those who see hope in the strides that we have made. Work for a challenge that will benefit people all over the county and the next generation. Also the purple line needs to happen please.
S0657.B	Thomas Peterschmidt	n/a	I live in subrbia . It is almost impossible for me to use public transit from my house if I go by foot. I love the idea of providing more and varied options for people like my self that live in the suburbs to get to experience public transpiration. This can be done by growing bus routes micro mobility vans and or providing more destinations where those fleets can easily go.
S0657.C	Thomas Peterschmidt	n/a	Sand Diego is so primed to be an absolute powerhouse for bikeways and walkways. The weather here is stunning and is constantly comfortable all years by proving acesss to safe alternate ways for people to move around San Diego will bring in more people. I ride my bike a lot and love the use of bike protected lanes along the 101 from Encinitas to Cardiff. There is always people there and that brings in more people to those surrounding communities. It even brings in people from the other neighborhoods and cities in San Diego county to experience the people friendly infrastructure. I would love to see much much more of the bike bath ways that are protected as well as parking on the side of traffics so it can create a barrier for the bikers and pedestrians.
S0657.D	Thomas Peterschmidt	n/a	I want to focus on the train components of cargo shipping. Since the tracks are owned by the cargo train companies like, bnsf, train commuters like myself are subjected to limited windows of train times. Specifically, the coaster and amtrack trains can stop around midnight to begin cargo trains to go by. I know many people who stay out past midnight going to restaurants, bars, other forms of entertain, or work and they are subjected to only one form of transportation which is just cars. If there could be where the tracks that run through our community be alluded only for commuters and the cargo trains make other tracks in another location. Since that would take a long time to do so I could love to see an extension of more train times for commuters.
S0657.E	Thomas Peterschmidt	n/a	Electrification for trains and busses, going green, dedicated bus lanes on the freeway and streets, prioritized signals for trains and busses. Please do not go down the path of more autonomous self driving cars. The more time we spend upgrading that the less time we have to focus on the needs of public transit and the massive technology deficit that those industries are in here in San Diego. I would also love love a train to the airport. And an extension of the blue line into Tijuana just like they have one with Canada into Vancouver from Washington.
S0657.F	Thomas Peterschmidt	n/a	Housing near transit centers. More development connected to low income housing. Mandates on new buildings allowing multiple unites to be build near each other rather than just single family homes. Invest in the bigger budget purchases. And always connect housing with transit. That goes hand in hand for consistent and higher ridership.
S0657.G	Thomas Peterschmidt	n/a	Safety is so important. I had a student of mine who was hit by a car in a busy street in San Marcos. They had to be out in a neck brace and missed weeks of school. She thankfully recovered but what really hit me was that she was on the cross walk and doing everything she was supposed to and still got hurt due to a careless driver. Cars kill people. Driving is extremely dangerous yet we are okay with it. We have to find safer ways of transit. By brining that's safety we can allow more growth of that portion of the community and at this moment with my student getting seriously hurt I will not be venturing back out to that area due to the potential danger that street present to my community.
S0657.H	Thomas Peterschmidt	n/a	It needs to happen. Transit is so connected to everyone. We need to make sure it is funded and enough funding so we can adapt. I see that taxing people such as wealthy individuals would be best. The 1% of San Diego residence. Raise their taxes by 2 % and start funding more public transit options.
S0657.I	Thomas Peterschmidt	n/a	Public transit signifacy cuts back on greenhouse classes. Cars in the US produce so much and there is always an incredible amount of traffic every day. Focusing on ways to provide green ways to commute and matching that with fast and high frequency is the way to benefit San Diegans and the planet.
S0657.J	Thomas Peterschmidt	n/a	Transit connects everyone. We all need it. Public transit is built for all to ride and we need to make sure we are providing services to not just the wealthy but the lower income and minorities of our community. East San Diego need much more development and is severely lacking in transit infrastructure. Projects have stalled and that hurts. I keep those communities in the dark and not progress with the rest of the county and world. Transit connect jobs, school, fun, work and so much more. I effect safety, health care due to car accidents and if we build right by focusing more on public transit we can be proud of what we have done not because we decided to bend the knee to a few rich people but because we have listened to the people that have been neglected the most in our country.
S0657.K	Thomas Peterschmidt	n/a	More more more. Social media allows the younger generation and all generations to interact with the amazing work Sandag is doing and that where I learned of it. Social media and more presence in San Diego. You all are deciding the future of this city and I don't think people really know what's going on. Please keep making projects happen and releasing highlights from your team on social media.

Table J6.3: Website-Sourced Public Comments Continued

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S0658.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....
S0658.B	n/a	n/a	Implications if this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it
S0658.C	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0659	Robert	n/a	plan does not show equitable distibution of funds and planning. plan does not create bike lanes...it merely paints bike symbols in existing traffic lanes, such as Highway 67, that does not provide safety to bike riders or POV's. Plan allows housing density projects to be constructed in rural areas WITHOUT improvements to road infrastructure to handle increased traffic demands for occupational and emergency ingress and egress. Focuses TOO much on providing access to Mexican vehicular traffic that does not follow US environmental or safety regulations as well as unsophiscated and untrained drivers
S0660.A	Jennifer Williams	n/a	I would like to see an increase in public transit, our midtown community has been inundated with larger multistory complexes and we need our public transport to accommodate that.
S0660.B	Jennifer Williams	n/a	San Diego is a pretty bike friendly city but could be better, please keep and preserve the bikeways that we already have and consider increasing the safe walkways and bikeways.
S0660.C	Jennifer Williams	n/a	I would like to see a big increase in carpool lanes, particularly when getting closer into San Diego, EG the 15 freeway the carpool lane disappears in Clairemont so there is terrible traffic for multi use vehicles and public transport. I'd like to see those on the 56 freeway and the 78 and other areas.
S0660.D	Jennifer Williams	n/a	I am in favor of denser housing in our mid town region provided that is accompanied with ways for people to use public transport since driving is not practical for those higher density housing areas.
S0660.E	Jennifer Williams	n/a	I would like to see our region reduce its use of gas vehicles so that we can do better with pollution and air quality.
S0661	Yvette Johnson	n/a	It appears that the implementation of the 10-year plan will require nearly 130 trillion dollars in funding. When asked, the moderator did not exactly elicit concrete sources. I understand that plan implementation will be ongoing as funding is secured, however, other than public funds (taxes), and some federal funding, what other sources are being contemplated? Increase in parking fees, fees for vehicle miles traveled, etc., etc., would never produce the desired outcome. Has the money been budgeted for at a local level? At a State level?
S0662	Jane Manderscheid	n/a	The Next Generation Rapid Service is described as a "bus network using special technology and infrastructure to get around traffic". Getting around traffic implies that there is somewhere else to go. I'd like to see an actual description of how this will work in the Ocean Beach and Point Loma areas. When the road is only one lane each way and there's no alternative, how do you get around traffic? In the absence of such a description, one can only conclude that these areas are included only to allow further development of these areas without parking due to past measures (bonus ADU's) and potential upcoming measures (SB79). The patchwork development that is resulting in single family home areas in San Diego is ruining the residential neighborhoods and increasing housing prices. It seems that most of the rapid lines are projected to be completed by 2035, thus continuing to allow the devastation of our neighborhoods. The major job center in Point Loma is the Navy Base. Rapidly getting to the entrance to the base is not very helpful, as the office/gym/eating facilities are often still miles away. Navy bases have very limited hours for their internal shuttles, often ending at 7 a.m. (I am a retired civilian Navy employee who can still access these bases.) I was evacuated during a partial base shutdown on North Island. It took an hour to get off base (main exit was shut down). Can you imagine what would happen if we need to evacuate Point Loma?

Table J6.3: Website-Sourced Public Comments Continued

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S0663	50 year resident of 92106	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area. With no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans (a two-way street). If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less; More congestion, not less; More greenhouse gases, not less; More parking problems, not less; More health and safety issues, not less; More evacuation issues, not less; Increase vehicles miles traveled (VMT), not reduce it. Decrease San Diegans quality of life, not improve it. Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on bikeways and walkways? Requiring the Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility Zone 4, per Complete Communities website you would need to build 27 miles of bike lanes in mobility Zone 4 to equal 1 mile of VMT reduction in mobility Zone 3. Bike lanes will not be added to mobility Zone 4 this area per Complete Communities. This two-ane road area is extremely dangerous to share with bikes, cars and buses.
S0664	Mid city can	n/a	I'm currently overlooking the green line trolley that has helped me tremendously when it comes to taking myself to and from appointments at the age of 15. I can not yet drive so I relay heavily on the public transit of san diego. Yet there are still place and areas I can not access due to the limitation of said MTS system. There is a huge gap in accusability when it comes to our transit system. In the past people were limited to the inner areas of san diego and limited to work areas . Yet citizens should be able to access the whole of San Diego county easily without having to rely on Uber or Lift which mean low-income and minors can not access. These people rely on programs like the YOP (youth opportunity passes) or other disconnect fares. By removing said programs it take away the freedom and ability to be independent and mutually for people like me. Who have limited access to vehicles and transportation during week day's and summer's. The community truly values and needs YOP to stay and be permanent part of san diego as a whole. To help transport youth to and from school,to and form appointment and other landmark in a teens life. Please consider extending the program.
S0665.A	Liz Silverman	n/a	Sprinter o Continue work to double-track and separate commuter rail from freight. o Grade separate tracks to reduce conflicts with other modes of transit, ideally beginning the long-term work now to turn this line into a proper metro either via tunneling or elevated track. o Aim for seven-minute headways, rather than fifteen-minute. Don't make people have to consult a schedule. Sprinter should be more convenient than a car. o Support local cities' in connecting transit infrastructure to Sprinter stations, such as protected bike lanes, multi-use paths, etc. Airport Connection o In Chapter Three, Near-Term Action S states, "Implement near-term improvements that better connect transit to the airport." I would like to see the Trolley, Coaster, and CAHSR connected to the airport. No people-mover, bus, or shuttle to Old Town/Downtown with long headways is a good substitute for a direct rail connection. I know that this is an extremely complex issue with lots of different agencies, municipalities, etc., but it is worth continuing to push for. Quality, efficient, safe transit options at the airport will significantly reduce car miles traveled (whether by private vehicle, taxi, or rideshare) as well as alleviate vehicle congestion in and around the airport. Beach Connections o I see in the regional plan that SANDAG is conserving beaches, but didn't see that we will prioritize connecting our rail infrastructure to beaches. Given that this is one of the largest tourism draws (and therefore major revenue generator), I think it's vital to keep this on the horizon. At minimum, I would love to see the Trolley extended to Ocean Beach and Pacific Beach. CAHSR o I recognize that the LOSSAN corridor is SANDAG's current priority, but I urge you to begin the preliminary planning work that will be required to bring CAHSR down the 15 corridor from Temecula through Escondido and to the airport and downtown. Inland North County's population will only continue to grow, and is more likely to experience a surge in density than wealthier coastal neighborhoods. As of 2020, a total of over 600k people live in this inland corridor: Escondido 151k, San Marcos 95k, Vista 100k, Murrieta 110k, Fallbrook 32k, Valley Center/Ramona 30k, and Temecula 110k. All these people need an alternative to the increasingly congested 15 freeway. Existing BRT is too slow and undersized to meet this need. Inland communities are also generally underserved relative to wealthier coastal communities, and the demand for such services there is likely greater.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0665.B	Liz Silverman	n/a	o As currently envisioned, these are merely subsidized rideshare services. There's certainly some value in that for those unable to drive or afford private rideshares. But it doesn't reduce vehicle miles and it detracts from efforts to improve and expand fixed route alternatives to cars that have transit priority. o The flexibility of this transit doesn't lead to dense development in the same way that a commitment to rail tracks through an area does. o If you want to continue expanding flexible fleets, then lean into dedicated lanes (similar to buses), signal priority (allowing them to jump the queue at busy intersections), and designated pickoff/drop-off "stations" with more amenities in frequently used locations such as hospitals, colleges, stadiums, and transit connections.
S0665.C	Liz Silverman	n/a	Inland Rail Trail (and Coastal Rail Trail) o Provide support for local municipalities to build transit infrastructure connected to these bike trails. The support can be in several forms, including SANDAG providing expertise and planning know-how, creating communications collateral (fliers, 1-pagers, and other explanatory materials) that residents can use to persuade city councils to undertake projects, and optimally micro grants or matching dollars. Projects could include: - Adding or upgrading bike lanes that connect to the rail trail, making it safer and faster for people to bike to/from the rail trail. - Making rail trail intersection crossings safer or more direct in areas with busy streets. - Adding landscaping, lighting, shade structures, bike racks, or other path improvements that make using the rail trail safer and more appealing.
S0665.D	Liz Silverman	n/a	Regarding proposed changes to 78: o Please do NOT expand 78 with more lanes. Expansion would induce demand and any new lanes will be as congested within years, if not months, of completing construction. It will add, not reduce, harmful air pollution in north county. Even if the additional lanes are managed/HOV, it still further bifurcates cities that are both north and south of 78, making it harder and less safe to take North-South trips within cities without a car. o Invest in alternate routes for short intracity trips. Currently, every street that crosses 78 in San Marcos has entrances and exits from 78. To travel between NE and SW San Marcos or between NW and SE San Marcos, all modes of transit (car, bike, pedestrian, Sprinter) are forced to engage with freeway entrance/exit traffic. Furthermore, to cross the city like this, it is faster and more convenient for car users to enter the freeway, even if only for 1-2 exits. Providing alternate routes will reduce highway congestion and mitigate the harmful effects of the highway (noise and air pollution, interruption of alternate transit modes, bifurcation of communities).
S0665.E	Liz Silverman	n/a	o Develop publicly-owned dense mixed-zone buildings adjacent to transit stations -- not only encouraging private development, but creating small retail spaces that can be subsidized. Modern five-over-ones are often developed by residential developers who have a financial interest in leaving ground floor retail underdeveloped and/or vacant. Publicly-owned housing would not only solve this by putting people over profit, but would create a sustainable new revenue source for future development.
S0665.F	Liz Silverman	n/a	How we design our streets has an outsized impact on pedestrian and bicyclist safety. Currently, most roads prioritize efficiency for cars. For every project, I urge you to consider all people who might use the infrastructure, regardless of mode. Instead of using past utilization as a metric for who to build infrastructure for, reframe it as, who would use this infrastructure if it were safer for them to use it? Nobody's going to swim across shark-infested waters (the cars are the sharks in this metaphor), but if you build a safe bridge (curb extensions, pedestrian islands, raised crossings, daylighted intersections, fewer lanes), they will cross.
S0665.G	Liz Silverman	n/a	As an obligate car driver due to lack of alternatives, please continue to focus on alternatives to car travel that are better for the climate, energy consumption, and air quality.
S0665.H	Liz Silverman	n/a	A lot of projects and focus is within central or downtown San Diego, with most projects outside the area focused on freeways, flexible fleets, and other car-centered approaches. The line is blurry between which projects SANDAG tackles and which it leaves to local jurisdictions, and even if it's not technically the case, it certainly seems that outlying regions of the county are left to fend mostly for themselves. Many of these regions are undergoing significant growth, and it's a great time for SANDAG to be more proactive in shaping how these areas develop, instead of waiting until they become completely car-centric fully-developed retrofit projects.
S0665.I	Liz Silverman	n/a	It seems that only extremely involved citizens (whether YIMBY or NIMBY), transit nerds, and government staff are aware of and participating in these sessions. I understand there are limited resource for outreach, but I do wonder if there's simpler, more straight-forward ways to tap into the communities' thoughts and preferences. Perhaps more online outreach, as well as flyers, and additional language translations? I think the north county session I attended mentioned that SANDAG receives about 2,000 responses to surveys like this, which sounds great until you realize the region has over 3.2 million people and that's about a 0.06% response rate.
S0665.J	Liz Silverman	n/a	I want to take this opportunity to say thank you to all the hardworking staff at SANDAG. I know you probably don't hear it often enough (and are constantly underfunded), but I appreciate your dedication and commitment to improving San Diego transit for everyone. For all my comments above, I do want to note that I see the improvements occurring (even if we all wish they'd go a bit faster), and I am excited for the future of transit in our county. Thank you!

Table J6.3: Website-Sourced Public Comments Continued

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S0666.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0666.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0666.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!

Table J6.3: Website-Sourced Public Comments Continued

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S0666.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
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S0667.A	Robin	n/a	Why don't we have a troller system that goes directly to the airport?
S0667.B	Robin	n/a	Stop the insane multiple ADU laws!
S0668.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE
S0668.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

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S0668.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to It It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0668.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0669.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans and Catalina, two-way streets. If a fire breaks out, there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remain a TPA/SDA.....More development that does not coincide with planned communities, which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less, More health and safety issues, not less, More evacuation issues, not less, Increase vehicles miles traveled (VMT), not reduce it, Decrease San Diegans' quality of life, not improve it, Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks, and infrastructure (that will NOT actually happen NOW or in 2035), nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0669.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, n ot less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to It It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0669.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0669.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0669.E	n/a	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0669.F	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S0670	Maricela Ramirez	n/a	Me gustaría que este proyecto diéra más rutas hasia las plañas y programas de tarifas bajas para los jóvenes *** I would like this project to provide more routes to the beaches and lowfare programs for young people.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0671	Rachel Kahan	n/a	Hello SANDAG! My name is Rachel Kahan, and I live in Grantville. I'm a nonprofit director and have led AYSO for the past two years in San Diego. I'm commenting on the 2025 Regional Transportation Plan because I care about the future of our region, and I believe this plan needs to go further to tackle climate change, air pollution, and accessibility for all communities. Here's what I'd like to see in the final plan: Increase the greenhouse gas emissions reduction goal to at least 25 percent by 2035. The current goal of 19.3 percent just isn't enough given the urgency of the climate crisis. Don't expand highways. Calling it a managed lane doesn't change the fact that adding lanes will lead to more traffic, more pollution, and more vehicle miles traveled. Let's invest in sustainable transportation instead. Make the Youth Opportunity Pass permanent. It's a key equity program that gives young people better access to school, work, and life without relying on cars. Prioritize the Purple Line and make sure it's completed by 2050. This project is essential for connecting people to jobs and education. Make transit faster and more reliable. If it takes three or four times longer to take the bus than to drive, people won't switch. Let's make transit time-competitive. Include clear goals and metrics. The plan should track things like mode shift, reductions in vehicle miles traveled, and improvements in air quality and health outcomes, especially in the communities most affected by pollution and unsafe infrastructure. Thanks for your time and for giving the public a chance to weigh in. Rachel Kahan
S0672.A	Descanso Community Planning Group	n/a	While not discussed in this document, I have the following Comment: Westbound I-8 to Highway 67. There are frequent and major backups on the WB I-8 to Highway 67. It could easily be remedied by closing the closest WB I-8 on-ramp at Mollison, thereby preventing merging traffic in this area of the freeway. Merging traffic from the Mollison on-ramp causes slowdowns, and often accidents in the off-ramp lane to Highway 67. Just a couple of K Rails closing off the Mollison on-ramp would do the trick until a new access to the Highway 67 from WB I-8 can be constructed. There are several on-ramps in this area, and this change of access would not cause much of an impact.
S0672.B	Descanso Community Planning Group	n/a	Chapter 3 Near-term actions O. Continue assessing the feasibility of a vehicle miles traveled (VMT) mitigation bank that can provide funding for transit and Flexible Fleets What is the mitigation bank, and how is it funded?
S0673.A	Randy Torres-Van Vleck, Associate Director of Community and Housing Development	PANA - Partnership for the Advancement of New Americans	PANA is very excited to support the Rapid 625 which connects South Bay, Southeast SD, Mid-City (including the future Global Village cultural hub and housing campus), SDSU and all three trolley lines. We ask that the phasing for this project be advanced from 2035 to 2030. We also support the Rapid 210 which connects Ocean Beach, Uptown, Mid-City (including the future Global Village) via University Ave, and La Mesa. We ask that SANDAG extend the eastern terminus from La Mesa to Downtown El Cajon in order to connect our east county communities to Mid-City and the beach. We ask that the phasing for this project be advanced from 2035 to 2030. Please continue to fund the Youth Opportunity Passes. Please include the 10 Transit Lifelines in the Regional Plan.
S0673.B	Randy Torres-Van Vleck, Associate Director of Community and Housing Development	PANA - Partnership for the Advancement of New Americans	Please expand neighborhood shuttle programs.
S0673.C	Randy Torres-Van Vleck, Associate Director of Community and Housing Development	PANA - Partnership for the Advancement of New Americans	We support the planned Chollas Creek Bikeway North Fork. We ask that the phasing be advanced from 2050 to 2030 for this project. We ask for your support with implementing regional active transportation, traffic safety projects, and blue/green infrastructure in our historically redlined and under-resourced Chollas Creek watershed communities as further detailed in the Chollas Creek Coalition letter. Please view that letter for details on this ask. Please preserve the Active Transportation Program at SANDAG which has delivered the most well-designed, and most community-supported active transportation projects in the region. We're very excited for the University Avenue Bikeway. We ask that the bikeway be upgraded with protection from high-speed traffic by converting the right-most travel lanes into parking lanes between 54th Street and 58th Street. Street parking is limited along this section. The community plan calls for street parking lanes.
S0673.D	Randy Torres-Van Vleck, Associate Director of Community and Housing Development	PANA - Partnership for the Advancement of New Americans	We ask for your support with implementing regional active transportation, traffic safety projects, and blue/green infrastructure in our historically redlined and under-resourced Chollas Creek watershed communities as further detailed in the Chollas Creek Coalition letter. Please view that letter for details on this ask. We ask that the Regional Plan take a transit-first and active-transportation-first approach.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0673.E	Randy Torres-Van Vleck, Associate Director of Community and Housing Development	PANA - Partnership for the Advancement of New Americans	PANA has appreciated the opportunity to work with SANDAG staff the past year and a half. We look forward to working more closely with SANDAG during the 2029 Regional Plan to engage our communities in City Heights, Mid-City, Southeast SD, and East County. PANA works especially close with Black, Arab, Middle Eastern, Muslim, and South Asian communities and refugee and immigrant communities in SD county.
S0674	Mark G. Stephens	n/a	Thanks for the opportunity to comment! I haven't had an opportunity to review the latest version of the draft plan in detail, but would like to comment briefly on transit connections to and from the airport (SAN). As a Downtown resident, I almost always use bus Route 992. Much was made of the potential for an elevated "people mover" connection to the airport, which would be massively expensive, very likely infeasible for a variety of reasons, and would take years of instrusive construction to implement. A direct trolley connection has also been considered, and may have some feasibility, but again would entail a huge capital cost (not to mention O&M expenses), and an extended lead time with significant construction impacts. In any case, bus service will remain the most viable transit option for a number of years. I have previously commented to SANDAG and the San Diego County Regional Airport Authority that whatever option is pursued, it should include stops at both Terminal 1 and Terminal 2. Otherwise, a passenger with baggage may need to walk up to a half mile to check in or to collect their bag(s) and reach a single transit stop. I love to walk, but this is crazy. Thus, any transit option should include a stop at each terminal (which the 992 bus currently provides). This may entail significant costs for a people mover or trolley extension (but would still be clearly warranted), but should be very easy and economical to accommodate through existing or enhanced future bus service. Thanks for your consideration! - Mark G. Stephens, AICP
S0675.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor You will cause small businesses to go out of business because there will be no parking .This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0675.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0675.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

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S0675.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0676.A	n/a	n/a	Transit: We do not have accessible enough transit options for the elderly, disabled or chronically ill to have the ADU rules the city is using. I'm struggling to find parking anymore because you all say there's transit within a mile of my house. I'm on a fixed income with mobility issues. Transit as it is not a good option for me. I just need to be able to park at my own house, but you're increasingly creating a community where I can't exist and thrive.
S0676.B	n/a	n/a	Bikeways: the city seems to love the appearance of doing something good and green by creating all these bike lines, but in my neighborhood, they are horrible underutilized. So we're pouring money into something the community doesn't use. Add to that the fact that the bike lanes are filled with overgrown brush and debris. It sure seems like it is all for show for political reasons and not really for the community.
S0676.C	n/a	n/a	You're selling our city to developers. Full stop. There seems to be no plan for improving infrastructure. It's just build build build and these are not even low cost housing options. You're making a few developers and private equity groups rich while screwing over communities.
S0677	n/a	n/a	I am writing to strongly support the continuation and expansion of the Youth Opportunity Pass (YOP) in the 2025 Regional Plan. As a youth living in San Diego, this program has had a life-changing impact on me and my family. When we first immigrated to the United States, we didn't own a car. My family was starting from the ground up, and even a $2.50 bus fare felt like a financial burden. At that time, reliable transportation wasn't just a convenience, it was essential. The YOP gave me access to school, community programs, and other important opportunities without putting extra strain on my parents, who were already working hard to rebuild our lives in a new country. Even now that we finally have one car, it's shared between everyone in our household. That means it's not always available when I need to go to school, attend a volunteer commitment, or access tutoring. Public transportation, made possible by the YOP, continues to be a vital part of my daily life. Without it, I wouldn't have the same level of independence or access to the opportunities that have helped me grow personally, academically, and socially. The YOP isn't just about free rides, it's about creating equitable access to education, jobs, healthcare, and civic participation. It gives youth, especially from low-income and immigrant families like mine, the ability to show up. I know many others who rely on this pass to reach their after-school jobs, take college courses, or get to medical appointments. For many of us, transportation is one of the biggest hidden barriers to opportunity, and this program helps remove that barrier. As we look to the future of San Diego, I hope the region will continue to prioritize youth accessibility in its transit planning. Investing in programs like the Youth Opportunity Pass is investing in the future of our city. I urge SANDAG to maintain and expand the YOP so that all youth, regardless of income, background, or zip code can keep moving forward. Thank you for considering this important issue.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0678.A	Mary Bryan	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0678.B	Mary Bryan	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0678.C	Mary Bryan	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0678.D	Mary Bryan	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

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S0679.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away.
S0680	Mike Marshall	n/a	I am a La Mesa resident impacted by the SR 94/SR 125 widening project. My home is adjacent to the Mariposa Street overcrossing. The bridge is the critical chokepoint over the southbound and northbound SR 125 that backs up traffic in both directions throughout the day. Caltrans needs to get this funded phase 1 project certified and started. Accidents on the 125 have become increasingly common. Also, surface streets in adjacent neighborhoods on either side of the 125 have been subject to increasing traffic volume over the years with the traveling public avoiding the 125 backups. This is a source of resident frustration and a significant increase of wear and tear on those neighborhood streets. After this phase 1 of the project is started, they need to work diligently on getting phase 2 funded and designed so this decades long problem will eventually come to an end.
S0681.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it

Table J6.3: Website-Sourced Public Comments Continued

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S0681.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it
S0682.A	Winston Lee	n/a	The success of the Blue Line UTC Trolley extension in 2021 shows that San Diegans need expanded transit that is more frequent, reliable, and accessible across different regions of San Diego besides downtown. If we want to combat urban sprawl and car dependency, San Diegans need a more expansive Trolley network that can help people commute to major work and school regions (like Torrey Pines and Sorrento Valley, where the majority of biotech and pharma companies are). Also, stricter standards for trolley cleanliness and safety must be prioritized. People are discouraged from taking the trolley because people think it's too dirty and dangerous.
S0682.B	Winston Lee	n/a	Bikeway bollards are a good start, but having concrete protected bike lanes is integral to having true protection for cyclists and encourage more people to bike. San Diegans already think cycling is too dangerous in a car-dependent city like San Diego, we need to make bike lanes safer if we want to get more people to bike.
S0682.C	Winston Lee	n/a	If we want to meet our CO2 goals for 2035 and 2050, we must curb efforts to expand highway lanes and instead fund for more Trolley network expansions. Allowing car-dependency as the status quo by adding highway lanes and doing nothing to make public transit more accessible and expansive will ensure San Diego will fail to meet our climate goals.
S0683.A	n/a	n/a	No mass transit in Point Loma.There is no way to expand on the PENINSULA!!it is a small water bound community and must remain as such!!Any community expansion is contrary to the needs!!
S0683.B	n/a	n/a	Bikeways should NOT compromise parking!!(which has already been compromised!!
S0683.C	n/a	n/a	Rosecrans Street is already compromised with traffic.Same probelm(community is a peninsula))
S0683.D	n/a	n/a	Should remain a single family residential area!!For all the same reasons -PENINSULA!!!
S0684.A	n/a	n/a	Please maximize transit across the region.
S0684.B	n/a	n/a	Please try to pass a sales tax increase.
S0685.A	n/a	n/a	Transit in San Diego is basically non existing, and if you do not increase frequency and routes it will never be used. No special bus lanes are necessary because with the lack of routes they would barely be used. Please get educated on what is public transportation by looking at what happens in the european countries.
S0685.B	n/a	n/a	Bikeways in San Diego are a huge waste of money because San Diego is a very hilly city and bikes are not the way to move around. Thinking of taking Amsterdam as a model is just an uneducated idea. Please be rational.
S0685.C	n/a	n/a	Local roadways need to be properly maintained. It's getting worse than the third world and we are extremely sick of it. Get your people around and actually look at the condition of some streets, the amount of trash on the sideways and of vegetation that can catch fire.
S0685.D	n/a	n/a	San Diego airport cannot possibly be used by Fedex, DHL and UPS cargo planes. It it congested and these planes should never use it. Again, very poor planning. Look at the cities that actually have an international airport. San Diego is absolutely ridiculous.
S0685.E	n/a	n/a	Time for some real fast trains or similar.
S0685.F	n/a	n/a	This city is rapidly degrading. Money is not put where it should go. There is litter all over, the light poles are still above ground and are a fire hazard, sidewalks are not maintained together with the roads, the police force is not properly trained to keep the city safe and in order. Neighborhoods are getting destroyed by the lack of respect for zoning rules and the administration is a disgrace.

Table J6.3: Website-Sourced Public Comments Continued

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S0686.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less; More congestion, not less; More greenhouse gases, not less; More parking problems, not less; More health and safety issues, not less; More evacuation issues, not less; Increase vehicles miles traveled (VMT), not reduce it; Decrease San Diegan's quality of life, not improve it; Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
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S0687	Nancy Lazarski	n/a	Please keep the bus system stop on Shelter Island. This not only helps workers transit to jobs on the island, but also locals that like to transit to old town or downtown without having to drive on Rosecrans. It also eases the number of cars in transit.
S0688.A	n/a	n/a	Pt Loma must be taken off transit list
S0688.B	n/a	n/a	NO bike lanes in pt loma
S0689.A	Cherie Celeste	n/a	I live a block from bus route 28. A household member has taken that bus to sports arena blvd. The congestion of the Point Loma base traffic in the afternoon is bad. Also the congestion of commuting cars from interstate 8 west makes the traffic lights slow. The buses get in the way and clog Rosecrans further. Anyone crossing Rosecrans makes traffic worse. Any increase in buses in the future would be worse
S0689.B	Cherie Celeste	n/a	The bikeways on Rosecrans and Shelter Island Drive are adequate. Sidewalks in La Playa on Rosecrans would help
S0690.A	Mari Hamlin Fink	n/a	LEAVE POINT LOMA AND SHELTER ISLAND ALONE! WE ARE A DEAD END AND MORE CONSTRUCTION WILL ENDANGER OUR SAFETY! STOP!
S0690.B	Mari Hamlin Fink	n/a	LEAVE POINT LOMA ALONE!
S0690.C	Mari Hamlin Fink	n/a	No more construction in Point Loma. Our evacuation ability is threatened!
S0690.D	Mari Hamlin Fink	n/a	LEAVE POINT LOMA ALONE!
S0691.A	n/a	n/a	Many of the new Rapid routes make connections currently unserved by transit. Is there enough demand on some of these routes to support frequent service over such long distances? Rather than expanding Rapid service into unknown rider markets, it may be worthwhile to improve current high-ridership lines with known demand. Also, standalone Rapid routes won't be successful unless they connect into a broader transportation network. In some of the outlying communities, the Rapid routes will have nothing to connect into.
S0691.B	n/a	n/a	Many of the microtransit zones are proposed in areas with robust existing transit service or in denser/more walkable communities. Microtransit is expensive to operate and should be prioritized in areas without other, more cost-effective, mobility options.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0692.A	Mike Rancourt	n/a	The 2025 plan takes a significant step back from the ambitious 2021 plan. The emphasis on "managed lanes" and the shift toward rapid buses is an understandable, pragmatic move, but there's still little detail to give any hope of shifting mode share or reducing VMT. The great benefit of Rapid Buses (as they are used in SD) is that they require little infrastructure. If you're going to be taking 10 years to implement, I hope that mean you're designing dedicated, grade-separated bus lanes, not just slowly rolling out more of the kinds of Rapid routes we have now. I noticed that the 2050 Transit and Flexible Fleet map (2025, p. 23) scales back the Purple Line compared to the 2021 Regional Plan (2021, p. 23). I mean, those maps aren't detailed enough to know what's going on, but it does not appear that you plan any new commuter rails going above Rt. 8 by 2050. This is disappointing. I am concerned that the 2025 RP does not do enough to shift drivers into transit.
S0692.B	Mike Rancourt	n/a	I am sad to see highway expansion.
S0693	Alexander Berryhill-Williams	n/a	I greatly support the buildout of the Rapid bus network described in this plan. San Diego County's existing bus network is greatly lacking. Many buses are incredibly infrequent, unreliable, and slow, making it difficult to get anywhere. The planned Rapid network would be a massive improvement, providing frequent all-day bus service to most of the county. I live in North County and don't drive, and this plan would put two new Rapid services within walking distance for me, greatly improving my ability to get around. Please ensure these routes are designed to be truly rapid, with bus lanes, signal priority, improved stops, and all-door boarding. I am disappointed to see that this plan is a huge step backwards for rail projects, both from the 2021 Regional Plan and from earlier concepts for the 2025 plan. The 2021 plan pushed the envelope with a long-term plan to give San Diego a world-class rail network. In the 2025 plan, most of these rail projects have been gutted or removed outright. Commuter Rail 581, the crucial east-west link along El Cajon Boulevard that would serve many of San Diego's most densely populated neighborhoods, has been cut completely, even in the Unconstrained Project List. The Purple Line has been downgraded from high-speed heavy rail to slow light rail, and has been cut in half, no longer serving San Diego's major job centers of Kearny Mesa, University City, and Sorrento Mesa. These cuts completely defeat the intended purpose of the Purple Line as a regional line, serving longer-distance trips between underserved transit-dependent communities and major job centers. The LOSSAN extension to the border has also been entirely removed, despite an intercity rail connection to the border being an crucial piece of California's State Rail Plan and a necessary relief for the overcrowded Blue Line. What remains of SANDAG's long term rail projects in this plan are a train to the airport, a slow streetcar for Uptown that doesn't reach Mid-City, a light rail line stripped of its potential, and improvements to LOSSAN, which will see only hourly off-peak Coaster service even by 2050. San Diego needs a true long-term vision for its transportation network. Projects like these usually happen only after decades of planning, so we need to solidify them as part of the regional plan now, while we build out the Rapid bus network in the mid-term. Please reconsider the state of these projects in the 2050 phase of the 2025 Regional Plan, and please keep Commuter Rail 581 on the books by returning it to the Unconstrained Project List.
S0694	Rosa Puentes	Olivewood Gardens and Learning Center	-I will like to to have accessible bathrooms in the bus tops and trolley and the bus connections, very necessary. -I understand nothing about the PRONTO card, we need more support on how to use the application and more because we are elderly.
S0695	Roxana Agpalo	Olivewood Gardens and Learning Center	I use Public bus to city college from National City. As I ride, I see seniors having issues with the electronic check in. Isn't the PRONTO card helping on that? I wonder if MTS can help with technical assistance campaign on using the electronic check in for them to us it. The older people needs it.
S0696	Elisa Lozano	Olivewood Gardens and Learning Center	The bus is always helpful for me when I need it. My mom does not drive me when she works late and i depend on it. thank s to the youth pass I can afford public transportation to my high school. I see other fellow students the use the bus in the city, pretty awesome me and my family benefit from it, it helps our finances.
S0697	M Daniels	n/a	Take the Shelter Island area of point Loma off the plan, as it fails to meet any of the mandated goals.
S0698	Kamani Magana	Olivewood Gardens and Learning Center	I love using Circuit electric bus because it gets me to where I want to where I want to very fast and free because I am a High school student, Thank you SANDAG!
S0699	Karolina Lizarraga	Olivewood Gardens and Learning Center	Public transportation (bus circuit) is a very convenient and has helped me to get where I wanted to fast , without it I have to walk to my destination and take longer. The easy access to a circuit has helped me and other families in the community safety get where they want to be.
S0700.A	n/a	n/a	More please. Would like to see more connections with better frequencies.
S0700.B	n/a	n/a	These are too expensive. I don't support use of limited funding on this type of transit outside of ADA needs.
S0700.C	n/a	n/a	I love what San Diego has added thus far. I find some sections can use improvements and would like that analyzed to increase safety. Otherwise we need more defined connects for traveling by bike.
S0700.D	n/a	n/a	STOP EXPANDING FREEWAYS! Do not add more lanes. We need to get people out of cars. Force drivers to drive slower and force them to be more attentive with better street design.
S0700.E	n/a	n/a	The only technology we should be investing in is public transit technology. Stop funding technology to improve higher car throughput. Give people more transit and take lanes away from personal vehicles.
S0700.F	n/a	n/a	Keep supporting housing infill. Remove single family housing only zoning. Neighborhoods should be able to grow.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0700.G	n/a	n/a	Should have active support of vegetation management.
S0701.A	Emma Rodriguez	San Diego 350	2035 is too late to wait for additional rapid bus and microtransit routes. SANDAG must accelerate the timeline and prioritize the Environmental Justice communities that need services the most. Plus, prioritize 24-hour service, frequency improvements, and improvements to transit stops (adding shade and ADA-accessible bathrooms) on the most popular routes to make the transit system fast, frequent, reliable, and accessible.
S0701.B	Emma Rodriguez	San Diego 350	Microtransit is great, and I love that SANDAG is committing to them. However, please work to make funding permanent, for new and existing programs.
S0701.C	Emma Rodriguez	San Diego 350	More bikeways and walkways! In particular, move the timelines up whenever possible, especially for bikeways/walkways in school areas.
S0701.D	Emma Rodriguez	San Diego 350	There must be NO highway expansions in SANDAG's plans for the future. This includes adding "managed lanes," as highway expansions in disguise. These only increase air pollution, VMT and cars on the road, with minimal effect on traffic reduction.
S0701.E	Emma Rodriguez	San Diego 350	SANDAG must act proactively to guarantee permanent funding for the Youth Opportunity Pass program past 2026. No-cost transit passes for under-18 youth encourage significant participation in public transportation, help shift expectations for how San Diegans use transit, and invest in our region's future. Given the current state of funding sources, SANDAG must take the lead on funding this critical program as a number one priority!
S0701.F	Emma Rodriguez	San Diego 350	While I applaud SANDAG's success in exceeding the state-imposed greenhouse gas emissions reduction target for 2020, the projected reductions for both GHG and VMT in the 2025 RTP do not go far enough. Climate change is accelerating, and we are currently seeing the results. The RTP must move aggressively to plan for a 25% reduction in GHGs and VMTs by 2035 by ending all highway expansion projects, including managed lanes.
S0701.G	Emma Rodriguez	San Diego 350	My name is Emma with SanDiego350. I want to make a comment as a driver, biker, walker, and transit user in San Diego to express my strong support for SANDAG's moves to make our transit system better, and my hope that SANDAG will move farther in that direction. The system of cars we have currently is good for some, but acts as a barrier to so many citizens-- we need alternatives.
S0702.A	Sunny Goodwin	n/a	It appears that less lanes are now planned to be added due to a freeze and changes in the regional plan. We desperately need those extra lanes on the 5 north up past hyway 78. Traffic snarls there are outrageous every day of the week now. Weekends make it necessary for those of us who live in this area to take surface streets, adding to even MORE traffic on our already clogged local streets!
S0702.B	Sunny Goodwin	n/a	I DO NOT support the huge housing complexes planned near bus stops and rail lines, as knowing the history of CA and it's dependency on the automobile, I believe it will AGAIN add to huge traffic snarls on our community streets!
S0703	Francisco Lizarraga	Olivewood Gardens and Learning Center	It is very important to the people that does not have a car and for the people that work in downtown, I use the trolley for the padres games! for the confor on traffic and the expensive of the parking.
S0704	Jubi A.	Olivewood Gardens and Learning Center	San Diego Transit is honestly not bad, it runs on schedule and fairly clean, Safety of the commuter is not challenged. Only bad thing I can say is the bus stops. Some are abut ran down and uncovered, Light for safety will be appreciated.
S0705.A	n/a	n/a	Congested Rosecrans St (level of service of E and F) cannot lose a travel lane for a dedicated bus lane that would be used only 4 times per hour. The two Rapid Bus lines proposed in the 2025 Plan would replace lower frequency bus service that is very lightly used. Unless these routes utilize existing lanes they should be eliminated from the Plan. It would take additional right of way that would need to be negotiated and obtained to accommodate a separate Rapid Bus Lane on Rosecrans St. Note that much of the two proposed Rapid Bus lines would operate on two lane streets. There is no evidence the proposed Rapid Bus line on Rosecrans would relieve traffic and would create even worse congestion if a traffic lane was removed. Another option is to extend a potential People Mover from the airport into Liberty Station and maybe onward towards the Midway District. Such a service would remove the need for a Rapid Bus service along Rosecrans. There are no projects in the plan to expand freeway construction and roadways to relieve the substantial traffic congestion along the I5, I8, I805 and I15 freeways which is what the public wants. Rather the Plan ignores public sentiment and concentrates its resources on expanding bikeways and bus routes in pursuit of some unrealistic goal of forcing people out of their cars onto public transit in pursuit of reducing greenhouse gas emissions and reducing the deficit that public transit systems incur. Fixed point public transportation systems have a number of problems including that they do not take people where they want to go which is why they are not used. People want the flexibility to continue using their cars not a public transit system that does not meet their needs. Therefore, more plan resources should be devoted to expanding roadways thereby relieving traffic congestions and not on public transit such as bikeways and busses.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0705.B	n/a	n/a	California's Design Information Bulletin 89-01 states the community should be involved with Class IV Bikeways: "Adding a Class IV Bikeway into an already built-out street environment usually requires a reevaluation of service needs and a level of service analysis for capacity, because some transportation feature(s) may need to be reduced or eliminated, e.g., vehicular lanes, shoulder, parking or sidewalk. Local jurisdictions must be involved when analyzing these community impacts with the local residents, businesses, and advocacy groups deciding what features are to be included in the street modification. Thus, community planning is necessary when local agencies are contemplating a Class IV Bikeway route. Whether in an overall planning document or in a specific project document, effective public engagement is vital to the successful development of the Class IV Bikeway." The proposed Bikeway on Rosecrans street will create an unsafe environment for Bikers due to traffic volume and speed. Rosecrans has speed limits of 35 and 40 MPH and many travel above the limit. Rosecrans has a computerized traffic system designed to keep high volume traffic moving. Bike riders hit by a 32 MPH vehicle have a 25% chance of dying while at 42 MPH it is a 50% chance of dying. Flexible posts and narrowed lanes to accommodate bikes do not increase safety. If a dedicated lane for bike would remove a travel lane, congestionwould further be degraded. Any Bikeway should be Relocated into Liberty Stations to create a safe and scenic Bikeway.
S0705.C	n/a	n/a	Include in the 2025 Transportation plan extension and improvements to the on-off ramps from I-5 and I-8 to Rosecrans street via Camino Rio West. Remove and eliminate TL023 Aterial Rapid Route 228 from the Regional Transportation Program until additional right of way can be negotiated and obtained to accommodate a separate Rapid Bus Lane, Rosecrans street is operating in a level of service of E and F and highly congested. There is no evidence the proposed program under TL023 will relieve traffic. Accelerate and implement the Airport Transit Connection Study TL001. Implement the People Mover alternative to improve connectivity to travelers and tourists and Accelerate and implement the Airport Transit Connection Study TL001. Implement the People Mover alternative to improve connectivity to travelers and tourists and reduce Greenhouse gas emissions in the region and local streets. reduce Greenhouse gas emissions in the region and local streets.
S0705.D	n/a	n/a	Recent legislation (SB79 Weiner) attempts to overturn local zoning and force future housing development along future transit lines that may not be funded in an attempt to reduce Greenhouse gas emissions and reduce transit system deficits. Transit funds should be allocated to underserved existing proven housing which generates transit demand rather than some imaginary population model that may not occur.. Similarly mandated statewide zoning code amendments should not force zoning amendments based on future transit lines that may not occur.
S0705.E	n/a	n/a	The Regional Plan allocates only $3.402B (2.70%) to the Point Loma Community in six projects over the next 25 years in a Plan costing $126.0 Billion. One of the six projects (TL001 Airport Transit Connection) accounts for $3.186 billion of the $3.402 B allocated to Point Loma that benefits mostly downtown. The other five projects cost 0.216B of the $3.402 B or 0.17% of the total $126B Regional Plan cost that is mostly concentrated in Bikeway and Express Bus projects This allocation is unequitable and unfairly discriminates against the Point Loma Community
S0706.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0706.B	n/a	n/a	It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0706.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it
S0706.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City's CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking
S0707.A	Frankie Lizarraga	Olivewood Gardens and Learning Center	I work in the navy base in Coronado and they aren't any bus routes that cross the bridge.
S0707.B	Frankie Lizarraga	Olivewood Gardens and Learning Center	I have used the circuit In National City and is very convenient, hopefully is there to stay.
S0707.C	Frankie Lizarraga	Olivewood Gardens and Learning Center	There is traffic every morning so I am not sure if a bus could make it better
S0708	Charo Arroyo	Olivewood Gardens and Learning Center	Please , bathrooms in every stations and monitored. with proper lighting .
S0709	Bryan Gonzalez Esparza	Olivewood Gardens and Learning Center	I don't think we need more Security, we just need them to be more spread out instead of all of them concentrated in 12th and Imperial. I f we have them spread out, we stop free riders from getting in for free before they pass t12th and Imperial. We don't need more security just more presence or security spread out.
S0710	Victor Valle	Olivewood Gardens and Learning Center	They need to improve the low cost for seniors, disabled and also need for more frequent service.
S0711	Bradley bang	Olivewood Gardens and Learning Center	Need to do what ever we can to encourage people to get out of their cars.
S0712	Carmen Gaxiola	Olivewood Gardens and Learning Center	WE want more justice, , lower fares public bathrooms, more monitoring

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0713	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S0714	Margarita Moreno	Olivewood Gardens and Learning Center	I will love to have a continuation of the youth passes. have more frequency in transportation, referring to cost an upgrade. another thing is bathrooms in thee trolley station, there is so may people that needs it.
S0715.A	Ms. Mitchell	n/a	Common sense development in our single-family-home neighborhoods is all but ignored in service of reaching housing quotas, generating tax revenue and the lure of big developer dollars. There appears to be a complete failure in acknowledging public safety and emergency preparedness with regard to existing traffic congestion, issues for ingress/egress for our already strained and congested streets. We in Point Loma live on a narrow peninsula. The voices of residents who actually live in these neighborhoods should take precedent and weigh more heavily over the voices of those who DON'T LIVE IN THE AFFECTED AREAS. In addition, the ramped-up activity at North Island has increased not only in air-traffic and the risks associated therewith, but also an increase in untenable noise pollution for adjacent residents in Point Loma, Coronado and downtown areas. The recent military jet crash at Kellogg beach was life threatening and terrifying and decimating to the health of our bay. The jet narrowly missed hitting residential neighborhoods in La Playa as well as military tanks and office buildings on the Point. The public has yet to receive a report on that harrowing incident. Where is the accountability and any effort to avoid a future incident? With the increased activity at North Island, residents' lives are continually being put at risk with the ever-increasing jet traffic and deafening sounds of roaring engines at North Island. There was a time when North Island was nothing more than a prop air field, so noise was tolerable. The City and the military need to work together to safeguard the residential neighborhoods, for an improved quality of life and communal living, again, with a common sense approach for cohabitation.
S0715.B	Ms. Mitchell	n/a	Traffic ingress/egress on and off the Peninsula, especially during emergency events. In the event of a catastrophic earthquake, liquifaction will occur along Seaworld Dr. (not a maybe, but rather a given), rendering that artery impossible as an option.
S0715.C	Ms. Mitchell	n/a	Consider rising tides with a warming ocean, melting ice-caps and resulting catastrophic weather events. Air quality must be a priority and addressed, in part, by promoting electric or hybrid autos. Also, given that San Diego caters to the cruise ship industry, there should be a push for cleaner technology. Perhaps offer incentives for cleaner technology. I can see with my own eyes the amounts of emissions/pollutants billowing into the air with the coming and going of each and every cruise ship. The approach to cleaner air needs to be holistic, not just an emphasis on auto-emissions. We need to work with the manufacturing community, the military, and with Mexico to improve both our environmental and air quality. We need to get the toxic Tiajuana River issue resolved immediately!
S0716	Teresa Olivo	Olivewood Gardens and Learning Center	-More frequency on the transportation (public) -Bathrooms available for disabled in every station
S0717	Mary Loaiza	Olivewood Gardens and Learning Center	We need more bathrooms in our community. also our fares for the children and the elderly. More safety in the buses.
S0718	Monserrath Hernandez	Olivewood Gardens and Learning Center	We are interested in upgrades in the public transit because in my community a lot of people uses it. The upgrades are very important, like having more frequency on the buses and trolleys, more infrastructure ad that have to include bathrooms in some stations.
S0719.A	n/a	n/a	Please include the Chippewa Ct. x Clairemont Dr. bus stop as one of the stops for the Pacific Beach rapid route. And can this rapid route also go to the Balboa Ave trolley station? Also please add a bus route that connects Balboa Trolley station to the Costco on Morena Blvd. A lot of students from UCSD want to go to Costco but can't because there is no public transit connecting Balboa Trolley to Costco despite being on the same street. It would be nice for this to be a loop that goes from Balboa Transit, to Avati Dr. intersection, to Costco, and then to Jutland Dr., then up to Clairemont Mesa Blvd. and then south on Clairemont Dr. and then to Balboa Ave. and then back down to Balboa Trolley station (and please include a stop at Chippewa Ct x Clairemont Dr. as it heads towards Balboa Ave.) And make the loop go in reverse too! The Costco loop can help Clairemont/Bay Ho residents who can't drive go to Costco too (that place is always full of cars anyways). And a bus that goes to Mission Bay Park would be nice too.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0719.B	n/a	n/a	The Clairemont Dr. and Chippewa Ct. intersection near Balboa Ave, please add a safe walkway there. So many people cross the street there instead of walking down to the light on Balboa Ave in order to access the stores on the other side. I even saw an old man with a walker trying to cross the other day. Cars like to speed in this area in order to catch the light before it turns red, but literally so many residents walk here so it would be nice to have a safe crosswalk here that can also discourage cars from speeding. Cars also speed here at night which is super loud. Also I see people walk across Chippewa Ct before reaching the stop sign at Clairemont Dr. but the cars heading south on Clairemont Dr. turn into Chippewa Ct really fast sometimes, I worry about them hitting people or hitting parked cars due to speed/visibility. A stop sign or something to help make safer crosswalks here and slow cars down before they turn would be great.
S0719.C	n/a	n/a	Please create incentives that also help renters switch to solar/electric energy. So far all of the incentives are aimed at homeowners but renters dont own their residence so they aren't usually allowed to make changes or if they do, it has to come from their own pockets while the owner is the one who benefits because the solar/electric systems stay on their property after renters move out. Either make leases for renters longer and more secure to avoid year-to-year or month-to-month vulnerability (in South Korea they have 30-year leases, and they can be passed down to kids) or provide incentives so that property owners actually try to add solar/electricity to their properties. This holds renters back from investing in electric cars as well since they cant even build electric chargers in the homes they rent or anything. Especially since so many people rent their homes or rent bedrooms in a house. These incentives should also exist for apartment buildings too to push solar/electricity. Electric stoves would also help with indoor air quality which is really bad and disproportioantely impacts women and children, but again renters aren't allowed to make those changes and property owners have no incentive to help make positive/healthy investments without raising rents on tenants. Make all the buses electric too.
S0720.A	JOSE DENNIS ALABASO	San Diego Regional Center	My suggestion is about trying to rebuild that abandoned train track in the city of Fallbrook. In fact, there's currently no way to make a commuter link connection between Oceanside and Murrieta/Temecula (via Camp Pendleton and the city of Fallbrook) and with the help of Metrolink Trains in connection with the proposed California High-Speed Rail Route. I demand to do something to rebuild that abandoned train track in the city of Fallbrook as soon as you can in the near future, so we can make better transportation connections via commuter rail in and for the future.
S0720.B	JOSE DENNIS ALABASO	San Diego Regional Center	For my suggestion on highway and local roadways throughout the Perris Valley, Temecula Valley and the greater Escondido city area along Interstate 15, I need to help add this expanded bus rapid transit roadway alongside both the Interstate 215 and Interstate 15 freeways/transitways also as soon as you can in the near future, so we too can make better transportation connections in bus rapid transit in and for the future.
S0720.C	JOSE DENNIS ALABASO	San Diego Regional Center	Also, my other suggestion on transportation technology is to have much better services for bus rapid transit and advanced commuter rail between Perris Valley, Temecula Valley, the greater Escondido city area and of course going further southbound along the Interstate 15 Freeway Corridor also in the very near future.
S0721.A	n/a	n/a	The youth program for kids to access a free bus pass has helped me so much. My parents can't take me places and with cars being so expensive, public transportation has been my main resource however if the youth program would be taken away I wouldn't be able to have acsessible transportation. 2.50 adds up over time and without a job it would affect me a lot.
S0721.B	n/a	n/a	I bike to places the bus doesn't have access to and sharing the road with cars is intimidating especially if there isn't a bike lane or a sidewalk to respect. I would really like it if we had more.
S0722	Shery Penn	Mid City CAN	Please do not cancel the YOP. The program has helped my family financially!!
S0723	Gabriel Caceres	Mid City CAN	The bus coming on time and higher frequencies to get to destinations on time. We need transportation improvements.
S0724	Felesa N. Averitte	Mid City CAN	Youth Opportunity Pass is very important to our youth in San Diego for youth to be able to ride the buses to school not only in disenfranchised communities but for all our youth.
S0725.A	Paul Koury	n/a	The Point Loma penisula does not have adequate access to freeways or public transit. Rosecrans is a mess. Sunset Cliffs is impacted.
S0725.B	Paul Koury	n/a	Riding a bike on Rosecrans is very dangerous
S0725.C	Paul Koury	n/a	We don't have adequate access to the I-5 Freeway, traffic to and from the submarine base is really heavy coming in the morning and leaving in the afternoon.
S0725.D	Paul Koury	n/a	The project proposed at 1004 Rosecrans will adversely impact the area, from Cabrillo Elementary School next door to the traffic on already impacted Rosecrans.
S0726.A	n/a	n/a	Bike lanes aren't used
S0726.B	n/a	n/a	Quit all the adu building. Ruins neighborhoods
S0727.A	María Rubio	n/a	La San Ysidro Middle School necesita transporte para estudiantes. *** San Ysidro Middle School needs transportation for students.
S0727.B	María Rubio	n/a	La subida de la escuela Smythe está muy oscura de noche para los peatones cuando bajan del trolley. *** The climb up to Smythe School is very dark at night for pedestrians when they come down from the trolley.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0728	n/a	n/a	Una ruta de camión de la estación del Trolley de Beyer Blvd hacia la escuela San Ysidro High School por la calle Otay Rd. Más rutas nuevas para lugares cerca de la Ave Madrid, del lado de la escuela La Mirada Elementary. *** A bus route from the Beyer Blvd Trolley station to San Ysidro High School via Otay Road. More new routes to places near Madrid Avenue on the side of La Mirada Elementary School.
S0729.A	Bertha Ruiz	n/a	Nos hace falta una nueva ruta hacia Beyer y Otay Rd, de ida y vuelta. Más horarios para el trolley en fin de semana y días festivos. *** We need a new route to Beyer and Otay Road, roundtrip. More trolley schedules on weekends and holidays.
S0729.B	Bertha Ruiz	n/a	Más alumbrado público en San Ysidro *** More public lighting in San Ysidro.
S0730	Anna Dí¡vila	n/a	1. Rutas más seguidas, no cada 20 minutos, a veces tardan aún más que 20 minutos. 2. Queremos una ruta hacia la escuela San Ysidro Middle School. *** 1. Routes should come more often, not every 20 minutes; sometimes they take even longer than 20 minutes. 2. We want a route to San Ysidro Middle School.
S0731	Wendy Barrientos	n/a	Es muy necesaria una ruta de camión en San Ysidro para la San Ysidro High School. También limpieza en las paradas del bus de todo San Ysidro, pavimentación de baches en vía de San Ysidro tiene muchísimo tiempo en mal estado. También la calle que está entre la escuela Willow y los departamentos Park Heaven necesita pavimentación, también tiene bastante tiempo en mal estado. *** A bus route is very necessary in San Ysidro for San Ysidro High School. Also, cleaning at all the bus stops in San Ysidro and repaving San Ysidro Road, which has been in bad condition for a very long time. Also the street between Willow School and the Park Heaven apartments needs paving; it's also been in bad condition for a long time.
S0732	Francisco Carbajal	n/a	Trolley towards Chula Vista and Otay (Southwestern College) *** Trolley towards Chula Vista and Otay (Southwestern College).
S0733	Guadalupe Garcia	n/a	Se necesita una ruta hacia la Middle School Otay, se requiere porque la subida es muy pesada. La necesitan la Escuela de Adultos, la Middle School y la High School. *** A route to Otay Middle School is needed because the hill is very steep. The Adult School, Middle School and High School need it.
S0734	jose figueros	n/a	El autobus 701 me gustaria que entrara ala quintard porque me queda muy retirado de mi casa y es la ruta mas cercas *** I'd like bus 701 to go along Quintard because it's far from my house and it's the closest route.
S0735	maria covarrubios	n/a	orange y connoley esta muy saturada de construcciones y se hace un trafico feo *** Orange and Connoley are very congested with construction and traffic gets really bad.
S0736	n/a	n/a	ocupamos un stop entre naples y elm ave en las dos calles *** We need a bus stop between Naples Ave and Elm Ave—one on each street.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0737	n/a	n/a	las paradas de camion en san ysidro esta muy mal cuidadas y feas poner bancas y sombras *** The bus stops in San Ysidro are badly maintained and ugly; install benches and shade.
S0738	n/a	n/a	transporte publico ala hora de los estudiantes esta muy lleno y mis hijos llegan muy tarde ala casa *** Public transport is packed at student times and my children get home very late.
S0739	antonio padilla	n/a	calle Costa ave en chula vista tiene muchos oyos la calle *** Costa Ave in Chula Vista has a lot of potholes in the road.
S0740	francisco perez	n/a	muchas de las paradas de camiones no tienen sombras ni una banca donde esperar y cuando llueve se moja uno todo *** Many bus stops have no shade or bench to wait on, and when it rains you get soaked.
S0741	alberto guzman	n/a	mas camiones los fines de semana porfavor *** More buses on the weekends please.
S0742	maria vargas	n/a	mas camiones los fines de semana *** More buses on the weekends.
S0743	n/a	n/a	me encanta todo el movimiento que estan haciendo creo que va ayudar mucho el trfico y la fluidez del todos *** I love everything you're doing; I think it will help traffic and overall flow a lot.
S0744	beatriz arballo	n/a	mas vigilancia en las areas de los trolleys *** More security in the trolley areas.
S0745	beatriz martines	n/a	estoy de acuerdo con todo los movimiento que se estan haciendo gracias por todo *** I agree with all the steps being taken; thank you for everything.
S0746	evelyn schmidt	n/a	muy agredecida de que los estudiantes tengan transporte gratis *** Very grateful that students have free transportation.
S0747	leticia dorado	n/a	mejorar los servicios de camiones en los horarios tardan y no pasan alas horas que dicen *** Improve bus services; they run late and not at the times they say.
S0748	gabriela abdon	n/a	gracias por darle transporte gratis a los estudiantes y muy agradecido con todos *** Thank you for giving students free transportation; very grateful to everyone.
S0749	erick valera	n/a	me gusta los cambios que estan haciendo en las calles por los ciclistas ocupan sentirse seguros *** I like the changes you're making on the streets for cyclists; they need to feel safe.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0750	rosa vazquez	n/a	tenia mucho que no usaba el transporte publico y hoy lo use y se me hizo muy limpio y rapido gracias *** I hadn't used public transit in a long time and I used it today—it seemed very clean and fast; thank you.
S0751	beronica h	n/a	fines de semana ocupamos transporte publico mas constante *** On weekends we need public transportation to be more frequent.
S0752	alondra diaz	n/a	camion 712 nececita ser mas constante los fines de semanan *** Bus 712 needs to be more consistent on the weekends.
S0753	vere martinez	n/a	ruta 929 ocupamos mas consistencia los fines de semana *** Route 929 needs more consistency on weekends.
S0754	Miriam	Mid City CAN	YOP me ayuda mucho a mis ninos 8 anos porque nos subimos al bus y trolley. Vamos a los parques,museos, balboa park, a visitar nuestra familia. *** YOP helps me a lot with my 8yearold children because we ride the bus and trolley. We go to parks, museums, Balboa Park and to visit our family.
S0755	Alicia Serna	n/a	Yo uso el Mid-City Go para ir al trabajo. Antes you caminaba a la parada del autobús y tardaba mucho. El microtransito me ayuda a acercarme mas a las paradas del autobús. El sistema de Mid-City Go es puntual y rapido. La frecuencia y la puntualidad es importante para que la gente llegue a tiempo a sus destinos. *** I use MidCity Go to get to work. I used to walk to the bus stop and it took a long time. Microtransit helps me get closer to the bus stops. The MidCity Go system is punctual and fast. Frequency and punctuality are important so that people arrive on time to their destinations.
S0756	Ana Gonzalez	Mid City CAN	Es muy importante que incluyan el programa de YOP, permanente en el Plan Regional, porque es un gran beneficio para nuestros jovenes para lograr tener éxito y tener acceso al transporte publico. *** It's very important to include the YOP program permanently in the Regional Plan because it's a great benefit for our youth to succeed and have access to public transportation.
S0757	Edith Hernandez	Mid City CAN	Necesitamos programas como YOP, transporte gratuito para los jovenes. Esto ayuda a los padres que trabajan y no tienen tiempo para llevar a sus hijos a las escuela u otros lugares. *** We need programs like YOP—free transportation for young people. This helps working parents who don't have time to take their children to school or other places.
S0758.A	Risalba Villa Rivera	Mid City CAN	Programas para usuarios del transporte publico *** Programs for public transportation users.
S0758.B	Risalba Villa Rivera	Mid City CAN	Antes la edad para pagar la tarifa de "senior" era 55 anos. La han subido y ha sido una desventaja para mi. Se necesitan mas programas de ayuda para los usuarios del transporte publico. *** The age to pay the senior fare used to be 55 years. They have raised it and that has been a disadvantage for me. More assistance programs are needed for public transportation users.
S0759	Silvano Leyva	n/a	En anita y 4ta ocupamos alumbrado y que reparen los oyos en la calle. *** At Anita and 4th we need lighting and for them to repair the holes in the street.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0760	n/a	n/a	Ocupamos alumbrado en Quintard, Hilltop dr y en calle 3ra *** We need lighting on Quintard, Hilltop Dr. and on 3rd Street.
S0761	Jose luis gonzalez	n/a	Calle quintar esta muy oscura y ocupamos algo para reducir la velodidad de los carros *** Quintard Street is very dark and we need something to slow down the cars.
S0762	rosa lopez	n/a	Calle north ln la iluminacion es muy mal no esta seguro *** On North Ln the lighting is very bad; it isn't safe.
S0763	n/a	n/a	En calle Quintard carros pasan muy rapido y esta muy oscuro *** On Quintard Street cars drive very fast and it's very dark.
S0764	Cristina a	n/a	no estoy de acuerdo que nos quiten los estacionamientos para hacer ciclovias y las glorietas qeu pusieron no son seguras no se ven casi *** I don't agree with taking away parking spaces to make bike lanes, and the roundabouts they installed aren't safe—you can hardly see them.
S0765	yolanda gonzalez	n/a	mucha construccion y nada de estacionamiento en calle melrose *** Lots of construction and no parking on Melrose Street.
S0766	estella o	n/a	la calle 3ra esta muy oscura y las banquetas no estan seguras para caminar ocupan reparaciones *** 3rd Street is very dark and the sidewalks aren't safe to walk on; they need repairs.
S0767.A	Laura Mancillas	n/a	Se necesita una ruta de bus para High School y otras escuelas como Willow Elementary en San Ysidro. *** A bus route is needed for the high school and other schools like Willow Elementary in San Ysidro.
S0767.B	Laura Mancillas	n/a	Urge ya comenzar a hacer un parque bonito que puedan usar los niños en edad escolar. *** It's urgent to start building a nice park that schoolage children can use.
S0768	Guadalupe Garcia	n/a	Una ruta hacia Middle School Otay se requiere porque la subida está muy pesada ahí le serviría a la escuela de adultos y la middle school y la high school. *** A route to Otay Middle School is needed because the hill is very steep; it would serve the Adult School, the Middle School and the High School.
S0769	n/a	Mid City CAN	Agradezco este apoyo gratuito ya que soy mamá soltera con dos niños y en estos momentos esta ayuda es muy buena, sigan apoyando a todos los estudiantes para que su traslado sea seguro. *** I appreciate this free support since I'm a single mother with two children and right now this help is very good; keep supporting all the students so their trips are safe.
S0770.A	n/a	UCSD Center on Global Justice	Painting icons for shared cycle - auto lanes on busy roads in mid city is not sufficient. These areas still feel dangerous to ride and make cross city commuting next to impossible. Further investment in green streets ideas that enhance permeability and shade while protecting riders and pedestrians is essential.
S0770.B	n/a	UCSD Center on Global Justice	Highway expansion needs to halt entirely. I understand the concern with relieving traffic bottlenecks, but the return on that investment given induced demand is profoundly negligible. That money could be spent instead on expanding connections to rail and revegetating margins of roads and canals with appropriate native species in order to reach statewide 30x30 and adaptation goals and to implement the city and county climate adaptation plans. More roadway only increases our impervious surface and associated effects of contamination and flooding that flow down our watersheds through the most vulnerable communities.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0770.C	n/a	UCSD Center on Global Justice	Flood risk around our urban freeways, street drainages, and rail infrastructure is a special concern after the flooding of January 2024. More distributed solutions that slow and clean water at multiple sites in the urban canyons and in suitable areas of highway interchanges or canal junctions can mitigate the need for large scale engineering solutions at the outlets of our urban drainages. By integrating blue green infrastructure solutions already utilized in other locations, transportation policy and capital improvements can provide an integral and foundational skeleton that links the region following the flood protection infrastructure, and could aggregate gains with city streets, stormwater, and city and county parks, all of whom have clear adaptation and mitigation goals that can be enhanced through improved connectivity on the transportation spine.
S0770.D	n/a	UCSD Center on Global Justice	The hardest hit climate victims in the next century live in the underserved urban areas mid and downstream in their respective watersheds. Their solutions, as individual communities, are limited by the resources and jurisdictions they are given. Sandag can be a vital link between these communities with low adaptive capacity and the wider regional goals of equitable adaption and urgent social risk reduction. That plan doesn't start with wider freeways! Especially given the carbon footprint of concrete and the diminishing margins produced by induced demand. If sandag is serious about its stated equity goals then it needs to begin from them, not add them on afterwards to whatever infrastructure projects have been sitting in the pipeline for a decade.
S0770.E	n/a	UCSD Center on Global Justice	Especially relevant for urban San Diego but the point about integrating goals bears on the region as a whole (including Tijuana!)
S0771	n/a	n/a	Gracias a este apoyo para tener grandes beneficios, sigan adelante *** Thank you for this support and its great benefits; keep it up.
S0772	Tania Hernandez	Olivewood Gardens and Learning Center	I live in Spring Valley & Love to see more safety, when traveling or commuting to other areas that connect me to cities like National City, Chula Vista y San San Ysidro, most of the time I use my car due to safety and convenience.
S0773	susie torrez	n/a	trabajo en la noche y cuando salgo de trabajar es muy dificil agarrar el camion *** I work at night and when I finish work it’s very hard to catch the bus.
S0774	Carmen Capaceta	Olivewood Gardens and Learning Center	I don't use the bus because I am a person that need to use the bathroom un several occasions. I utilize the private car for my medical appointments. Will be nice to se if there possibilities to have accessible bathrooms with coins or some code to facilitate the use.
S0775	Enrique Ramos	Olivewood Gardens and Learning Center	Sometimes I can go in the bus because I live in national City and I have to use three connections to arrive to school. is very complicated but we have to do it, it takes like two hours in commuting. (South western college)
S0776	Rosa Maria B.	Olivewood Gardens and Learning Center	We will like bathrooms in the bus stops and trolley, will be genius due to sometimes we commute far away and the bathroom use is a need.
S0777	anthony greta	n/a	mas camiones en los fines de semana *** More buses on the weekends.
S0778	jose dorado	n/a	mucho trafico durante las mananas *** Lots of traffic during the mornings.
S0779	esai varela	n/a	yo apoyo el que se hagan linias de bicicleta y el transporte gratis de studiantes *** I support making bike lanes and free transportation for students.
S0780	zayetzi flores	n/a	muy feliz con los servicios apoyo en las tomas de decisiones *** Very happy with the services; I support the decisions being made.
S0781	Marisela moreira	n/a	palomar st el camion deja la ruta muy temprano salgo tarde de trabajar y tengo que caminar a mi casa *** On Palomar Street the bus stops running very early; I get off work late and have to walk home.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0782	clementina Lira	n/a	haciendo un super trabajo mejorando todo gracias *** You're doing a great job improving everything; thank you.
S0783	Janet contreras	n/a	linia azul en el trolley siempre esta muy sucia y hay muchos homeless ocupamos mas seguridad en los trolleys *** The Blue Line trolley is always very dirty and there are many homeless people; we need more security on the trolleys.
S0784	dotty grifin	n/a	trolley no se sienten seguro y estan muy sucios *** The trolleys don't feel safe and they're very dirty.
S0785	esperanza guerra	n/a	cruce peatonal enfrente de castle park middle en quintard *** Pedestrian crossing in front of Castle Park Middle on Quintard.
S0786	Arturo Lopez	n/a	gracias sandag por todo su trabajo *** Thank you, SANDAG, for all your work.
S0787	Rosita Casas	Olivewood Gardens and Learning Center	So fa the transit (public service) is good clean and affordable, bathrooms are a necessity and lighting is a need addressed several times that we contributed in public comment. Please SANDAG listen to the community, specially in the South cities like ours in National City, the senior citizens will appreciate.
S0788	teresa gonzales	n/a	me siento segura en el transporte publico *** I feel safe on public transportation.
S0789	beatriz estrada	n/a	agradecida con sus servicios *** Grateful for your services.
S0790	Mary Heredia	n/a	gracias por el transporte gratis para los estudiantes es de mucha ayuda *** Thank you for the free transportation for students; it's very helpful.
S0791	ana V	n/a	meencanto todo lo que estan haciendo con las ciclovias gracias *** I love everything you're doing with the bike lanes; thank you.
S0792	Rosy torres	n/a	estacion de trolley en palomar esta muy sucia *** The trolley station at Palomar is very dirty.
S0793	dolores chaves	n/a	amo la aplicaccion de circuit gracias por todo *** I love the Circuit app; thank you for everything.
S0794	lous ramirez	n/a	mas seguridad en el trolley y en las estaciones *** More security on the trolley and at the stations.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0795	Yolanda Hernandez	n/a	Blue Line Trolley está muy sucio y huele mal. Hay basura y hay mucha gente sin hogar y no me siento segura. También la línea Orange todo el tiempo esta sucio y no se aguanta el olor. Siempre hay mucha basura y está tan lleno. Tarda mucho en llegar. Ya no me gusta usar el trolley por estas razones. ** The Blue Line Trolley is very dirty and smells bad. There's trash and a lot of unhoused people and I don't feel safe. Also on the Orange Line, it's very dirty all the time and it's hard to stand the smell. There's always a lot of trash and it's too crowded and takes a long time to come. I don't like using the trolley anymore because of these reasons.
S0796	n/a	n/a	*N/A repeat submission of S795*
S0797	Linda Victorino	n/a	San Ysidro es entrada a otro país. Debería estar mejor atendido y hermosiado. Las calles necesitan mayor señalamientos. Los autobuses en domingo deberían tener más servicio nocturno. Empezando desde Chula Vista 91911 hasta San Ysidro, no hay salidas de autobuses en domingo por las tardes y temprano. Thank you if you can do something. ** The San Ysidro transit center is the entryway to another country - it should be better staffed and beautified. The streets in that area need better signals and the buses on Sundays need to have more night service. Going from Chula Vista 91911 to San Ysidro, there aren't buses leaving on Sundays in the afternoon or early. Thank you, if you can do something.
S0798	M. Zapata	n/a	Calles con muchos baches en San Ysidro y muy mal alumbrado público y mucha gente sin hogar ** There are streets with a lot of potholes in San Ysidro and very poor public lighting and lots of unhoused people.
S0799	A. Zapata	n/a	Muchos problemas con la gente sin hogar. Mucha basura y robos. Se metieron hasta mi casa ** There are a lot of problems with unhoused people: a lot of trash and robberies. They have tried coming into my home.
S0800	Audoro Galvan	n/a	Davis Way todo está muy bien y muy agradecidos por su apoyo ** Davis Way has been fixed up nice and we're grateful for your support.
S0801	Maria Cintaria	n/a	En calle Dairy Mart, no hay topes y hay muchos niños y los carros pasan como si fueran por el freeway ** On Dairy Mart Road (San Diego), there should be speed bumps because there are children walking. Lots of cars pass by very fast as if it were a freeway.
S0802	Wendy Barrientos	n/a	Que en el puente de San Ysidro, está lleno de baches y no han hecho nada, que los contendores de basura están muy llenos y no recogen las basuras. En donde está la escuela Willow [Willow Elementary School] y Park Haven Apartments está lleno de hollos. ** There's a bridge in San Ysidro with a bunch of potholes and nothing has been done to fix them. Also the trash receptacles are always very full and trash isn't getting picked up. There are also a bunch of potholes next to Willow School and Park Haven Apartments
S0803	Matilda Jaramillo	n/a	En la calle 2nd and Orange hay un pasillo en donde se bajan del bus y está muy oscuro y peligroso. Necesita más alumbrado y estar más inspeccionado. ** At the 2nd Ave and Orange Ave intersection, there's an alleyway where people get off the bus and it's very dark and dangerous - we need more light and security in this area.
S0804	Juan Chavez	n/a	Que en las calles Anita y Broadway en Chula Vista, no se puede encontrar estacionamiento público ** It's hard to find public parking on Anita and Broadway Streets in Chula Vista
S0805	n/a	n/a	Me gusta el servicio pero en el trolley hay personas que se suben con bicicleta y no permiten que uno se suba. [Se necesita] poner luces para cuando cruce y unas cámaras ** I like the trolley service, but there are people that get on with their bikes that don't leave room so other people can get on. Lights for when people are crossing and cameras are needed.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0806	n/a	n/a	Agradezco a la gente que trabaja para la gente mayor. [Se necesita] paradas de autobuses con bancos y sombra, y tambien un cruce peatonal frente a la escuela San Ysidro Middle. Gracias ** I'm thankful to people who work to help older people. Bus stops need benches and shade and also a pedestrian crossing in from of San Ysidro Middle school. Thank you.
S0807	n/a	n/a	Más seguridad para el Trolley ** More security on the trolley
S0808	n/a	n/a	Que las rutas de transporte sean más continuas los fines de semana ** Transit routes need to come more frequently on weekends
S0809	Marcos Mancillas	n/a	Gracias por trabajar para los mayores. Necesitamos una parada frente a la escuela San Ysidro Middle y un alumbrado o lámpara. Gracias ** Thank you for working for seniors. We need a stop sign in front of San Ysidro Middle School and lighting. Thank you.
S0810	n/a	n/a	[Se necesita] topes peatonales, semáforos, alumbramiento, y faltan paradas ** Speedbumps to make things safer for pedestrians, streetlights, lighting, and stop signs [are needed].
S0811	n/a	n/a	[Se necesita] alumbramiento y topes porque pasan los carros muy rápido ** More lighting and speedbumps are needed because cars pass by really fast
S0812	Maria Castro	n/a	Que en la bajada del bus en la calle segunda y Orange está un pasillo por el que se tiene que pasar. Está muy oscuro y inseguro ** Where people get off the bus at 2nd Ave and Orange Ave, there's an alleyway that is dark and unsafe and people have to pass through there.
S0813	n/a	n/a	Speedbumps by schools [are needed]. Potholes
S0814	Josefina Gonzalez	n/a	Que los buses pasen más seguido y más horas ** The buses need to come more often and have more service hours.
S0815	Maria Guzman	n/a	Que no haya gente sin hogar en el trolley ** There shouldn't be unhoused people on the trolley
S0816	n/a	n/a	Calle Rienstra, carros pasan muy rápido. Por favor revisen *** On Rienstra Street cars drive very fast. Please look into it.
S0817	Raquel Campos	n/a	Gracias por todo. Deben poner más luz en las paradas de bus y tener el bus más limpio. *** Thank you for everything. They should put more lights at bus stops and keep the bus cleaner.
S0818	Ubaldine Carrillo	n/a	Yo tomo el 704 y los fines de semana, me gustaría que pasara más seguido y que pase más tarde que las 6pm *** I take the 704 and on weekends I'd like it to come more often and run later than 6 pm.
S0819	Alma Rosa Zalazar	n/a	El 712 no pasa tanto el fin de semana y termina de pasar temprano. Por favor permite que el servicio pase más que cada media hora y hasta las 10pm. *** The 712 doesn't run much on weekends and it stops running early. Please have the service run more frequently than every half hour and until 10 pm.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0820	Tomas Marquez	n/a	Desde Melrose Ave hasta la Main van carros muy rápido. Por favor pongan topes para que los automovilistas bajen su velocidad. *** From Melrose Ave to Main cars drive very fast. Please install speed bumps so drivers slow down.
S0821	Salvador B	n/a	En San Ysidro se necesitan reparar las calles ya que hay mucho bache y marcado de líneas en las calles. *** In San Ysidro the streets need repairs because there are many potholes and the lines need to be marked.
S0822	Norma Diaz	n/a	Que sea más accesible el estacionamiento por la calle Broadway y Main porque los hicieron acceso a bicicletas *** Make parking more accessible on Broadway and Main because they turned it into bicycle access.
S0823	Lorenzo	n/a	En San Diego sur, muy malas calles, falta de líneas, cruces peatonales y falta de topes para bajar la velocidad de carros. En la calle Quintard y 2nd por Castle Park Middle School, pasan muy recios los carros. Hace falta reductores de velocidad. *** In South San Diego the streets are in very bad shape, with no lane markings, no crosswalks and no speed bumps to slow down cars. On Quintard and 2nd by Castle Park Middle School cars go very fast. Speed reducers are needed.
S0824	Patricia Delgado	n/a	Les solicitamos con urgencia un cruce peatonal y una lampara ya que el tráfico es muy intenso y hay una escuela. (Cerca de Castle Park Middle) Esto representa un peligro para el peaton. *** We urgently request a pedestrian crossing and a light because traffic is very heavy and there is a school. (Near Castle Park Middle) This is dangerous for pedestrians.
S0825	Lilian Villarreal	n/a	Uno de los graves problemas que se está viviendo en Otay Ranch es el área de Milenia. Es el estacionamiento. Siguen otorgando permisos de construcción que se me hace negocio (sin planeas con peticiones). Así como el gasto inútil que hicieron del transporte de Rapid 225 en esa área. Nadie lo ocupa. Yo no creo en SANDAG. Solo promete y no te cumple. *** One of the serious problems in Otay Ranch is the Milenia area. Parking is the issue. They keep granting construction permits—just a business without planning with public input. As well as the useless expense on the Rapid 225 in that area. No one uses it. I don't trust SANDAG. It only makes promises and doesn't deliver.
S0826	Linda Victorino	n/a	La ruta 932 no pasa en sus horas y que pasen más tarde, que los domingos sea todo el día y que no trabajan toda la semana. Fines de semana difícil tomar ruta de bus. La ruta de bus no hay buses los domingos. *** Route 932 doesn't run on schedule and should run later; on Sundays it should operate all day and not shut down for the week. On weekends it's hard to take the bus route. There are no buses on Sundays on the route.
S0827	Rosa	n/a	Hola pienso que este servicio sirve mucho. Gracias por pedir opinion para que tengan mejor servicio. ** Hi, I think this service works well. Thank you for asking for opinions so that you have better service.
S0828	Antonio Castaños	n/a	El rio de las Americas huele muy feo y les afecta su salud. *** The Río de las Américas smells very bad and affects people's health.
S0829	Susana Avila	n/a	Todo bueno es su rumbo *** Everything about its direction is good.
S0830	Matha ?	n/a	me gustaria que los parques tuberan mal alumbrado publico *** I'd like the parks to have more public lighting.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0831	n/a	n/a	falta luz calles *** The streets lack lighting.
S0832	G. Rivera	n/a	Por la Date y Main necesita alumbrado y muchos baches *** Near Date and Main more lighting is needed and there are many potholes.
S0833	Rosalia Santana	n/a	Me gustaria que puserian topes, pasan los carros muy rapadi y tambien componer (las luces) en la noche, muy oscuro *** I'd like them to install speed bumps—cars go very fast—and also fix the lights; at night it's very dark.
S0834	Silvia Ortiz	n/a	Queremos parques cercanos *** We want parks nearby.
S0835	Maria Gre Rodriguez	n/a	En calle quintard necesita mucho alumbrado y limpieza *** On Quintard Street a lot of lighting and cleaning is needed.
S0836	Maria Ibarra	n/a	mas seguridad en paradas de transporte publico y iluminacion *** More security and lighting at public transportation stops.
S0837	Aurora Nidome?	n/a	Mas iluminacion en los parques y seguridad en las estaciones de trolley *** More lighting in the parks and security at the trolley stations.
S0838	Erik Valera	n/a	Yo sí apoyo los planes de los transportes públicos para los menores de edad y la transportación más facilitada. Me gustaría que también se enfoque en ayudar a las personas con discapacidades. Finalmente yo creo que la expansión de la area de que una persona puede ser transportada puede ser un poco más grande para las personas que viven lejos de partes grandes de la ciudad. *** I do support public transportation plans for minors and easier transportation. I would also like it to focus on helping people with disabilities. Finally I think the coverage area for transportation could be a bit larger for people who live far from the main parts of the city.
S0839	Maria Txuniz	n/a	Me parece una propuesta muy interesenta, ya que los beneficios seran los jovenes y adultos mayores, con todas las mejoras. *** I think it's a very interesting proposal since the beneficiaries will be young people and seniors with all the improvements.
S0840	Rosa Vazquez	n/a	Yo sí apoyo los planes de los transportes públicos para los menores de edad y la transportación más facilitada. Me gustaría que también se enfoque en ayudar a las personas con discapacidades. Finalmente, yo creo que la expansión del área en que una persona puede ser transportada puede ser un poco más grande para las personas que viven lejos de partes grandes de la ciudad. *** I do support public transportation plans for minors and easier transportation. I would also like it to focus on helping people with disabilities. Finally I think the coverage area could be bigger for people who live far from major parts of the city.
S0841	Beronica M	n/a	que el bus pasara más seguido los sábados y domingos, porque no todos tenemos transportación *** For the bus to run more often on Saturdays and Sundays because not all of us have transportation.
S0842	Camrne V	n/a	Necesitamos área para caminar en el área de la calle Industrial y L St. *** We need a walking area around Industrial Street and L Street.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0843	Alma Rosa Salazar Ortiz	n/a	Espero muchísimo el camión 712 el fin de semana. ¡Tiene que haber más frecuencia! En la segunda y la Palomar espero y me quemo porque no hay sombra para el sol!! *** I have to wait a very long time for bus 712 on the weekend. It needs to run more frequently! At Second and Palomar I wait and get burned because there is no shade from the sun!!
S0844	Beronica Martinez	n/a	Sábado y Domingo, los camiones (929) se tardan mucho en pasar. Especialmente los Domingos. En Quintard 929 no hay sombra y en el verano uno espera mucho en el sol. *** On Saturdays and Sundays the 929 buses take a long time to come. Especially on Sundays. On Quintard on route 929 there is no shade and in the summer you wait in the sun a long time.
S0845	Silvane y Leyva	n/a	Entre Anita y 4ta hay mucho roche y más alumbrado desde la 3ra a la Broadway y en la Quintard. *** Between Anita and 4th there are a lot of potholes and more lighting is needed from 3rd to Broadway and on Quintard.
S0846	Evangelina Suarez	n/a	Quintard por favor más alumbrado en Quintard y hay alumbrado pero no sirve entre Hilltop Dr. y Calle 3ra Broadway también. *** On Quintard please provide more lighting; there is lighting but it doesn't work between Hilltop Dr. and 3rd Street, and also on Broadway.
S0847	Jose Luiz Gonzalez	n/a	En la calle Quintard pasan carros muy rápido, como quien dice vuelan. Por favor, hagan algo rapidísimo. *** On Quintard Street cars go very fast—as they say, they fly. Please, do something right away.
S0848	Rosa I Lopez	n/a	Calle North Ln no tiene iluminación. Está demasiado oscuro. Necesitamos seguridad los peatones. *** North Lane has no lighting. It's too dark. We pedestrians need safety.
S0849	n/a	n/a	Me gustaría mucho que alumbren y coloquen los límites entre cada carro en la Quintard frente a la Middle. Es muy oscuro y se presta para cosas malas. *** I'd really like you to add lighting and mark the parking spots on Quintard in front of the middle school. It's very dark and lends itself to bad things.
S0850	Cristina A.	n/a	1. Quitar los círculos que pusieron en algunas calles de J St o Blvd, donde está Mt. Carmel, Beyer Blvd y otros. Quitar el área de (creo que son para bicicleta o peatones), pero esos espacios nadie los usa, estorban y quitaron un carril para construir este estorbo. 2. Nos ha afectado mucho el tráfico. Construir apts. para gente de bajo ingreso (en mi casa vivimos 4 familias, 3 recámaras) porque no pueden pagar rentas tan caras. 3. Talleres para aprender y usar computadoras. 4. Traer institución NAC, Proyect, abogados que nos ayuden con algún consejo. 5. El edificio de West Park está casi vacío. Pongan ahí talleres para mejorar la salud a los adultos mayores. 6. Que el gobierno dé fondos para el YMCA (local) para mejorar la salud de la comunidad. *** 1. Remove the circles they put on some streets on J St or Boulevard, where Mt. Carmel, Beyer Blvd and others are. Remove the areas (I think they're for bikes or pedestrians) because no one uses them, they're in the way and they removed a lane to build this obstruction. 2. Traffic has affected us a lot. Build apartments for lowincome people (there are 4 families living in my house with 3 bedrooms) because they can't pay such high rents. 3. Workshops to learn and use computers. 4. Bring in organizations like NAC, Project and lawyers who can give us advice. 5. The West Park building is almost empty. Provide workshops there to improve the health of older adults. 6. For the government to provide funds to the local YMCA to improve community health.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0851	Yolanda Gonzalez	n/a	Por favor revisen la calle Melrose que no hay estacionamiento *** Please check Melrose Street—there's no parking.
S0852	n/a	n/a	Hay lugares en los que está muy obscuro y como personas de la tercera edad es muy peligroso para nosotros, pues nos podemos caer *** There are places that are very dark and for seniors it's very dangerous because we could fall.
S0853	Jorge Lopez	n/a	Calle Palomar Chula Vista, Mucho tráfico para salir sobre las vías *** On Palomar Street in Chula Vista there's a lot of traffic getting across the tracks.
S0854	Rosa Vazquez	n/a	Hola, mi comentario es que deben de controlar la construcción de tanto edificio. California no tiene agua y cuando hacen edificio no tienen estacionamiento. Hay calles que siempre están llenas y no encontramos lugar. *** Hi, my comment is that they should control the construction of so many buildings. California doesn't have water and when they make buildings they don't include parking lots. There are streets that are always full and we can't find a place to park.
S0855	Manuela Lara	n/a	Me desespero mucho esperando el camión los fines de semana. Tomo el trolley y me gusta mucho. Pero el camión se tarda demasiado. Un domingo esperé hora y media. ¡Necesitamos más camiones sábado y domingo! *** I get very frustrated waiting for the bus on weekends. I take the trolley and I like it a lot. But the bus takes too long. One Sunday I waited an hour and a half. We need more buses on Saturday and Sunday!
S0856	Virgen Alvarado	n/a	Tercera y J, Chula Vista: necesitamos una silla en la parada del 929. En Orange hay una parada y mucho tráfico. Que el bus 701 pase más seguido *** Third and J St in Chula Vista: we need a seat at the 929 stop. On Orange there is a stop and a lot of traffic. Have bus 701 run more often.
S0857	Eva Garcia	n/a	Nos hacen falta las banquetas especialmente en Naples St. y estacionamiento en las calles. *** We need sidewalks, especially on Naples St., and street parking.
S0858	Veta Galvan	n/a	Pedestrian crosswalk with light posts and lights on the ground. Also, a YMCA for sports and exercise.
S0859	Patricia A. Laguna	n/a	New port of entry. Waiting time now is outrageous to cross back and forth.
S0860	Robert A. Laguna	n/a	New port of entry. Improved highways
S0861	Patty Laguna Jr.	n/a	Port of entry
S0862	Robert G. Laguna	n/a	New port of entry. To cross to and from is ridiculous
S0863	Jose Figueroa	n/a	El autobús 701 me gustaría que pasara por la Quintard hacia la 3a. Por favor revisar carros estacionados en la calle Quintard entre la Hilltop y 2a porque hay muchos carros que no los mueven. Si es posible pongan parquímetros. *** I'd like bus 701 to run along Quintard toward 3rd. Please check the cars parked on Quintard between Hilltop and 2nd because many cars don't move. If possible, install parking meters.
S0864	Maria Covarrubios	n/a	Favor de pasar a ver la calle Connoley Circle y sus alrededores. Están poniendo cable para internet nuevo y la calle la están dejando muy fea por tantos hoyos que hicieron en las calles. Orange y Connoley, Chula Vista, CA. 91911 *** Please come and check Connoley Circle and the surrounding streets. They're installing new internet cable and the street is being left in bad shape because of all the holes they've made. Orange and Connoley, Chula Vista, CA. 91911
S0865	n/a	n/a	Need stop between Naples and Elm Ave both sides.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0866	n/a	n/a	Mejoras en el transporte en San Ysidro porque es un lugar importante y de mucha afluencia. Cuidar y agregar cruces peatonales seguros *** Improve transportation in San Ysidro because it's an important and very busy place. Maintain and add safe pedestrian crossings.
S0867	n/a	n/a	Sobre el transporte público he visto que algunos alumnos no los levanta el bus. *** Regarding public transport I've seen that some students aren't picked up by the bus.
S0868	Antonio Padilla	n/a	En la calle Costa Ave, Chula Vista 91911, necesita urgentemente reparaciones. Muchos hoyos y no reparan. *** On Costa Ave in Chula Vista (91911) urgent repairs are needed. There are lots of holes and they don't repair them.
S0869	Savannah Espinoza	n/a	Muchas paradas no tienen sombra y hace mucho calor! *** Many stops have no shade and it's very hot!
S0870	Alberto Guzman	n/a	Necesitamos + camiones los fines de semana *** We need more buses on the weekends.
S0871	Maria l. Vargas	n/a	Por favor mas caminoes los Domingos! *** Please more buses on Sundays!
S0872	n/a	n/a	Creo que es bueno el plan de crecimiento en nuestra región. Ayuda bastante y facilita el movimiento de personas, tráfico y empleos. *** I think the growth plan in our region is good. It helps a lot and makes the movement of people, traffic and jobs easier.
S0873	Beatriz Arballo	n/a	Más seguridad y vigilancia en la ciudad de Chula Vista. Y en las áreas de transporte *** More security and surveillance in the city of Chula Vista. And in the transportation areas.
S0874	Beatrice A. Martinez	n/a	Estoy de acuerdo en las mejoras de los autobuses, el que sean sus salidas más frecuentes y tengan seguridad, porque hay veces en que suelen pasar incidentes entre los pasajeros. *** I agree with improvements to the buses—having more frequent departures and security—because sometimes incidents happen between passengers.
S0875	Evelyn Schmidt	n/a	Me parece una propuesta para los estudiantes y la comunidad porque sí se necesita todo lo que están proponiendo y sería una gran ayuda para todos nosotros. *** It seems like a good proposal for the students and the community because we really need everything that is being proposed and it would be a great help for all of us.
S0876	Leticia Dorado	n/a	Mejorar los servicios actuales *** Improve the current services.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0877	Gabriela Abdon	n/a	Gracias por darles transporte público a los estudiantes. Espero que siga así, es de gran ayuda para las familias y comunidad en general. También he escuchado que muchos choferes no suben a los estudiantes, pero estaría bien más vigilancia para las personas y que ellos sepan que no pueden hacer desorden. *** Thank you for giving students public transportation. I hope it continues like this; it's a great help to families and the community in general. I've also heard that many drivers don't pick up students, but more monitoring would be good and they should know they can't cause trouble.
S0878	Susie Torrez	n/a	More secruity at night. And more late night or 24/7 buses.
S0879	Anthony Gaeta	n/a	We need more buses on the weekend we wait forever and its so hot and there aren't enough benches or shade!
S0880	Jose M. Dorado	n/a	Too much traffic during AM hours and PM hours
S0881	Esai Valera	n/a	I support more investment in safe bike lanes and youth transportation initiaives. It emphasizes that affordable and accessible transportation is crutial for the youth.
S0882	Zayetzi Flores	n/a	I support investment in safe bike lanes and youth transportation programs. Affordable and accessible transportation is essential for young and underserved communities. Please also expand the specialized transport services for seniors and people with disabilities.
S0883	Marisela Moreira	n/a	The extension of hours on the Palomar area for the bus because is very important to have bus to run until 10pm. Also the Pronto card to be more accessible and by creating it like a reward system. For example after so many rides get a free ride.
S0884	Clementina Serna	n/a	You are doing a good job! On Second Street coming from Palomar to Quintard on the sidewalk existe una bajada (slope) que irregular (es irregular) que puede ser peligrosa. Justo a la salida de los departamentos donde se encuentra una mesa de picnic. La banqueta es irregular y se puede uno caer si no se fija. Gracias por su consideración. falta señal para emergencias
S0885	Janet Contreras	n/a	Blue line trolley is always packed, dirty, and has no air conditioner. There's always homeless, and I feel unsafe because they bother us. The orange line trolley is worse. It's really unsafe. People are either fighting or smoking inside. I don't like how it's always cramped, and it takes a long time to arrive. There's big need for security. It's always a hassle to find a seat because there's no space, and seats are taken.
S0886	Dotty Griffen	n/a	Trolleys are dirty & feel unsafe. Highways are dirty. In South Bay area roads are horrible.
S0887	Esperanza Guerra	n/a	Please create a pedestrian crossing and a space for seniors to exercise and dance in front of Castle Park Middle School.
S0888	Arturo Lopez	n/a	Thank you SANDAG for all improvements that have been made in transportation. I am a 70 year old senior who can enjoy getting around San Diego with ease
S0889	Irene Ramirez	n/a	I am very pleased with all transportation improvements that have been made across the San Diego Region! I feel they are convenient and accessible to people of all ages. Thank you!
S0890	Teresa Gonzales	n/a	I don't drive anymore nor do I take public transportation but it makes me happy and confident to know that if I ever need to I can with no problem.
S0891	Beatrice Estrada	n/a	I am very thankful and greatful for San Diego's public transportation I use it every day!
S0892	Mary Heredia	n/a	My Son is in High School and takes the Bus and trolley every day!
S0893	Ana V.	n/a	Im a bike rider and I cant wait to take a beautiful ride along the Bayshore Bikeway once all improvements are completed!! Thank you!
S0894	n/a	n/a	Palomar station really dirty! 911 button in trolley cars.
S0895	Delores Chavez	n/a	I absolutely love the Circuit app! Its cheap and fast very convenient! Thank you SANDAG
S0896	Lous R Ramirez	n/a	The trolley needs more safety measures in every trolley cars. More buses on weekends
S0897	n/a	n/a	Too many holes in the street need repair
S0898	Martha Rocha	n/a	mucha construccion y poco estacionamiento marcar estacionamientos para que no agarran dos espacios *** Lots of construction and little parking; mark parking spaces so people don't take up two spots.
S0899	n/a	n/a	Mas paradas de camiones *** More bus stops.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0900	Susana Palomino	n/a	En San Ysidro Calle Via Suspiro se necesitan las lineas Amarillas y en San Ysidro Bulevar *** In San Ysidro on Via Suspiro they need yellow lines, and on San Ysidro Boulevard.
S0901	Jesus Talavera	n/a	Donna St. & 16th - con baches y hay muchas calles condigo 92154 *en medio de donna y elm hay callejon que llena de agua y no se puede pasar. Ya se han metido mucho quejas y no han hecho NADA! *** Donna St. and 16th have potholes and many streets in 92154; between Donna and Elm there's an alley that fills with water and you can't pass. Many complaints have been submitted and they haven't done ANYTHING!
S0902	Anita Ramirez Garcia	n/a	ocupamos alumbrado de lus - Beyer y del Sol Blvd. *** We need lighting on Beyer and Del Sol Blvd.
S0903	Teresa Valenzuela	n/a	las calles de San Ysidro ocupa pavimento el alumbrado esta bueno *** The streets of San Ysidro need paving; the lighting is good.
S0904	Evelyn Schmidt	n/a	Quiero comentar de la falta de una protección para las personas en la parada del bus 392 en el 3rd Ave y Orange Ave en Chula Vista, junto al mercado en el international. *** I want to comment on the lack of a shelter for people at the bus 392 stop at 3rd Ave and Orange Ave in Chula Vista, next to the International market.
S0905	Angelica Cisneros Arce	n/a	En National City quitar algunos espacios en rojo para poner carros porqu estan en zonas residenciales y hacer vías para ciclistas en E Plaza Blvd. *** In National City remove some red zones to allow parking because they're in residential areas, and create bike lanes on E Plaza Blvd.
S0906	n/a	n/a	I, community resident would like to see more pole lights near bus stops. Specially in Palomar St & Melrose cross street, Thank you!! Light poles are needed for safety of residents in Chula Vista.
S0907	Cecilia Perez	n/a	Mi problema por dos años ha sido con el bus 701 en la parada del parque de la hilltop junto a la middle school. A la hora que salen los estudiantes salen los choferes y no param incluso cuando hay espacio. Creo que falla concientizar a los choferes que esperando el siguiente bus pueden pasar muchas cosas por la inseguridad que genera el parque. Gracias *** My problem for two years has been with bus 701 at the Hilltop Park stop next to the middle school. When the students get out, the drivers leave and don't stop even when there's space. Drivers need to be made aware that while waiting for the next bus many things can happen due to the insecurity around the park. Thank you.
S0908	Susana B. Santos	n/a	Me gusto mucho la información que dan a la comunidad, y el tato que tenemos con las personas que se presentan a darnos información. Gracias *** I really liked the information they give the community and the way we're treated by the people who come to give us information. Thank you.
S0909	Zayetzi Flores	n/a	Yo estoy de acuerdo con el plan regional de SANDAG. Creo que es una buena causa para la comunidad el transporte público. Es muy importante que sea mas accesible para todos. La comunidad se los agradece. *** I agree with SANDAG's regional plan. I think public transportation is a good cause for the community. It's very important that it be more accessible to everyone. The community thanks you.
S0910	Carlos Manzanera	n/a	Potholes and cracked pavements are common problems in the streets at Chula Vista, especially in the western section of the city. For everyone´s safety its important to address this issues. In addition, there are intersections on H street, Broadway and E street in Chula Vista that have a large number of accidents. These are dangerous spots for people driving, walking or biking.
S0911	Mela E.	n/a	El Trolley no pasa a su hora y está muy sucio a veces va demasiado lleno *** The trolley doesn't arrive on time and is very dirty; sometimes it's too crowded.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0912	Esperanza	n/a	Que hay mucho indigente en las paradas del Trolley y bus *** There are a lot of homeless people at the trolley and bus stops.
S0913	n/a	n/a	Que pusieran un boton de emergencia dentro del Trolley *** They should install an emergency button inside the Trolley.
S0914	Maria W.	n/a	Que haya mas horrarios del camion los fines de semana porque no pasan muy seguido *** There should be more bus schedules on weekends because they don't come very often.
S0915	Elina H.	n/a	En el area de Oxford en Chula Vista donde está el condado todavia hay mucha basura y se ve muy sucio *** In the Oxford area of Chula Vista near the county offices there's still a lot of trash and it looks very dirty.
S0916	Ofelia Coronado	n/a	Que las calles las arreglen y pavimenten como se debe porque estan llenas de baches *** Fix and pave the streets properly because they're full of potholes.
S0917	Todeo L.	n/a	Que pongan mas señales y luces *** Add more signs and lights.
S0918	Maria I.	n/a	Necesita mas seguridad en las estacionamientos del trolley y bus stop; alumbramiento, limpieza en el parking *** More security is needed in the trolley and bus parking lots; lighting and cleaning in the parking area.
S0919	Luisa Lopez	n/a	Tapar hes hoyos de las calles *** Fill in those holes in the streets.
S0920	Erik Valera	n/a	Yo estoy de acuerdo con el plan y creo que esta haciendo una buen causa. Yo creo que si deberia te estar disponsible a todos *** I agree with the plan and think it's doing a good job. I think it should be available to everyone.
S0921	Maite Martinez	n/a	The trolley/bus is definitely a safe environment, & always takes me right where I need to get, & always has good energy + amazing & generous bus drivers
S0922	n/a	n/a	Muy agradadecer por la despensa en la comunidad y porque es accesible cerca de cana y como esta todo tan caro es un gran apoyo *** Very grateful for the food pantry in the community and because it's accessible near home; with everything so expensive it's a big help.
S0923	Giovanna Nicolette B.	n/a	I think that the public transport is safe, but sometimes it's unsafe how in the trolley there is people who may threaten you. Which is scary. Maybe more lights in the quintard st. It's pitch black and the students leave late for school.
S0924	Elsie Delgadillo	n/a	I believe we need more security at the trolley stations in the evenings (Palomar etc) Also may consider trolley line going to the airport
S0925	Edward Boesson	n/a	We need the trolley to reach all public places. Water taxi to reach bay areas and surrounding hotels. Bus lines should run every 15 minutes
S0926	Maribel	n/a	Maybe lowering the cost.
S0927	Claudia L.	n/a	Housing and land is expensive and we would like to have affordable neighborhood for everybody. A safety environment to the whole people. A safety neighbors.
S0928	Noor Habibollah	n/a	good, everything is fine
S0929	n/a	n/a	tiene buen servicio de camiones le trolley falta taxis ya fue varios personos no usan la aplicacion del Uber falta mas seguridad por las tarde noche *** Bus service is good; the trolley needs taxis as some people don't use the Uber app, and more security is needed in the evenings.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0930	n/a	n/a	Seguridad en el troley y Autobuses *** Security on the trolleys and buses.
S0931	Carmen Arroyo	n/a	Se necesitan mas autobuses, taxis particulen *** More buses and private taxis are needed.
S0932	Carmen Eseiza	n/a	A quien corresponda: Mi comentario es que los líneas de transporte deberían ser gratuitas para estudiantes. La edad para seniors debería ser apartir de los 60 años. Las calles de Chula Vista no tienen alumbrado favor de inspeccionar *** To whom it may concern: My comment is that the transit lines should be free for students. The senior age should start at 60 years. The streets of Chu a Vista have no lighting; please inspect.
S0933	n/a	n/a	Alumbomiento en las calles y estaciones de los autobuses y troley *** Lighting is needed in the streets and at the bus and trolley stations.
S0934	Cristal Cruz	n/a	Por las noches hay mucha enseguridad en las paradas del Trolley y autobus *** At night there is a lot of insecurity at the trolley and bus stops.
S0935	Teresa B.	n/a	Areas con mas luces por la calle Segunda *** More lights are needed in areas around Second Street.
S0936	[Illegible]	n/a	En la Calle Tercera Pasando la main esta muy oscuro *** On Third Street past Main it’s very dark.
S0937	Andrea Tijerina	n/a	Please work on improvement to the entrance to Balboa Park from Park Blvd. There is too much congestion entering.
S0938	Pedro Y. Moreno	n/a	Please work on connecting or transporting people to major hosopitals; One in particular is the Kaiser Permanente Garfield. The closest bus route is on Clairemont Mesa Drive. So we need a shuttle or connection from the 235 to Kaiser Garfield on Convoy.
S0939	Portland Bates	n/a	I live in North Park and the roads are in bad condition. Also, all of the additional bike lanes and bus lane make it difficult to drive down 30th street. There isn't any parking and I have not seen the community utilize the bike lanes as they were designed. They ride their bikes on the sidewalk making things dangerous for pedestrians
S0940	n/a	n/a	I am a high school student and I see a lot of homeless in the streets. Many of them are outside during the hot and specially the cold weather. I really want to see less homeless people in the U.S. but specially San Diego.
S0941	David Leon	n/a	I would love it if the trolley had overnight service between 1AM and 4AM. I know this is probably impractical but it would allow me to truly live without a car.
S0942	Christian Sabedra	n/a	Cleaner park bathrooms, Brighter/New Street lights, Filling Pot holes/Fixing roads
S0943	n/a	n/a	Less Homeless & Homicide
S0944	Savannah Arroyo	n/a	more street lights, fix streets up more (potholes, cracks), clean up abandoned businesses
S0945	Steve Flynn	n/a	More street cleaning/sweeping. The curb in front of my house has trash and broken glass + debris from the floods. I can't dispose of it in normal trash or compost. A pool of standing water accumulates and even grass was starting to grow.
S0946	Traci	n/a	As a longtime driver, I have been all over San Diego and I find the roads surrounding the trolley tracks to be hard and rough on my car.
S0947	Erika Valera	n/a	We need better streets with less Potholes
S0948	Anne Stapleton	n/a	I lead a weekly litter cleanup for Lemon Grove & the MTS bus stops are always in need of power washing & cleaning. Also, people can't fit their take out trays & pizza boxes in the trash cans that only have a small circle opening
S0949	Shanell Morrison	n/a	Better laws that would stop Homeless from trashing our fwys and neighborhoods

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0950	Zac Morrison	n/a	We live off H Street in Chula Vista/Eastlake 125 & H Street. Buses are infrequent and wanting. We need more schedules and routes.
S0951	n/a	n/a	Take out the bike lanes! Bring back parking! Repair roads in N Park & Hillcrest
S0952	Andrea Castañeda	n/a	Better infrastructure for bicycles. Walkable city development (ie homes w/in walking distance of stores, cafes, libraries, etc.) More bus routes/MTS routes
S0953	Joyce Moore	n/a	Traffic lights on Palm Avenue in Lemon Grove. Speed bumps in my neighborhood to stop people from flying through the streets
S0954	Seth Smith	n/a	Dedicated bus lanes. Expanded trolley/light rail system. Technologies & strategies to adapt to increased stormwater due to climate change. More public charging stations. More urban park spaces. Funding for cities to accomplish all of the above.
S0955	Mike Fellows	n/a	1. Funding that is provided to cities with no strings attached. 2. More local control of land use. 3. Lower RHNA standards and numbers
S0956	Pedro E. Moreno	n/a	I hope this message finds you well. I'm a member of the Church of Christ on 32nd Street. I'm writing to express a growing concern about vehicle speeds along 32nd Street. While we understand it's a public roadway, we've noticed that many drivers tend to exceed safe speeds, which poses a risk to pedestrians, children, and cyclists in our residential area. In the interest of community safety, we would like to kindly request that the city consider installing speed bumps on this street. We believe this would greatly enhance the safety in the neighborhood. We appreciate all the work the city does to maintain safe streets. Thank you for your time and attention to this matter.
S0957	Teresa P.	n/a	The bike lanes are too close to the existing traffic in North Park. Please remove them. They don't help
S0958	n/a	n/a	Yo vivo en San Diego pero vengo a trabajar a Chula Vista todos los dia, y en 4th Ave entre la L St. y la K pasan muy rapido, alta velocidad los vehiculos. En ese lugar esta la escuela Chula Vista High y exite muchos cruce y peatones, padre y estudiantes hace falta otro sema ford para estudiantes. Como el de la 4th Ave entre la L St. y Moss St. *** I live in San Diego but come to work in Chula Vista every day, and on 4th Ave between L St. and K the vehicles go very fast. In that spot is Chula Vista High School and there are many crosswalks and pedestrians, parents and students; another traffic light for students is needed. Like the one on 4th Ave between L St. and Moss St.
S0959	n/a	n/a	Quiero comentar que por la Palomar St. entre los calles Broadway y 5th Ave los buses que vienen del east a west rutas 392 y 701 bajan muy aprisa y por ahi hay casas habitacion en donde salen y entran vehiculos. Y ponen en peligro a las persona que viven ahi *** I want to comment that on Palomar St. between Broadway and 5th Ave the buses coming from east to west (routes 392 and 701) travel very fast and there are houses where vehicles come in and out. And they endanger the people who live there.
S0960	n/a	n/a	Mi comentario es que es muy necesarias una banca y un techito para proteger del sol y la lluvia a las personas que estan esperando el bus 701 *** My comment is that a bench and a small roof are very necessary to protect people waiting for bus 701 from the sun and rain.
S0961	n/a	n/a	Yo no uso el transporte publico pero he observado que el bus 701 no se para a levantar a los estudiantes de la Castle Park High School, pienso que no hay supervisor que revisa las corridas y ahi se quedan los estudiantes. Checkearlo por favor! *** I don’t use public transport but I’ve seen that bus 701 doesn’t stop to pick up students from Castle Park High School; I think there’s no supervisor checking the runs and the students are left there. Please check it!
S0962	n/a	n/a	En las mobile home de la calle 2nd Ave. y Quintard St. Los buses auxiliares (chicos) entran muy pocas veces al dia y en la tarde despues de las 6pm, no hay corridas mas continuas ya que son trailas para adultos mayores *** At the mobile home park on 2nd Ave and Quintard St. The small auxiliary buses enter very few times a day, and after 6 pm there are no more runs since these are trailers for older adults.
S0963	n/a	n/a	Cuando es hora de salida de los trabajos de 2 a 5pm en la estacion del trolley de la Palomar mucha gente se queda sin abordar porque vienen llenos de norte a sur si pudieran aumentar mas corridas seria estupendo. *** Between 2 and 5 pm at the Palomar Trolley station many people can’t board because the trolleys coming from the north are full; if they could increase the runs that would be great.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0964	n/a	n/a	En la calle Hilltop Dr. los buses 701 pasan muy retirados de horarios y los estudiantes de la escuela Castle Park High School, cuando salen duran mucho tiempo esperando para ir a su casa. Se necesitan mas buses a la hora de salida de los estudiantes *** On Hilltop Dr. buses 701 pass very infrequently and students from Castle Park High School wait a long time to get home. More buses are needed when students get out of school.
S0965	n/a	n/a	Mi comentario es que es muy necesario la iluminacion de la calle Quintard entre la 2nd ave y la calle primera en Chula Vista. En las afueras de la escuela Castle Park Middle School. *** My comment is that lighting is very necessary on Quintard Street between 2nd Ave and First Street in Chula Vista. Outside Castle Park Middle School.
S0966	Evelyn Schmidt	n/a	Quiero comentar de la falta de una proteccion para las personas en la parada del bus 392 en el 3rd ave y Orange Ave. en Chula Vista. Junto el mercado El International. *** I want to comment on the lack of a shelter for people at the bus 392 stop at 3rd Ave and Orange Ave in Chula Vista. Next to the International market.
S0967	Aurora Nidome	n/a	La iluminación de las calles y los parques. Algunos si tienen lámparas, pero la luz es muy tenue. *** Street and park lighting. Some places have lamps, but the light is very dim.
S0968	n/a	n/a	Yo sugiero que haya banquetas hechas para silla de ruedas, porque muchas veces no se puede caminar con la silla por la banqueta y tengo que bajarme para caminar junto a los carros *** I suggest there be sidewalks designed for wheelchairs because often you can't move the chair on the sidewalk and I have to go into the street to walk alongside cars.
S0969	n/a	n/a	Que haya mas señalamientos de no manejar cansado o bajo los efectos del alcohol *** There should be more signs warning not to drive when tired or under the influence of alcohol.
S0970	n/a	n/a	Por favor pidan casco a las personas que andan en patín en las ciclovías *** Please require helmets for people on scooters in the bike lanes.
S0971	n/a	n/a	Que los ciclistas respeten a las personas peatonales *** Cyclists should respect pedestrians.
S0972	n/a	n/a	Me ha tocado varias veces que el camión no me espera cuando estoy a punto de llegar al camión. *** It's happened to me several times that the bus doesn't wait for me when I'm just about to reach it.
S0973	n/a	n/a	Que den la oportunidad a los que vamos caminando al camión de esperar hasta llegar, pues perdemos la salida y tenemos que esperar hasta una hora al otro camión. *** They should give those of us walking to the bus a chance to get there, because we miss the departure and have to wait up to an hour for the next bus.
S0974	n/a	n/a	Eduquen a los que andan en patineta, que tambien andamos adultos mayores caminando y ellos van corriendo y ha habido accidentes *** Educate those who ride skateboards; we older adults are also walking and they go speeding by, and there have been accidents.
S0975	n/a	n/a	It is common to see people smoking vape and othr substances inside the trolley, which should be prohibited and enforced.
S0976	Elvia Chavez	n/a	We need better enforcement of smoke-free travel. Often I ride the trolley and folks are smoking marihuana. Even when they are not smoking, the smell stays in the trolley. More buses on the weekends please.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0977	n/a	n/a	Necesitamos alumbrado público en E Quintard Street frente a Castle Park. Autobuses más seguido en 3rd Ave. Patrullaje en Chula Vista mas en específico entre las calles de orange ave y palomar st. *** We need public lighting on E Quintard Street in front of Castle Park. Buses more often on 3rd Ave. More patrols in Chula Vista, specifically between Orange Ave and Palomar St.
S0978	Martin Martinez	n/a	Necesitamos mas estacionamientos para los departamentos y que la policia vigile que no haya carros estacionados por mas de una semana en Quintard St. Baños en las estaciones del trolley. Autobuses más seguido. Alumbrado público en Quintard St, frente a Castle Park Middle. *** We need more parking for the apartments and for the police to ensure cars aren't parked for more than a week on Quintard St. Bathrooms at the trolley stations. Buses more frequently. Street lighting on Quintard St. in front of Castle Park Middle.
S0979	Lourdes Villaseñor	n/a	Arreglas las calles que estan en mal estado. La iluminación de las calles que se necesitan porque estan muy oscuras. *** Fix the streets that are in bad condition. Lighting is needed on the streets because they are very dark.
S0980	n/a	n/a	Need street repairs in The Palm Ave-Saturn Corridors, too many potholes. Rapid Transportation from southbay to the airport. Better Lighting on 13th street in Egger Highlands to Bayshore Bikeway
S0981	Beatrice Martinez	n/a	Pienso que deberían hacer más transporte, que fuera más frecuentes las salidas en la ruta 704 *** I think they should provide more transportation and that route 704 should have more frequent departures.
S0982	Maria Cruz Lazo	n/a	Componer banqueta *** Fix the sidewalk.
S0983	n/a	n/a	Me gustaría que pusieran topes en Castle Park Middle porque pasan muy recío los carros *** I would like speed bumps at Castle Park Middle because cars go very fast.
S0984	Gerina Neal	n/a	Me gustaría que pase a las horas que marcan porque a veces pasan antes o despues de su hora *** I would like it to run at the times it's scheduled because sometimes it comes before or after its time.
S0985	Antonio Torres	n/a	Más iluminación y pavimentación en la calle 2da y la Quinta *** More lighting and paving on 2nd Street and Quintard.
S0986	Joana Del Prado	n/a	Buenos días a mi me gustaría que pusieran más iluminación en la calle quinta en Chula Vista a la altura de la escuela castle park middle porque esta muy oscuro y hay muchos indigentes que hatsa han vandalizado los carros y es muy inseguro transitar por esa calle cuando oscurece. Tambien el bus 704 pasa muy tardado a comparación de los otros y algunas veces se adelanta o se atrasa muy seguido y eso hace que uno llegue tarde a su destino, me gustaria que abran más horarios en la ruta 704. *** Good morning, I would like there to be more lighting on Fifth Street in Chula Vista by Castle Park Middle School because it's very dark and there are many homeless people who have even vandalized cars, and it's very unsafe when it gets dark. Also bus 704 is very slow compared to the others and often arrives early or late; that makes you late to your destination. I'd like them to add more runs on route 704.
S0987	María	n/a	Alumbramiento en estaciones de bus, seguridad y limpieza de parking en la H Street. *** Lighting at bus stations, security and cleaning of the parking at H Street.
S0988	Marisela Moreira	n/a	Bus is needed on Main St from East to West

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S0989	Martha	n/a	Mejorar estacionamiento *** Improve parking.
S0990	Carmen Vi	n/a	Más alumbrado en la comunidad de Chula Vista West y mantenimiento en las banquetas *** More lighting in the Chula Vista West community and maintenance of the sidewalks.
S0991	Gabriela Abdon	n/a	Gracias por escuchar y seguir co los planes. Las luces que ponen no iluminan nada. *** Thank you for listening and continuing with the plans. The lights they install don't illuminate anything.
S0992	Faustino Lopez Jr.	n/a	I would love to have sidewalsk on all of our streets
S0993	María	n/a	Más luz en los parques o fuera de las escuelas *** More light in the parks or outside the schools.
S0994	María H	n/a	Alumbramiento en la calle Anita y la calle Tercera *** Lighting on Anita Street and Third Street.
S0995	Irene Hernandez	n/a	Calle Hilltop Dr. Chula Vista la banqueta necesita arreglarse, porque se han caído las personas que pasan por ahí. En transporte del trolley, las personas que fuman marihuana. *** On Hilltop Dr. in Chula Vista the sidewalk needs to be fixed because people walking there have fallen. On the trolley people smoke marijuana.
S0996	n/a	n/a	On my intersection, Hiltop + Naples we need a stop sign. They use that street as a race strip
S0997	Joanna Ferreira	n/a	En Denery Rd, esta muy obscuro, casi no hay alumbrado por donde pasa el camión por la Walmart de la palm *** On Denery Rd it's very dark; there's hardly any lighting where the bus passes by the Palm Avenue Walmart.
S0998	Rosa A. Calderón	n/a	Sugiero más eventos donde se den a conocer los programas para la comunidad, como este. Gracias *** I suggest more events where community programs are presented, like this one. Thank you.
S0999	Cinthia Trujillo	n/a	Falta más vigilancia e iluminación *** More surveillance and lighting are needed.
S1000	Lorena	n/a	Iluminación sobre la calle Quintard a la altura de la escuela Castle Park Middle *** Lighting on Quintard Street near Castle Park Middle School.
S1001	Rosa V	n/a	Lo que yo he visto es que tienen muchas bancas y no tienen sombra, yo prefiero una sombra. Un día salí a tomar el camión, estaba lloviznando y no pude sentarme porque la banca estaba mojada y me moje esperando el camión. *** What I've seen is that there are a lot of benches and no shade; I prefer shade. One day I went to catch the bus; it was drizzling and I couldn't sit because the bench was wet and I got wet waiting for the bus.
S1002	Aracely Hernandez	n/a	Poner banquetas enla calle Emerson. Sombra en las paradas del bus, más areas verdes. *** Put sidewalks on Emerson Street. Shade at the bus stops and more green areas.
S1003	n/a	n/a	For the safety of everyone, the security in the trolley should be more monired due to vandalism and crime

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1004	Mariela Torres	n/a	Un cruce peatonal enfrente de Castle Park Middle *** A pedestrian crossing in front of Castle Park Middle.
S1005	n/a	n/a	Mejoras en el transporte y parques. Los baños estan muy sucios o no tienen baños. *** Improvements in transportation and parks. The bathrooms are very dirty or there aren't any bathrooms.
S1006	Esthela Mendez	n/a	Por la calle Donax hay muchos baches que necesitan reparación *** On Donax Street there are many potholes that need repair.
S1007	Jessica	n/a	En lo personal, a mi no me parece una buena idea las ciclovías porque provocan más congetionamiento vial ya que esta comunidad no es que las utilicen mucho *** Personally, I don't think the bike lanes are a good idea because they cause more traffic congestion since people here don't use them much.
S1008	Celeste A	n/a	Por la calle Oxford en Chula Vista se necesita alumbrado público porque las calles estan muy oscuras, también seguridad porque rompen mucho los vidrios de los carris *** On Oxford Street in Chula Vista public lighting is needed because the streets are very dark, and security because car windows are often broken.
S1009	Tomasa	n/a	En la calle Palomar se necesitan más botes de basura y que la recojan más seguido *** On Palomar Street more trash cans are needed and the garbage should be collected more often.
S1011.A	Anabel Martinez	n/a	- El bus de #120 que lo regresen su recorido completa el fin de semana - y tambien queremos que nos regresen el bus #25 - el las paradas del bus deben de poner botes de basuras y sombras *** – Return bus #120 to its full route on the weekend – and we also want bus #25 back – the bus stops should have trash cans and shade zones.
S1011.B	Anabel Martinez	n/a	El pase del programa del bus sea permanentes para q los jovenes no pagan cuando suben para irse a la escuela *** The bus program pass should be permanent so youths don't pay when they ride to school.
S1012.A	Javier A. Mendez	n/a	- luses en bus stops to see better - necesitamos transport 125 que pondan bote de basura en las paradas de bus y sombra y necesitamos la ruta del bus que transporte 25 de Ulric asta el ospital Sharp es muy necesario por fabor para todos los recidente de Linda Vista *** – Lights at bus stops to see better – we need busses 125 to have trash cans at bus stops and shade zones and we need the bus 25 route from Ulric to Sharp Hospital; it's very necessary, please, for all residents of Linda Vista.
S1012.B	Javier A. Mendez	n/a	- mas arc rampas para cilla de rueda *** – More ramps for wheelchairs.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1013.A	Araceli Sanchez	n/a	- ocupamos que regresa el bus #25 ocupamos esa ruta es muy necesario que recorre del Sharp a Fashion Valley - tambien se ocupa sombra en las paradas de bus - y en los paradas de bus tambien se ocupa botes de basuras *** – We need bus #25 to come back; we need that route from Sharp to Fashion Valley – we also need shade at the bus stops – and at the bus stops we also need trash cans.
S1013.B	Araceli Sanchez	n/a	- necesitamos que el programa gratis para los jovenes que continuen porque lo necistamos para nuestros hijos para que puedan moverse nuestros hijos a las escuelas *** – We need the free program for youth to continue because we need it so our children can get to school.
S1014.A	Edith Villanueva	n/a	- queremos el bus 120 los fines de semana - queremos que regrese la ruta del bus #25 que pasaba por la Comstock en Linda Vista - pedimos por favor de que se pongan sombras en las paradas de los bus (techos) - poner botes de basura en las paradas *** – We want bus 120 on the weekends – we want the bus #25 route that went along Comstock in Linda Vista back – please install shade (roofs) at the bus stops – install trash cans at the stops.
S1014.B	Edith Villanueva	n/a	- que siga los pases para los jovenes menores de 18 anos que siga el transporte gratis *** – Keep the passes for youths under 18 so transportation remains free.
S1015	Jim smith	Olivewood Gardens and Learning Center	Would like more bike trails in Chula Vista/More walking trail upgrades
S1016	Carmen Gutierrez	Olivewood Gardens and Learning Center	I use my car for everything due safety reasons
S1017	Rocina Lizarraga	Olivewood Gardens and Learning Center	I will like to see more effective advocacy of representatives from our city at the SANDAG Board of Directors, a strong advocate is crucial to have justice for our residents as they represent and are fully aware of the population they serve and the needs they have.
S1018	Isabella Haddad	n/a	Safer motorcycle transportation. Implementing policy to help keep motorcycles in lanes without drifting between cars. This idea is developed from personal experiences, real injuries/accidents.
S1019.A	Mary Davis	n/a	Until you make transit safe and clean, ridership will not increase. Focus more on cleanliness and safety before increasing frequency (aka, don't put the cart before the horse).
S1019.B	Mary Davis	n/a	1. Get rid of your 'share the road' policy; small things don't belong on the same infrastructure as big things. 'Share the road' is a faulty premise that paves the way for catastrophic outcomes. 2. Provide real protection; a painted line or plastic bollard is a faux "solution". 3. Quit pushing urban bike "solutions" on rural areas. No one is commuting on bikes up and down the Poway Grade. 4. Bulb bump-outs, "sharrows", and other gimmicks actually make biking more dangerous.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1019.C	Mary Davis	n/a	1. Complete (or start) the projects you enticed us with in ballot language to renew the TransNet tax. 2. Add dedicated transition ramps for WB 8 to NB 67, and SB 67 to EB 8. 3. Prioritize transition ramps for the 125/94 connector (vs. exiting Spring St.) Regional equity demands it, as you fast-tracked the 125/905 connector while this one still languishes after four decades. 4. *** Add lanes to SR-67 for fire evacuation. *** 5. Add a center divide along SR-67 to prevent head-on collisions
S1019.D	Mary Davis	n/a	1. Do not implement ANY tracking technology. It is antithetical to privacy and freedom of movement. Given recent immigration-enforcement concerns (or going to church during Covid), the everyday movements of people should not be tracked. Any system that tracks our movements by default should be soundly rejected by SANDAG as a matter of public policy.
S1019.E	Mary Davis	n/a	1. Track data of ownership of SFRs (single family residences) by: - Foreign nationals - Corporations - NGOs/non-profits
S1019.F	Mary Davis	n/a	Document how much has been spent on fighting 'climate change', and what effect those expenditures have had. What is the ROI (return on investment) we are seeing for our taxpayer dollars (or are we throwing money into the wind?)
S1020.A	Ozzy Meneses	n/a	San Diego's transit future must prioritize equity, frequency, and accessibility. Investment in frequent, reliable bus and trolley service especially in environmental justice communities,should be non-negotiable. Transit that runs every 10-15 minutes, all day, every day, is essential for working families, youth, and seniors. We urge SANDAG to prioritize service over shiny projects and ensure low-income communities are first in line for upgrades, not last. Transit investments should also include improved shelters, safety lighting, and wayfinding at stops, especially in underserved neighborhoods.
S1020.B	Ozzy Meneses	n/a	Build bikeways and walkways that actually connect people to where they need to go, schools, parks, jobs, transit, and food. The plan must accelerate implementation in communities historically left behind by infrastructure investments. This means Class IV protected bike lanes, widened sidewalks, curb ramps, shade trees, and pedestrian-scale lighting. In particular, we urge SANDAG to prioritize active transportation along the Chollas Creek corridor, where communities have long called for safer, greener connections. This area presents a key opportunity to integrate flood resilience, mobility, and park access in one cohesive strategy. We encourage SANDAG to collaborate with local nonprofits like Groundwork San Diego Chollas Creek, who have deep community trust and a track record of engaging residents in equitable planning. These partnerships are critical to ensure the infrastructure reflects real community needs and results in lasting, measurable benefits. It's not just about mobility, it's about health, safety, and quality of life. Don't let another plan pass without real timelines and budgets for walkable, bikeable neighborhoods in places like City Heights, Encanto, and National City.
S1020.C	Ozzy Meneses	n/a	Tech must serve people, not the other way around. Prioritize community-first approaches - like real-time transit tracking, digital fare equity, and multilingual apps that work for residents with limited data access. We need tech that's inclusive, simple, and supports climate goals - not just another app for tourists or tech-savvy users. Also ensure data privacy and public transparency around all pilot programs.
S1020.D	Ozzy Meneses	n/a	SANDAG must move beyond traditional outreach and embrace deep, community-rooted engagement - especially with communities most impacted by climate change, displacement, and underinvestment. Public meetings and comment periods are not enough. We need ongoing partnerships with community-based organizations, trusted messengers, and residents who live the realities these plans are meant to address. That means paying people for their time, compensating nonprofits for outreach, and co-creating strategies - not just presenting pre-decided plans. Efforts like the Chollas Creek Coalition, supported by Groundwork San Diego, Chollas Creek, are strong examples of what real, community-led planning looks like. These kinds of partnerships should be the norm, not the exception. Residents should see themselves reflected in planning processes, not just as checkboxes for equity metrics, but as co-designers of long-term solutions. SANDAG' s future depends on rebuilding public trust. That requires transparency, culturally competent communication, and long-term, neighborhood-based engagement that goes beyond short-term input windows.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1020.E	Ozzy Meneses	n/a	SANDAG should align its Regional Plan with state and federal priorities around transportation equity, climate resilience, and environmental justice - not just in name, but in action. That means prioritizing funding and project delivery for zero-emission transit, active transportation, and climate-resilient infrastructure over outdated highway expansions that worsen pollution, traffic violence, and displacement in vulnerable communities. Regulatory compliance should be treated as a minimum standard, not the end goal. We are also deeply concerned about recent federal funding shifts that threaten to cut resources from the very communities most impacted by climate change, underinvestment, and systemic inequity. SANDAG must be vocal in advocating for continued and increased funding for these communities'and ensure that every dollar received is transparently tracked, community-informed, and equitably distributed. Now more than ever, San Diego's regional plan must center disadvantaged communities in both intent and impact. That means grounding all state and federal compliance efforts in measurable equity outcomes, transparent public reporting, and authentic community partnerships,not just bureaucratic box-checking.
S1021	Lisa Pittman	n/a	Vista Way is a major thorofare between Hwy 76 and Hwy 78. The traffic is often backed up in the late afternoon going north onto Hwy 76 creating a danger in the event of an emergency evacuation. The lights are not timed and the access to Hwy 76 is slow. Adding an on ramp instead of a light and improving the traffic flow along Vista Way, including additional lanes at the north end would be helpful as well as improving alternate evacuation routes.
S1022	Courtney Cortez	n/a	Thank you for teaching me what SANDAG stands for: San Diego Associated Government. Plus the bar code for more information.
S1023	Robert Concon	n/a	Transportation is very efficient
S1024.A	Deborah Boss	n/a	Point Loma does not have the infrastructure to support mass transit. Mass transit not used by the military or other working populations because it takes too long to get to facilities via a bus. The only form of mass transit for working professionals is the bus and routes were cancelled because there was not enough use by the public. Between all the schools and the military base the community is locked up with traffic from 7:30 - 9:00 and from 2:30 - 5:30 on a daily work week basis. Emergency vehicles have enough trouble getting in and out of the point. Road congestion would prohibit daily commuters from using public transportation.
S1024.B	Deborah Boss	n/a	Bonus adus and land development should be designed to fit the community and lot size. Set back areas between residential homes should be respected. Building heights should also be respected within the community where the development is occuring. Residents/Developers should not be permitted to build 3 story buildings in their backyards, especially in a community where most of the homes are only 1 story. A minimum of (1) parking space per unit should be added to all new development.
S1025	Mary Elizabeth Lopez	n/a	I have been riding the busses since I was in 1st grade. The bad language from the transit. Homeless no respect and a lot of drug use
S1026	Tommy	n/a	The shuttle from Temecula to here sounds awesome. The bike trails sounds good because of too much traffic.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1027	Eric Johnston	n/a	This comment is submitted on behalf of the applicant for the Otay Ranch Village 13 Project, which was approved by the County of San Diego in November 2020 for the development of 1,881 single-family residences; 57 multi-family residences; approx. 20,000 square feet of commercial use; a resort site with 200 guest rooms and up to 20,000 square feet of commercial uses; a public safety site for a fire station; an elementary school; and acreage for parkland, manufactured open space, preserved open space, and roadways. These approvals are consistent with the vision of the Otay Ranch General Development Plan/Otay Subregional Plan, which was approved in 1993 following an extensive multi-agency effort to create a long-term development framework for the area. Following the County's 2020 approvals, a lawsuit was filed by environmental organizations challenging the adequacy of the County's CEQA compliance for the Village 13 Project. The Attorney General of California also participated in the lawsuit. In March 2025, a settlement agreement was finalized. That agreement provides a pathway forward for the Village 13 Project, including the option for the applicant to pursue entitlements with the County for a total of 2,750 housing units. Based on an evaluation conducted by CR Associates, SANDAG's Draft 2025 Regional Plan currently provides neither an accurate nor reasonable set of land use assumptions for the Village 13 Project, which is located in Traffic Analysis Zones 4587 and 4588 in ABM3. More specifically, CR Associates reviewed the Socio-Economic Data model inputs for the model base and horizon years, and determined the Draft 2025 Regional Plan reflects the following land use on the Village 13 Project site: Land Use: ABM3 Single Family Residential: 186 Multi Family Residential: 0 Non-Residential Employees: 1 I am writing to request that the Draft 2025 Regional Plan be revised to incorporate accurate and reasonable land use assumptions for the Village 13 Project. Based on the County's 2020 approvals and the 2025 settlement agreement's parameters, proceeding with the land use assumptions currently reflected in the Draft 2025 Regional Plan (as shown in the table above) would not be reasonable and would not provide an accurate representation of the foreseeable development potential of the site. We appreciate SANDAG's efforts through the Draft 2025 Regional Plan to establish vibrant, functional, and multi-faceted transportation opportunities for the San Diego region, which contains many subregions that are diverse in type and attributes. Our request herein is intended to ensure that SANDAG's regional transportation planning efforts closely align with anticipated development patterns and plans across the region. Please do not hesitate to contact me with any questions regarding this request or the information conveyed by this e-mail. Thank you for your consideration. Eric Johnston Baldwin & Sons
S1028	Mayra Ramirez	n/a	Request 1: Free transportation for all seniors, handicap/disabled in all San Diego with verification. Request 2: Better access to public transportation from Fallbrook/Bonsall area through Hwy 76 to Oceanside Public Transit Center.
S1029	Camiessa Stuart	n/a	Free transportation for disabled & seniors
S1030	Ryanrey Sanferd	n/a	I travel on my bike to the light rail for city to city trips. Sometimes the city bus for inner city transportation.
S1031	Martha Brodell	n/a	Improvements bus routes to Mission Vista Hills High School
S1032	Nauna C.	n/a	I am one of the people who use public transportation in daily life. My advise: 1) Should not allow homeless to use public transportations because they can spread disease from pee, the dirty stuffs on them. 2) They have no need or purpose for the transportation. They take it to occupy their time and for fun. They can spread disease to others. 3) Better to use the vinyl material to make the seats in the bus.
S1033.A	Karely Serrano	Mid City CAN	We need a YOP extension!! I've seen how helpful it has been to so many youth and families. It helps them get around. Thank you for funding such a great program.
S1033.B	Karely Serrano	Mid City CAN	Expansion of microtransit to other communities! Mid City Go has been sucha good help in City Heights, but I feel like it should run later than 5 pm.
S1034.A	Vanessa P Forsythe	n/a	Need focus on trains from SD to LA. Need two tracks. Need underground tunnels in Encinitas and Del Mar. Need direct link from No County to airport.
S1034.B	Vanessa P Forsythe	n/a	Redo entry ramp coming from Rt 78 W to Rt 5 going south. Most dangerous and many accidents, deaths - make it a priority.
S1034.C	Vanessa P Forsythe	n/a	Agree with emphasis building near transit.
S1035.A	n/a	n/a	How can we make streets have 2 hour parking? I live near a hall used for rentals and events as well as an elementary school. With a new 50+ apartment building being constructed on our street without parking I expect people will have to park about 1/2 to one mile away from their homes.
S1035.B	n/a	n/a	When a property is set for a 14 unit condo building with parking who in their right mind would put in a 50+ unit apartment building without parking. The bus comes once per hour. This is just wrong. A community is to suffer because a Developer wants two make more money?

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1036.A	Erin Meluso, RADD President	RADD, a 501 (c3) nonprofit, aka Recording Artists Against Drunk Driving	Among the Key Performance Measures RADD Supports are: (1) Access to Opportunities: The 2050 Regional Plan states that "more people across the. region will be able to get to work or school by transit." RADD is wholly in favor and would like to add the fact that including shared cabs and rideshare services could provide critical first-and-last mile travel to and from home at a modest cost. . (2) Vehicle Miles Traveled (VMT): The 2050 Plan states that "reducing the number of miles driven across the region is a key strategy in advancing a more sustainable and efficient transportation system." RADD agrees and would like to see shared cabs and rideshare services be included in regional planning to support shorter and fewer drive alone trips.
S1036.B	Erin Meluso, RADD President	RADD, a 501 (c3) nonprofit, aka Recording Artists Against Drunk Driving	RADD supports active community participation with buy-in to come from SANDAG hosting local meetings, community surveys, and targeted media outreach campaigns to give.local citizens the tools they need to understand the issues and participate in resolving/improving those issues that impact their community, RADD would also like to see Vision Zero, MADD, and other local traffic safety advocates have a voice in overall planning inclusive of public awareness campaigns to teach citizens how to use the new improvements safely and lower road-related risks for all by acting responsibly: Slow down, give way, buckle up, drive sober, use alternate transportation (bus, transit, cab, rideshare, or plan ahead with a sober designated driver) if you have consumed anything -- including Rx medications -- that might impair your ability to drive safely.
S1037.A	Lawrence (Larry) Emerson	n/a	From La Mesa & Lemon Grove to communities just east of Balboa Park there are no good bicycle connections to the Bayshore Bikeway. The current draft of the RTP put off any effort to improve this situation until 2025! This should be accelerated to 2030 and funding should be provided for a feasibility study to work on the details. Many years ago kids (now Senior Citizens) tell stories how groups of 10 would get on their bikes and ride all the way to Mission Bay/Mission Beach. Now there are too many vehicles on the roads and NO SAFE Paths for such bikers. Developing the Chollas Creek Connection to the Bayshore Bikeway will open up many possibilities for kids and adult to enjoy and explore the community in a healthy bicycle way. Please accelerate this schedule..
S1037.B	Lawrence (Larry) Emerson	n/a	Need more funding for bicycle pathway feasibility studies to make things happen
S1038	Ron Abernethy	Major Taylor Cycling Club of San Diego	According to the SANDAG Regional Transportation Plan (RTP) for the Bayshore Bikeway, there are no plans for additional bike lanes until "possibly" 2025. Given the staggering statistics of bike related traffic injuries and deaths which are still alarmingly high (according to 2024 data), the necessity of constructing lanes that serve both populations, drivers and cyclists, seems to be of paramount importance. In my view, a twenty-five year window portends only more bike/vehicle related injuries and deaths . Is it possible for the 2050 bike lanes construction date to be "reconsidered" and pushed up to 2030? Thank you for your consideration.
S1039	Jim Davis	n/a	Highway 78 Ramona to Julian and Highway 70 Descanso to Julian need to have turnouts or passing lanes added.
S1040.A	Margo Sommerfeld	n/a	Proposed bus lanes on some roads in Point Loma will be disastrous for the flow of traffic, which is bad enough as it is. Also this would eliminate much needed parking and affect small businesses in the area. I do not believe this has been thought out completely.
S1040.B	Margo Sommerfeld	n/a	Our neighborhoods are being destroyed by the destruction of our former zoning laws. What used to be granny flats for a relative or friend have been turned into multi-unit, multi-story housing structures. How would you like a 3 story building basically in your backyard and it's tenants able to watch everything going on in your yard or home? Where is the parking to go along with these structures. Street parking is already at a premium in most areas and with the advent of the mayor's bike lanes, becomes less everyday. Has any consideration been given with the increase in inferstructure to go along with the increased density & fire stations, police services, water usage using current pipes, sewers, etc., etc., etc. (Trying to approach these problems after the fact will be a mess.) Is it fair to the residents of San Diego who have paid premium prices to live in Single family neighborhoods, to change the rules on them. There are plenty of places to the east to build large housing units. Leave San Diego's neighborhhoods alone. They are a vital part of San Diego. We are watching our city be destroyed by our leaders. Please stop this before it is too late.
S1041.A	Lawrence (Larry) Emerson	n/a	CORRECTION TO EARLIER COMMENT -TYPED 2025 instead of 2050 From La Mesa & Lemon Grove to communities just east of Balboa Park there are no good bicycle connections to the Bayshore Bikeway. The current draft of the RTP put off any effort to improve this situation until 2050 (not 2025)! This should be accelerated to 2030 and funding should be provided for a feasibility study to work on the details. Many years ago kids (now Senior Citizens) tell stories how groups of 10 would get on their bikes and ride all the way to Mission Bay/Mission Beach. Now there are too many vehicles on the roads and NO SAFE Paths for such bikers. Developing the Chollas Creek Connection to the Bayshore Bikeway will open up many possibilities for kids and adult to enjoy and explore the community in a healthy bicycle way. Please accelerate this schedule

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1041.B	Lawrence (Larry) Emerson	n/a	Funding should be provided for a feasibility study to work on the details early so implementation can occur before or by 2030.
S1042.A	n/a	n/a	Add faregates to the entire Trolley system. Change the C Street/Park Blvd trolley lines to train crossing gates. Fast track the UTC Coaster tunnel to the furthest extent possible. Bring back heavy rail to the purple line. Swing for the fences on this project. Remove all the managed lanes projects if you have to in order to deliver this project the way it should be. Managed lanes are worthless and it's a tragedy they take up so much of this regional plan that should be positioning this metro region for a climate neutral future.
S1042.B	n/a	n/a	Remove all the managed lanes projects if you have to in order to deliver the transit projects this metro region deserves. Managed lanes are worthless and it's a tragedy they take up so much of this regional plan.
S1042.C	n/a	n/a	Remove all the managed lanes projects if you have to in order to deliver the transit projects this metro region deserves. Managed lanes are worthless and it's a tragedy they take up so much of this regional plan.
S1043.A	n/a	n/a	Real transit systems have faregates. Please study the addition of these across the entire system, or at least at strategic locations. Adding these would be a massive boon to safety and transit profitability. Make sure they're the ones that can't be jumped over.
S1043.B	n/a	n/a	Please allocate much more funding to transit and much less to funding to highways. The highways are fine. The transit being improved will in turn improve the highways.
S1044.A	n/a	n/a	San Diego needs to build more public transit. Whether it is BRT, LRT, or Subway, we need more efficient ways to move people around the city. Instead of expanding highways, we must invest in an alternative. Traffic in San Diego will only get worse unless we build high capacity, fast transit. I believe that both the Purple Line and Balboa Park street car are imperative to build for the benefit of our city. Similarly, San Diego must build bus rapid transit with dedicated lanes and stations, fast buses, and high frequency on routes with a lot of traffic and demand. Because it is a lower cost than rail, we can implement it quickly for people to use, but we need to ensure it is high quality. Neighborhoods that would benefit from this are, Hillcrest, North Park, City Heights, Normal Heights, and other neighborhoods in central San Diego.
S1044.B	n/a	n/a	We must build as much dense housing as possible. We cannot afford to sprawl out any longer, so we must provide more incentives for developers to build housing.
S1045.A	n/a	n/a	We need more FINAL MILE solutions adjacent to trolley stations. For example Balboa Station - great central location but anyone wanting to get to the beach has terrible options. Buses run every 30 minutes & Circuit on-demand can be unreliable as well. Short trip solutions to actually get people INTO popular areas like PB or North Park would cut traffic & needs for parking as the trolley would become a more viable option for recreational travel.
S1045.B	n/a	n/a	They should be free.
S1045.C	n/a	n/a	Bike lanes should be protected by SOLID bollards that Nimbys cannot move or destroy. The infrastructure needs to support current cyclists AND ENTICE new people to start seeing cycling as a viable commute option.
S1046	Christine Smith	n/a	In this Regional Plan, SANDAG has expanded the Rapid transit routes that they are treating as bus rapid transit when determining major transit stops for determining state mandated Transit Priority Areas, areas for parking requirement removals per AB2097, and San Diego's Bonus ADU/Complete Communities Sustainable Development Area. The bill for the new Rapid routes has ballooned from $$2.18B by 2035 with $382M more by 2050 to $4.17B by 2035 with $326M more by 2050. Yet the 2023 RTIP shows no funding for these new routes prior to 2028. It is unrealistic to think that all of these Rapid lines can be in place by 2035 and this is a disservice to all the communities of San Diego since density with no parking can be built in the areas surrounding these stops with no concern for the surrounding communities. If SANDAG truly wanted walkable, pedestrian neighborhoods, major transit stops would be located where there are amenities such as groceries, pharmacies, restaurants, and parks, not imaginary transit stops on aspirational transit improvements that SANDAG has no resources and no intention of every putting in place.
S1047	n/a	n/a	Would love to see plans for light rail expansion along the 15 connecting Mira Mesa, Scripps Ranch, Rancho Bernardo, etc to downtown.
S1048	n/a	n/a	We desperately need more trolley stops in north county but especially near the 15. I live in Mira Mesa and there are no walkable trolley stops near me. I love taking the trolley especially downtown since I don't have to worry about parking or traffic, but I'd love to leave the car at home entirely. Also, why does the Nobel Station parking garage have three whole empty floors for retail? The transportation floors fill up so quickly and the other floors literally never get close to filling up. They have enough parking for retail. Please expand
S1049	n/a	n/a	Public transit expansion and subsidized fares
S1050.A	n/a	n/a	Need more frequent trolleys. Every 5-10 minutes ideally. Also need the trolley to connect to the airport.
S1050.B	n/a	n/a	Need bans on e-scooters lifted. It was such a great thing while we had it. Encourages less driving and makes the city feel more alive with people.
S1050.C	n/a	n/a	Need contactless payments for all transit, including credit and debit cards, as well as mobile payments like Apple Pay and Google Pay.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1051	Joshua Kenchel	n/a	Not a single dollar should be spent on freeway or roadway expansion. If we envision the city we wish to live in by 2050, we already have all the asphalt we need and then some. If SANDAG's lofty transit goals are executed, and not just window dressing for a car-centric infrastructure plan, then we need no more private vehicle lanes. Toll lanes and bus lanes on freeways should absolutely happen, but they should repurpose existing private vehicle lanes.
S1052	n/a	n/a	Transit better than car, which is why you fund more transit projects (preferably Trolley cause it's embarrassing how we don't even have an airport line).
S1053.A	Ryan	n/a	To improve beach access for transit a walking path should be built under or over the 5 between the Tecolote Road transit station and mission bay/Fiesta island
S1053.B	Ryan	n/a	Allow more multi family building and mixed used in all neighborhood around sand digo
S1053.C	Ryan	n/a	Reduce auto dependency to improve air quality
S1054.A	Mary (advocate for elderly and special needs son)	n/a	How to make it possible for commuters to leave their vehicles securely at a bus station or transfer site overnight.or for a few days. How to assure that mass transit employs fully qualified drivers/conductors How to assure that rural routes will be safely and routinely assessed to meet the needs of rural commuters.
S1054.B	n/a	n/a	How to further assure pedestrian and bicyclist safety at cross walks and busy intersections.
S1054.C	n/a	n/a	Areas that can be better, and more safely accessed, with safety zones for both pedestrians and bicyclists How to better enforce safety regulations for speeding/reckless/inconsiderate motorcyclists on backcountry highways and roads.
S1054.D	n/a	n/a	Please also see above. How to assure for public safety if there are concerning issues at certain transfer sites or other locations providing public transportation. How to assure that the elderly, developmentally disabled or other individuals with developmental challenges can be better served and have access to certain underserved (as yet) locations; assure employees better educated about serving their population
S1054.E	n/a	n/a	Please see above
S1055.A	Hong Au	n/a	1) buses, trolleys, trains: more frequent stops on college campuses and rural areas week days as well as weekends. "If you build it, they will come."• - maybe smaller buses for areas with less people, or design an app to hail a bus to see the need for the daily schedule. All-electric vehicles equipped with self-charging panels on the buses.
S1055.B	Hong Au	n/a	2) bikeways & walkways: make them safer and away from cars, maybe not sharing the road, but a bike path on its own where Segways and scooters may also ride on these paths.
S1055.C	Hong Au	n/a	3) highways & local roadways: pave more of the rural roads so that out-of-town tourists may want to visit these beautiful places and help increase foot traffic and help grow the economy. Some roads in Ramona are just dirt paths, messy to drive in bad weather, unsafe, and causes need for law enforcement to go out there to mitigate preventable and foreseeable accidents. California, the fourth largest economy in the world, deserves the fourth largest economically, sound paths and transportation of the world. It's time to make that change. Thank you for allowing me to share my input. All the best to what's to come.
S1055.D	Hong Au	n/a	Tiny houses, are they still an option for smaller families? Maybe build more smaller houses without yards, but a large shared park for play, exercise, and event gathering. Do not build them In fire-prone areas; make them weather-proof and earthquake-proof with vegetation coverings to cool the internal temperature as well as painting them with that white paint that reflects heat, and build them with transportation-built in that travel to shopping areas, schools, and professional offices.
S1056.A	n/a	n/a	SANDAG's priority should be building a direct connection between the San Diego International Airport and Little Italy / downtown San Diego. This connection is essential, it would benefit both residents and visitors, support our tourism economy, and make public transit a real option for travelers. It's long overdue, and it would bring measurable value to the region. On the other hand, the proposed extension of the Purple Line down 4th Avenue in Chula Vista isn't the right move. That route is less than a mile from the existing Blue Line. It doesn't solve a true transit gap. As housing prices continue to rise, more people are moving east of the 805 freeway. That's a trend we've seen in other cities, and it's happening here too. If we're thinking about the future, transit investment needs to follow that shift. The better solution would be to build new rail lines along or east of the 805, where growing communities are underserved by the current system. SANDAG has a real opportunity to make a difference in how people move through San Diego. Let's focus on smart, effective transit project', not duplicate routes that damage neighborhoods and don't address where growth is actually happening.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1056.B	n/a	n/a	I strongly support the expansion of bikeways and walkways throughout San Diego County, and want to emphasize the importance of improving east-west connectivity. Many residents living or will be living in the eastern parts of the county have fewer transportation options, yet the majority of recreational, waterfront, and cultural amenities are located closer to the coast. Expanding bikeways that connect these regions would open up new opportunities for mobility, access, and quality of life. San Diego is uniquely positioned to be a national leader in bike-friendly infrastructure. Our proximity to the coast makes it especially valuable to create safe, dedicated bike routes that allow residents, especially those without access to a vehicle, to enjoy the benefits of our waterfront, parks, and recreational areas. With the increasing cost of car ownership, access to reliable bikeways becomes not just a convenience, but a necessity for many. By prioritizing bikeways that connect inland communities with the western side of the county, we make San Diego more inclusive, healthier, and better connected. Please consider this east-west emphasis as you plan future improvements to our regional bike and pedestrian network.
S1056.C	n/a	n/a	I strongly support the expansion of the initiative to reduce maximum speed limits across San Diego County. I understand this effort is being piloted or implemented in 2025, and I encourage SANDAG to accelerate and broaden this work throughout the region. Lower speed limits are a critical step toward improving safety for all road users, particularly cyclists and pedestrians, who remain among the most vulnerable. Reducing vehicle speeds not only saves lives but also reinforces a culture of accountability, where drivers are more aware of their responsibility to protect themselves, their neighbors, and the broader community. Walkability and safe biking corridors improve public health, reduce emissions, and create more connected, livable neighborhoods. Please prioritize speed reduction as a core part of your bikeway and walkway strategy going forward.
S1056.D	n/a	n/a	Please prioritize the use of technology to enhance neighborhood safety by supporting and funding traffic camera infrastructure. Speeding, red-light running, and unsafe driving behaviors continue to put pedestrians, cyclists, and other drivers at risk, particularly in residential and school-adjacent areas. Investing in traffic cameras allows for more consistent and fair enforcement, even when officers aren't physically present. These tools act as a deterrent and promote safer driving habits while relieving the burden on already stretched public safety resources. Data from other cities show a clear correlation between automated enforcement and reductions in both accidents and traffic fatalities. SANDAG has an opportunity to champion forward-thinking safety measures. Please consider traffic camera deployment as part of a broader, integrated approach to improving safety on our highways and local roadways.
S1057.A	n/a	n/a	Very happy to see the Purple Line and Balboa Park Streetcar projects, but they need to be moved up in the timeline. New trolley connections (especially those that shorten travel time) are critical for MTS to become viable as a daily means of transportation. We can't wait until 2050 for these projects. Direct funding towards them TODAY. Increase Trolley and Bus Frequencies ASAP to reduce wait times. People will have the best experience with transit if they can walk to it without having to look at a schedule or wait 15 minutes in the hot sun. "Park and Ride" is a band aid solution to transit access. Prioritize getting transit stops within walking distance of where people live, rather than commercial areas. When choosing where to direct funds, direct them to trolley and bus infrastructure instead of costly eyesore roads that make our city hot, ugly, and dangerous. Lastly, spending levels towards Transit Security is wasteful and ineffective. If you want to make these services safer, do things that will increase access (and therefore ridership), or towards janitorial/informational positions. Concerns about fare evasion would be better served by making sure all pay stations are consistently located closer to the tracks.
S1057.B	n/a	n/a	Flexible Fleets, while useful for certain situations, will never be able to provide the level of service that Uber/Lyft/Taxi's do. Increasing access to bus routes and bus frequency will generally be a better use of public funding, as those routine services can be trusted to arrive faster and more reliably than any Flexible fleet shuttle (so long as they are built near the people who will use it and connect them to other bus routes/trolley lines that can get them where they want to go).
S1057.C	n/a	n/a	Prioritize protected and off-street bikeways. Bikers are most safe when they don't have to interact with cars, and bikeways take up less space. Separating Bikeways from the road with trees or rain gardens make the neighborhood more attractive to live in, more pleasant to walk around, and keep everyone safe. Bikeways and Pedestrian bridges over freeways are also critical to make active transportation between neighborhoods reasonable.
S1057.D	n/a	n/a	The city (and state in general) desperately needs more housing. However SANDAG is able to assist, support public housing projects wherever possible. Prioritize mixed use development projects to foster walkable neighborhoods.
S1058.A	n/a	Climate Action Campaign	Public Transit funding needs to be expanded for more frequency on all modes. Operation dollars are limited and need additional funding especially for critical routes. Capital improvements need to be prioritized to ensure public transit is resilient to extreme weather such as floods. Grade Separation needs to be part of the prioritization.
S1058.B	n/a	Climate Action Campaign	Funding levels for active transportation are way too low. The region's ATP should be at least 10% of the projects funded.
S1058.C	n/a	Climate Action Campaign	No more highway expansion. The cost of expanding highways is astronomically high and the return on invest is negative. Even the addition of HOV lanes does not help. Focus on repurposing general purpose lanes for HOV rather than building more lanes.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1058.D	n/a	Climate Action Campaign	Public safety and health requires our regional MPO to focus on how to connect folks in more sustainable ways and to ensure that projects that benefit communities of concern are prioritized. Their should be a focus on using the City of San Diego's Climate Equity Index and other indices to prioritize projects in communities that have historically suffered from unhealthy levels of air pollution. These projects should demonstrate outcomes that lower the pollution burden for these folks.
S1058.E	n/a	Climate Action Campaign	Social equity needs to be a factor in project prioritization and program implementation. If done successfully, the region's most vulnerable populations will fair much better than they currently do.
S1059.A	Elena	n/a	SANDAG should remove all highway expansions from the 2025 regional plan. Adding an additional managed lane to a highway (as opposed to converting an existing lane or making no changes at all) will induce demand, worsening vehicle miles traveled and greenhouse gas emissions. And for the managed lanes that are being built, I urge SANDAG to ensure that buses are truly prioritized on these routes rather than languishing behind dozens of toll-paying cars.
S1059.B	Elena	n/a	The current greenhouse gas reduction goal in the plan, 19.3%, is too low to ensure a livable and equitable future. The goal for greenhouse gas reductions should be increased to 25% by 2035, because taking immediate action to slash the most significant piece of San Diego's emissions is absolutely necessary to ensure the success of our city for years to come.
S1060.A	n/a	n/a	Instead of Buses for new routes would love to see trams put in. They are much more enjoyable ride for everyone, and saves a lot on maintainence costs. Many European cities have had success with trams instead of buses.
S1060.B	n/a	n/a	I would like to see the Calisthenics outdoor parks from Greenfields Outdoor Fitness be added to every single park in San Diego, Chula Vista, National City, Coronado, etc They are low-cost, and would fit into the budget of doing well by all our fellow people who live in San Diego
S1061.A	n/a	n/a	We need a trolley line starting from the Otay Border heading North through Eastlake (East Chula Vista) connecting to the North County. The Blue line in the South Bay is so busy. Ideally the Eastlake portion wouldve stopped at Southwestern College.
S1061.B	n/a	n/a	Why is the 125 still a toll road?
S1062.A	n/a	n/a	I wish the Regional Plan had a more coherent long-term vision for high quality, rapid rail transit. The Miramar tunnel under UTC is a necessary and important investment, and I'm glad to see it in the plan. Otherwise though, the ideas for a Purple Line and a trolley around Balboa Park seem disjointed - they seem like interesting ideas on their own, but don't seem to fit into an integrated vision for a cohesive trolley and train network. Rail is so crucial to better transit, and I wish SANDAG would plan for better and more rail, in the short and long term, rather than destructive highway widening projects.
S1062.B	n/a	n/a	Much of the emphasis of the Regional Plan seems to be on Managed Lanes, which will be built by expanding highways. This is not an inspiring vision for San Diego's transportation future. Although I support dedicated lanes for buses, building additional lanes - even for buses and carpooling - has been shown to lead to more driving overall. Furthermore, transit that focuses on highway corridors misses neighborhoods where people live, and does not encourage many more people to use transit. I wish this plan showed more vision around expanding rail to provide high quality transit options. Building more highway lanes only locks us in to more emissions - we should not be building a single mile of new freeway lanes in San Diego.
S1063	n/a	n/a	The Purple Line's ridership should be completely restudied as the assumptions are incredibly misleading. The population trend is far lower than in reality, and station catchments are assumed to have decreased job and residential access, despite the region still growing. And that's disregarding the fact that building TODs would massively boost assumed catchment populations. Additionally, by excluding the South Bay from the ridership estimate, a huge swath of ridership was arbitrarily disregarded. South Bay and border commuters make up a huge chunk (if not majority) of the would be Purple Line's ridership. Please redo this ridership projections with less pessimistic population and catchment values, and include South Bay ridership + network effect.
S1064.A	n/a	n/a	SANDAG must build multiple new rail lines in order to increase reach and ridership of the system. However, there must be a huge emphasis on removing interlining as much as possible to ensure future frequency increases are able to occur. The airport line should be built as an APM which functionally acts as a light metro. It should have the capability to be extended both east and west. Ideally, the south line runs from the airport (elevated where possible, grade separated everywhere) down Harbor Dr and Market St, terminating at Euclid Station. It should be extended west to serve Liberty Station as well as Point Loma and/or Ocean Beach. Speaking of Ocean Beach, the reason the Airport Line should have a Harbor Dr alignment is because the Ocean Beach Spur should be built. This was a line briefly mentioned in the I8 CMCP but has plenty of potential. Instead of interlining with the trolley, this line should be built (also elevated where possible, with 100% grade separation) along Pacific Coast Highway and Sports Arena Blvd. From Ocean Beach, the line should serve Sports Arena, Old Town, NAVWAR, and then practically duplicate service but along PCH instead of LOSSAN. Just west of Santa Fe Depot, this line should curve to the median of Broadway, and run elevated down Broadway as well. It should run down Broadway until it curves and becomes 32nd, then run down 32nd to the Pacific Fleet station. Another big corridor is Balboa Avenue. An elevated Balboa Ave LRT should run from Pacific Beach to Kearny Mesa. The Purple Line should be built from the border to Sorrento Valley using concepts 1, 2, and 7 from the study. It should serve both proposed Kearny Mesa stations. Both termini should be extendable, with the south being able to extend to CBX, and the north being able to extend down Mira Mesa Blvd for a future extension. The line should be a metro, though a Sepulveda line alt 4 esque one capable of very high frequency preferably. Additionally, the densest neighborhoods in San Diego deserve rail transit. A trolley line up 5th Avenue and El Cajon Blvd would serve majorly underserved corridors. It would run from Gaslamp Quarter Station to SDSU via Downtown, Bankers Hill, Hillcrest, North Park, and Midcity.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1064.B	n/a	n/a	Please support SB79. Transit Oriented Development is a crucial tool that we have to build the housing our region is desperately missing. By ensuring dense housing by high quality transit, you vastly increase mobility options and quality of life.
S1065	n/a	n/a	Build a bus/bike/ped bridge connecting Regents Road. It would vastly improve connectivity between UTC and Kearny Mesa-two quickly redeveloping and interconnected regions-to each other and within themselves. It would provide great transit links to the Kearny Mesa Transit Center, and increase coverage and flexibility of bus transit in both areas. Additionally, both Kearny Mesa and UTC warrant additional bus lanes. As part of the "On The Move" SANDAG initiative, add quick build bus lanes down Genesee. It's currently undergoing massive pipeline construction, and there's now a chance to add a bus lane when it concludes as people have gotten used to the reduction in travel lanes. As a massively trafficked arterial, a bus lane here would help reduce delays and improve reliability. Other corridors also warrant such investments, such as La Jolla Village Dr., Nobel Dr., and Regents Road.
S1066.A	n/a	n/a	The proposed Purple line on Fourth Avenue in Chula Vista is not needed nor a good choice for the community. It will create a safety hazard for the numerous schools on that route. In addition to noise and traffic that will disrupt students and residents. There is already a trolley down the street that connects from Tijuana/San Ysidro border to Downtown.
S1066.B	n/a	n/a	There is already traffic on Fourth Avenue due to schools on that street. A trolley line there would create more traffic.
S1066.C	n/a	n/a	There is already a trolley in Chula Vista. Another line is not necessary in that area. It can be added from National City and above.
S1067	n/a	n/a	SANDAG should build a busway (dedicated guideway) connecting UTC with UCSD. Both of these regions are incredibly interconnected and are practically one connected neighborhood. I envision this dedicated busway beginning east of Gilman Transit Center after the bridge over the 5. It should follow a similar alignment to the Mesa Pedestrian Bridge, and continue through Miramar St. From there, it can continue through to Executive Drive and Genesee, or it can take Regents Road, La Jolla Village Dr, and Genesee, which should all have bus lanes.
S1068	n/a	n/a	Transit Signal Priority should be installed on at least the busiest bus routes. Routes like the superloop would be far more competitive with driving if buses had inherent priority at signalized intersections. They're not incredibly expensive to install and operate, and have plenty of upside.
S1069.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking.This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1069.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans' quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1069.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete CommunitiesHousing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1069.D	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans; quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the Citys CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the Citys CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1070.A	n/a	n/a	Priority on the purple line or purple line rapid bus route
S1070.B	n/a	n/a	Improve access to mission valley from north and south of via bike. For example, recent bollards added to Fairmount and Montezuma seem like partial measures. Need more ways to cross I-8 via bike.
S1071.A	Peter LaMontagne	n/a	You claim: "Reducing the number of miles driven across the region is a key strategy in advancing a more sustainable and efficient transportation system". However, your plan does little to show you actually believe this. There is no significant new rail in the plan except for a slow street car and potentially half of the purple line. Given the recent cost estimates for the purple line, it is clear SANDAG needs to go back to the drawing board and identify a transit corridor that will support robust ridership and actually be attainable with current funding strategies. Too much of this plan is focused on managed lanes and other freeway - focused transit, but people don't live or work directly adjacent to freeways. Transit needs to support routes people actually take and more focus needs to go into transit rather that roadway improvements.
S1071.B	Peter LaMontagne	n/a	I am fully in support of adding more bikeways like this plan says. I think it is important these bikeways are well thought out and connect to eachother in a safe and logical way.
S1071.C	Peter LaMontagne	n/a	Highways should be improved to make them safer and to fix bottlenecks. However, I do not support adding lanes just to add them. Induced demand is a well-understood concept any point so any plan focused around adding lanes is simply a waste of taxpayer money. In some cases, adding bus only lanes can be good, however it should be done carefully as freeway-focused transit is not generally appealing.
S1071.D	Peter LaMontagne	n/a	Much more of this plan needs to focus on TOD and zoning changes, as they are by far the most important thing that can be changed to reduce VMT and cost no money to the taxpayer. Recently hearing SANDAG was lobbying against SB 79 when you clearly don't have a better plan was extremely disappointing. SANDAG needs to get ahead of the density debate by planning transit and other infrastructure improvements that will allow people to live in dense neighborhoods without having to sacrifice in other areas of their lives.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1071.E	Peter LaMontagne	n/a	Measure G was a failure and it is clear why. It was a vague payday to an organization that has not earned the trust of the public. If you want more funding, you need to come to the table with a clear and actionable plan of what exactly you're going to build and how you are going to build it. LA county has had amazing success with much more expensive transit measures that succeeded because they were clear and they did not shy away from what people want: more transit. Measure G was half-baked and it is important that we get the next one right.
S1071.F	Peter LaMontagne	n/a	In Southern California, climate is VMT. Nothing else even comes close. EVs are not going to save us anytime soon, and even those pollute with their rubber tires and sources of electricity. We need to focus more on things like walking, biking, and riding transit that make a difference and improve peoples lives in other ways.
S1072	n/a	n/a	I hear a proposal on building a trolley thru 4th ave. Definitely against it.
S1073.A	Masaki Mendoza	n/a	I'd like to see as much investment as possible into transit rather than freeways and roadways. Transit is an essential lifeline for many San Diegans, and for people who do not want to rely so much on a car to get around given its expense and high environmental costs. We should be investing more money into expanding transit frequencies and reach so that more places can be quickly and conveniently accessed by transit.
S1073.B	Masaki Mendoza	n/a	While I acknowledge that freeways are an integral part of the transportation network, it's clear that continued investment into expanding freeway capacity is not the move we should be making. The 5 and 805 freeways in particular are notoriously congested despite several widening projects over the years, revealing the need for mass transit solutions. Instead of putting more money into such projects, please fund the Purple Line to connect San Ysidro with UTC through the City Heights and Kearny Mesa areas, and invest in boosting the Blue Line frequency to at least every 7.5 minutes for the entire line through to UTC.
S1074.A	n/a	n/a	Please accelerate the purple line construction and build the park Blvd tram/ trolley to North Park finished before 2040.
S1074.B	n/a	n/a	There needs to be an integrated regional dedicated bikeway system from San Ysidro, east Chula vista, downtown and mission valley. Something like what Amsterdam, NL has.
S1074.C	n/a	n/a	Create more transit oriented development and high speed transit that's dedicated.
S1075	Ethan Paul	n/a	Coaster to the boarder should be included as a SANDAG goal and before 2050.
S1076.A	n/a	n/a	The trolley should be connected to the airport as soon as possible. That way, tourists will not have to rent a car when visiting just to get to their hotel, and locals will not have to leave their car at the airport while they travel (thus freeing up parking space). On a related note, the Balboa Park streetcar should also be a priority, while you can already take the 7 and 215, there is still immense room for improvement, and the streetcar can be that improvement. Also, there simply needs to be more seating everywhere, at all stations.
S1076.B	n/a	n/a	We do not need to build more lanes. Instead of building new lanes to use as express lanes, it would be better both financially and environmentally to convert already existing lanes to express lanes.
S1077.A	Anthony Soto	n/a	Transit should be prioritized over any sort of highway expansions. More lines and more frequent service.
S1077.B	n/a	n/a	Housing should be built to increase density near transit. Walkable neighborhoods should be the goal.
S1078.A	Paul Grimes	Peninsula Community Planning Group	Congested Rosecrans St (level of service of E and F) cannot lose a travel lane for a dedicated bus lane that would be used only 4 times per hour. The two Rapid Bus lines proposed in the 2025 Plan would be additional to lower frequency bus service that is very lightly used. Unless these routes utilize existing lanes they should be eliminated from the Plan. It would take additional right of way that would need to be negotiated and obtained to accommodate a separate Rapid Bus Lane on Rosecrans St. Note that much of the two proposed Rapid Bus lines would operate on two lane streets. There is no evidence the proposed Rapid Bus line on Rosecrans would relieve traffic and would create even worse congestion if a traffic lane was removed. Another option is to extend a potential People Mover from the airport into Liberty Station and maybe onward towards the Midway District. Such a service would remove the need for a Rapid Bus service along Rosecrans.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1078.B	Regionwide	Peninsula Community Planning Group	California's Design Information Bulletin 89-01 states the community should be involved with Class IV Bikeways: "Adding a Class IV Bikeway into an already built-out street environment usually requires a reevaluation of service needs and a level of service analysis for capacity, because some transportation feature(s) may need to be reduced or eliminated, e.g., vehicular lanes, shoulder, parking or sidewalk. Local jurisdictions must be involved when analyzing these community impacts with the local residents, businesses, and advocacy groups deciding what features are to be included in the street modification. Thus, community planning is necessary when local agencies are contemplating a Class IV Bikeway route. Whether in an overall planning document or in a specific project document, effective public engagement is vital to the successful development of the Class IV Bikeway." The proposed Bikeway on Rosecrans street will create an unsafe environment for Bikers due to traffic volume and speed. Rosecrans has speed limits of 35 and 40 MPH and many travel above the limit. Rosecrans has a computerized traffic system designed to keep high volume traffic moving. Bike riders hit by a 32 MPH vehicle have a 25% chance of dying while at 42 MPH it is a 50% chance of dying. Flexible posts and narrowed lanes to accommodate bikes do not increase safety. If a dedicated lane for bike would remove a travel lane, congestion would further be degraded. Any Bikeway should be Relocated into Liberty Stations to create a safe and scenic Bikeway
S1078.C	Paul Grimes	Peninsula Community Planning Group	Housing will continue to grow on the Point Loma Peninsula with recently added, and currently under construction, large projects being planned. The Point Loma Peninsula has few exit routes in case of an emergency and most are congested or problematic with poor entry to freeways and added trolley service that blocks Taylor St at an increasing rate. A major issue is the I-5/I-8 Interchange, which previously had a proposed direct ramp from I-8 East to I-5 North. It's sad to see no improvements planned to this interchange prior to 2050. The greatest need is a 2nd through lane on I-8 eastbound at I-5. Every afternoon there are long backups on I-8 East at I-5. A second through lane would help relieve traffic from the heavily congested Rosecrans corridor via Camino Rio West. It appears there is room for the second I-8 EB through lane with minor adjustments just east of I-5. The major Midway Rising project would also substantially increase traffic congestion. .
S1079	n/a	n/a	More transit needs to extend to the border. The Purple Line extending to the border is great, however it should be a metro and not the slower LRT. Additionally, the southern leg of the Purple Line must be part of the Initial Operating Segment (IOS). Without this key ridership driver, the IOS will underperform. Along with this, the LOSSAN corridor must also be extended to the border. It is currently being extended to Convention Center station, however this is not enough. The Blue Line is crowded at peak, and the Coaster can function as an express Blue Line (especially when factoring in the desperately needed Del Mar and Miramar tunnels). By extending the Coaster south, you create a faster parallel Blue Line without any of the complexities of adding trackage to the Blue Line. This could be achieved by re-activating the Coronado Branch and hooking back into Blue Line ROW around Palm Avenue. This would be a quick and easy way to achieve express rail service on the corridor, and would vastly reduce the infrastructure needed to avoid interlining. The Surfliner would also be able to quickly and efficiently serve the many many cross border traveler and commuters.
S1080	n/a	n/a	The Blue Line deserves span improvements, as evidenced by the new 910 overnight bus paralleling the route when it can't run. How about making it so that the Blue Line can run at night? Yes, freight requires temporal separation on the two tracks the Blue Line runs on, but how about building a third LRT only track with passing sidings that would allow the Blue Line to run on just its own dedicated trackage, no temporal separation needed? Additionally, this would increase the capacity and reliability of the already overwhelmed line. Along with this, you could run express services as needed since you would have a third track with overtaking opportunities.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1081.A	Lisa Hodgson, Chairman	Jamul-Dulzura Community Planning Group	On behalf of members of the Jamul-Dulzura Community Planning Group, the following consolidated input is submitted: With the 2025 SANDAG Regional Plan scheduling rural SR-94 shoulder widening and road straightening improvements in Phase 2 (Years 2035 to 2050) versus Phase 1 (Years 2025 to 2035), the Jamul - Dulzura Community Planning Group believes that this timing to improve SR-94 is unacceptable and must be moved forward to Phase 1 for the following reasons: 1. Rural SR-94 is Jamul and Dulzura's major wildfire and emergency evacuation route with all roads in Jamul and Dulzura feeding it. Today, it is a heavily traveled 2 lane road with dangerous curves and line of sight issues from SR-188 all the way to Rancho San Diego. It is also the only state highway which traverses the Subregion from the Northwest to the Southeast ending just north of Tecate, Mexico. 2. Rural SR-94 (currently Level of Service F-rated on a scale of A through F) is extremely vulnerable to traffic stoppages and burdened beyond capacity, especially from increased Tecate-Campo-Jamul- Rancho San Diego commuter traffic. Due to our rural character and great variety of large conservation wilderness areas that provide recreational opportunities, we get thousands of visitors, especially on the weekend from coastal communities and back county residents. 3. Also, it is important to note the massive population increase of Tecate, Mexico with a population estimate of 132,000 residents and growing. The impacts to rural SR-94 due to expansive "maquiladora" manufacturing in Tecate and the expanded port of entry for commercial truck and automobile transportation into California, only exacerbate the traffic on the rural SR-94 corridor. 4. SANDAG must take note that the rural SR-94 issues and challenges that we have mentioned above are unique to any state highway in San Diego County. Rural SR-94 is not SR-67 or SR-78. SR-94 is in reality, a 2-lane international thoroughfare whose issues and challenges are only going to get worse as traffic continues to increase, accidents and fatalities increase and not to mention the increased wildfire and emergency evacuation threat we face every day. 5. It is important to remember that the new Jamul Casino Hotel with its huge number of brightly lit widows and its brilliant arching spotlights, add another dimension to the problems on the SR-94 route, violating Jamul's dark sky policy, and further exacerbating the line-of-sight problems on this narrow curvy two-lane commuter route. 6. Lastly, with necessary rural SR-94 safety improvements moved to Phase 1, SANDAG can also continue to move forward with its aspirational Vision Zero Plan of no fatalities and accidents on county and especially state highways. This a win-win for both SANDAG and the communities along rural SR-94 whose lives really do depend on this state highway.
S1081.B	Lisa Hodgson, Chairman	Jamul-Dulzura Community Planning Group	On behalf of members of the Jamul-Dulzura Community Planning Group, the following consolidated input is submitted: With the 2025 SANDAG Regional Plan scheduling rural SR-94 shoulder widening and road straightening improvements in Phase 2 (Years 2035 to 2050) versus Phase 1 (Years 2025 to 2035), the Jamul - Dulzura Community Planning Group believes that this timing to improve SR-94 is unacceptable and must be moved forward to Phase 1 for the following reasons: 1. Rural SR-94 is Jamul and Dulzura's major wildfire and emergency evacuation route with all roads in Jamul and Dulzura feeding it. Today, it is a heavily traveled 2 lane road with dangerous curves and line of sight issues from SR-188 all the way to Rancho San Diego. It is also the only state highway which traverses the Subregion from the Northwest to the Southeast ending just north of Tecate, Mexico. 2. Rural SR-94 (currently Level of Service F-rated on a scale of A through F) is extremely vulnerable to traffic stoppages and burdened beyond capacity, especially from increased Tecate-Campo-Jamul- Rancho San Diego commuter traffic. Due to our rural character and great variety of large conservation wilderness areas that provide recreational opportunities, we get thousands of visitors, especially on the weekend from coastal communities and back county residents. 3. Also, it is important to note the massive population increase of Tecate, Mexico with a population estimate of 132,000 residents and growing. The impacts to rural SR-94 due to expansive "maquiladora" manufacturing in Tecate and the expanded port of entry for commercial truck and automobile transportation into California, only exacerbate the traffic on the rural SR-94 corridor. 4. SANDAG must take note that the rural SR-94 issues and challenges that we have mentioned above are unique to any state highway in San Diego County. Rural SR-94 is not SR-67 or SR-78. SR-94 is in reality, a 2-lane international thoroughfare whose issues and challenges are only going to get worse as traffic continues to increase, accidents and fatalities increase and not to mention the increased wildfire and emergency evacuation threat we face every day. 5. It is important to remember that the new Jamul Casino Hotel with its huge number of brightly lit widows and its brilliant arching spotlights, add another dimension to the problems on the SR-94 route, violating Jamul's dark sky policy, and further exacerbating the line-of-sight problems on this narrow curvy two-lane commuter route. 6. Lastly, with necessary rural SR-94 safety improvements moved to Phase 1, SANDAG can also continue to move forward with its aspirational Vision Zero Plan of no fatalities and accidents on county and especially state highways. This a win-win for both SANDAG and the communities along rural SR-94 whose lives really do depend on this state highway.
S1082.A	n/a	n/a	As an avid user of public transportation, my two main issues are 1) safety and 2) sanitation. One, I have seen more transportation officer presence, but are they trained to deal with mental illness/homeless? Are you working with professionals & institutions specializing in behavioral illness? and with homeless shelters to help these individuals? Second, I rarely see anyone cleaning. On occasion, once in a blue moon, I'll see a power water washer. Not near enough. So many times, the trolley smells of urine. The transit centers that have high traffic and an abundant of homeless like Old Town & Downtown are the worst. I'm a proud native, and want to show off my beautiful city, but these places are embarrassing.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1082.B	n/a	n/a	As an artist, I see so many places that are dark and unsafe to traverse, that would benefit from reaching out to local artists to beautify and adding lights. Specifically, the underpass from fashion valley mall to the Trader Joes shopping center on Camino De La Reina, eastbound. It is so dangerous. I challenge any woman walking it at night alone! Not safe. Another underpass, Camino De La Reina, westbound, with Hotel Circle N to S, that area needs lights and would be another great place for art as murals. Lastly, another place I don't dare walk, is the underpass west of the Old Town Transit Center, where Taylor St meets Rosecrans. It's filled with homeless, which most suffer from mental illness. Its dirty, its dreary, could use more lights as well.
S1082.C	n/a	n/a	My answer here is really a combination of my previous comment of Safety & Security. As an artist, I see so many places that are dark and unsafe to traverse, that would benefit from reaching out to local artists to beautify and adding lights. Specifically, the underpass from fashion valley mall to the Trader Joes shopping center on Camino De La Reina, eastbound. It is so dangerous. I challenge any woman walking it at night alone! Not safe. Another underpass, Camino De La Reina, westbound, with Hotel Circle N to S, that area needs lights and would be another great place for art as murals. This area is surrounded by hotels and used by tourists. Lastly, another place I don't dare walk, is the underpass west of the Old Town Transit Center, where Taylor St meets Rosecrans. It's filled with homeless, which most suffer from mental illness. Its dirty, its dreary, could use more lights as well. If you need someone to spearhead local artists to beautify San Diego via murals, consider me bymoniqueguzman.com I am a proud native, and would love to help beautify my city.
S1083.A	Javier Saunders	Peninsula Community Planning Group	The proposed Bikeway on Rosecrans street will create an unsafe environment to Bikers. Relocate the Bikeway into Liberty Stations to create a safe and scenic Bikeway.
S1083.B	Javier Saunders	Peninsula Community Planning Group	*Include in the 2025 Transportation plan extension and improvements to the on-off ramps from I-5 and I-8 to Rosecrans street via Camino Rio West. *Remove and eliminate TL023 Aterial Rapid Route 228 from the Regional Transportation Program until additional right of way can be negotiated and obtained to accommodate a separate Rapid Bus Lane, Rosecrans street is operating in a level of service of E and F and highly congested. There is no evidence the proposed program under TL023 will relieve traffic. * Accelerate and implement the Airport Transit Connection Study TL001. Implement the People Mover alternative to improve connectivity to travelers and tourists and reduce Greenhouse gas emissions in the region and local streets.
S1084	n/a	n/a	The Next-Gen Rapid are great, but we need to be building real BRT, especially those incorporating standards from the Institute for Transportation Development & Policy (ITDP). We need dedicated bus rights of way, all door boarding, off bus fare collection, signal preemption, and multiple routes using the infrastructure. SANDAG has been able to build projects that incorporate parts of these elements, such as the route 227 Transit Guideway. By building out this infrastructure, these become fast enough to be competitive with driving, which is a crucial way to encourage a shift in modal split. If SANDAG wants to hit its transit goals, building out true BRT corridors with physical infrastructure is one of the best ways to achieve them.
S1085.A	Andrew Hollingworth	Peninsula Community Planning Group	There are no projects in the plan to expand freeway construction and roadways to relieve the substantial traffic congestion along the I5, I8, I805 and I15 freeways which is what the public wants. Rather the Plan ignores public sentiment and concentrates its resources on expanding bikeways and bus routes in pursuit of some unrealistic goal of forcing people out of their cars onto public transit in pursuit of reducing greenhouse gas emissions and reducing the deficit that public transit systems incur. Fixed point public transportation systems have a number of problems including that they do not take people where they want to go which is why they are not used. People want the flexibility to continue using their cars not a public transit system that does not meet their needs. Therefore, more plan resources should be devoted to expanding roadways thereby relieving traffic congestions and not on public transit such as bikeways and busses.
S1085.B	Andrew Hollingworth	Peninsula Community Planning Group	Recent legislation (SB79 Weiner) attempts to overturn local zoning and force future housing development along future transit lines that may not be funded in an attempt to reduce Greenhouse gas emissions and reduce transit system deficits Transit funds should be allocated to underserved existing proven housing which generates transit demand rather than some imaginary population model that may not occur.. Similarly mandated statewide zoning code amendments should not force zoning amendments based on future transit lines that may not occur.
S1085.C	Andrew Hollingworth	Peninsula Community Planning Group	*The Regional Plan allocates only 3.402B (2.70%) to the Point Loma Community in six projects over the next 25 years in a Plan costing 126.0 Billion. One of the six projects (TL001 Airport Transit Connection) accounts for 3.186 billion of the 3.402 B allocated to Point Loma that benefits mostly downtown. The other five projects cost 0.216B of the 3.402 B or 0.17% of the total 126B Regional Plan cost that is mostly concentrated in Bikeway and Express Bus projects This allocation is unequitable and unfairly discriminates against the Point Loma Community *76.2B (58%) of funding for the 2025 plan $126B cost is anticipated to come from local sources. This includes 13.72B from future sales tax measures which require voter approval including a one-half cent sales tax increase anticipated for approved in the 2032 election and another in the 2036 election. . In addition, the 2025 regional plan assumes voter approval of a one-half cent sales tax for MTS that would generate an addition $7.11B. Finally, the plan assumes 2.75B of funding would come from future parking fees of $1-3 dollars per hour with 2-3% annual growth. Recent voter defeat of a proposed San Diego general sales tax increase places these assumptions in doubt in view of the rise in San Diego's cost of living which is already one of the highest in the nation with residents moving to other lower cost states to escape it. Therefore, the Plan should not predicate the program scope on the assumption that they will be approved by voters but rather scaled back to make it less expensive to reduce the local tax burden on citizens and thereby partially address the cost-of-living problem in San Diego County. .
S1086.A	Malcolm Gettmann	n/a	The median of SR 94 is wide enough to provide for Bus only lanes as it passes through Spring Valley. Using this area for Rapid Bus service to downtown would be a plus. Stations at Kenwood and Sweetwater Springs Blvd would allow for a connection with Transit, micro transit interconnects. Further extending this to Fury Lane would provide access to Cuyamaca College.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1086.B	Malcolm Gettmann	n/a	On its own it will not address the problems. Combine with a meaningful transit corridor that receives its riders from the integrated micro transit system
S1086.C	Malcolm Gettmann	n/a	The SB 125 to EB 94 project is critical. On 0717/2025 there was two accidents within the project area. This will reduce engine idle time,wait times and reduce accident frequency. Since there is an increase in commercial truck traffic from the US/Mexico Border, perhaps some Federal Funding for mitigation dollars. Also note that the Mariposa OC on SR125 is substandard and is at risk in a seismic event. At SR 125 Jamacha Blvd/Elkelton Place/Quarry Road,the low water crossing project that is funded needs to be expidited. This will allow for micro transit use as flooding is a major issue. School Buses for the CVESD, Sweetwater High School District , Grossmont High School District and La Mesa/Spring Valley School district routinely use this point to access Students on the East side of Spring Valley Creek
S1086.D	Malcolm Gettmann	n/a	In many locations, creeks pass through private property. Anything that flows downstream often collects on what is deemed "private Property" thus governmental funds cannot be used. Additionally use of labor from the Dept of Corrections , Sherrif or other correctional facilties, services are restricted. This places a huge financial burden on those owners. Keeping creeks and waterways free of debris is essential in both a flood management aspect and enviromental aspect. Getting the laws/regulations changed to allow for this use of manpower for waterway mangement will help on multiple fronts.
S1087.A	Alex Minton	n/a	It would be nice to have at least some operation 24 hours a day, even if at reduced times. I work at 5:30am, sometimes 4:30am, and I would like to take the trolley in to work.
S1087.B	Alex Minton	n/a	I utilized the FRED quite a bit, and it was really nice, especially on days when there were event in Downtown. It would have been nice to have a slightly expanded range to just outside Downtown.
S1087.C	Alex Minton	n/a	Bike paths need to have a form of physical barrier to protect cyclists. It's ridiculous that you can see all of the flimsy white cones "protecting" bike paths are all hot, some of them ripped out of the ground from contact. We should care more about the lives of people biking than someone's personal property getting damaged from their own reckless driving.
S1087.D	Alex Minton	n/a	We need to find highways less, and place more money in safer bikeways, and expanded operations on public transit. I can see the argument for repair our local roads, especially if in bad disrepair. But upkeep should be the max we spend on our roadways. No more expanding freeways. Expand public transit.
S1087.E	Alex Minton	n/a	More apartments/condos should be built near trolley stops. Maybe even create new stops in areas where apartments can be built.
S1087.F	Alex Minton	n/a	Probably not the right place for this, but we need to fund a new trolley line. Even if it's just an expansion of the Orange Line up Park Blvd to the Zoo. It's ridiculous that one of the biggest tourist destinations in the county isn't connected to our trolley network.
S1088.A	Marco Espinosa	n/a	Adding directional arrows on the highway with labeling that a lane ends in x number of feet/yrds/meters etc I do notice that the checkered lines are different at times indicate the upcoming change, but it's such a small detail to the road that I don't believe most drivers notice it well enough and thus don't use the highway like how it was intended to be. Also would like the 94 covered like Dallas did with Klyde Warren Park over the 366.
S1088.A	Marco Espinosa	n/a	For the trolley, I'd love more comfortable seats. But yes I do understand the utilitarian design. Easy to clean. Also the ceiling his very high, difficult to hold on to hand bars. I'd like easy places to hold on to as the trolley moves along. I like the quieter electric busses.
S1088.A	Marco Espinosa	n/a	In all seriousness, what's it take to get a stationary bike(s) hooked up to the power grid and generate electricity by peddling?
S1089	n/a	n/a	Extend Coaster to the Border, tunnel under UTC with station, Del Mar tunnel, add Balboa Ave infill station.
S1090.A	n/a	n/a	Additional bus service weekends for rural communities(Campo, Jamul etc.) Point Loma(Voltaire Avenue) weekdays p.m. and weekends; Carlsbad's Legoland, The Outlets Center weekdays/weekends bus scheduling.
S1090.B	n/a	n/a	More accessibility area for seniors with disabilities (walkers, wheelchairs)
S1090.C	n/a	n/a	Needed to continue the future development of Transportation planning.
S1090.D	n/a	n/a	More available updates/information open to the public; monthly or bi-monthly.
S1091	n/a	n/a	Sprinter Express please
S1092	n/a	n/a	The Coaster should be expanded to the border alongside the Purple Line. Purple line should follow an alignment that allows easy extension to the border, but in reality the border segment should be part of the Initial Operating Segment. The Coaster should continue south past the new Convention Center Station and follow the Coronado Branch to the border. Additionally, an infill station at Balboa Ave would greatly enhance connectivity.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1093.A	n/a	n/a	Adding a Del Mar Tunnel option that hops interstate 5, travels on the east side of the 5 through Del Mar Heights, and includes a Coaster (and potentially Amtrak) station at One Paseo, would instantly win over the entire area. It could also be elevated instead of tunneled if you followed El Camino Real. A One Paseo Coaster station would be such a massive trip creator for the entire region, and I would really recommend studying it further as a new alternative to the hotly contested Del Mar Tunnel. Redoing the Blue/Orange lines through downtown to have crossing gates and travel priority over cars would be a massive boon for the entire city. Please re-evaluate funding all your worthless highway projects, and with the newfound money you've saved, bring back the full length Purple line to Sorrento Valley. And bring it back as heavy rail too if possible.
S1093.B	n/a	n/a	The region does NOT need new highway projects, managed lanes solve NO problems and are a complete and total money sink. Seeing more and more real transit projects fall off the table between 2021's plan and now, while managed lanes somehow survive all cuts, is absolutely mind boggling. Please re-evaluate this obsession with highway projects while we still can.
S1093.C	n/a	n/a	Allocate MUCH MORE funding to transit projects (specifically rail, i.e. Purple Line) and MUCH LESS funding to highway projects. The region does NOT need new highway projects, managed lanes solve NO problems and are a complete and total money sink. Seeing more and more real transit projects fall off the table between 2021's plan and now, while managed lanes somehow survive all cuts, is absolutely mind boggling. The time to fix our mindset as a city is now. Please re-evaluate your priorities as an entity.
S1094.A	n/a	n/a	More trains and trolleys to ocean view hills
S1094.B	n/a	n/a	More EV lanes
S1094.C	n/a	n/a	More open green space
S1095.A	n/a	SANDAGTransportation committee alt.	SANDAG should lead the design standards for regional bikeways. I agree with Transportation Committee Zito that SANDAG has the overall regional perspective to direct the correct types of buffered/safe bikeways throughout the region. Successful bikeway corridors provide the users with continuity of design and functional continuity.
S1095.B	n/a	SANDAGTransportation committee alt.	Continuous bikeway corridors designed to a regional standard will foster the safest bicycle infrastructure
S1095.C	n/a	SANDAGTransportation committee alt.	SANDAG can establish the standards for safe and continuous bikeways
S1096.A	n/a	n/a	No to expensive flexible fleets that can only carry a few passengers at a time. Buses are a much more affordable, efficient, and reliable form of transportation.
S1096.B	n/a	n/a	No to expensive dense housing near transit where people will NEVER use the transit, no matter how close it is. People want affordable single family homes with development impact fees, CEQA, and EIRS all waived to build them quickly and affordably.
S1097.A	n/a	n/a	MTS and NCTD need to prove PAID ridership, NOT increased ridership of people riding for free. SANDAG needs to ensure funding specifically goes to security measures for public transit, NOT to "free" ride programs like YOP.
S1097.B	n/a	n/a	SANDAG needs to follow NEPA law by properly mitigating its future Otay Mesa East border crossing. Using tax dollars to buy land for animals will NOT mitigate the effects of incentivizing increased development in Tijuana, which will increase sewage that hits the South Bay. SANDAG needs to hold Mexico accountable for its negative environmental damages, NOT enable it by giving Mexico 50% of a future toll road.
S1098.A	n/a	n/a	No more bikeways that are used for recreation, NOT transportation. No more bikeways with curb stops and bollards. No more bikeways on our streets meant for CARS. Put bikeways on separated sidewalks AWAY from cars. No more expensive bikeways that cost over $1 million a mile.
S1098.B	n/a	n/a	In order to ensure Federal funding, eliminate all DEI or Equity programs. Eliminate ALL PLAs that only fund political unions, who then funnel those profits to their political candidates. SANDAG spending needs to be extremely REDUCED. NO spending on catering or Board Retreats.
S1099.A	n/a	n/a	Build Evacuation Routes for EVERY highway - 67, 78, 76, etc! Fix interchanges. Expand or build highways where feasible (no eminent domain).
S1099.B	n/a	n/a	SANDAG needs to hold outreach events at Farmer's Markets, City events, City Council meetings, etc. Meet people where they're at, NOT where you want them to meet you.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1100.A	n/a	n/a	We need more investment in transit to make buses more frequent, trains and trolley more prioritized on a more aggressive timeline (sooner than 2050), and highways less of a focus. The purple line will be a huge improvement to many people's quality of life and it is very disappointing it is stuck in so many planning and study phases while highways get approved almost instantly for any lane additions, interchanges, and connectors. Transit will make San Diego a much better place to live, and we need to develop the right kinds of infrastructure that support mass adoption and consistent usage. Keeping bus and trolley service reliable is so important, and we need to keep growing it. The trolley is a great service, but comparing the extent of service and scale and pace of development to Los Angeles is something residents of San Diego should be ashamed of. Los Angeles is expanding the network so rapidly, while San Diego barely has any line of sight into making our rapid public transit more appealing and wider serving to the people who live here. We need viable alternatives to driving, and I am not seeing the focus from the city or county of San Diego to achieve it.
S1100.B	n/a	n/a	Recently there has been some news of bike lanes being removed. I really enjoy biking and it is much more convenient and health for me to be able to go places without driving and parking (not to mention healthier for the environment) so it is very important to continue making the right investments for biking to be a safe, efficient, and attractive alternate to driving. Biking and walking can make San Diego a more human scale city, rather than the car-centric urban sprawl which fails to maintain a community. Biking being seen as an attractive option benefits all, as roadways are less congested, people see their neighborhood more humanely, and car parking becomes less needed.
S1100.C	n/a	n/a	Highways are not going to be solved by further expansion. The introduction of viable alternatives to driving are so important to divert the demand from roadways to public transit and other forms of transportation.
S1100.D	n/a	n/a	Affordable housing developed with transit should be a top priority of San Diego. Along the blue line, there are several stations that feel as if they have so much wasted potential (Balboa Ave, Washington Street) that have poor connections to some of the densest regions of San Diego (PB and Hillcrest respectively). Being separated from the neighborhoods by a highway (maybe because it is easier to buy the right of way and develop parallel) is a shortsighted and inefficient way to build. We should make sure transit and surrounding development go together to provide the most benefit to the community, not just check a box by opening stations that are not well connected or utilized as places people can walk or bike to.
S1100.E	n/a	n/a	If MTS can do better advertising for feedback, the public outreach and engagement on how transit and San Diego could be better would be easier to communicate.
S1101.A	n/a	n/a	NO to the Otay Mesa East Border Crossing without proper mitigation for Mexico's sewage! And NO to giving Mexico 50% of Toll Revenue while they continue to pollute! NO to allowing ANY cars or trucks into our country from Mexico that do not meet California Emissions Standards, and thereby HARM San Diego's Air Quality via Smog and GHGs. NO to SANDAG building border crossings when that's the Federal Government's job!
S1101.B	n/a	n/a	SANDAG needs to create a plan to reign in Mexico's pollution by ANY MEANS NECESSARY - Work with the EPA and SANDAG's other partners to ensure environmental compliance. They do NOT deserve a seat at the Board Of Directors table if they will NOT make progress on building the wastewater treatment plants they need. SANDAG needs to give Imperial Beach a Environmental Hardship Discount or Waiver on ALL Sand Nourishment programs while sewage affects their tourism numbers. SANDAG also needs to create Water Nourishment program in order to start creating solutions to both Air and Water Quality for areas like Imperial Beach, Coronado, Otay Mesa, National City, Chula Vista, South San Diego, etc.
S1102.A	n/a	n/a	NO to any form of Biometric, AI, or Intelligent Transportation technology introduced by SANDAG. There should be NO program by SANDAG that threatens people's privacy when they are traveling via highways, public transit, or streets. SANDAG's Bike Lockers should NOT be asking for personal information in order to have access to use them.
S1102.B	n/a	n/a	Social Equity is a meaningless, made-up concept that needs to be Eliminated in order to avoid Federal Defunding. NO to Social Equity.
S1103.A	n/a	n/a	NO Toll Lanes, NO Managed Lanes, NO HOV Lanes, NO Express Lanes, NO Managed Toll Lanes, NO MORE TAXES! All Tolls are Inequitable by default; they are a Tax upon the poor.
S1103.B	n/a	n/a	NO to ANY and ALL future Taxes proposed by SANDAG, MTS, or NCTD! No to ANY and ALL forms of Tolls, which are just another type of Tax on roads we already paid for!
S1104	Angel	n/a	Please increase the speed of the trolleys, please find a way to easy San Ysidro - Downtown service thats faster than 30-1hr. Please invest in more electric buses, specially down in san ysidro to help ease with air pollution. Working people need improvement in weekend and later at night service . Please expand the free Mts opportunities to up to 25 year olds like previously requested by the previous Chair of the county board of supervisors.
S1105.A	n/a	n/a	The exceedingly expensive and predominantly unused bike lanes in Bankers Hill and North/South Park should be removed immediately. What a boondoggle and all that was accomplished was making the streets unsafe for everyone walking or driving a car. Ridiculous.
S1105.B	n/a	n/a	The amount of money that has been spent on the Homeless...with no effect...is appalling. The Mayor should not just be fired but prosecuted for malfeasance.
S1105.C	n/a	n/a	The current administration's push to densify single-family neighborhoods is misguided at best. With no investment in necessary infrastructure and no parking requirements, you are RUINING our city block by block. It is so sad to see and one of the reasons so many are leaving this once great City. The Mayor should not just be fired but prosecuted for malfeasance.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1105.D	n/a	n/a	Ridiculous. Stop the Virtue Signaling. The Mayor should not just be fired but prosecuted for malfeasance.
S1105.E	n/a	n/a	There is none...making this question moot. The Mayor should not just be fired but prosecuted for malfeasance.
S1105.F	n/a	n/a	The amount of money that has been spent on the Homeless...with no effect...is appalling. The Mayor should not just be fired but prosecuted for malfeasance.
S1106.A	n/a	n/a	Purple Line - subway Airport Rail Connection - if Trolley to Airport: reroute and extend Green Line to Ocean Beach and possibly PLNU and Cabrillo National Monument - Murray Dr infill Orange and Green Line station (next to Grossmont High School) - Euclid Ave grade separation: Aerial with island platform above the road itself - Bus only lanes on all 4-lane roads with an average bus frequency of 15 minutes or better Adams Ave station on I-15 for rapid 235 New bus routes from Grantville Trolley to Grossmont College via Waring Rd and Navajo Rd, and Santee via Mission Gorge Rd SDSU to Santee bus route via Mission Gorge Rd Santee to Grossmont Transit Center bus route via Mission Gorge Rd, Fanita Dr, Grossmont College, SR-125 ramps, and Fletcher Pkwy East-West subway line via El Cajon TC and Main St, La Mesa Blvd, Rolando or College Area, City Heights, North Park, Hillcrest, Old Town, and maybe Mission Bay Area Route 30 along Mission Bay to realigned from I-5 to East Mission Bay Dr with bus lanes there Balboa Ave COASTER station and Jutland Dr trolley station (along Blue Line) Taylor St grade separation at Old Town: merge some bus routes and relocate them to under the tracks where Taylor St would be Electrify Sprinter and expand that system to connect with Kaiser Permanente, Lake San Marcos, San Marcos High School, Legoland and Carlsbad Flower Fields via Palomar Airport Rd, Fallbrook, Encinitas/Cardiff via El Camino Real COASTER extension to Fallbrook via Camp Pendelton Copper Line extension to Lakeside Coastal streetcar from PLNU to La Jolla Shores
S1106.B	n/a	n/a	Protected bike lanes along El Cajon Blvd More catwalks in residential neighborhoods
S1106.C	n/a	n/a	Roundabouts at busy intersections such as the following: College Ave/Waring Rd/Navajo Rd College Ave/Del Cerro Blvd College Ave/Montezuma Rd College Ave/El Cajon Blvd College Ave/University Ave Cuyamaca St/Fletcher Pkwy Mission Gorge Rd/Golfcrest Dr Fletcher Pkwy/Navajo Rd Lake Murray Blvd/Jackson Dr Lake Murray Blvd/Navajo Rd Mission Gorge Rd/Princess View Dr (extend Tierrasanta Blvd to this intersection) Dismantle numerous freeways, starting with SR-94, SR-15 (between I-8 and I-15), I-5 between Old Town and SR-54, and SR-125 between I-8 and I-52, and I-52 between Mission Gorge Rd and SR-67
S1106.D	n/a	n/a	More locally made products and food so that there is less cargo trucks taking up traffic

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1106.E	n/a	n/a	More TOD around trolley/sprinter and COASTER stations (currently unproposed), such as: Gillespie Field (?) Mission Valley Center (across from Camino De La Reina) Fashion Valley (in current parking lot in front of JCPenney) 32nd & Commercial Euclid Ave 24th St H St Palomar St Tecolote Rd Solana Beach Encinitas Carlsbad Pointsettia Carlsbad Village Coast Highway Crouch St Vista TC Vista Civic Center Buena Creek San Marcos Civic Center Escondido TC
S1106.F	n/a	n/a	Prioritize transit improvements/transit, transit-oriented development, protected bike lanes, neighborhood catwalks, curb extensions, and roundabouts. Investing in those would result in less costs of road maintenance, lower utility bills, more walkability, and economic growth.
S1106.G	n/a	n/a	Invest in clean buses as soon as possible Plant trees near bus stops as well as on the way between bus stops and schools.
S1107.A	Lucas	n/a	Like I mentioned under highways and local roadways, I would like all freeways to be examined for the potential of bus-on-the-shoulder and usage by transit vehicles (including non-public ones, e.g. jitneys). I would also like to have a comprehensive evaluation of other transit improvement like dedicated busways (only need to have concrete on area under wheels; in between can be unpaved), bus lanes, queue jumpers, signal prioritization, etc. on all local roads or in areas where it makes the most sense. Also, consider bus/bike lanes. At least in North County, I would like to see more coordination between bus routes for ease of transfer and reduced trip length from waiting for transfers. I would also like to see more/better routes and frequencies, and outreach. I would like to suggest a route that goes from MiraCosta in Encinitas to MiraCosta in Oceanside, bypassing the transit plaza on El Camino Real or with a much shorter stop. Maybe it could cross over to College before the 78, but I don't know how it would do with the hills; maybe a shorter bus would be a better option for that. I think there should be more frequency during the day of the 445 bus; people might want to take the 309 to the 445 to destinations like Costco, etc. It might be good to look at Express busses, too; for example, the 101 takes a very long time because it makes so many stops and goes on surface streets. Maybe there could be a more express/rapid bus that at least partially takes the 5? Having lived off the 56, that western part of that area suffers from having no transit connection from NCTD or MTS. I think there would be a lot of demand for connection to both, including for commuting. For example, branch lines on local streets to a line on the 56 to go south (a lot could meet at the exit near CCA), and/or Del Mar Hts Rd (western portion) and/or Carmel Valley Rd (eastern portion) for connectivity to the north. Also could take Black Mtn Rd / Camino del Sur / Carmel Mtn Rd for connection to the southeast. You should look into beach express busses that take people both from inland to beaches like Moonlight in Encinitas and local people in Encinitas / nearby areas to the beach. It might also be a thing where you could provide at least part as grant money to the city for a shuttle service. I would like to see funding for more transit to special events and the Del Mar Fair (doesn't have to be MTS/NCTD). Would like to see encouragement/facilitation/funding of employer-provided/coordinated/encouraged transit/vanpooling/carpooling/biking. Outreach to local schools; e.g., subsidize college students (inc. community college).

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1107.B	Lucas	n/a	I would like a focus on "bike highways" and take into account how e-bikes are changing the landscape of transportation and 1st mile / last mile. Look at building bike/mixed use/ped paths. Look into the potential for high-visibility traffic cones or other non-fixed barriers to reduce potential risk if a cyclist strikes it (don't know if this is better than fixed), maybe also consider strategic use of road features like at curves to prevent encroachment into the buffer/bike lane. Educate drivers that, legally, separated bike infrastructure is optional. Encourage considering use of sharrows/BMUFL signs/change lanes to pass signs in conjunction with installation. Consider education for drivers (e.g. PSAs), in general, on bike and ped rights on road and their safety, and maybe grants for evidence-based (if there is sufficient, high-quality evidence) bike classes for schools that focus on rights of cyclists (e.g., taking full lane, leaving bike lane, etc.), safety/risks and the benefits/versatility of biking. Be creative with bike infrastructure / bike design for improvement (e.g., center-running bike lanes, bike boxes [but make sure big enough and maybe with buffer for visibility over hood for higher vehicles, if relevant). Work with local schools and students to encourage walking/biking/bussing/transit/carpooling. Consider bus/bike lanes.
S1107.C	Lucas	n/a	There should be NO money dedicated to freeway or roadway expansion. It induces demand and worsens pollution and destroys the environment (https://ww2.arb.ca.gov/sites/default/files/2025-04/Roadway%20Capacity%20and%20Induced%20Travel%20-%202025%20Policy%20Brief.pdf). Even with EVs, you have tire particulate pollution (including PM0.1). Any money for local roadways should be contingent on road safety and improvements for bikes and peds. Not necessarily protected bike lanes, but things like narrower lanes (10' and 11' are common now; studies suggest 9' can be even more safe [https://narrowlanes.americanhealth.jhu.edu/report/JHU-2023-Narrowing-Travel-Lanes-Report.pdf]), less lanes in certain cases, and wider bike lanes (unless the road just has an extra-wide outside lane). Roads without a bike lane should have sharrows and "BMUFL" signs, with the addition "change lanes to pass" if 2 or more lanes are going in the same direction. Additionally, give min. 3 ft to pass signs should be places in areas with bike lanes where drivers cut the corner or cheat towards the right of the outside general purpose lane. There should also be a focus on enforcement and education for drivers: e.g., daylighting, distracted driving, recklessness, speeding, harassment, DUI, etc. There should be focus on / grant for ped safety improvements, like flashing beacons. Roadway materials should be sustainable; for example, there should be attention paid to the sustainability of any sand mining for concrete. On freeways, all areas should be examined for the potential of bus-on-the-shoulder and usage by transit vehicles (including non-public ones, e.g. jitneys). I am strongly against any freeway widening, if there is a strong desire for HOT lanes, lane conversion should be the only option considered. Consider congestion pricing all freeways, all lanes for fuel efficient 45-65mph flow. Look at "smart freeways" like they are doing in Riverside.
S1107.D	Lucas	n/a	Are there any plans for the "impossible railroad" out east? At the border crossings, there should be work to reduce vehicle idling to improve air pollution - maybe somehow make groups of vehicles turn off their engines and then all move forward together, for example? The energy to turn on an engine is equivalent to 7 seconds idling. This may not be feasible with all vehicles, especially in the heat, but I think it would be good to encourage and maybe reward no idling.
S1107.E	Lucas	n/a	There should be a focus on protecting and ensuring the vitality of open / green spaces in San Diego County. Both areas that are in otherwise built up areas and areas in the backcountry. Consider policies that enhance the vitality of the ecosystem e.g., native bees, encouraging people near backcountry open areas to plan native species, encouraging certain practices like avoiding certain pesticides or yard-care practices / doing certain things to facilitate native species / the ecosystem. Look into dam removal and/or allowing pulse flows or other normal flows to help with the natural flow of sediment to the beach. Look at revitalizing and protecting watersheds and waterways. Fund interventions like rain gardens, bioswales, etc. to improve water quality. Maybe make as part of requirements for use of SANDAG funds locally. Look at smart development that maintains the natural environment and facilitates active transportation and transit (e.g., no suburban sprawl). REDUCING LIGHT POLLUTION!!! See International Dark Sky and Flagstaff Dark Sky. There are many many benefits. There was more care about this in San Diego County in the past; it should come back.
S1107.F	Lucas	n/a	Encourage policies that reduce use of things like leaf blowers and maybe subsidize conversion of two-stroke gas-powered to good-quality non-gas powered. Also, educate on indoor air pollution and look at potential grants for replacing old, more polluting things with less-polluting newer things.
S1107.G	Lucas	n/a	While there are limitations on how transit agencies can design their routes around high/middle/elem school children, SANDAG should consider subsidizing bussing for certain districts / schools where it could provide GHG benefits vs. the current situation. Also, facilitating carpooling, etc.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1107.H	Lucas	n/a	Work with other orgs to educate about reduce/reuse/recycle. Especially focus on educating on proper recycling (after emphasizing that it should generally be the last option after the first two), e.g. recycling difficult-to-recycle things and the importance of clean & dry to make sure the recycling will be accepted. Maybe also facilitation / enforcement for businesses that are supposed to recycle certain things. Educate and promote reducing food waste; educate on good samaritan laws and legal obligations to compost or donate, especially for businesses. Maybe also fund enforcement. REDUCE LIGHT POLLUTION!!! See International Dark Sky and Flagstaff Dark Sky. There are many many benefits. There was more care about this in San Diego County in the past; it should come back.
S1108.A	Rosa B	Olivewood Gardens and Learning Center	More public restrooms in biking and walking area, park.
S1108.B	Rosa B	Olivewood Gardens and Learning Center	More equitable public access to restrooms.
S1109	Constantina Saldivar	n/a	Yo quisiera que ubiera transportacion de Oceanside a Temecula, esa es mi opinion. Es bueno que tengan planeado la ruta de SanMarcos a Temecula, pero deberia de ver conexion a Oceanside tambien. Tal vez por el 76. *** I would like transportation from Oceanside to Temecula; that's my opinion. It's good that you're planning the San Marcos–Temecula route, but there should also be a connection to Oceanside. Maybe along Highway 76.
S1110	Elizabeth Shaun	n/a	I would like to see more Sprinter service out here sooner.
S1111.A	n/a	n/a	Pienso que seria buena idea implementar las rutas de RAPID. *** I think it would be a good idea to implement the RAPID routes.
S1111.B	n/a	n/a	Tambien estoy de acuerdo con implementación de mas proyectos de transportación activa en la region del condado del norte. Es muy necesario. Debería de ver también mas comunicación con las ciudades, ya que la ciudad de Vista instalo ciclovías nada mas para quitarlas despues de pocas semanas. Es un gasto de dinero y recursos. *** I also agree with implementing more active transportation projects in the North County region. It's very necessary. There should also be more communication with the cities, since the city of Vista installed bike lanes only to remove them a few weeks later. It's a waste of money and resources.
S1112.A	Teddy Routsis	Olivewood Gardens and Learning Center	-more tram stops, bathrooms -Cleaner buses
S1112.B	Teddy Routsis	Olivewood Gardens and Learning Center	Bike lanes Murals. more signs
S1113.A	Rosa Rivera	n/a	I ride the bus in the morning and evenings, and sometimes the buses run late. The buses I use are the 303 and 302. Perhaps more frequency would help for these local bus routes, they connect a lot of people to major destinations.
S1113.B	Rosa Rivera	n/a	Buses get stuck in traffic, so I think there needs to be better technology to allow the buses through lights in North County.
S1114	Guillermina Arizaga Lopez	Olivewood Gardens and Learning Center	It is a very good program, we need to support to have bathrooms to be able to use them. more information on the bus for National City
S1115.A	n/a	n/a	I'm an occasional bus rider only because I live in Fallbrook, and my only connection to here is the 306, which isn't very convenient for me. Maybe they should look into a trolley. I think there should be transit connection to Fallbrorok and Pechanga Pala area. I like to go out there to the casinos, but its hard to get there on transit, near impossible at times. I also think that the RAPID route to Temecula should connect to Fallbrook in some way like through a fixed route.
S1115.B	n/a	n/a	Microtransit is a good idea for Fallbrook, so long as it can go out of fallbrook too.
S1116	Virgie Nelson	n/a	I like the proposed improvements and project for Oceanside.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1117.A	Mike Benisnston	Olivewood Gardens and Learning Center	More bathrooms (porta potty)
S1117.B	Mike Benisnston	Olivewood Gardens and Learning Center	Lower gas tax in CA
S1118	Carolina Martinez	Olivewood Gardens and Learning Center	Please consider bathroom access u=in the transit stations, also more access too transit at the border arriving to San Diego downtown.
S1119.A	David	n/a	Removal of the 334 bus and outreach around the new NCTD+ service replacing it was not well executed. Many seniors like myself used the fixed route and have no idea or can't afford to use the NCTD+ since we can't use our PRONTO cards on it. Riding it every now and then is okay, but imagine spending the $3 every day? I live on Highland Drive, and I believe that fixed route that goes through that area would be helpful for many in my community using surrounding main roads like Melrose, Oceanside Boulevard, and then the side street North Drive. The key to any projects of course it to have extensive outreach and community meetings in the area. Door to door and neighbor to neighbor communication is key to get projects that people will use out!
S1119.B	David	n/a	Flexible fleets such as the NCTD+ sound good but if I can't use my PRONTO card, it is difficult and costly for me to use.
S1119.C	David	n/a	Community townhalls and workshops around transit are needed in our communities. There's schools in the area that could be used as gathering areas for specific neighborhoods.
S1120.A	Elia De La Torre	Olivewood Gardens and Learning Center	People sometimes does not feel safe in the bus and will be perfect to have bathrooms.
S1120.B	Elia De La Torre	Olivewood Gardens and Learning Center	Lower gas tax
S1121	Rosa R.	Olivewood Gardens and Learning Center	We need bathrooms youth passes and seniors more safety
S1122	Cynthia	Olivewood Gardens and Learning Center	I do nor use public transportation, but my children do, sometime they tell me that will like to see more safety, and bathrooms that are essential if one day we decide to use bus to commute.
S1123	IsabelTorres	Olivewood Gardens and Learning Center	It was fine, just sometimes the electric bus FRANC is very delayed and they don't serve beyond Euclid Avenue
S1124.A	n/a	n/a	Escondido Route 358/359 needs expanded service hours as well as weekend service. There are many people in need in that area of that connection on the weekends, and bus stops are unshaded with no seats. There should be more outreach in the surrounding community around this bus route.
S1124.B	n/a	n/a	Microtransit might help in the neighborhoods of this bus [Route 358/359], but unsure how it would work.
S1125.A	Gabriel	n/a	I agree with more transit in North County. I love the speed of the sprinter and so I agree with more frequent service :) I also use the 303 bus, and I find that it often falls behind schedule probably due to the traffic, but also because the bus driver seems to lag when having to leave? Not sure why he hangs around talking to his coworkers. I'm not the only one that has noticed.
S1125.B	Gabriel	n/a	Microtransit is great and I see the vision for the one in Vista using NCTD+, but as a senior on a senior pass and limited income, I can't afford daily trips on it as I would have with using the fixed route 334. I should be able to use my pronto card.
S1126	Juan Millan	n/a	There needs to be better connection to Pala from Escondido and Oceanside. I know people who work out there that need this service. I go there for the casinos, and find myself stranded sometimes! I like the discount for seniors and that should continue! THough I do feel our younger adults pay too much (18+). I live on North River Road, and there's a lot of housing going in that I think would benefit from having a bus route, especially toward fallbrook, temecula, pala. We have a mini transit station San Luis River, and I think having more services there would be awesome. I also think that the bus time tables could be improved. Many times some buses leave right as the sprinter is leaving. Shouldn't they wait for people to unboard the sprinter and then leave?
S1127.A	Margarita Amador	Olivewood Gardens and Learning Center	-the proposal to have 12 new rapid routes to connect three important areas areas described there. The proposal to add a third line will increase the Blue line to pass more frequent. -To continue the Youth pass, -

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1127.B	Margarita Amador	Olivewood Gardens and Learning Center	I live in the south region and is very necessary the extra line described, same as the mini buses in the neighborhoods for short trips are excellent.
S1127.C	Margarita Amador	Olivewood Gardens and Learning Center	I am an elder and disabled, and will like to pass funding and proposals for us
S1127.D	Margarita Amador	Olivewood Gardens and Learning Center	-Thank you for always think about us and act upon upgrading the conditions of transit that benefit the community
S1127.E	Margarita Amador	Olivewood Gardens and Learning Center	I love all the future project listed described in the brochure of the draft RTP 25..
S1128	Francisco	n/a	I think that having more frequent Sprinter service would be great. Many people use it and when school's in session it gets packed in the mornings and evenings! So I definitely support any projects to help the sprinter be fast and more frequent :)
S1129.A	Silvia Hernandez	Olivewood Gardens and Learning Center	I don't feel comfortable using public transportation sometimes I don't fell safe, lack of security. -Sometimes not enough lighting -Need more maintenance on bathrooms.
S1129.B	Silvia Hernandez	Olivewood Gardens and Learning Center	Need more assistance for seniors and handicap.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1130.A	Gregory Essayan	n/a	The following improvements should be considered, and implemented by whatever means necessary. Ignore the NIMBYs and unleash those trains!! Light Rail: Purple Line - North Extension. This would give a continuous north-south transit corridor for many neighborhoods/cities that currently lack one, with many tie-ins to other lines. It also provides crucial trolley access to Sorrento Valley, which is one of the main epicenters of traffic in the entire county, and an alternative trolley transfer point for the Coaster that isn't located in Downtown. Proposed stops along route (North to South): -Mira Mesa/Black Mountain -Mira Mesa/Camino Ruiz -Lusk/Mira Mesa -Sorrento Valley (Transfer to Coaster) -Nobel Station (Transfer to Blue Line) -Genessee/Governor -Genessee/Clairmont Mesa -Genessee/Balboa -Balboa/Convoy -Mesa College -Fashion Valley (transfer to Green Line, Purple Line) -El Cajon/30th (to meet with proposed Balboa Park Streetcar) -University/I15 (transfer to 235 bus, proposed Cyan Line) -Continue with remainder of Purple Line to Chula Vista Light Rail: Cyan Line. This can be a street-level light rail or a peel & stick underground light rail running the length of University Ave, then connecting through Old Town to Point Loma to disperse the insane traffic caused by the military bases at Old Town and the Point Loma peninsula. This route can also be a bus with a managed lane and signal priority temporarily, but light-rail preferred. Proposed stops along route (East to West): -Grossmont Station (transfer to Green, Orange, Copper) -University/Yale -University/College -University/54th -University/Euclid -University/Fairmount -University/I15 (transfer to 235 bus, proposed Purple Line) -University/30th -University/Park -University/6th -University/Washington -Old Town Station (transfer to Coaster, Green Line) -Rosecrans/Chatsworth @Liberty Station -Rosecrans/Harbor -Catalina/Talbot Extend Airport Transit Connection to meet new proposed Cyan Line at Rosecrans/Chatsworth. Expands car-free tourism westward to Point Loma. Extend Sprinter to Rancho Bernardo Transit Center. This gives Sprinter access to the northernmost part of the City of SD at an area with a ton of offices, and helps close the transit gap between Rancho Bernardo and Escondido. Thank you so much for the planned DAR/Managed Lanes along the I15! The section between Mira Mesa and the bus-only lane at El Cajon should be bus-only; it makes the 235 not just usable, but extremely time-advantaged compared to traffic in that area. This might also require switching the 235 to a 7-minute interval bus during peak transit hours. Please ensure that the 235 DAR near SDSU connects directly to the transit center/Green Line trolley. Thanks again for all the work you're doing expanding transit access throughout San Diego!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1130.B	Gregory Essayan	n/a	All on-street bikeways should be protected by delineators at a minimum, and berms ideally. All on-street bikeways should be stepped up to a 2035 completion date; the ROI of doing so is massive because it shifts demand away from cars and destresses car infrastructure, especially in more densely populated areas. It also fills in a ton of last-mile gaps along current and proposed transit lines. Please use whatever power you have to stop the destruction of the Vista protected bike lanes immediately. Protected bike lanes should be added in the following sections; all of these should be continuous and have no gaps in protection. This would make the SD protected biking network much more continuous, safe, and practical, and would greatly drive utilization. This is far from a complete list, but addresses gaps/shortfalls in many communities including Mid-City, SDSU/Rolando, the University/El Cajon corridors, Mission Valley, Clairemont, UTC, Carmel Mountain, RPQ, Scripps, Poway, Rancho Bernardo, 4S Ranch: -Clairemont Dr from Field St to Clairmont Mesa Blvd (end) -Texas/Qualcomm from Civita (end) to Upas (end) -Washington Street/Normal St/El Cajon Blvd from University Ave to Spring Street -University Ave from Park Blvd (end) to La Mesa Blvd (end) -Friars Rd from Sea World Dr. (end) to Mission Gorge Rd (end) -Mission Center Rd from Camino Del Rio S (end) to Aero Dr (end) -Montezuma Rd from Fairmont Ave (end) to El Cajon Blvd (end) -Regents Rd/Governor Rd from Clairmont Mesa Rd (end) to Greenwich Dr (end) -Nobel Dr from Judicial Dr. to Via La Jolla Dr (end) -Towne Center Dr from Nobel Dr (end) to Eastgate Mall (end) -Regents Rd from Genessee (end) to Arriba St (end) -Lebon Dr from Charmant Dr (end) to La Jolla Village Dr (end) -Via La Jolla Dr from Gilman Dr (end) to Gilman Dr (end) -Lusk Blvd from Vista Sorrento Pkwy (end) to Mira Mesa Blvd (end) -Vista Sorrento Pkwy from Carmel Mountain Rd (end) to Mira Mesa Blvd (end) -Sorrento Valley Blvd from Sorrento Valley Rd (end) to Vista Sorrento Pkwy -Del Mar Heights Rd/Carmel Valley Rd from El Camino Real to Black Mountain Rd -Carmel Mountain Rd/RPQ Blvd from Camino Del Sur to Poway Rd -Camino Del Sur from Park Village Rd to Rancho Bernardo Dr -Bernardo Center Dr from Camino Del Norte to Duenda (end) -Rancho Bernardo Dr from Camino Del Norte (end) to Espola Rd -Bernardo Heights Pkwy from Bernardo Center Dr (end) to Pomerado Rd (end) -Paseo Lucido/Carmel Mountain Rd from Bernardo Heights Pkwy (end) to RPQ Blvd (end) -Highland Ranch Rd from Carmel Mountain Rd (end) to Ted Williams Pkwy (end) -Scripps Ranch Blvd from Black Mountain Rd (end) to Spring Canyon Rd (end) -Spring Canyon Rd from Pomerado Rd (end) to Scripps Poway Pkwy (end) -Mercy Rd/Scripps Poway Pkwy from Black Mountain Rd (end) to Stowe Dr -Community Rd from Scripps Poway Pkwy (end) to Poway Rd (end) -Poway Rd from Community Rd to Espola Rd -Twin Peaks Rd from Community Rd to Espola Rd Thank you for all the great work you're doing on these!!
S1130.C	Gregory Essayan	n/a	I'll be frank: Ignore NIMBYs. Their intended goals for infrastructure, zoning, construction, and transit are diametrically opposed to the best interests of the overwhelming majority of people in San Diego.
S1130.D	Gregory Essayan	n/a	Reintroduce Measure G over and over again, every election cycle, until it gets passed.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1130.E	Gregory Essayan	n/a	I don't know what zoning restrictions exist that would limit solar installations on top of parking lots, warehouse buildings, or big box stores - but they need to be removed, the approvals process for such projects needs to be streamlined, and incentives need to be provided for companies who opt-in. There are thousands of acres of this city dedicated solely to car storage; the least these areas can do is serve a dual purpose. A single acre of solar coverage can generate power for ~40 homes perpetually; imagine the potential gains.
S1130.F	Gregory Essayan	n/a	Utilize social media to drive engagement by partnering with local influencers in seemingly unrelated spaces. The people who would actually utilize public transit are busy at work, raising young kids, etc etc - one of the very few shortcuts to accessing them is through the social media they're already watching. Somehow featuring the work and proposals of SANDAG and encouraging public involvement could be a great way to drive engagement and utilization locally. Local automotive influencers like Greg Peters (YT: Carpassionchannel) and Doug DeMuro (YT: DougDeMuro) are a great way to reach out to the car community (of which I am unashamedly a member). Car enthusiasts are an interesting bunch; we are much more open to transit than you'd think. We love cars as a hobby, but differentiating between car dependency (which we knowingly or unknowingly just tolerate our outright detest) and car enthusiasm is a hump a lot of us are either headed towards, or already over. It helps that in our quest to turn our vehicles into race cars, we tend to make them much more difficult to live with day-to-day. We're also the ones our family/friends go to for car advice - if our advice is "your work commute is only four miles and they're installing a protected cycling lane; you could save thousands a year by becoming a single-car household!", it means extra coming from us (for better or worse). And there is of course a huge overlap between environmentally-conscientious travelers and content consumers; Kevin Espiritu (YT: EpicGardening) would be my suggestion in this realm. I'm sure there are other suggestions; farm the idea around and see who comes up! In the meantime, let whoever runs the SANDAG and MTS social media pages go hog-wild making the most aggressive memes possible. I hate how effective it is at reaching people, but it works!
S1130.G	Gregory Essayan	n/a	I just want to say what a great job you all are doing, and how much I appreciate the solicitation of public feedback on the crucial infrastructure projects within this regional plan. Thank you again for all the hard work, and for all you do for the city/county of San Diego!
S1131.A	Amelia Porras	Olivewood Gardens and Learning Center	The public transit is very important in our community, there is a lot of people does not own a car and need public transportation to do medical appointments school and buy food. -Bathrooms are important in bus stops due that there is not easy access to use. -I know that safety personnel has being good when present
S1131.B	Amelia Porras	Olivewood Gardens and Learning Center	The FRANC has being a big support, however is limited.
S1131.C	Amelia Porras	Olivewood Gardens and Learning Center	Pubic lighting in some areas are not enough strong and are necessary for our safety
S1132	Maru Rios	Olivewood Gardens and Learning Center	-Upgrades in transportation are very important -Flexible fares
S1133	Luis Lopez	Olivewood Gardens and Learning Center	-I will like upgrades to the public transit -Placing bathrooms and more frequent bus and also cleaner
S1134	Mary Cairo	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it
S1135.A	Deborah Porter	n/a	Our transit system is not accessible to many people who might otherwise us it. They took away the bus stop from Catalina Blvd.. and there is no other stop that is easy to get to. Stop pretending that we have a functioning transit system and just fix it.
S1135.B	Deborah Porter	n/a	Bikeways have not been well thought out.. They are on major roads instead of nearby local streets, and take up valuable parking spaces, making it a definite negative for businesses on those roads and their consumers. Stop listening to the lobbyists for bike lane placement and get the neighborhoods to participate . Or is that too much trouble?
S1135.C	Deborah Porter	n/a	Drop the BONUS ADU program all together and get the community buy-in on what makes sense for growth and development.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1136.A	Deb Porter	n/a	Pt Loma and OB citizens want acceleration of the interstate 5 and 8 interchange improvements, grade separation at Pacific Highway and Taylor St for Old Town Transit and especially transit to the airport.
S1136.B	Deb Porter	n/a	Amend the rules for ADUs to allow setbacks, infrastructure fees, height and density limits.
S1137.A	Kyle Teixeira	n/a	Need more frequent bus service and trolley service. Add a bus rapid transit between towns and cities. Trolley or bus to airport. As bus dedicated lanes on both roads and freeways. Busses need to be competitive to cars. Bus transportation hubs near points of interest and commuting.
S1137.B	Kyle Teixeira	n/a	Don't get rid of Fred system.
S1137.C	Kyle Teixeira	n/a	Get rid of bike lane shared bus lanes. Not safe for bikes and slows down busses. Need better and safer bike lanes to transit.
S1137.D	Kyle Teixeira	n/a	Don't add lanes. Add dedicated bus lanes to decrease bus lanes.
S1137.E	Kyle Teixeira	n/a	Encourage housing near public transit, but the transit needs to go to more places. Also, don't put houses within 2000 feet of a freeway
S1137.F	Kyle Teixeira	n/a	Your engagement is poor. The public doesn't trust you and that is why measure g failed. Please build and repair our faith in you.
S1138.A	Paula Dunn	n/a	Rosecrans and point Loma is not a mass transportation corridor. There's one bus line that is rarely used.
S1138.B	Paula Dunn	n/a	The city was not transparent and disingenuous in their communications with the Neighborhood about the proposed development on the corner of Talbot and Rosecrans. The city is also not taking into account significant negative impact on the Neighborhood.
S1139.A	Dan Dreifort	n/a	More trolley lines. More street cars. More buses. Fewer new roads and new lanes please. Make more lanes bus only.
S1139.B	Dan Dreifort	n/a	More bike ways and more walkways. Separating bikeways is good. It would be nice to see some maintenance of existing bike ways because cars run over the bollards. It would also be nice to see some enforcement of bike Lane violations by vehicles.
S1140	n/a	n/a	Please prioritize the trolley to the airport and the purple line! San diego could have such better public transportation, and I am a strong believer that once these two are complete, it will open the way for San Diego to have a world class trolley system!
S1141.A	Roberto	n/a	I want more public transit to coronado island with frequent stops. Every 5-10min is best for people to plan on using public transit.
S1141.B	Roberto	n/a	Bikeways and walkways are the final mile solution after public transit gets people close to their destination
S1141.C	Roberto	n/a	More public transit near housing. Denser housing.
S1141.D	Roberto	n/a	More public transit to save the environment. I would love to not need a car
S1141.E	Roberto	n/a	Public transit is more affordable than car ownership
S1142.A	n/a	n/a	Poway connect: Rapid transit needs to connect Twin Peaks@Pomerado to Sabre Springs Transit Center. This hub also needs easy service, in addition to plans for Poway Road. The TwinPeaks hub would capture more of central Poway to use I15 rapid transit. As a user of the 235, I drive to the Sabre Springs Transit Center. The loop into Poway Road is too inconvenient and slow.
S1142.B	n/a	n/a	Poway Connect: Safe separate bikeway from TwinPeaks@Pomerado Rd to Sabre Springs Transit Center. This could be a pleasant and viable e-bike option. Biking on a heavily used arterial road with fast moving cars is not an option for most.
S1143.A	n/a	n/a	More trolley lines, and expanded trolley service
S1143.B	n/a	n/a	It's insane that there is no trolley line to balboa/zoo, or servicing north park or Hillcrest. Why is there no trolley to the airport? Old town is RIGHT THERE
S1144.A	n/a	n/a	Please try to build an airport people mover instead of a new trolley line. It can go from the rental car center, to Middletown station, then wrap around to the terminals. That would allow higher frequencies and automated trains. I also think you should explore a couple trolley subway routes, underneath 5th Ave from gas lamp to hillcrest, and under university from hillcrest to city heights. Explore a trolley extension from old town to mission beach via sports arena and sea world.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1144.B	n/a	n/a	I think the 30 foot height limit in the coastal area should be changed to 40 feet, but then still enforced. We don't need 20 story buildings but more 3-4 story buildings would be helpful. Also allow more commercial zones in suburban areas so that people can walk to a corner store or something useful.
S1145.A	n/a	n/a	The draft plan mentions a downtown transit connector to SAN Airport, but it is not clear whether this would be a bus or rail-based solution. I recommend that SANDAG explicitly commit to a rail extension and expand the concept westward: from Downtown to SAN, continuing through Liberty Station, Midway District, and finally connecting to Old Town Transit Center. This westward approach allows for intermodal rail-airport connectivity, serves several dense mixed-use districts currently underserved by transit, and strengthens connections to the broader MTS system. A rail spur in this corridor would greatly improve airport access while reducing congestion on N. Harbor Drive and Rosecrans Street. While I appreciate the inclusion of Express Bus Route 247 along CA-56 in the draft plan, I urge SANDAG to consider adding a local east-west bus route that connects Del Mar Heights, Carmel Valley, Torrey Hills, Pacific Highlands Ranch, and Torrey Highlands to 4S Ranch and Rancho Bernardo. Route 247 appears designed for express freeway travel, bypassing many of these neighborhoods. A local service would fill this crucial gap, providing basic mobility for residents not served by arterial Rapid routes. That said, I am encouraged to see Arterial Rapid Route 493 proposed, connecting coastal communities like Carmel Valley and Torrey Hills to UTC and Oceanside via El Camino Real. This is a step in the right direction, but we still need neighborhood-scale service along the east-west spine of North City.
S1145.B	n/a	n/a	Please consider including aerial cable car (ropeway) systems as part of your emerging flexible fleet and microtransit strategies, especially in areas like Sorrento Valley and Mission Valley, where steep grades, freeway bottlenecks, and limited rights-of-way restrict conventional surface transit options. Aerial systems have proven successful in dense or hilly urban environments such as Medellín and La Paz, and can offer reliable and cost-effective connections across chokepoints without major land acquisition. Stations can also include small-scale retail to enhance ridership and provide a modest return on investment. Clearance over SDG&E power lines should be reviewed in the planning phase.
S1145.C	n/a	n/a	As SANDAG invests in its active transportation network, it should consider how walkability and bike infrastructure can be fully integrated into transit-oriented station development. A model to consider is Japan's "ekibiru", which refers to a station building that combines the rail station with vertically integrated housing, retail, dining, and offices. Similarly, Hong Kong's MTR station malls connect transit access directly to multi-level commercial hubs. These walkable, mixed-use environments encourage biking and walking as natural first and last mile modes, reduce dependence on parking, and promote small business vitality. Unfortunately, current local examples fall short. For instance, the UTC Trolley station exit leads directly into a parking structure rather than into the shopping center, missing a key opportunity for pedestrian-oriented design and seamless retail connectivity. Future planning should avoid this kind of spatial disconnect. The plan mentions secure bike parking in general terms, but I urge SANDAG to prioritize dedicated, high-capacity bike parking at major transit hubs, especially those targeted for TOD. This should include covered bike racks, lockers, and potentially staffed bike stations near key station entrances to support active mobility choices.
S1145.D	n/a	n/a	The plan should broaden its transportation innovation strategy to include aerial cable car systems and station-integrated retail infrastructure. Both represent proven technologies abroad and offer scalable solutions for regional chokepoints or land-constrained corridors. Aerial systems offer unique benefits in topographically challenging areas and can attract private sector partners. Incorporating small-scale retail or community spaces at aerial or flexible fleet stations can generate additional revenue and serve local needs, aligning with goals in the draft plan around Complete Corridors and cost-effective investment.
S1145.E	n/a	n/a	To support the regional housing and transportation goals, I recommend SANDAG promote more vertical, multi-use station development, taking inspiration from Japan's ekibiru or Hong Kong's MTR mall model. These developments co-locate housing, retail, civic services, and mobility options within the same footprint, allowing transit agencies to generate revenue and increase ridership. SANDAG's continued support for housing acceleration programs is encouraging, but future TOD should move beyond standalone housing and embrace integrated urban villages centered on transit. The plan should also go beyond zoning reforms and actively commit to producing affordable housing on public land at TOD sites, including in high-opportunity areas. It should also include anti-displacement policies such as tenant protections, affordability covenants, and inclusionary requirements tied to transit investments.
S1145.F	n/a	n/a	The plan should prioritize local east-west roadway connectivity in fire-prone suburban areas. Many newer neighborhoods are designed with limited egress, and some are surrounded by canyons or wildlife buffers with only eastern exits, which will be dangerous when Santa Ana winds drive fire from that direction. I urge SANDAG to incorporate redundant circulation design standards and evacuation modeling into long-range road planning to protect lives in the event of major wildfires.
S1145.G	n/a	n/a	In addition to TransNet, I encourage SANDAG to pursue value capture mechanisms tied to station development. Station malls and aerial cable car terminals offer retail and real estate opportunities that could fund transit operations with a higher return on investment than parking lots. Given the current cost of living crisis, I do not believe the public will support additional half-cent sales tax increases. Furthermore, recent revelations regarding toll road mismanagement have undermined public trust, and without demonstrable transparency and fiscal responsibility, continued reliance on traditional tax-based funding may no longer be viable. Exploring public-private partnerships and land-based revenue tools is a more sustainable path forward. I recommend that SANDAG establish a land banking strategy to acquire parcels near current or future transit nodes. This protects long-term TOD goals, prevents speculative price spikes, and allows for green infrastructure or resilience hubs in underbuilt areas. Land isn't getting much cheaper unless times are bad.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1145.H	n/a	n/a	I recommend that SANDAG coordinate with religious communities, including Jewish congregations who rely on eruv infrastructure, when upgrading utility poles or pedestrian signals. Eruvs are often discreet and not well known outside these communities, but they are critical for religious mobility on the Sabbath, especially for families with children or disabled members. Including such needs in future outreach or ADA-related planning would support inclusive mobility and uphold religious equity.
S1146.A	n/a	n/a	Adding more transit options is the only way to reduce traffic and the first of maintenance on roads.
S1146.B	n/a	n/a	This needs more publicity
S1146.C	n/a	n/a	We need protected bike ways, stop sharing the road with drivers that go way too fast
S1146.D	n/a	n/a	Our lights are so dumb. I can't tell you how many times I've seen a pile of cars sit at an SD intersection in one direction while there is literally no traffic going across in the other.
S1147	n/a	n/a	bike storage/rack / ped accessibility requirements
S1148.A	Luis	n/a	Expand transit lines that are not centralized around the downtown area, which could create a better connected and more enticing option for commuting and trips. If the goal is to reduce VMT there should be more options and connections.
S1148.B	Luis	n/a	Microtransit is helpful, in my area of National city we have the microtransit buses that move elders and others around. This disincentivizes driving.
S1148.C	Luis	n/a	If there are bikeways make them protected. As for the walkways they should add elevated crosswalks to slow down traffic. Traffic engineers should stop focusing on speed and efficiency of cars and start caring about the people who walk and bike.
S1148.D	Luis	n/a	Stop expanding highways, start focusing on making local roadways safer.
S1148.E	Luis	n/a	More TOD and less single family zoning, allow for more infill development. Lower costs of permitting an ADU and if someone has built an ADU within their home without permit, don't fine them and instead work to make sure it's safe. San Diego is full of sprawl and now the most unaffordable city. With the changes to CEQA we hope that less people shut down housing development projects or ADUs. ALSO: pass tenant protections! Too many people are pushed into the streets not because of drugs, but due to financial struggles or harassment from their landlord. As the economy worsens more people will struggle and we can expect homelessness to rise. The best way to prevent homelessness is to keep people housed, since it's easier to keep someone housed than to have someone who has been homeless for a long time back into stable housing.
S1149	Taras Balabanoff	n/a	After 6 years working on hwy 5 north country your still not finished Poinsettia on and off ramp still looks like shit When will you be finished ? [redacted]
S1150.A	n/a	n/a	More dedicated right of way needed for buses, even if it's taking lanes from car traffic Purple and Silver Lines trolleys need to happen a lot sooner than 2050
S1150.B	n/a	n/a	Bike lanes should not be considered "protected" if all they have is paint and plastic posts. Concrete curbs are the bare minimum and on a lot of streets, K-rails are needed. More Dutch-style protected intersections, less slip lanes and high speed junctions onto neighborhood streets (i.e. Washington St going over SR 163 and Balboa Ave at I-15; these should be folded diamond interchanges not cloverleafs)
S1150.C	n/a	n/a	More Dutch-style protected intersections, less slip lanes and high speed junctions onto neighborhood streets (i.e. Washington St going over SR 163 and Balboa Ave at I-15; these should be folded diamond interchanges not cloverleafs) SR 163 freeway should be removed and converted to a busway on one side and a bikeway on the other; this can preserve the historic features of the historic highway while reducing congestion
S1150.D	n/a	n/a	More precautions needed to be taken to avoid adding road capacity in the backcountry. Adding capacity to highways like SR 67 will induce more development in Ramona/SD Country Estates, putting even more people in danger
S1150.E	n/a	n/a	Outreach needs to be targeted towards renters, working-age people, and students; homeowners and retirees are way over-represented at public hearings and their views seldom align with those of the broader community
S1150.F	n/a	n/a	Too many studies, build stuff!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1151.A	n/a	n/a	Improve transit by giving priority via dedicated right of ways that are separate from other vehicles, lights and signals can make this possible as well, too often busses get stuck in car traffic making them less reliable.
S1151.B	n/a	n/a	Expand the network connectivity and push for temporary separated bike lanes until a more permanent solution can be placed. The network is too broken to get across effectively and is not safe enough to get most people out. Doing so can bring more economic activity to neighborhoods.
S1151.C	n/a	n/a	More traffic calming because drivers are on their phones and sometimes driving dangerously. At times it's not malicious but they are not aware that they creating such situations because the road is allowing them to speed.
S1151.D	n/a	n/a	Improve areas for delivery drivers and cargo to offload/onload. Many times the post office, Amazon drivers, and other services will park in the bike lane forcing users into oncoming traffic. This puts those riding on bikes in danger, and damages infrastructure in place due to large vehicles running over posts, and makes it so that the road users have to guess what to do in order to safely navigate the scene.
S1151.E	n/a	n/a	Stop opposing bills that would increase and encourage better land use around transit center. Proper land use and density are not "communism" they are American ideals that ensure freedom and allow the American dream to thrive and continue into the future. Stop wasting my tax dollars on lobbying Sacramento to reject bills that would promote transit use. This organization exists to promote transit to to kill it. any member on board here that thinks other wise is not fit to serve their community.
S1151.F	n/a	n/a	Fight for more funding, we can't expect transit to function the way it is intended by not giving it the money needs. The less we put in the less we get out. We need to continue to fight to get more funding by any means necessary to ensure we have this essential and critical service.
S1152	n/a	n/a	We need the trolley to serve more parts of San Diego. Right now it's not enough to make me want to use it more. We need another north-south line more inland. A line east-west parallel to El Cajon Blvd or University to connect Hillcrest, City Heights and points east would really help as well. Also if I could get to Kearny Mesa and Mira Mesa by trolley I would be riding it all the time.
S1153.A	Mason	n/a	I would like to see a greater emphasis on the reliability of the transit system, which a focus on the frequency, speed, and priority of bus services on surface streets. More bus stops should have the same simple amenities: benches, shelters. Next bus arrival audio buttons would be a helpful amenity to consider adding to bus stops in the system. The light rail system should be more separated from other traffic to improve service reliability and speed, full systemwide signal priority over vehicle traffic would reduce time trains spend traveling through the city center. I think more barriers should be added between the tracks at stations where pedestrians can cross the tracks from any part of the platform. All platforms should also be modified to be level with the train floor so passengers needed to use the ramp will not need to, these ramps often cause problems for riders needing them and will cause delays. As a solution for occasional freight trains using shared track sections on the system, gauntlet tracks can be put in further from the platform edge, this is done on Oregons WES rail service.
S1153.B	Mason	n/a	Safer sidewalks and road crossings should be focused on more.
S1153.C	Mason	n/a	Driverless trains for the purple line project.
S1153.D	Mason	n/a	Seeking private investments may help fund major projects.
S1153.E	Mason	n/a	Clairemont and Kearny Mesa are congested and growing areas, the transit access and infrastructure in these areas is not sufficient to what it should be for these areas.
S1154	Nick R	n/a	Is it possible to complete the Purple Line earlier than 2050, more like prioritizing it much sooner

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1155.A	Geoffrey Hueter	Neighbors For A Better San Diego	VIABILITY OF BUS RAPID TRANSIT CONVERSIONS The Plan includes ambitious plans for Bus Rapid Transit (BRT), which are labeled as "Nextgen Rapid" in the Plan. In addition to their expense, BRT has the stringent legal requirements defined in Public Resources Code 21060.2: (a) "Bus rapid transit" means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features: (1) Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. (2) Transit signal priority. (3) All-door boarding. (4) Fare collection system that promotes efficiency. (5) Defined stations. Given these requirements, NFABSD calls into question the physical viability of some of the proposed BRT conversions, which require removing at least two automobile lanes from the streets that are being converted. For example, Figure A.3 (Appendix A of the Plan), shows a BRT conversion on La Jolla Boulevard, but as a visual survey of this route makes clear, it is not physically possible to do this in some locations without completely re-routing automobile traffic around bottlenecks in the road. The Plan needs to be pragmatic. All proposed BRT conversions, including the one referenced above, should be surveyed for their viability, and those that are unrealizable should be removed from the Plan. Alternatively, if "Next Gen Rapid" is not intended to meet the requirements of Bus Rapid Transit, then these routes need to be downgraded to local bus service in designation of major transit stops. Note that the requirement of dedicated bus lanes for BRT precludes sharing these lanes with alternative mobility options, such as using these as bike lanes, as is done on the purported BRT route on El Cajon Boulevard in the City of San Diego. Sharing mobility uses downgrades these routes from BRT to local bus service and changes the criteria for including these routes in the major transit stops maps. This issue is particularly important because a substantial number of SANDAG major transit stops are included only on the basis of future BRT service and wouldn't qualify based on current local bus service. As noted above, these stops are being used to allow projects based on San Diego's Sustainable Development Area and would also be used in the future to allow development under SB 79, if it passes.
S1155.B	Geoffrey Hueter	Neighbors For A Better San Diego	CONCENTRATE NEW DEVELOPMENT TO ACHIEVE TRANSIT ADOPTION Because of the San Diego region's relatively low overall population density, the barriers to broad increased transit usage aren't network effects, but rather the lack of housing close to transit at the start of the journey and job centers and other highly connected uses at the destination end of the trip. Therefore, to have the greatest success in maximizing transit adoption and minimizing vehicle miles traveled (VMT), the Sustainable Communities Strategy in the Regional Plan rightly proposes to add housing and commercial development in focused areas. As stated on page 18 of the Plan: "The Series 15 Regional Growth Forecast/SCS land use pattern focuses 80% of future residential development and employment growth in areas with a high concentration of transportation options." It is important to have a clear definition of "areas with a high concentration of transportation options," including consideration of how far people are willing to walk to and from transit. The 2023 SANDAG On-Board Transit Survey reports that 75% of transit riders walk less than four-tenths of a mile to transit, and 50% walk less than two-tenths of a mile, emphasizing that transit incentive areas, such as the countywide Transit Priority Area (one-half mile as the crow flies to transit stops) and San Diego's Sustainable Development Area (one-mile walking distance) are much too broad to achieve the goals of walkable communities, transit-oriented development, and 15 minute trips.
S1156.A	Geoffrey Hueter	Neighbors For A Better San Diego	TRANSIT PLANNING AS ZONING With the City of San Diego's use of bonus densities based on the Sustainable Development Area and statewide proposals, such as SB 79 (Wiener), future transit decisions are de facto zoning decisions. While transit modeling can inform city and county planners where new development can best take advantage of transit, automated upzoning based on transit may include areas that have other constraints to development or that include lower-priority transit routes that may be eliminated in future iterations of the Regional Transportation Plan (RTP). To be cognizant of this effect, the RTP should be realistic about funding for future projects and certain in the prioritization of projects. Projects that are not certain of being funded should be eliminated from the Plan or at least identified as contingent and therefore excluded from SANDAG's major transit stops maps.
S1156.B	Geoffrey Hueter	Neighbors For A Better San Diego	APPARENT CONTRADICTION OF SERIES 15 POPULATION AND JOBS PROJECTIONS The Series 15 projections show that population is flat between 2035 and 2050, yet employment increases by 140,000. Given that the population will be aging (and presumably retiring, not entering the workforce), it would be helpful if the Plan could provide a succinct explanation for the apparent divergence of population and job projections.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1157	Geoffrey Hueter	Neighbors For A Better San Diego	WEIGHTING REVENUE SOURCES AND PROJECT DELIVERIES BY RISK NFABSD questions the likelihood that some future revenue sources will materialize and therefore that there will be sufficient funding for all of the listed projects. The Plan assumes multiple transit-specific sales tax increases in 2032 and 2036, on top of an extension of the TransNet to take the program beyond 2048. These taxes will be further competing against city-level sales tax measures, making it unlikely that SANDAG can count on approval of all three sales tax increases. Rather than just listing the risk factors for each funding source, this uncertainty should be accounted for in the revenue forecast using probability weights for each revenue source and then prioritizing projects against the probability-weighted revenue forecast. In particular, there may be high confidence that voters will extend TransNet, but budgeting an additional $13.72 billion on the assumption of new transit taxes, as proposed on page I.16 (Appendix I), is highly optimistic, especially given the failure of a transit tax measure on the last San Diego County ballot (2024). On the expense side, given past projects being delivered later than planned, at higher costs, it is important that these contingencies be accounted for in the budgeting and prioritization of projects. This is especially important given that the Plan does not consider any margin for error. Per page 40 of the Plan: "given how funding sources have been approved historically, it is reasonable to assume that new funding sources will continue to be established. We assume that none of the new sources will begin prior to 2028, and they would be required to complete all of the projects in the Regional Plan." It is unrealistic to assume that there will be exactly the amount of funding needed to deliver every project. More likely, some of the proposed projects will need to be moved to a future plan or abandoned in favor of higher value projects. To accommodate funding changes, project overruns, and other contingencies, the Plan should separate high-priority projects that can be confidently executed within the Plan horizon from lower-priority projects that will only be started if funds are still available after the high-priority projects have been completed. These contingent, lower-priority projects should not be included in the major transit stops map for the San Diego region.
S1158	Matthew Naiman	n/a	The Shelter Island area of Point Loma should be removed from the Regional Transportation Plan (RTP). It fails to meet key transportation, safety, climate, and equity goals. The area's narrow, two-lane roads cannot support dedicated bus lanes or upgraded transit stations, and routes like 28 and 228 lack the frequency, ridership, or infrastructure to become Next Gen Rapid Routes. Peak-hour congestion already hinders bus movement, and limited access via Rosecrans Streetcreates serious evacuation risks in this high fire hazard zone, especially for the Navy base and surrounding residential areas. Designating this area as a TPA/SDA will lead to unplanned development without the necessary infrastructure, worsening traffic, air quality, greenhouse gas emissions, and public safety. With no major activity centers nearby and minimal access to essential services (e.g., hospitals, pharmacies), increased density here contradicts the goals of SANDAG, Complete Communities, and the City's Climate Action Plan. The location's classification as Mobility Zone 4 also renders any proposed bikeways ineffective for VMT reduction, and the narrow, congested, roads pose a severe safety risk for shared use. Transit, bikeways, and walkways in this context are neither safe nor practical. This plan also conflicts with state mandates to reduce greenhouse gases and VMT. Continuing to include Shelter Island in the RTP endangers public safety, harms small businesses due to parking shortages, and decreases not improves quality of life. This is not a convenient, equitable, healthy, or sustainable vision for San Diego.
S1159	n/a	n/a	look at funding for mitigations of noise pollution and regular pollution like PM0.1; e.g., plants
S1160	n/a	n/a	encourage native / environmentally beneficial landscaping/plants and maintenance practices
S1161.A	n/a	n/a	pursue automated and automation-ehanced/supplemented enforcement, e.g. for distracted driving, speeding. etc. If necessary, lobby for changes in state law.
S1161.B	n/a	n/a	pursue automated and automation-ehanced/supplemented enforcement, e.g. for distracted driving, speeding (also reduces emissions in addition to improving safety), tailgating, recklessness, carpool violation, etc. If necessary, lobby for changes in state law.
S1162.A	n/a	n/a	The roads in North Park are so wide. The city should narrow them to slow down traffic and give more space to pedestrians
S1162.B	n/a	n/a	Widen sidewalks, give more space to people and trees, not for cars
S1163.A	Gabriel Retzer	n/a	San Diego cannot continue to expand without more comprehensive and effective public transit. This would be most effectively done through increased railway transit. Having additional options, and options running late at night would mean the ability for San Diego to continue being a destination and desirable place to live throughout the county. Having a light rail running down University Avenue, would increase its impact and allow for more effective commuter use of transit services.
S1163.B	Gabriel Retzer	n/a	I appreciate the constant expansion of protected bikeways throughout the county. Continuing to add sidewalks throughout the city where none exist. There are still some areas where I am surprised by the lack of designated walkways. Down Florida as it goes south from Upas and Morley Field Drive.
S1164	n/a	n/a	More transit lines. Trolley safety and clean improvements. Pedestrian safety improvements.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1165.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans 39; two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAG's goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1165.B	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town. The closest pharmacy is 1.7 miles away. The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA..... More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1165.C	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the Citys CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1165.D	n/a	n/a	The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans' quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the City s CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1165.E	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.
S1166.A	n/a	n/a	Please keep the Youth Opportunity Program.
S1166.B	n/a	n/a	Fund the Youth Opportunity Pass past 2026.
S1167.A	Mr Bill Joyce	n/a	We live in a New Senior apt complex in Clairmont. Parking is a big issue. 79 units and 24 parking spaces. Residents are fearful of running errands during the day and when returning no space but overflow is available 2 blocks away. Residents with handicap placards/plates are forced to navigate the obstacles. So micro transit would be awesome for shopping days or close by Dr visits.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1167.B	Mr Bill Joyce	n/a	We have bikeways I front of our Apt and no riders as not safe. Crossing Balboa ave and Genesee intersections is one dangerous crossing.
S1167.C	Mr Bill Joyce	n/a	People in San Diego need to work and run errands. Our city was built with cars as the main mode of transportation so let's fix our pothole roads and get gas prices Down.
S1167.D	Mr Bill Joyce	n/a	We just moved from Pt Loma to Clairmont and same issues up here, parking, Roads and Homeless/unhoused!!!
S1168	n/a	n/a	Point Loma is already experiencing severe congestion on our roads (Rosecrans, Sports Arena,...). Yet developers continue to build apartments, which will exacerbate the problem. Should a disaster arise evacuation will be extremely difficult.
S1169.A	n/a	n/a	We need to build more transit. Add dedicated bus lanes and prioritize funding for Purple Line, Airport Connection, and Balboa Park Streetcar so we can complete them by 2035.
S1169.B	n/a	n/a	Create incentives to build more high density housing near transit.
S1170	n/a	n/a	The proposed tunnel under UTC for amtrak and coaster lines have UTC mall have access to amtrak and coaster and keep the Sorrento Valley station for the coaster
S1171.A	n/a	n/a	The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking. This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1171.B	n/a	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans ; quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!
S1171.C	n/a	n/a	The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area. There is no way to limit the stops this route already has. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership. The closest major hub is 3.2 miles away in Old Town.The closest pharmacy is 1.7 miles away.The closest hospital is 5.6 miles away. Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1171.D	n/a	n/a	The current approach to affordable housing by bypassing the 30ft height limit in coastal areas and allowing for over development of neighborhoods and communities is not only a legal impropriety, but also a risk to health and welfare of residents. Transportation corridors are already clogged, developers will not develop property without promising them exceptions where their financial concern is considerable and the voted on 30 foot limit are all obstacles that current proposals do not address or take into consideration.
S1171.E	n/a	n/a	Implications of this area remaining a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the Citys and SANDAGs goals: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decreases San Diegans quality of life, not improve it Decreases access to resources and opportunities to improve the quality of life, not add to it It violates the Citys CAP goals. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!! What is your comment on state and federal regulations? Required The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State.
S1172.A	n/a	n/a	When is highway 67 going to have streetlights for night driving and some sort of divider in between scripps Poway parkway and Poway road...very dangerous.
S1172.B	n/a	n/a	Don't even think about a per mile tax.
S1173.A	n/a	n/a	We need to connect our most dense neighborhoords and make sure we're focusing on keeping transit reliable and frequent before expanding. We need regional intervention in having a holistic land use and transportation vision, leveraging existing legislation. Specifically, I'd love to see more east SD connections from south county, like the SY transit station, Rapid 688 should be one of the agencies priorities no doubt about it.
S1173.B	n/a	n/a	San Ysidro would benefit from a flexible fleet program, as well as all of the highest ridership stations in our lightrail system. Strongly support this!
S1173.C	n/a	n/a	Sandag and the region have consistently delivered quality bikeway infrastructure, I'd love for the agency to continue this work and build towards a region that provides multiple transportation options. Biking is healthier for us, cheaper and more environmentally friendly, when constantly supported - with funding and advocacy - it always delivers.
S1173.D	n/a	n/a	Work relentlessly to reach our housing needs and goals. Continue all the gard work on programs like the HAP and REAP support. I love SANDAG to find a way to work directly, with developers to make sure we have more units in the lower income brackets and not always at market rate. We need to make sure we use land that is next to the highest ridership stations, and at the same time make sure that we're delivering low income rent and working with all of our jurisdictions to meet regional housing needs and goals.
S1173.E	n/a	n/a	We can't back down from our mission to make transit, housind our regional planning overall more equitable. Set policy and frameworks in place that consider low-income communities and minorities, no car ownership first.
S1174	Martha Marquez	n/a	I have the Fastrak and it's great!!! I cross everyday from TJ to Chula Vista and the lines are pretty long due to National Guards from Tijuana. When I go back home, I usually don't get border line to cross to Tijuana which is great. I wish more port of Entry were opened tho so crossing to USA could be faster.
S1175.A	n/a	n/a	San Diego county has extremely underdeveloped transit compared to other metropolitan areas of similar size. Los Angeles, infamous for its traffic, has now started to seriously invest in large-scale transit projects. Yet San Diego continues to squander our funding on highway expansion and other car-centric infrastructure that separates communities, increases pollution, and further alienates the large portion of San Diegans who simply cannot afford, or are able, to drive a personal vehicle. I personally would love to take public transit- the times in which my situation was specific enough for this was enjoyable. I did not have to worry about bad drivers, about being constantly vigilant on my trip, and was able to be productive on my commute in a way that driving a car would not allow. But because of the low connectivity of our region (few and infrequent bus routes, limited destinations via trolley, service ending early especially compared to other American cities) I rarely can even have an opportunity to take public transit. I know San Diegans who are reliant on public transit, and they always complain about the same things- the lack of bus frequency, the circuitous bus routes, and the limited scope of our trolley system, with these complaints being much stronger the further east and further north in the county . If San Diego is serious about expanding housing, limiting emissions, and making our city livable for those who cannot afford, or are unable to drive, a car, or simply those who do not want to be beholden to a car-centric way of life, San Diego cannot dely projects like the purple line, the trolley extension to the airport, and smaller city-wide improvements like increase bus reliability and connectivity to other modes of transportation, such as the Coaster and our trolley lines.

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1175.B	n/a	n/a	San Diego's biking and sidewalk infrastructure is typical of most car-centric cities. Poorly maintained, too small for the foot traffic in many places, and sorely lacking. San Diego's weather is perfect for nearly year-round cycling and walking, yet much of our cycling infrastructure is little more than a painted gutter off the side of a three-lane road where cars are traveling of speeds upwards of 40 miles per hour. There are sometimes billiards or small plastic barriers if its a newer bike lane. This is not safe. This does not inspire cycling, a method of micro-transportation that I myself would consider were it not so dangerous in San Diego. I would cycle more often as a San Diegan if bike lanes were separated by a concrete barrier, tree line, or something similar of that scale. I would also cycle more if there was more space allocated to cyclists and pedestrians and a reduction in lanes for cars. Cycling is a critical method of connection to bus stops, trolley stops, and train stations that San Diego is lacking. Our sidewalks, which are also critical in quality-of-life for San Diegans, are consistently small and poorly maintained. Whenever I walk through an area with high foot-traffic, I always need to move out of the way for people, even as a single person passing another single person. Narrow sidewalks make walking- a fundamental human right and necessity for many- extremely unappealing. I would walk more as a pedestrian and feel more empowered if there were larger sidewalks, especially in areas that experience high foot traffic on a local scale.
S1175.C	n/a	n/a	SANDAG's commitment to car-centric development is very disappointing. Car infrastructure is incredible damaging to our city and its residence. With more car-centric planning comes more traffic, more particulate in our air, more pollution, more separation from our communities, and a lower quality of life in my opinion, as a constituent of SD. Highway and roadway expansion does nothing to alleviate car congestion- because of the induced demand created by making a specific a method of transport-- car -- more accessible, it encourages more driving and more car use, which leads to more traffic, which causes more congestion. This has been observed over and over again in adding lanes to highways and local road expansion. If SANDAG is serious about helping San Diegans, they should stop expanding highways, because this does not help your constituents. Car-centric infrastructure development increases car traffic, which increases pollution, particulate, obesity, and creates a more hostile environment to pedestrians and cyclists.
S1175.D	n/a	n/a	San Diego's housing problem goes hand-in-hand with transit. If we offer more dense housing built near transit, this increases the amount of housing that can be built as opposed to a car-centric development that requires more space fot parking and roads for cars to travel on. Road maintenance will also cost more than what is required of public transport. SD has an outrageous and embarrassing housing problem- and this can only be solved by more developments, denser developments, and transit-connected developments that do not require the space, nor the maintenance, that car centric developments would.
S1176.A	n/a	n/a	make it feasible and achievable to the maximum so the people will feel the difference and see what is best instored for the future....
S1176.B	n/a	n/a	increase in number
S1176.C	n/a	n/a	increase more
S1176.D	n/a	n/a	keep it going
S1176.E	n/a	n/a	monitor
S1176.F	n/a	n/a	make them more accessible
S1176.G	n/a	n/a	make more tourist attractions!
S1177.A	Odrei Tulio	n/a	prioritize safe, accessible walkways along local roads.
S1177.B	Odrei Tulio	n/a	Also, expand EV charging infrastructure equitably across all communities.
S1178	n/a	n/a	Overall SANDAG does a good job it is clear, reliable and affordable for the most part. The service could be more frequent especially on the weekends. I hope the connections between the lines can be improved, especially in the Mid-city area of San Diego. The stops for the trolley should be more secure with transit security and maybe gates to keep unhoused individuals with carts and animals off.
S1179	R. Cruz	n/a	Southbay needs carpool lane.
S1180	Lu Infante	n/a	I am a current Fastrak user. Using Fastrak saves time and very affordable. I like that it automatically deduct from a prepaid account. It's convinces and I can skip the toll booth.
S1181.A	Linda Gore	n/a	rush hours, bus service should be more frequent
S1181.B	Linda Gore	n/a	Clean water channels before rain season to help with flooding
S1182	Paola Francisco	n/a	Riding a bus is very accommodating. I enjoyed riding the bus, it convenient and arrives on time.
S1183	n/a	n/a	I'd like to see more immigrant street vendors selling food!
S1184	Maria Vergara	n/a	Improve safety in transportation services, to ensure no harassment is being done.
S1185	Valerie Balanon	n/a	expansion of routes to Mira Mesa or Tierrasanta. Esp in Mira Mesa, getting out of there in that area
S1186	n/a	n/a	A hotline number to call to know more about micro-transit in all locations in San Diego
S1187	Matt L	n/a	The bus and the trolley needs to run more often

Table J6.3: Website-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization	Comment
S1188	Jose Padilla	n/a	1. Making the public transportation more affordable but also add more security to it. 2. Adding cameras to the stations
S1189	Victoria Morison	n/a	I wish we had more frequent stops for the trolleys, Coaster, & Sprinter. Also, I wish we had more alternatives to driving (that are also accessible)
S1190.A	Debra Berg	n/a	ridership, lowering cost ridership to prove that loyalist riders/transportation importance - lower taxes / taxes benefits
S1190.B	Debra Berg	n/a	35th / Euclid & Imperial - empty lot -> agriculture -> lower taxes on property
S1191.A	Izzy	n/a	Keep communities connected
S1191.B	Izzy	n/a	More safety measures / lights
S1192	Raquel Tucker	n/a	Lovely additions. Thank you for what you do.
S1193	Marni von Wilpert	City of San Diego	"This comment is on behalf of Councilmember von Wilpert and was given during a Regional Plan presentation by Tuere at the City of San Diego Active Transportation and Infrastructure Committee: North eastern San Diego (Scripps Ranch, Rancho Penasquitos) is being developed and there is high VMT, but since this area doesn't have a parking district, we are not eligible for a Flexible Fleet. It would be challenging to compete against paid parking but the service would be utilized. Can SANDAG do something for this district?"
S1194.A	heidi morton	n/a	Listen to the people, you work for us. Stop the bike lanes, they are not helping. I am an avid bike rider. These bike lanes do not work.
S1194.B	heidi morton	n/a	The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses. Implications of this area remains a TPA/SDA.....More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions: More cars, not less, More congestion, not less, More greenhouse gases, not less More parking problems, not less More health and safety issues, not less More evacuation issues, not less Increase vehicles miles traveled (VMT), not reduce it Decrease San Diegans quality of life, not improve it Decrease access to resources and opportunities to improve the quality of life, not add to it It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood. You will cause small businesses to go out of business because there will be no parking This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

Table J6.4: Email-Sourced Public Comments

ID	Commenter Name	Agency or Organization
E001	Eric Graves	n/a
E002	Lindsey Jauregui	n/a
E003	Steve Smith	n/a
E004.A-B	Bruce Higgins	n/a
E005	Paul Grimes	n/a
E006.A-B	Tom Lichterman & Mike Bullock	Oceanside Bicycle and Pedestrian Committee
E007	Al Ratliffe	n/a
E008	Melissa Hammer	n/a
E009	Cindi Andersen	n/a
E010	Dave Hogan	Sierra Club
E011	Mitch Meredith	n/a
E012	Kimberli Grogan	n/a
E013	Michael Deftos	n/a
E014.A-B	Gregory Nord & Kristin Tso	Orange County Transportation Authority
E015	Derek Hofmann	n/a
E016	Kesav Gupta	n/a
E017	McGarrah Wilson	n/a
E018	Sofia Carrasco	Youth v. Oil
E019	Frank Carasco	n/a
E020	Ashley Mayorga	n/a
E021	Megan Nguyen	n/a
E022	Bruce Nguyen	n/a
E023	Pamela Heatherington	Environmental Center of San Diego
E024	John Perry	n/a
E025	F. Lewis	n/a
E026	Nirmala Singaracharlu	n/a
E027.A-B	Peter Wheeler	n/a
E027.X	Barbara Franklin	n/a
E028.A-C	Steve Linke	n/a

Table J6.4: Email-Sourced Public Comments Continued

ID	Commenter Name	Agency or Organization
E029.A-D	Albert Perdon	n/a
E030	Dev Gupta	n/a
E031	Doris Nguyen	n/a
E032	Victoria Olivares	n/a
E033	Mark Maydahl	n/a
E034	Megan Bryan	n/a
E035	Deborah Allen	n/a
E036.A-B	Kirk Jackson	n/a
E037	Mary Davis	n/a
E038	Gregory Essayan	n/a
E039	Craig Jones	n/a
E040.A-E	Pete Penseyres	n/a

Outlook

Government efficiency

From ERIC GRAVES <ericgraves@cox.net>
Date Tue 5/27/2025 2:03 PM
To RegionalPlan <RegionalPlan@sandag.org>

[You don't often get email from ericgraves@cox.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I'm sorry to read how your organization wasted funds just like other gov't agencies.
GOVERNMENT DOESN'T DO ANYTHING VERY WELL!!!

Eric Graves
Sunset Cliffs

Sent from Eric's iPhone

Outlook

SANDAG Regional Plan contact

From Lindsey Jauregui <cascodagama@yahoo.com>
Date Tue 5/27/2025 2:56 PM
To RegionalPlan <regionalplan@sandag.org>

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CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Hi, SANDAG. It doesn't matter how it gets done, but it would be wonderful if SANDAG could work with the Trump Administration to obtain Federal funding (and removal of bureaucratic / military Red Tape) so that the old rail line to Fallbrook can be rehabilitated for NCTD Sprinter train service. BNSF might even be willing to use the line as well, once restored, with tens of thousands of local residents and workers on Camp Pendleton benefiting from having this great travel option available to them! Thank you, Lindsey Jauregui

Outlook

Re: Share Your Comments on the Draft 2025 Regional Plan

From S Smith <ksmsmith1220@earthlink.net>
Date Tue 5/27/2025 3:24 PM
To RegionalPlan <regionalplan@sandag.org>

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

I live in Fallbrook. I'm old....I don't use public transportation... I do have a concern about transportation planning issues regarding bus service in Fallbrook. Bus benches and shelters are missing on S. Mission at Via Encinos and Green Canyon....northbound. Other bus benches are missing too in Fallbrook. It is a sorry sight for me to see people waiting for the bus sitting on the ground because NCTD refuses to replace the benches and shelters that were there until about 3 years ago. It's a sad situation that folks who might generally be considered to be less fortunate and are left using public transportation cannot even have a place to sit while waiting for the bus. I've reached out to NCTD more than once and they just blew me off. These two locations used to be equipped with benches and shelters. You all are spending millions studying transportation issues trying to encourage people to get out of their cars and can't even properly maintain the facilities you have. NCTD brags on their website that they are spending millions on E-Busses and Hydrogen Fuel busses and they can't even replace a mission bench and shelter. Sad.

Thanks for letting me vent a little. I have a good life and like to think I have some compassion for those less fortunate. Can you facilitate getting benches and shelters replaced in Fallbrook?

Thank you very much,

Steve Smith

-----Original Message-----
From: SANDAG <regionalplan@sandag.org>
Sent: May 27, 2025 12:49 PM
To: <ksmsmith1220@earthlink.net>
Subject: Share Your Comments on the Draft 2025 Regional Plan

May 2025

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SANDAG

2025 Regional Plan

We Want to Hear From You!

The Draft 2025 Regional Plan is now available for public review and comment through **July 18, 2025**.

The draft plan outlines proposed transportation improvements to existing infrastructure, new projects, supporting programs and policies, implementation actions, and a financial plan. This will help make getting around the San Diego region more convenient, equitable, healthy, and safe for everyone who lives, works, and travels here.

Explore what's planned for your area and share your feedback!

View and Comment

How to Share Your Comments

You can submit comments in several ways:

- **Online:** SANDAG.org/2025regionalplan
- **Email:** regionalplan@sandag.org
- **Voicemail:** 619.515.1169
- **Mail:**

SANDAG
Attn: Sara Toma Ischep
1011 Union Street, Suite 400
San Diego, CA 92101

Join a Community Learning Session

Learn more about what's proposed in your area at an upcoming session:

- **East County:** Wednesday, June 11, 2025 | 5:30–7 p.m.
  Salvation Army El Cajon Corps
  1011 E Main St, El Cajon, CA 92021
- **North County:** Tuesday, June 17, 2025 | 5:30–7 p.m.
  The Vistonian
  306 S Santa Fe Ave, Vista, CA 92084
- **South County:** Wednesday, June 25, 2025 | 5:30–7 p.m.
  National City Public Library
  1401 National City Blvd, National City, CA 91950
- **Central San Diego:** Wednesday, July 9, 2025 | 5:30–7 p.m.
  Boulevard Hall
  4265 El Cajon Blvd, San Diego, CA 92105
- **Unincorporated San Diego County:** Wednesday, July 16, 2025 | 6–7 p.m.
  Zoom (virtual session)
  Webinar ID #823 0970 9826

RSVP

What is the 2025 Regional Plan?

The 2025 Regional Plan is a blueprint for how the San Diego region will grow and thrive over the next 25 years. It focuses on making it easier for people to get where they need to go—whether by car, bus, train, bike, or on foot—and creating better connections to jobs, schools, housing, and other essential services.

SANDAG is required by law to update the Regional Plan every four years; to keep up with our region's changing needs, including population growth, environmental goals, and how people get around. It includes proposed transportation improvements to our roads, transit system, bike lanes, and more—designed to make travel more convenient, equitable, healthy, and safe for everyone.

Now through fall, we'll be working with communities across the region to finalize the plan and we want your voice to be part of the conversation.

Learn More

Stay Connected

Sign up to our email list to stay informed on updates about the plan and how you can get involved.

Subscribe Now

¡Queremos escuchar su opinión!

El Borrador del Plan Regional 2025 ya está disponible para revisión y comentarios del público hasta el **18 de julio de 2025**.

El borrador del plan describe las mejoras al sistema de transporte, incluyendo la infraestructura existente, nuevos proyectos, programas y políticas de apoyo, acciones de implementación y un plan financiero. Todo esto tiene el objetivo para que los traslados por la región de San Diego sean más convenientes, equitativos, saludables y seguros para todos los que viven, trabajan y viajan aquí.

¡Explore lo que se ha planeado para su área y comparta sus comentarios!

Comenta Aquí

Como Compartir sus Comentarios

Puede enviar sus comentarios de varias maneras:

- **En línea:** SANDAG.org/2025regionalplan
- **Correo Electrónico:** regionalplan@sandag.org
- **Buzón de Voz:** 619.515.1169
- **Correo Postal:**

SANDAG
Attn: Sara Toma Ischep
1011 Union Street, Suite 400
San Diego, CA 92101

Participe en una Sesión Comunitaria Informativa

Acompáñenos para conocer más sobre las propuestas para su área en un evento pronto:

- **East County:** miércoles 11 de junio de 2025 | 5:30–7 p.m.
  Salvation Army El Cajon Corps
  1011 E Main St, El Cajon, CA 92021
- **North County:** jueves 17 de junio de 2025 | 5:30–7 p.m.
  The Vistonian
  306 S Santa Fe Ave, Vista, CA 92084
- **South County:** miércoles 25 de junio de 2025 | 5:30–7 p.m.
  National City Public Library
  1401 National City Blvd, National City, CA 91950
- **Central San Diego:** miércoles 9 de julio de 2025 | 5:30–7 p.m.
  Boulevard Hall
  4265 El Cajon Blvd, San Diego, CA 92105
- **Área No Incorporada del Condado de San Diego:** miércoles 16 de julio de 2025 | 6–7 p.m.
  Zoom (sesión virtual)
  Webinar ID #823 0970 9826

Confirme su Asistencia

¿Qué es el Plan Regional 2025?

El Plan Regional 2025 es una guía sobre cómo crecerá y prosperará la región de San Diego en los próximos 25 años. Su objetivo es facilitar que las personas lleguen a donde necesitan ir, ya sea en automóvil, autobús, tren, bicicleta o a pie, y crear mejores conexiones con empleos, escuelas, viviendas y otros servicios esenciales.

SANDAG tiene la responsabilidad de actualizar el Plan Regional conforme a la ley cada cuatro años; para adaptarlo a las necesidades cambiantes de nuestra región, incluyendo

el crecimiento poblacional, las metas ambientales y las maneras en que las personas se trasladan. El plan incluye mejoras propuestas para carreteras, el sistema de transporte público, ciclovías y más, con el fin de que todo que los traslados sean más convenientes, equitativos, saludables y seguros para todos.

Desde ahora y hasta el otoño, estaremos trabajando con comunidades de toda la región para finalizar el plan, y queremos que su voz forme parte de la conversación.

Más Información

Manténgase Informado

Suscríbase a nuestra lista de correo electrónico para mantenerse informado del plan y las maneras en que usted puede participar.

Suscríbase ahora

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En cumplimiento con la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés), usted puede solicitar este documento en formatos alternos, contactando al Coordinador de ADA de SANDAG, Director de Diversidad y Equidad, al 619.699.1900 o 619.699.1904 (TTY).

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Outlook

SANDAG Fund Raising

From Bruce Higgins <brucehiggins1253@gmail.com>
Date Tue 5/27/2025 3:35 PM
To RegionalPlan <RegionalPlan@sandag.org>; Sean Elo Rivera <seanelorivera@sandiego.gov>

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

The review request for your regional plan is a transparent fundraising attempt.

Your organization's lack of controls and accountability comes precariously close to fraud. Your 'Bait & Switch' on a past bond measure, the lack of accountability on expense accounts under your former manager, the arrogance of your planning that sends the message of "Give us the money and go away, we know what is best for you," your consistent poor audits, and the lack of over-site of the contractor for the toll road, indicates to me an organization that is out of control.

SANDAG needs a top to bottom house cleaning, starting with the Board of Directors and ending with the newest janitor, you should all be fired for cause, and an entire new organization and mission created.

Until then I will reject any additional funding for SANDAG and urge others to do the same. You have zero trust with the public, because you have squandered it with your actions.

Bruce Higgins
Brucehiggins1253@gmail.com
[redacted]

Outlook

Re: Automatic reply: SANDAG Fund Raising

From Bruce Higgins <brucehiggins1253@gmail.com>
Date Tue 5/27/2025 3:38 PM
To RegionalPlan <RegionalPlan@sandag.org>

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

And another example of SANDAG'S lack of care and control. Your automatic reply to feedback on your regional plan was sent out with no text.
You have lost your way completely and its time for you to go.

Bruce Higgins
Brucehiggins1253@gmail.com
[redacted]

On Tue, May 27, 2025 at 3:35 PM RegionalPlan <RegionalPlan@sandag.org> wrote:

Outlook

SANDAG 2025 Regional Plan

From Paul Grimes <aquawise2@gmail.com>
Date Wed 5/28/2025 12:37 PM
To RegionalPlan <RegionalPlan@sandag.org>

[You don't often get email from aquawise2@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Dear SANDAG:

First, I have a new desktop along with a fiber line and the map viewer is really slow. Took a minute to get the Central County area to load. There are too many colors of projects to see what's going on. Rosecrans Street has a blue line, which doesn't appear to match anything on the legend.

Unless you are a cyclist, there is little good happening in this plan.

I see housing is projected to grow faster than the low growth rate of population meaning more families will be leaving San Diego and more people will be living alone.
The rate of jobs goes up from 49% of total people to 52% of total people. We must be expecting a mix of fewer children, fewer full-time jobs and fewer retirees, which is disturbing.

Transit has been pretty much a complete failure in San Diego with low ridership, high fare evasion, poor travel times and at least perceived safety issues. The buses mostly have few riders, which is at least a bit better than all the empty bike lanes.

The days are gone of SANDAG providing the original balanced Transnet goal of 1/3 each to freeways, local streets and transit.

We continue to be in the era of SANDAG wasting money, unethical dealings, burying major errors, corruption, hiring transit gurus and building things with tax money that few will use. The brochure is filled with bikes, empty buses, rail on fragile cliffs, HOV lanes and, of course, people wearing masks.

Living in Point Loma, the traffic congestion is just awful with the absolute worst being the daily massive delay heading eastbound on I-8 where CALTRANS or other powers-to-be have several lanes funneled to a single lane at the I-5 interchange. If there was ever an emergency those on the Peninsula would be trapped. Nimitz to I-8 and Sea World Drive has major backups, Rosecrans has major backups, Taylor Street has the self imposed gate blockage by the expanding Trolley plus Amtrak and the Coaster. Access to Downtown via N Harbor Drive isn't much better. Massive building projects at Midway Rising, numerous apartment/condo projects and the staggeringly large SPAWAR redevelopment will only make things much worse.

Instead, we get lane reductions in width for bike lanes, parking losses for bike lanes and lane removals for bike lanes and dedicated bus lanes

that are used under 10 vehicles per hour. It surely appears the goal is to make driving as bad as transit.

SANDAG has made so many errors it is not trusted. Blowing through Transnet 2 so quickly was a huge error that got new Measures floated that were voted down. People don't want their money wasted on projects they don't use.

The 2025 Regional Plan Project Type Glossary shows that money is being spent on things that few use. The closest thing to moving traffic is freeway manages lanes and ramp/interchanges. There are an uncountable number of Bike lane projects and scores of transit projects in Appendix A. It looks like very few, if any freeway projects in the City of San Diego. Are all lane changes to manage HOV traffic?

Your priorities are in the wrong place and expenditures are out of control. We San Diegans don't need idealistic, highly- paid planners trying to rework San Diego from the paradise we all love to some East Coast type high-rise urban "paradise".

Please rework this plan to meet the goals of the average San Diego, not just groups that lobby for special interests.

Paul Grimes
[redacted]

Outlook

Questions on Active Transportation Projects for Oceanside Area in Regional Plan

From lichtermanti@gmail.com <lichtermanti@gmail.com>
Date Thu 5/29/2025 8:48 AM
To RegionalPlan <RegionalPlan@sandag.org>
Cc mike_bullock@earthlink.net <mike_bullock@earthlink.net>; Bob Nelson <robert.j.nelson52@gmail.com>

You don't often get email from lichtermanti@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Hello SANDAG Staff,
I have looked through the Active Transportation Projects for the Oceanside area in Appendix A and am wondering if I could get more information about some of them. The descriptions are rather cryptic and it's hard to know exactly what each project is proposing to do. I tried using the interactive map on the website but the info there is the same as the tables in Appendix A.

You can reach me at this email or by phone at [redacted]. The specific projects I am interested in are:

AT001	Inland Rail Trail Phase 4
AT019	Coastal Rail Trail Oceanside
AT036	Inland Rail Trail Vista to Oceanside
AT082	San Luis Rey River Trail
AT091	Camp Pendleton Trail
AT108	Coastal Rail Trail Segment 1 ALT
AT153	San Luis Rey River to Coast

FYI, I also left a message about this on the phone number listed on the Regional Plan web page.

Thank you.

Tom Lichterman, Chairman
Oceanside Bicycle and Pedestrian Committee

Outlook

RE: Questions on Active Transportation Projects for Oceanside Area in Regional Plan

From mike bullock@earthlink.net <mike bullock@earthlink.net>
Date Sun 6/1/2025 8:22 AM
To RegionalPlan <RegionalPlan@sandag.org>; lichtermanti@gmail.com <lichtermanti@gmail.com>
Cc 'Bob Nelson' <robert.j.nelson52@gmail.com>

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Terrible answer. Is their documentation so bad that they can't find the answer themselves? Cryptic is not cool.

From: RegionalPlan <RegionalPlan@sandag.org>
Sent: Thursday, May 29, 2025 2:40 PM
To: lichtermanti@gmail.com
Cc: mike_bullock@earthlink.net; Bob Nelson <robert.j.nelson52@gmail.com>
Subject: RE: Questions on Active Transportation Projects for Oceanside Area in Regional Plan

Hi Tom,

For more information about projects and programs proposed in your area, or to ask staff questions about the Draft 2025 Regional Plan, we invite you to attend an upcoming learning session:

- **East County:** Wednesday, June 11, 2025 | 5:30 – 7 p.m.
  Salvation Army El Cajon Corps
  1011 E Main St, El Cajon, CA 92021
- **North County:** Tuesday, June 17, 2025 | 5:30 – 7 p.m.
  The Vistonian
  306 S Santa Fe Ave, Vista, CA 92084
- **South County:** Wednesday, June 25, 2025 | 5:30 – 7 p.m.
  National City Public Library
  1401 National City Blvd, National City, CA 91950
- **Central San Diego:** Wednesday, July 9, 2025 | 5:30 – 7 p.m.
  Boulevard Hall
  4265 El Cajon Blvd, San Diego, CA 92105
- **Unincorporated San Diego County:** Wednesday, July 16, 2025 | 6 – 7 p.m.
  Zoom (virtual session)
  Webinar ID #823 0970 9826

RSVP here

From: lichtermanti@gmail.com <lichtermanti@gmail.com>
Sent: Thursday, May 29, 2025 8:48 AM
To: RegionalPlan <regionalplan@sandag.org>

Cc: mike_bullock@earthlink.net; Bob Nelson <robert.j.nelson52@gmail.com>
Subject: Questions on Active Transportation Projects for Oceanside Area in Regional Plan

You don't often get email from lichtermanti@gmail.com. Learn why this is important

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Hello SANDAG Staff,
I have looked through the Active Transportation Projects for the Oceanside area in Appendix A and am wondering if I could get more information about some of them. The descriptions are rather cryptic and it's hard to know exactly what each project is proposing to do. I tried using the interactive map on the website but the info there is the same as the tables in Appendix A.

You can reach me at this email or by phone at [redacted]. The specific projects I am interested in are:

AT001	Inland Rail Trail Phase 4
AT019	Coastal Rail Trail Oceanside
AT036	Inland Rail Trail Vista to Oceanside
AT082	San Luis Rey River Trail
AT091	Camp Pendleton Trail
AT108	Coastal Rail Trail Segment 1 ALT
AT153	San Luis Rey River to Coast

FYI, I also left a message about this on the phone number listed on the Regional Plan web page.

Thank you.

Tom Lichterman, Chairman
Oceanside Bicycle and Pedestrian Committee

Outlook

Sandag Regional Plan comments

From Alvin Ratliffe <sublootion@yahoo.com>
Date Sat 5/31/2025 2:46 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Hi, Sandag, I'd really like to see that railroad line into Fallbrook rebuilt, so that commuters and residents alike can get where they want to go without the hassle of busses or headaches of being stuck on Highway 76 when there's a wreck or other issue (which is pretty darn often these days). Thanks, Al Ratliffe

Outlook

Planning for SANDAG

From Melissa Hammer <willbemel@yahoo.com>
Date Sat 5/31/2025 2:55 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from willbemel@yahoo.com. Learn why this is important

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Good afternoon, SANDAG Management: Up until the early 1980s, a branchline of Santa Fe came all the way into downtown Fallbrook, but then ATSF donated the tracks to Camp Pendleton and the military cut us off from the outside world, perhaps payback for 'The Fallbrook Story' made by famous Hollywood director Frank Capra. You can see this nifty little short film online for free, and it is in full Technicolor.

Fallbrook has lost so much of it historical character because our railroad was severed; if SANDAG can fight for us and get the line back in action, it will be the greatest thing to happen to this area in half a century or more. SPRINTER trains already in use on the Escondidop line can also serve Fallbrook, leading to greater efficiency and usefulness. All we need is a rebuilt track, some basic signaling and limited-access platforms for any stops inside Camp Pendleton's military reservation.

On the east coast where I used to live (home to Fallbrook, MA, namesake of CA's Fallbrook) Boston MTA has a special limited-access platform serving Lynn, MA's General Electric Co. River WWorks station, so that only verified employees can enter. The same idea can easily be applied to Camp Pendleton, so that only authorized military personnel can get inside.

Best,
Melissa Hammer

Outlook

SANDAG planning contact

From Cindi Andersen <cindersnaps343@yahoo.com>
Date Mon 6/2/2025 12:02 AM
To RegionalPlan <RegionalPlan@sandag.org>

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Good morning, Regional Plan. It would be so great for SANDAG to return passenger rail to the Fallbrook area, especially NCTD Sprinters. When the tracks through town were torn up, it ripped out Fallbrook's heart and soul; it also didn't help that the historic depot was bulldozed a decade before, in the early 1970s.

Very respectfully,

Cindi Andersen

Outlook

Regional Plan projects list in Excel?

From Dave Hogan <hogansierraclub@gmail.com>
Date Mon 6/9/2025 12:19 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Would it be possible to share the draft 2025 Regional Plan Appendix A list of projects, ideally as one master list rather than broken down by region (due to projects being listed multiple times as they overlap regions). Our goal is to have a tool to accurately compare the number and costs of projects in different categories.

Thank you,
Dave Hogan
Sierra Club San Diego
hogansierraclub@gmail.com
[redacted]

Outlook

Safety

From Mitch Meredith <mitchmeredith.usc.alumni@gmail.com>
Date Thu 6/12/2025 1:39 PM
To RegionalPlan <RegionalPlan@sandag.org>

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SANDAG,

What measures will be made to public transportation to make use, safe, for all ages?

Mitch Meredith

Outlook

FW: CORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge Area of Point Loma TPA/SDA is classified incorrectly!

From Chesley DeLeon <chesley.deleon@sandag.org>
Date Mon 6/16/2025 10:17 AM
To RegionalPlan <RegionalPlan@sandag.org>

From: Kimberli Grogan <kbeck@kabcorp.com>
Sent: Monday, June 16, 2025 10:08 AM
To: "MayorToddGloria@sandiego.gov" <mayortoddgloria@sandiego.gov>; Lowe, Elyse <elowe@sandiego.gov>; SANDAG PIO <pio@sandag.org>; Peter Stevens <peter.stevens@sandag.org>; Data <data@sandag.org>; SustainableTransportation <sustainabletransportation@sandag.org>; antoinette.meir@sandag.org; Sara Toma Ischep <sara.toma@sandag.org>; Chesley DeLeon <chesley.deleon@sandag.org>; sustainability@sandiego.gov; Trom, Philip <PTrom@sandiego.gov>; Cecily Taylor <cecily.taylor@sandag.org>; Peter Thompson <peter.thompson@sandag.org>; SANDAG Surveys <sandagsurveys@sandag.org>
Subject: CORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge Area of Point Loma TPA/SDA is classified incorrectly!

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Please remove the Shelter Island area from TPA/SDA it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
2. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents.
3. This area of the bus line **cannot accommodate a dedicated bus lane (see photo below)**. Route 28 or 228 will never become a Next Gen Rapid Route in this area.
4. The peak traffic hours are completely congested and will not allow a bus to pass even with a **transit signal priority.**
5. The bus route runs every 30-60 minutes with minimal passengers. You **cannot justify increasing service hours for high-frequency service** or intervals. MTS has a deficit and this area is at the bottom of their priority list
6. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility

zone 3. **Bike lanes will not be added to mobility zone 4** - this area.

7. There are no **major activity centers** in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away.
8. There is **no room to add upgraded stations** in this area.
9. There is no way to **limit the stops** this route already has.
10. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.
11. The closest major hub is 3.2 miles away in Old Town.
12. The closest pharmacy is 1.7 miles away.
13. The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA.....

1. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the **devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals:**
    a. More cars, not less,
    b. More congestion, not less,
    c. More greenhouse gasses, not less
    d. More parking problems, not less
    e. More health and safety issues, not less
    f. More evacuation issues, not less
    g. Increase vehicles miles traveled (VMT), not reduce it
    h. Decreases San Diegans' quality of life, not improve it
    i. Decreases access to resources and opportunities to improve the quality of life, not add to it
    j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure **(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
    k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the TPA/SDA. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

This is the end if the line for route 28. Next Rapid Transit "Planned" for 2035 is not realistic. There is no way to add dedicated lanes in this area as you can see by the photo.. Most of this area is two lane roads. This includes the Navy Submarine bus major ingress and egress from the point. 12,000-22,000 people occupy this area daily. It is located in a Very High Fire Hazard Safety Zone. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents.

28 OLD TOWN
MTS

28 OLD TOWN
MTS

Outlook

Regional Plan Public Comment

From Michael Deftos <mdeftos@gmail.com>
Date Wed 7/9/2025 10:10 PM
To RegionalPlan <RegionalPlan@sandag.org>

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SANDAG Board of Directors,

The Regional Plan should include a plan to move the LOSSAN railroad corridor away from land threatened by sea level rise and flooding caused by climate change. This should include a plan to construct an electric passenger railway along the I-5 corridor from Oceanside to Downtown San Diego and the San Diego Airport, with connectors to eastern locations along the SR-52, -56, and -94 corridors. In addition to protecting against climate change, this will increase access for all of San Diego County, not just coastal cities, to the benefits of passenger rail travel. For freight, the Regional Plan should include a plan to move rail freight to the 1-15 corridor, with connections to the Mexico border and the Port of San Diego. This should utilize elevated autonomous electric freight-moving technology.

Such a plan would help meet numerous priorities, including:
1. Increasing ridership by increasing the proximity of the railway to centers of population and job density
2. Increasing the speed potential of rail travel and freight transport by eliminating sharp curves and grade crossings along the railway.
3. Decreasing greenhouse gases by implementing electric technologies and increasing ridership
4. Removing freight trucks from freeways by using an elevated autonomous electric system
5. Removing infrastructure from coastal lagoons, increasing their value as natural resources and as buffers against the effects of sea level rise and flooding
6. Eliminating road grade crossings and other rail-associated hazards by removing the railway away from the center of communities, pedestrians and bikers.

Thanks for your consideration,
Michael Deftos

Outlook

OCTA's Comments on SANDAG's Draft 2025 Regional Plan

From Kristin Tso <KTso@octa.net>
Date Thu 7/17/2025 3:58 PM
To Sara Toma Ischep <Sara.Toma.Ischep@sandag.org>; RegionalPlan <RegionalPlan@sandag.org>
Cc Gregory Nord <gnord@octa.net>; Dan Phu <DPhu@octa.net>

Some people who received this message don't often get email from ktso@octa.net. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Good afternoon Sara,

Thank you for the presentation today and the opportunity to comment on the San Diego Association of Governments' (SANDAG) Draft 2025 Regional Plan. The Orange County Transportation Authority (OCTA) appreciates SANDAG's continued partnership in developing a transportation system that improves regional mobility, equity, and sustainability.

OCTA supports the Draft Plan's commitment to advancing multimodal investments and offers the following comments on elements relevant to inter-county coordination:

1. **LOSSAN Corridor Improvements**
   OCTA supports the ongoing focus on the LOSSAN Corridor, which provides critical passenger rail service between San Diego and Orange Counties. Additional details on cross-county coordination would further strengthen the Plan's commitment to integrated interregional rail service.

2. **Northern Interstate 5 (I-5) Corridor Improvements**
   OCTA supports the inclusion of managed lane improvements along I-5 between State Route (SR) 78 and SR-76, as well as both managed lane connectors and interchange improvements at the I-5/SR-78 junction. These projects are vital to the long-term mobility of Southern California and OCTA encourages continued coordination. In addition, OCTA is advancing a project to add managed lanes on I-5 from Avenida Pico to the San Diego County line. SANDAG and OCTA should continue to work together to ensure that improvements on both sides of the county line are well coordinated and support regional travel demand.

3. **Unconstrained Vision for the Northern I-5 Corridor**
   OCTA acknowledges that the I-5 corridor north of SR-76 is included in the unconstrained portion of the Draft Plan. OCTA supports maintaining this vision and encourages future collaboration to advance improvements to the county line as funding becomes available.

4. **Camp Pendleton Trail Segment**
   OCTA supports the inclusion of the Camp Pendleton segment of the Coastal Rail Trail as part of the Regional Bike Network. This segment would improve bicycle connectivity between San Diego and Orange Counties and offers value as a regional active transportation asset.

OCTA appreciates the opportunity to provide these comments and looks forward to continued coordination with SANDAG to support regional transportation planning and implementation.

Sincerely,

Kristin Tso, PE, TE
Principal Analyst
Long-Range Planning & Corridor Studies
Orange County Transportation Authority
[redacted]

From: Sara Toma Ischep <Sara.Toma.Ischep@sandag.org>
Sent: Friday, July 11, 2025 9:42 AM
To: Gregory Nord <gnord@octa.net>
Cc: Dan Phu <DPhu@octa.net>; Tuere Fa'aola <Tuere.Faaola@sandag.org>; RegionalPlan <RegionalPlan@sandag.org>
Subject: RE: SANDAG's Draft 2025 Regional Plan

Hi Greg,

Thank you for reviewing and providing comments on the Draft 2025 Regional Plan. Looking forward to our meeting next week.

Thank you,

Sara Toma Ischep, AICP (she/her/hers)
Senior Regional Planner

619.699.7327 office
1011 Union Street, Suite 400, San Diego, CA 92101

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From: Gregory Nord <gnord@octa.net>
Sent: Friday, July 11, 2025 9:37 AM
To: Sara Toma Ischep <Sara.Toma.Ischep@sandag.org>
Cc: Dan Phu <DPhu@octa.net>
Subject: Re: SANDAG's Draft 2025 Regional Plan

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Hi Sara,

Thanks for coordinating the upcoming meeting. I also want to let you know that OCTA plans to submit some minor comments on the Plan. In short, we want to communicate support for the proposed investments in the LOSSAN Corridor, the I-5 and SR-78 corridors in North County, and the Camp Pendleton segment of the Coastal Rail Trail. We also encourage continued coordination to align improvements on both sides of the Orange-San Diego County line, particularly in consideration of our I-5 managed lane project, from the county line to Avenida Pico, that is currently in PA/ED.

Looking forward to the presentation.

Thanks,
Greg

Gregory Nord | **Department Manager**
Regional & Active Transportation Planning
Orange County Transportation Authority
[redacted]
email: gnord@octa.net

From: Sara Toma Ischep <Sara.Toma.Ischep@sandag.org>
Sent: Wednesday, July 9, 2025 4:58 PM
To: Camille Guiriba <guiriba@scag.ca.gov>; whiteakerw@scag.ca.gov <whiteakerw@scag.ca.gov>; mateer <mateer@scag.ca.gov>; felix@scag.ca.gov <felix@scag.ca.gov>; davidaguirre@imperialctc.org <davidaguirre@imperialctc.org>; JChan@RCTC.org <JChan@RCTC.org>; JChan@RCTC.org <JChan@RCTC.org>; Gregory Nord <gnord@octa.net>
Cc: Tuere Fa'aola <Tuere.Faaola@sandag.org>; Hector Vanegas <Hector.Vanegas@sandag.org>
Subject: SANDAG's Draft 2025 Regional Plan

Good afternoon,

I am reaching out to you to coordinate a meeting between our agencies to present the Draft 2025 Regional Plan. The Plan is currently out for the required 55-day public comment period, ending July 18th. We know this might be difficult to coordinate a meeting with all our agencies in one meeting, I am happy to schedule separate ones based on your availability. At the meeting, we will share various projects that intersect between our regions, project timeline, and Q/A to share with us any concerns you might have on transportation projects.

We have the following dates/times available:

Tuesday, July 15, 1-2 PM
Wednesday, July 16, 1-2 PM
Friday, July 18, 3-4 pm

Thank you in advance for working with me on this request.

Thank you,

Sara Toma Ischep, AICP (she/her/hers)
Senior Regional Planner

619.699.7327 office
1011 Union Street, Suite 400, San Diego, CA 92101

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Outlook

Feedback on Draft 2025 Regional Plan

From Derek Hofmann <derek.hofmann@gmail.com>
Date Mon 7/14/2025 7:54 PM
To RegionalPlan <RegionalPlan@sandag.org>

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CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Dear SANDAG,

In reviewing your Draft 2025 Regional Plan, 15-30 minute peak bus frequencies is not acceptable. Every bus route should have 12 minute peak frequencies or better so that people won't have to plan their trip around the bus schedule. That includes bus routes 20, 110, 235, 280, and 290, even though they all run on the I-15. Want to save money? Deinterline[1] those routes and run a single local/express pair as a trunk line with even higher frequencies so people don't mind transferring, and to reduce dwell times at bus stops.

Another benefit of consolidating redundant routes is simplicity, and in general, simpler improves usability and is better for your clients[2], ask any engineer if you don't believe me.

And so that people don't get stranded when they miss the last bus, all bus routes should run 24/7, including the weekday 280 and 290 if you choose to keep them (which you probably shouldn't, see above).

People will switch from driving to transit and reduce traffic congestion for everyone if buses ran frequently and didn't get stuck in traffic[3], so wherever buses experience traffic delays, the road needs bus lanes. HOT lanes are fine but not HOV lanes because those get congested and that makes them useless. They must be congestion-free 24/7 or people won't trust them. So you need for example to replace the new HOV lanes on the SR-56 with bus lanes, and add bus lanes (or restripe regular lanes to bus lanes) to the I-5, SR-52, and SR-163.

In summary:

1. Run every bus route at 12 minute peak frequencies or better.
2. Deinterline/consolidate routes as needed to save money.
3. Run every remaining bus route 24/7.
4. Eliminate all HOV lanes and add bus lanes wherever buses experience delay.

Benefits:

1. Less time waiting for buses.
2. Less cost.
3. Eliminates traffic congestion.
4. Faster buses and less dwell time at bus stops.
5. Simplicity.

Sincerely,
Derek Hofmann
San Diego, CA

Footnotes:
[1] https://pedestrianobservations.com/2018/06/12/how-deinterlining-can-improve-new-york-city-transit/
[2] https://humantransit.org/2010/11/connections-vs-complexity.html
[3] https://youtu.be/RQY6WGOoYis

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From Kesav Gupta <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 7:50 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from noreply@adv.actionnetwork.org. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

Countywide all-door boarding on every MTS and NCTD bus

A rebuilt PRONTO system with tap-to-pay and student pass access by 2026

Permanent funding for Youth Opportunity Passes beyond 2026

Transit Signal Priority at over 250 intersections in high-ridership, equity-focused corridors

100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Kesav Gupta
kesav.guptanyc@gmail.com
[redacted]

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From McGarrah Wilson <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 7:58 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from noreply@adv.actionnetwork.org. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

Countywide all-door boarding on every MTS and NCTD bus

A rebuilt PRONTO system with tap-to-pay and student pass access by 2026

Permanent funding for Youth Opportunity Passes beyond 2026

Transit Signal Priority at over 250 intersections in high-ridership, equity-focused corridors

100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

McGarrah Wilson
mcgarrah8@yahoo.com
[redacted]
[redacted]

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From Sofia Carrasco <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 8:01 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

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These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Best,
Sofia Carrasco
Youth v. Oil Intern

Sofia Carrasco
Sofster3579@gmail.com
[redacted]

Outlook

Stop Ignoring Us. Fix the Plan.

From Frank Carasco <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 8:05 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Regional Plan Team Regional Plan,

To the SANDAG Board and Planning Staff,

This draft Regional Plan is unacceptable. It fails the moment we needed it most. While our region faces intersecting climate, mobility, and racial equity crises, SANDAG continues to double down on the same car-centric, freeway-first approach that created these problems in the first place. Funding more highway expansions—under the misleading guise of "managed lanes"—is not just negligent, it's indefensible.

Every dollar you pour into roads is a dollar stolen from the future. You are locking us into decades of emissions, sprawl, traffic deaths, and segregation while pretending this is progress. Do you understand how angry people are? How tired we are of your empty climate promises and performative equity rhetoric, only to see another budget stacked with road widenings?

Stop pretending we can have it both ways. We can't meet climate goals while expanding freeways. We can't fix transit without making real investments. We can't claim equity while forcing working-class San Diegans to spend hours on broken, infrequent bus lines because you refuse to fund real alternatives.

The People's Platform demands are not radical. They are the bare minimum. You've had years to act. We've shown up at meetings. We've written letters. We've sat through your planning documents and performance dashboards. And still, you keep building for cars instead of people. Enough.

Adopt all 10 demands. Not later. Now.
- Systemwide 7½-minute trolley service by 2029
- 10-minute peak and 15-minute weekend bus service on top routes
- Clock-face COASTER and SPRINTER with full upgrades
- All-door boarding across MTS and NCTD
- A rebuilt PRONTO with student access and tap-to-pay

• Permanent Youth Opportunity Pass funding
• Transit signal priority on 250+ intersections
• 100 miles of protected, camera-enforced bus-only lanes
• A real countywide bike-share network
• A public, transparent transit performance dashboard

Stop hiding behind studies and excuses. Start building the system we actually need. You are running out of time, and we are running out of patience.

Fix this plan. Or get out of the way.

—Frank

Frank Carasco
sidixi2410@lhory.com
[redacted]

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From Ashley Mayorga <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 8:06 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

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100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Ashley Mayorga
ximenashley@icloud.com
[redacted]

Outlook

Adopt a Just Transit-First Regional Plan

From Megan Nguyen <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 8:57 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

My name is Megan Nguyen and I am a 7th grader at Pacific Beach Middle School. Public transit has been so vital for me to get around, especially as a person who is not yet eligible to drive, and it serves as a way to travel with a lower carbon footprint.

The 2025 Regional Plan, however, does not reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. The current plan set fuels freeway expansions (50% of GHG emissions comes from transportation!) while underinvesting in public transit, walkability, and bike infrastructure. This plan ignores the needs of the people it is supposed to serve, and undermine's San Diego's climate goals.

In particular, I ask for permanent funding for Youth Opportunity Passes beyond 2026. Transportation is a human right. I know many others who rely on public transit, people with schools where the majority of kids use the trolley. Many people using public transit are low-income, therefore free transportation is vital.

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Prioritize climate justice and build the system this region needs.

Megan Nguyen
mroohoohyay@gmail.com
[redacted]

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From BRUCE NGUYEN <noreply@adv.actionnetwork.org>
Date Tue 7/15/2025 9:41 PM
To RegionalPlan <RegionalPlan@sandag.org>

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Regional Plan Team Regional Plan,

Dear SANDAG Board and Planning Staff,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

DR BRUCE NGUYEN OD

BRUCE NGUYEN
BRUCENGUYENOD@GMAIL.COM
[redacted]

Outlook

FW: Comments on Draft RTP 2025

From Clerk of the Board <clerkoftheboard@sandag.org>
Date Wed 7/16/2025 9:49 AM
To RegionalPlan <RegionalPlan@sandag.org>

Hi friends, is there any information you'd like me to include in my reply? If not I'll just confirm receipt.

Thanks!

Francesca Webb (she/her/hers)
Deputy Clerk of the Board

619.977.9294 cell
1011 Union Street, Suite 400, San Diego, CA 92101

SANDAG | *Pursuing a brighter future for all*

Learn about our commitment to equity
SANDAG office hours are Tuesday–Friday and every other Monday from 8 a.m.–5 p.m.

From: Pam Heatherington San Diego <contactecosd@gmail.com>
Sent: Wednesday, July 16, 2025 9:45 AM
To: Clerk of the Board <clerkoftheboard@sandag.org>
Subject: Comments on Draft RTP 2025

You don't often get email from contactecosd@gmail.com. Learn why this is important

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RE: Comment on 2025 Regional Plan – Protect Biodiversity, Advance Equity, and Prioritize Transit Over Freeways

Dear SANDAG Board of Directors,

Thank you for the opportunity to comment on the Draft 2025 Regional Plan. While we appreciate the inclusion of certain rail, bike, and pedestrian improvements, the Plan falls short of delivering the transformative vision our region urgently needs. San Diego deserves a transportation system that protects our globally significant biodiversity, reduces greenhouse gas emissions, and centers public transit as a tool for equity and climate resilience—not sprawl and car dependence.

We are deeply concerned that the 2025 RP **removes the regional habitat conservation funding** included in the 2021 plan. This funding is essential to protect the region's native wildlife, endangered species, and natural lands. San Diego is a global biodiversity hotspot, and SANDAG must take a leadership role in preserving this natural legacy. Moreover, the plan lacks basic environmental safeguards: there are **no conditions to avoid**

sensitive habitats, protect wildlife corridors, or control invasive species. Several planned freeway and rail expansion projects—such as the LOSSAN double-tracking through Carroll Canyon and freeway expansion over Rose Canyon—threaten these irreplaceable ecosystems.

Equally troubling is the continued **prioritization of freeway and managed lane projects**, many of which incentivize sprawl and benefit single-occupancy vehicle drivers at the expense of meaningful climate action. The Plan includes **61 freeway and road projects** by 2035 totaling **$10.84 billion**, compared to just **6 rail projects** during the same time period. Many of these "managed lanes" provide paid FasTrak access that undermines carpooling and slows buses—especially egregious given that some freeways slated for managed lanes have **no express bus service planned**.

Worse still, the 2025 RP **downgrades or removes critical public transit projects** from the previous plan—like the Purple Line commuter rail and direct downtown connections to the U.S.-Mexico border and El Cajon—while failing to deliver a **rail link to the airport**. We urge you to restore these projects and ensure that transit, not cars, leads regional mobility planning.

We also endorse the **People's Platform from RIDE SD**, a community-driven vision that SANDAG must embrace. This includes:

- 7½-minute trolley frequencies across all lines by 2029
- 10-minute peak and 15-minute weekend service on top bus routes
- Clock-face Coaster and 15-minute Sprinter service
- Countywide all-door boarding and upgraded PRONTO
- Permanent Youth Opportunity Pass funding
- Transit signal priority at 250+ intersections
- 100 miles of protected, enforced bus-only lanes
- Real-time public accountability and performance metrics

These are realistic, data-backed solutions that would create a **transit-first system** centered on equity, accessibility, and climate action.

We urge SANDAG to revise the 2025 RP to restore habitat funding and biodiversity protections, cancel sprawl-inducing freeway expansions, and fully embrace a bold, transit-centered future for San Diego County. Our region, our climate, and our most vulnerable communities cannot afford another decade of delay.

Sincerely,
Pamela Heatherington

Pamela Heatherington
Board of Directors
Environmental Center of San Diego
The environment is the foundation for all living things. Please act accordingly.

Outlook

Comments

From John Perry <gobluejohn72@yahoo.com>
Date Wed 7/16/2025 10:44 AM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from gobluejohn72@yahoo.com. Learn why this is important

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Regarding highway projects: two sections - CA52 east/west from Mast Blvd to 125 south/north, and CA125 south/north between I-8 and the 125/94 interchange.

I realize a long term solution is on the books for this area, but my comment is regarding a much much less costly interim solution to easing somewhat the current traffic congestion in this area. The proposal would be to stripe the roadway on CA52 to three lanes where it now narrows to two lanes to cross the San Diego River. It would mean no shoulder for that stretch of roadway but I know this is not uncommon in California - a good example is the Coronado Bridge which has no shoulder for it's entire span, that is how they added a lane to that roadway.

The same could be done for CA125 from I-8 to the 94 interchange (although expanding from three lanes to four). Again a narrow spot at overpasses/underpasses, therefore no shoulder. These would both be "temporary' until the already planned projects are ready for construction.

One additional comment: If second proposal is not feasible there is an even easier step that could be taken at one section in one direction. At southbound CA125 from the control lights at I-8 southbound there is ample concrete on the left shoulder for an additional lane while still leaving a safe shoulder. The additional lane could continue to a point past where there is a lot of merging onto the 125 southbound from I-8 east and westbound as well as Grossmont Blvd. The additional lane on the left would at least help that congestion in that area, plus there is plenty of concrete already in place to add the lane and still leave a shoulder.

Thank you for the opportunity to comment.

Sincerely,
John Perry

PS: I realize that this is for comments regarding the Regional Plan so if necessary perhaps this can be forwarded to appropriate party.

Outlook

Status of SR 76

From ferol lewis <ferollew@yahoo.com>
Date Wed 7/16/2025 12:41 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from ferollew@yahoo.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Hello,
I am wondering what is being done to mitigate the noise issue in the residential areas along SR 76? New housing and construction has seriously increased the noise along the residential areas along SR 76.

What is the process to discuss current plans and future plans for mitigation.
Please advise what steps homewoners can do to learn more about the current and future plans for SR 76.
Thank you and best regards,
F. Lewis

Outlook

A Letter From A North County Grandma

From Nirmala Singaracharlu <noreply@adv.actionnetwork.org>
Date Wed 7/16/2025 1:43 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from noreply@adv.actionnetwork.org. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Regional Plan Team Regional Plan,

I'm writing to you as a San Diegan, now in my older years, with a heart full of worry and hope. I've watched this region grow over decades. I've seen neighborhoods thrive—and I've seen how easily we can lose our way when decisions are made that leave people behind.

I may be old, but I still walk these streets. I still ride the bus. I still care deeply about the kind of world we're leaving to our children and grandchildren. And I am begging you, truly begging you, to do better with this Regional Plan.

We are facing a climate crisis. So many in our community—seniors like me, young people, working families—depend on transit that simply isn't there when they need it. Meanwhile, we continue to pour billions into widening freeways, as though that's ever solved anything. It hasn't. It's only made things harder for the very people this plan is supposed to serve.

Please listen: we need a system that's built for people, not just cars. A system where a young person can get to school or work safely and quickly, where a mom with a stroller doesn't have to wait 30 minutes for a bus that never comes, where someone like me can still live an independent life without relying on a car I can no longer drive.

The 10 demands from the People's Platform of San Diego are not extravagant. They're what any caring, forward-thinking region should already be doing:

- 7½-minute trolley service everywhere by 2029
- Reliable buses every 10 minutes during peak, 15 minutes on weekends
- Predictable train schedules and major upgrades for COASTER and SPRINTER
- Easy all-door boarding on every MTS and NCTD bus
- A PRONTO system that works, with tap-to-pay and student passes
- Youth Opportunity Passes made permanent
- Traffic lights that give priority to buses in the places people need them most
- 100 miles of safe, protected, camera-enforced bus lanes

• A real, connected bike-share program across the county
• A transparent public dashboard that shows how transit is really doing

None of this is radical. It’s basic. It’s decent. And it’s what this beautiful place we all call home deserves.

Please—I’m asking with all the sincerity I have left—don’t waste another four years. Don’t lock us into more car-dependence, more emissions, more heartbreak. You still have time to do the right thing.

I’m begging you. Please, adopt the 10 demands and give San Diego a future we can be proud of.

Nirmala Singaracharlu
nsingaracharlu@gmail.com
[redacted]

Outlook

Fwd: Fw: CORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs Area of Point Loma TPA/SDA is classified incorrectly!

From Pete Wheeler <pete.wheeler45@gmail.com>
Date Wed 7/16/2025 2:29 PM
To RegionalPlan <RegionalPlan@sandag.org>

1 attachment (18 KB)
Comment on the SANDAG mobility study.docx;

You don't often get email from pete.wheeler45@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Dear Board Member, I bring to your attention the below request. The drafter has done an excellent job of expressing the issues. Please give your careful attention to this request. Peter Wheeler

Subject: Re: CORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs Area of Point Loma SANDAG has classified incorrectly! WE ARE BEGGING YOU!!! PLEASE LISTEN.

Please remove the Shelter Island area from the SANDAG mobility/transportation plan it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
2. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents.
3. This area of the bus line **cannot accommodate a dedicated bus lane (see photo below)**. Route 28 or 228 will never become a Next Gen Rapid Route in this area.
4. The peak traffic hours are completely congested and will not allow a bus to pass even with a **transit signal priority.**
5. The bus route runs every 30-60 minutes with minimal passengers. You **cannot justify increasing service hours for high-frequency service** or intervals. MTS has a deficit and this area is at the bottom of their priority list
6. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. **Bike lanes will not be added to mobility zone 4** - this area.
7. There are no **major activity centers** in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away.
8. There is **no room to add upgraded stations** in this area.
9. There is no way to **limit the stops** this route already has.
10. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.
11. The closest major hub is 3.2 miles away in Old Town.
12. The closest pharmacy is 1.7 miles away.

13. The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA.....

1. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the **devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals:**
    a. More cars, not less,
    b. More congestion, not less,
    c. More greenhouse gases, not less
    d. More parking problems, not less
    e. More health and safety issues, not less
    f. More evacuation issues, not less
    g. Increase vehicles miles traveled (VMT), not reduce it
    h. Decrease San Diegans' quality of life, not improve it
    i. Decrease access to resources and opportunities to improve the quality of life, not add to it
    j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure **(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
    k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the Transportation Plan. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

This is the end if the line for route 28. Next Rapid Transit "Planned" for 2035 is not realistic. There is no way to add dedicated lanes, or in this area as you can see by the photo.. Most of this area is two lane roads. This includes the Navy Submarine base major ingress and egress from the point. 12,000-22,000 people occupy this area daily. It is located in a Very High Fire Hazard Safety Zone. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.

28 OLD TOWN
$ 2.50
MTS

There are two days left to leave a comment on the SANDAG mobility study that comes out every 4 years. Please comment today...

Website Link:

https://engage.sandag.org/public-comment-form-draft-2025-regional-plan

Check the boxes for Transit/Bikeways/Transportation Technology

Cut and paste the following....

What is your comment on transit? Required

The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.

Implications of this area remains a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
More congestion, not less,
More greenhouse gases, not less
More parking problems, not less
More health and safety issues, not less
More evacuation issues, not less
Increase vehicles miles traveled (VMT), not reduce it

Decrease San Diegans' quality of life, not improve it
Decrease access to resources and opportunities to improve the quality of life, not add to it.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking.

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on bikeways and walkways? Required

The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses.

Implications of this area remains a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
More congestion, not less,
More greenhouse gases, not less
More parking problems, not less
More health and safety issues, not less
More evacuation issues, not less
Increase vehicles miles traveled (VMT), not reduce it
Decrease San Diegans' quality of life, not improve it
Decrease access to resources and opportunities to improve the quality of life, not add to it

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on transportation technology? Required

The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area.

The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority.

The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list

This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area.

There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away.

There is no room to add upgraded stations in this area.
There is no way to limit the stops this route already has.
There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.
The closest major hub is 3.2 miles away in Old Town.
The closest pharmacy is 1.7 miles away.
The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA…..

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
More congestion, not less,
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It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

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This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on climate, energy, and air quality? Required

Implications of this area remaining a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

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Increase vehicles miles traveled (VMT), not reduce it

Decreases San Diegans' quality of life, not improve it
Decreases access to resources and opportunities to improve the quality of life, not add to it

It violates the City's CAP goals.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on state and federal regulations? Required

The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State.

Implications of this area remaining a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
More congestion, not less,
More greenhouse gases, not less
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More health and safety issues, not less
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It violates the City's CAP goals.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

3. What area in the San Diego region is your comment related to? (Optional)
Entire region

The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.

Outlook

ORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs Area of Point Loma SANDAG has classified incorrectly! WE ARE BEGGING YOU!!! PLEASE LISTEN.

From Barbara Franklin <msbarbpl@gmail.com>
Date Wed 7/16/2025 9:06 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from msbarbpl@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Please remove the Shelter Island area from the SANDAG mobility/transportation plan it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
2. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents.
3. This area of the bus line **cannot accommodate a dedicated bus lane (see photo below)**. Route 28 or 228 will never become a Next Gen Rapid Route in this area.
4. The peak traffic hours are completely congested and will not allow a bus to pass even with a **transit signal priority.**
5. The bus route runs every 30-60 minutes with minimal passengers. You**cannot justify increasing service hours for high-frequency service** or intervals. MTS has a deficit and this area is at the bottom of their priority list
6. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. **Bike lanes will not be added to mobility zone 4** - this area.
7. There are no **major activity centers** in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away.
8. There is **no room to add upgraded stations** in this area.
9. There is no way to **limit the stops** this route already has.
10. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.
11. The closest major hub is 3.2 miles away in Old Town.
12. The closest pharmacy is 1.7 miles away.
13. The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA.....

1. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the**devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals:**
    a. More cars, not less,
    b. More congestion, not less,
    c. More greenhouse gases, not less
    d. More parking problems, not less
    e. More health and safety issues, not less
    f. More evacuation issues, not less
    g. Increase vehicles miles traveled (VMT), not reduce it

h. Decrease San Diegans' quality of life, not improve it
i. Decrease access to resources and opportunities to improve the quality of life, not add to it
j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure**(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the Transportation Plan. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

This is the end if the line for route 28. Next Rapid Transit "Planned" for 2035 is not realistic. There is no way to add dedicated lanes, or in this area as you can see by the photo.. Most of this area is two lane roads. This includes the Navy Submarine base major ingress and egress from the point. 12,000-22,000 people occupy this area daily. It is located in a Very High Fire Hazard Safety Zone. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.

28 OLD TOWN
$ 2.50
MTS

Barb Franklin

Outlook

Public comment on SANDAG 2025 Regional Plan and for 7/18/2025 Transportation Cmte meeting

From Steve Linke <splinke@gmail.com>
Date Thu 7/17/2025 4:23 AM
To RegionalPlan <RegionalPlan@sandag.org>

2 attachments (2 MB)
S Coast Hwy separated bikeway case report v0.9-DRAFT.pdf; Dixon-FHWA study critique v0.9-DRAFT.pdf;

You don't often get email from splinke@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

SANDAG Board, Committee members, and staff:

One aspect of SANDAG's 2025 Regional Plan appears to be strong encouragement of separated ("protected") bikeway installations/conversions (adding plastic posts, wheel stops/curbs, etc.), and perhaps requiring that style of bikeway to compete for grant funding. However, despite massive marketing of separated bikeways by organizations like the Federal Highway Administration (FHWA) and the National Association of City Transportation Officials (NACTO), the data behind their safety is extremely weak. I implore you to allow local jurisdictions to make their own decisions on optimal bicycle facilities and encourage them to exercise extreme caution and very careful designs, if they choose to try them.

I am a former Carlsbad traffic commissioner and retired scientist. I have conducted a detailed crash analysis of the separated bikeway installed in 2020 on South Coast Highway 101 at the southern end of Encinitas. I have attached a draft version of a case report manuscript that describes a 59% increase in bicyclist crashes after the conversion of that corridor, including a fatality and numerous severe injuries. The draft manuscript also describes other fatalities and severe injuries in our region and throughout North America in separated bikeways, which, despite apparently creating a perception of safety, introduce inherent new hazards to bicyclists.

I also have conducted an in-depth analysis of the studies cited by FHWA and NACTO that allegedly prove that separated bicycle lanes reduce crashes and injuries. However, these studies are very weak--not accounting for the vast majority of bicycle crashes (e.g., only including crashes with vehicles in the middle of blocks, excluding all intersection crashes and crashes that do not involve vehicles). The study designs are also weak, and they tend to stretch statistics to the limit. I have attached a second draft manuscript (white paper) that discusses these weaknesses. I have contacted other experts who agree with my conclusions, and, with their encouragement, I have contacted the FHWA to try to convince them to reconsider some of their guidance on separated bikeways.

Please study and understand the two attached manuscripts--at least the first several pages of each.

The SANDAG Draft 2025 Regional Plan, Appendix K (Active Transportation), includes the following statement: "**To support safer streets for all users, the updated Regional Active Transportation Network in the 2025 Regional Plan will be built for All Ages & Abilities, consistent with the National Association of City Transportation Officials (NACTO) Contextual Guidance for Selecting All Ages & Abilities Bikeways.**" The NACTO guidance is then presented in Figure K.4, which places an enormous emphasis on "Protected Bicycle Lanes" (PBLs) to the exclusion of most other approaches on all streets other than local neighborhood streets.

Local jurisdictions should be able to make their own decisions on how to create safe bikeways, particularly given the fact the separated bikeways can actually reduce safety in many contexts. Please remove the above language and figure from the 2025 Regional Plan, or modify them to make them optional and not preferred over other bikeway designs.

Best regards,
Steve Linke
Carlsbad

Case report showing elevated bicycle crashes and injuries in a separated bikeway in Encinitas, California

Steven P. Linke, PhD; Ron Medak, MD; and Serge Issakov

ABSTRACT

There is substantial inconclusive and contradictory information published on the alleged safety of separated bikeways. This report is an investigation of crashes on a South Coast Highway 101 corridor in the southern part of Encinitas, California. A "before-after" analysis of police report and emergency medical services data showed that crashes increased by 59% after conversion of a portion of the roadway to a separated bikeway configuration, seemingly due mainly to the vertical components and reduced space to maneuver. In contrast, no meaningful change in crash numbers occurred in an adjacent control corridor during the same time periods. Although no bicycle counts were collected by the city to assess crash rates, data from adjacent areas indicated that the increased crashes were largely not attributable to increased volumes. Additional crash data collected using crowdsourcing during the "after" time period further highlighted separated bikeway hazards. The combined police report, emergency medical services, and crowdsourced crash data included a fatality and numerous severe injuries attributable to the separated bikeway infrastructure. In addition, the crash data showed that reliance on police report data alone is likely to miss a majority of crashes, particularly in separated bikeways. Although this report addresses only one separated bikeway and control corridor, when considered in combination with other published observations, it raises serious concerns about the actual safety of separated bikeways.

INTRODUCTION

Over the past couple of decades, there has been an accelerating movement in transportation planning to separate bicyclists from motorists by creating bikeways with vertical components, such as flexible post delineators, wheel stops, curbs/medians, parked cars, etc. In California, these are legally called "Class IV separated bikeways," but they also are known as "separated bicycle lanes," "cycle tracks," or "protected bicycle lanes." The rationale is that they may increase ridership due to an increased perception of safety, and that they also may increase actual safety.[1]

Based largely on a 2023 self-published report,[2,3] the Federal Highway Administration (FHWA) is now claiming that such separated bikeways are established as "proven safety countermeasures" that "reduce crashes by up to 53%."[4,5] In addition, the National Association of City Transportation Officials (NACTO) is now claiming that separated bikeways are "appropriate for all streets in all contexts."[6] However, there is substantial countervailing evidence that crashes are likely to increase with vehicles at intersections on

separated bikeway corridors and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout such corridors, which could lead to net increases in crashes and injury severity.[7]

The 2023 FHWA report and other studies reporting separated bikeway safety tend to exhibit remarkable limitations, including weak study designs, small sample sizes/lack of statistical significance, unreliable bicycle counts, insufficient accounting for confounding variables, exclusion of a majority of crashes (e.g., those that occur at and around intersections and those not involving moving motor vehicles), etc. The findings have been largely inconclusive or contradictory between studies.[7]

Over the past few years in the north coastal region of San Diego County, California, there have been at least three widely reported fatal crashes in separated bikeways, and evidence indicates that the separated bikeway components themselves (plastic post delineators and wheel stops) were primary causes.

1. On November 28, 2020, a bicyclist was killed in the westbound separated bikeway on Leucadia Boulevard at Moonstone Court in Encinitas, when he struck the side of a right-turning truck (right hook crash).[8] The City of Encinitas eventually removed some of the plastic posts in the area and settled a lawsuit that alleged[9]:

   > [These] dangerous conditions created a trap that a reasonably careful person would not notice or anticipate as being dangerous, since the lack of dashed lines, and presence of bollards/stanchions created a false sense of safety while operating a bicycle in the bikeway while at the same time, depriving automobiles adequate opportunity to merge into the bikeway to turn right onto Moonstone Court.

2. On March 17, 2024, a bicyclist was killed in the northbound separated bikeway near the 2800 block of South Coast Highway 101 in Encinitas.[10,11] Official police records indicate that there was no vehicle involvement, but that the bicyclist had collided with a fixed object (California Crash Reporting System[12] Collision ID 4622805). Images of the crash site show that it was adjacent to plastic post delineators and wheel stops.

3. On October 12, 2024, a bicyclist was killed in the northbound separated bikeway near the 1900 block of Jimmy Durante Parkway in Del Mar.[13,14] The City of Del Mar eventually removed some of the plastic posts in the area, presumably because they were suspected of causing the crash.

Just since 2024, there have been several other reports of bicyclist fatalities and severe injuries in separated bikeways across North America, for example, two fatalities in Cambridge, Massachusetts,[15] a life-altering traumatic brain injury in Seattle, Washington,[16] and a hospitalization in Montreal, Canada.[17] In each of these cases, the vertical components (plastic posts, curbs, and/or parked vehicles) appear to have contributed to the vehicle drivers (typically in larger SUVs or trucks) being unaware of the bicyclists traveling in the same direction (blind spot), and to the bicyclists being unaware that the right turns were happening until it was too late—virtually identical to the “right hook crash” on Leucadia Boulevard in

Encinitas. The Seattle crash also led to a lawsuit against the city for the dangerous separated bikeway design,[16] and the legal status is unknown in the other cities.

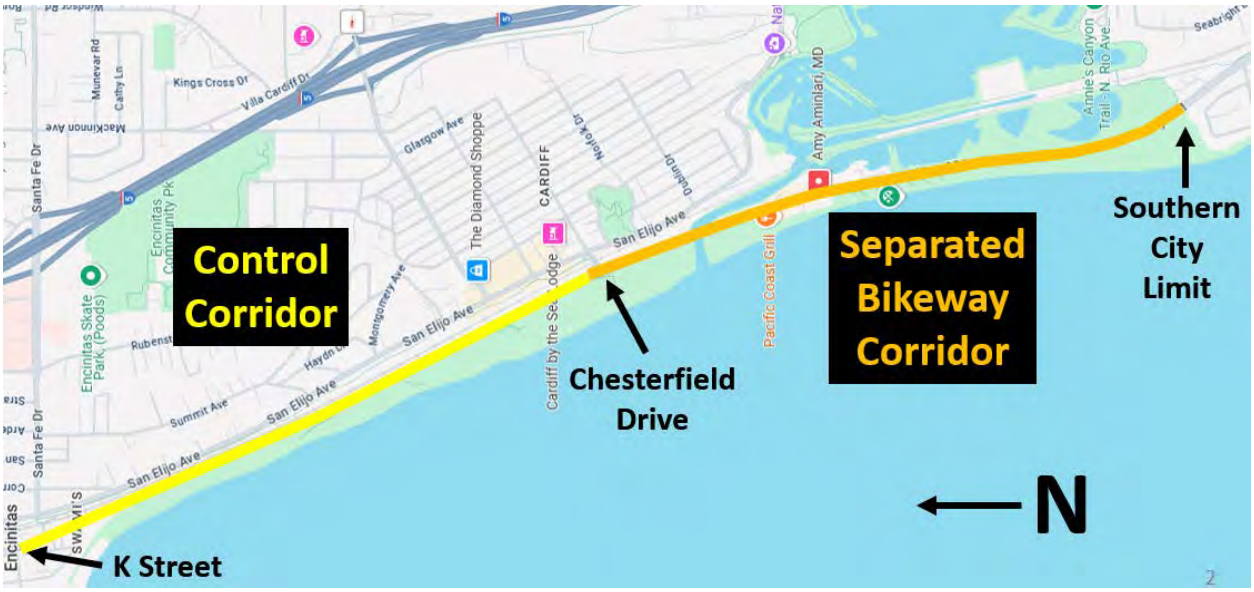
In the South Coast Highway 101 bikeway, along with the fatality described above, bicyclists have been reporting many other crashes, which were either directly or indirectly caused by the vertical components, and several have resulted in serious injuries. The intent of this case report is to assess the crash history of this bikeway.

RESULTS

Street corridors

The "separated bikeway corridor," which is the subject of this report is the approximately 1.3-mile portion of South Coast Highway 101 stretching from the southern city limit of Encinitas (at its border with Solana Beach) up to and including the Chesterfield Drive intersection (Figure 1, orange line). The vertical components include plastic delineator posts and wheel stops. In addition, an approximately 1.4-mile "control corridor" includes the portion of South Coast Highway immediately north of the separated bikeway corridor, stretching from north of Chesterfield Drive up to and including the K Street intersection (Figure 1, yellow line).

Figure 1. Study corridors: Separated Bikeway Corridor (orange) and Control Corridor (yellow).



Official crash data

Official crash data were first collected from the online California Highway Patrol's "California Crash Reporting System" (CCRS) database, which compiles local police reports.[12] However, it is well-known that this under-reports bicycle crashes, particularly those that do not involve motor vehicles and/or that occur off-roadway (separated bikeways are legally off-roadway).[7] Therefore, additional official crash data

were obtained from the Encinitas Fire & Marine Safety Department's emergency medical service (EMS) dispatch logs.

All crash data were filtered for location on the corridors and to include only bicycle-involved incidents. Some crashes were only present in the CCRS database, some were only present in the EMS database, and some appeared in both. Table 1 demonstrates this in a subset of the analyzed crashes that occurred in 2021 through 2022.

Table 1. Official crash data sample (2021 through 2022).

Approximate Collision Date/Time	CCRS Collision_Id	EMS Incident Number
1/17/2021 16:56		2021-004912
4/21/2021 11:28		2021-030639
8/14/2021 0:44		2021-064176
9/6/2021 15:46		2021-071020
10/5/2021 16:08	2873756	
10/9/2021 13:45	2873754	2021-080645
1/14/2022 17:06	2627295	
8/12/2022 17:32		2022-064746
8/27/2022 7:52	2686951	
9/1/2022 18:03	2694444	2022-070711
11/16/2022 11:56		2022-092716

Longitudinal (before-after) approach

The wheel stops creating the separated bikeway were installed by April 2020, and CCRS data was available through December 2024. Therefore, equal 57-month analysis periods before (July 2015 through March 2020) and after (April 2020 through December 2024) conversion to the separated bikeway were compared. This "longitudinal" approach (crashes before and after on the same roadway) minimizes contamination with potentially confounding variables relative to a "cross-sectional" approach (crashes on different roadways compared during the same time period). Confounding variables in this context are differences in roadways other than the bikeway separation that could contribute to crashes.

Large increase in crashes after separated bikeway conversion

Table 2 shows the "before" and "after" bicycle-involved crash numbers for both the separated bikeway and control corridors. When only the police report-based crashes (CCRS database) are considered for the separated bikeway corridor, there were only 7 crashes before conversion and 10 crashes after (little meaningful difference). However, the EMS dispatch logs add an additional 27 crashes that did not generate police reports. In total, there were 17 crashes in the separated bikeway corridor reported in these official records before conversion, and 27 after conversion, representing a 59% increase.

In contrast, the control segment had 14 total crashes before and 13 after (no meaningful difference). Unfortunately, the City of Encinitas did not collect any bicycle counts in these corridors either before or after conversion of the bikeway. Therefore, it is impossible to compare crash "rates" that could have accounted for possible changes in volume. However, the inclusion of the control corridor data helps control for bicycle volumes and other factors that may have changed between the "before" and "after" time periods.

Table 2. Crash numbers before and after separated bikeway conversion. The numbers are split into crashes that appeared only in the CCRS database, only in the EMS dispatch logs, or both.

	Only CCRS	Both	Only EMS	Total	Change
Separated Bikeway Corridor (Southern City Limit to Chesterfield Drive)					
Before	2	5	10	**17**	
After	5	5	17	**27**	**59% increase**
Control Corridor (North of Chesterfield Drive to K Street)					
Before	3	3	8	**14**	
After	2	1	10	**13**	

EMS data demonstrates significant under-reporting of bicycle crashes in police reports

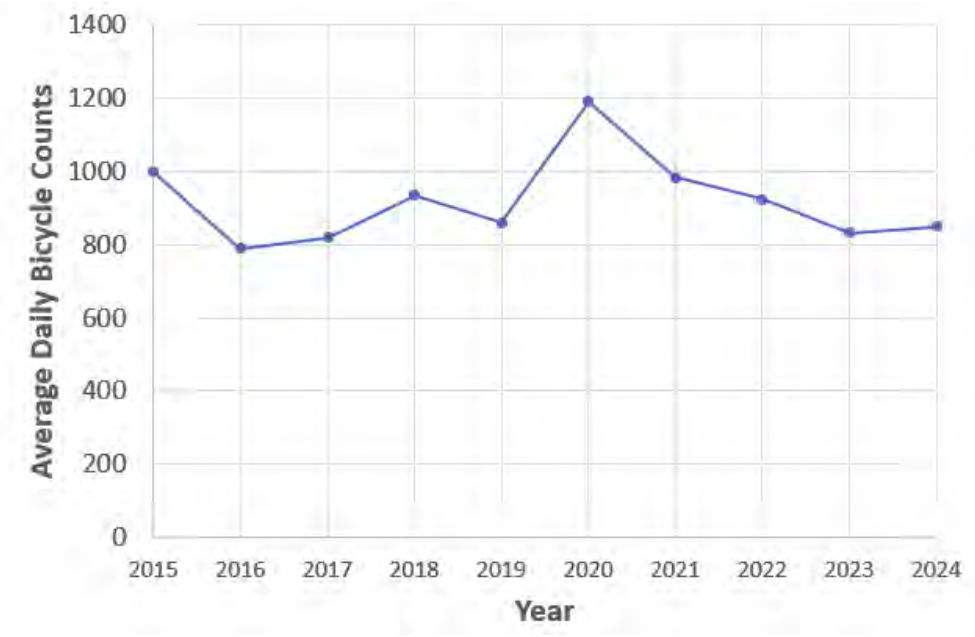
It is remarkable that 63% (45 of 72) of the total crashes in both corridors were recorded only in the EMS dispatch logs—no police reports generated for them to appear in the CCRS database, despite the fact that the injuries were severe enough to call for emergency assistance.

Bicycle volume data

Although the City of Encinitas has collected no bicycle counts in the separated bikeway corridor itself, the San Diego County Association of Governments (SANDAG) has a continuous automated bicycle counter located in Solana Beach at the intersection of South Coast Highway 101 and Lomas Santa Fe Drive (about 0.7 miles south of the separated bikeway).

Apart from a modest temporary increase in 2020 during the pandemic, bicycle counts remained relatively stable on South Coast Highway 101 over the course of the analysis period (Figure 2). Cumulative bicycle traffic was about 7% higher in the after period relative to the before period at the SANDAG counter, which would not account for the 59% increase in crashes in the separated bikeway corridor.

Figure 2. Average daily bicycle counts: Counts obtained from the SANDAG "Coast Highway & Coastal Rail Trail" continuous bicycle counter.



Exploratory analysis of crowdsourced crash data (101 Crash List)

Since conversion of the South Coast Highway 101 corridor to a separated bikeway, Serge Issakov has maintained a "crowdsourced" crash list (101 Crash List) compiled from reports from victims, family members or friends of the victims, or eyewitnesses.[18] From April 2020 through May 2025, there were 37 crashes added to the list, 10 of which also appeared in the CCRS database and/or EMS dispatch logs. Table 3 includes a sampling of the crashes from 2021 through 2022 side-by-side with the CCRS and EMS crashes, giving credence to the crowdsourcing approach.

Table 3. Crowdsourced "101 Crash List" sample (2021 through 2022).

Approximate Collision Date/Time	CCRS Collision_Id	EMS Incident Number	101 Crash List
1/17/2021 16:56		2021-004912	
4/21/2021 11:28		2021-030639	
7/13/2021			✓
8/14/2021 0:44		2021-064176	
9/6/2021 15:46		2021-071020	✓
10/5/2021 16:08	2873756		✓
10/9/2021 13:45	2873754	2021-080645	
1/14/2022 17:06	2627295		
3/23/2022			✓
7/16/2022			✓
8/12/2022 17:32		2022-064746	
8/27/2022 7:52	2686951		✓
9/1/2022 18:03	2694444	2022-070711	
11/16/2022 11:56		2022-092716	

101 Crash List crashes directly attributable to the bikeway

Based on information from the victims or eyewitnesses, it was determined that a minimum of 19 of the crashes on the 101 Crash List could be directly attributed to the existence of the vertical components of the bikeway (e.g., solo crashes from directly hitting a plastic post or wheel stop, or as a result of the inability to conduct an avoidance maneuver). Among these 19 crashes, 16 did not appear in either the CCRS or EMS crash lists, and 10 of those resulted in visible or worse injuries, further demonstrating that even the combined CCRS and EMS crash data does not fully capture all bicyclist injuries, let alone all bicyclist crashes.

Recent individual case reports (supplemental data)

It is also important to note that the crashes and injuries are happening to both experienced/vehicular bicyclists, as well as more casual/recreational bicyclists. Below are 8 example individual case reports.

On May 3rd, 2020, two different children under the age of 16 hit wheel stops, and one of them was thrown into the #2 vehicle lane.

On May 26th, 2020, experienced randonneur "Len" hit a wheel stop trying to avoid surfers and suffered fractures.

On March 13th, 2025, bicycle commuter "Annie" was forced to ride in the #2 vehicle lane, because there were pedestrians in the cycle track. She was crowded by a close-passing car and attempted to re-enter the cycle track, struck a wheel stop, and damaged her bike.

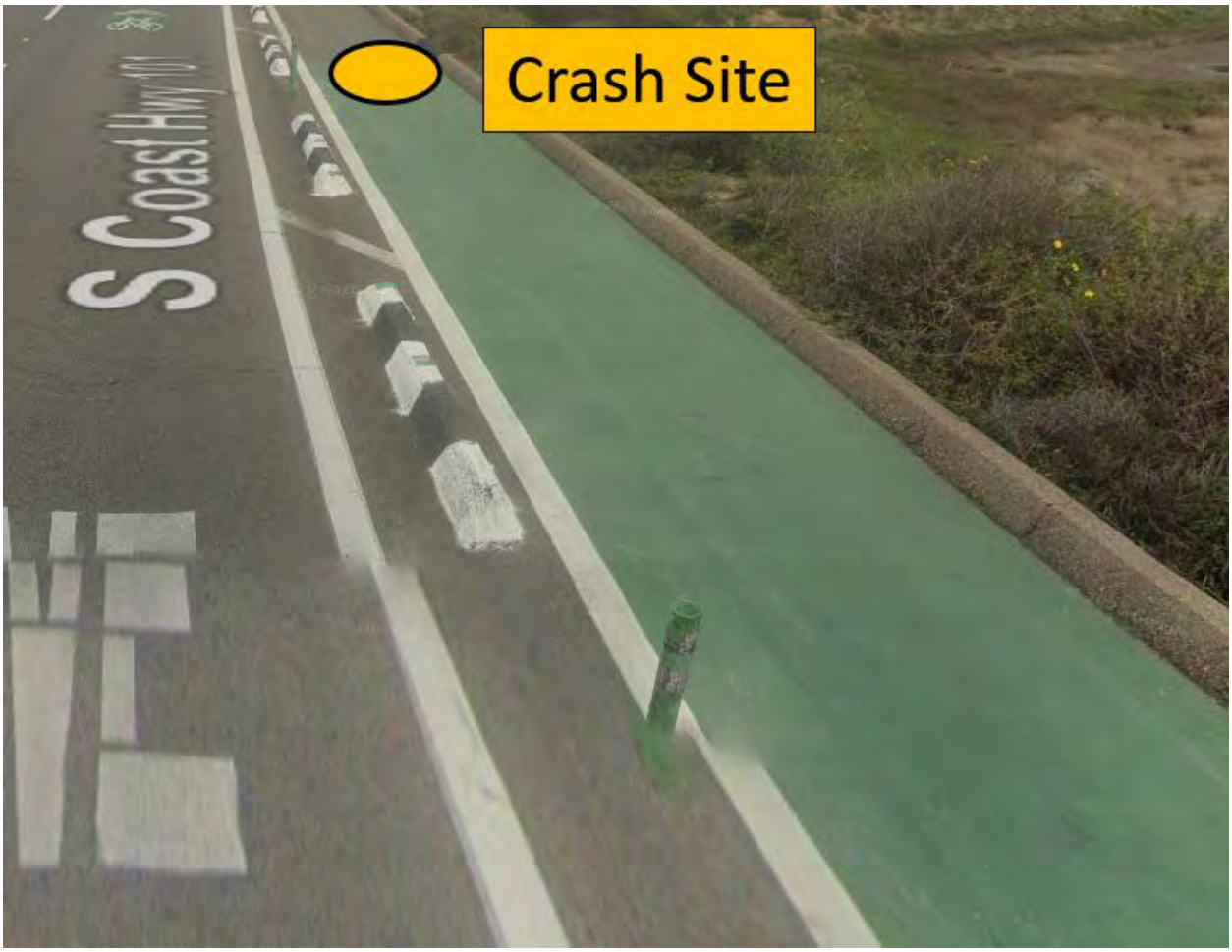
On May 11th, 2025, casual e-bicyclist “Priscilla” lost control in sand, swerved left, and fell, hitting her head on a wheel stop. She suffered a concussion, multiple scrapes, and EMS was dispatched and took her to the hospital.

On August 14th, 2023, experienced bicyclist “Fred” collided with a wheel stop, fell, and hit his head.

On October 5th, 2024, experienced bicyclist “Ken,” acting as sweeper for a local recreational cycle club ride, hit a plastic post, crashed, and broke his clavicle and five ribs. He also had a concussion and brain bleed and was taken to the hospital unconscious.

On April 29th, 2025, experienced bicyclist “Herb” hit a plastic post and wheel stop, crashed, and suffered a concussion. EMS was dispatched and took him to the hospital.

On March 17, 2024, USMC Captain “Ryan” was killed at the location shown below near the northbound entrance at the southern city limit.[10] The police report determined the cause to be a collision with a fixed object, presumably a wheel stop, a plastic post, or the curb.[12]



DISCUSSION

The primary finding in this report was the 59% increase in crashes in the South Coast Highway 101 separated bikeway corridor in the 57-month period after its conversion compared to the 57-month period before. This longitudinal (before-after) approach is superior to a cross-sectional approach to minimize potential confounders. Another strength of this report is the inclusion of before-after data from the contiguous, very similar, control corridor.

The main limitation is the fact that this is a case report of a single separated bikeway corridor, so it is not possible to make any broad statistical conclusions, although that was not a goal. Another limitation is the fact that the City of Encinitas did not collect any bicycle count (exposure) data to account for possible changes in ridership. However, the stable bicycle counts observed directly south of the studied bikeway, as well as the stable crash numbers observed in the control corridor directly north, are strongly

indicative that bicycle counts did not change considerably in the separated bikeway corridor in the before vs. after time periods—at least not enough to account for the 59% increase in crashes. In addition, there is substantial evidence that many of the crashes were directly or indirectly caused by the vertical components themselves, which could not have occurred but for the conversion to a separated bikeway.

Although the crowdsourced data was not available in the before time period, and because it could not be collected in a uniform manner for all crashes, it is considered exploratory. However, the data was thoroughly documented and corroborated, and it provides valuable, complementary information, as described below.

A potential minor limitation of this report is the fact that the construction of the separated bikeway occurred over a few months, so a few crashes with vertical components occurred before all vertical components had been installed. Also, a two-way cycle track was added to part of the control corridor in 2023, but the main roadway with its standard bicycle lanes, remained in operation, and there is not enough data yet to assess the safety of the cycle track.

This report highlights the fact that police report crash data, while critically important in any crash report/study, is far from comprehensive. When considered in the context of EMS dispatch logs, the police report data missed a majority of the crashes (63% of officially reported crashes appeared only in the EMS data). Even the combination of these two official data sources was far from complete, though. Crashes compiled through crowdsourcing overlapped to an extent with the official sources but also included many unique crashes, typically solo incidents.

It is not surprising that solo bicycle crashes would not appear in police reports, because police reports are heavily focused on motor vehicle-involved crashes. However, several of the solo events led to injuries and did not appear in the EMS logs either. While minor (visible) injuries would not necessarily lead to an EMS call, some were more severe, but the victims used alternative means to get medical attention, so these injury crashes did not appear in either official source. Researchers in other studies have analyzed records for emergency department visits and hospitalizations, which could help capture these additional crashes without relying on crowdsourcing. That was beyond the scope of this report, but studies likely need to include all of these sources to be comprehensive.

In conclusion, despite substantial marketing on the alleged safety of separated bikeways, there seem to be many contexts in which their installation makes conditions more hazardous for bicyclists, as demonstrated in this report and discussed in detail elsewhere.[7] Further, this report confirms the need to assess crashes more comprehensively to reach safety conclusions. Police report data alone and data that fails to account for solo bicyclist, off-road, or intersection crashes is not sufficient to make definitive conclusions on safety. Future separated bikeway studies should focus on before-after results with accurate and complete bicycle exposure and crash data, and local decision-makers should proceed with extreme caution when considering installations.

DETAILED METHODS

Street corridor characteristics

Separated bikeway corridor. Generally, there are two vehicle drive-lanes going in each direction (outside lane 11 feet wide, inside lane 10 feet wide) with single one-way bikeways on each side (7 feet of rideable width with 3-foot buffers from vehicles), along with a 5-foot sidewalk on the far west side. In areas with parking, there is also an 8-foot parking lane on the west side with a 2-foot buffer from the drive lane. Black wheel stops with white strips and green plastic delineator posts were installed in the 3-foot bicycle buffer between about February and May 2020. The wheel stops are generally about 10 feet long with 10-foot gaps between, and the plastic delineators are generally installed in every other wheel stop gap. Prior to conversion, generally, there were 5-foot unbuffered bicycle lanes.

Control corridor. Generally, there are one or two vehicle drive lanes going in each direction with 5-foot unbuffered bicycle lanes. In 2023, a two-way cycle track was installed on the west side, but the main configuration remained. Insufficient time has elapsed to assess its safety impacts.

Intersections. All intersections within the corridors were included, and areas within 250 feet of the bounding Chesterfield Drive and K Street intersections were included, consistent with industry standards.

Bicycle counts

Bicycle counts were obtained from the SANDAG Open Data Portal,[19] based on an automated in-pavement Eco Counter Zelt Evo at the "Coast Highway & Coastal Rail Trail" location (near the intersection of Coast Highway and Lomas Santa Fe Drive), about 0.7 miles south of the Cardiff cycle track.

Crash data

California Crash Reporting System (CCRS) database. The most recent ten years of crash records in the State of California are publicly available from the California Highway Patrol's California Crash Reporting System (CCRS) through the California Open Data Portal.[12] This database was formerly known as the Statewide Integrated Traffic Records System (SWITRS). The years 2015 through 2024 were available for download at the time this study was conducted (March 2025), and there are three comma-separated value (CSV) files for each year that can be linked with a "CollisionId" field common to each file: Crashes (crash details), Parties (parties involved in the crashes), and InjuredWitnessPassengers (numbers and severities of injuries). Note that data from 2023 and 2024 are considered "provisional."

The Crash files were first filtered for "City Name" = "Encinitas" and combined into one master database for all years. Second, the database was filtered for all collisions that occurred on Coast Highway 101 as the "PrimaryRoad" (this was a manual process, because there were several spelling variations. Third, the specific locations of the collisions along Coast Highway 101 were determined by using the block numbers, or by using distance ("SecondaryDistance") and direction ("SecondaryDistance") from the listed cross-streets ("SecondaryRoad").

Emergency Medical Services (EMS) dispatch logs. EMS dispatch logs, filtered for location and bicycle involvement, were obtained from the Encinitas Fire & Marine Safety Department for both the main study area and the control area for 2015 through 2024. Injuries for dispatches that resulted in transport to a hospital were assumed to be severe, and all others were assumed to be non-severe. Note that one crash was excluded, because a police report definitively established that it was a solo motor vehicle incident.

101 Crash List

The 101 Crash List is crowdsourced in chronological order based on information about crashes provided to Mr. Issakov by the victims themselves, family members or friends of the victims, or eyewitnesses. The information was transmitted in person; via email, text or phone; or on social media (e.g,, Facebook). Social media posts that could not be independently corroborated were excluded. Injury severity was assessed by Dr. Medak based on the accounts as complaint of pain/probable, visible/minor, or severe/serious.

ABOUT THE AUTHORS

Dr. Steven Linke, PhD (corresponding author: splinke@gmail.com), is a retired scientist and former traffic commissioner for the City of Carlsbad, California.

Dr. Ron Medak, MD, is a physician and traffic commissioner for the City of Encinitas, California.

Serge Issakov is a lifelong cyclist who has been actively advocating for more and safer cycling for more than 20 years. He is a board member of the San Diego Bicycle Club, the San Diego County Bicycle Coalition and the California Association of Bicycling Organizations. He is also a League (of American Bicyclists) Certified Instructor, a ride leader, and a former member of the San Diego Mobility Board.

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Unproven separated bicycle lane safety: Overreaching conclusions and marketing

Steven P. Linke, PhD, Carlsbad, CA

A. Introduction/Purpose

In 2023, the Federal Highway Administration (FHWA) published a report on separated bicycle lane (SBL) safety ("2023 FHWA study").[1,2] SBLs add vertical elements in the boundaries between bicycle and vehicle lanes to "separate" them (known in California as "Class IV separated bikeways," and sometimes called "cycle tracks" or "protected bicycle lanes"). Based largely on the alleged statistical rigor of this study,[3] the FHWA is now claiming that SBLs are established as "proven safety countermeasures" that "reduce crashes by up to 53%" (see Figures 1 and 2).[4,5] In addition, the National Association of City Transportation Officials (NACTO) is now claiming that SBLs are "appropriate for all streets in all contexts."[6]

However, a deep dive into the 2023 FHWA study and most other studies on the subject reveals that the claim of an expected 53% reduction in crashes should, at a minimum, be accompanied by the following warning statements:

- The expected 53% reduction in bicycle crashes applies only to the subset of crashes with moving vehicles in mid-block locations more than 250 feet on either side of intersections (other crash types were not studied, and intersection crashes had to be excluded from the study in order to achieve statistical significance).[1,7]
- Other studies indicate that crashes are likely to increase with vehicles at intersections on SBL corridors and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout SBL corridors, which could lead to net increases in injuries and fatalities despite mid-block reductions in crashes.
- The expected 53% reduction in bicycle crashes applies to SBL designs with flexible post delineators only. The study found that inclusion of other physical separation (e.g., wheel stops, curbs, parked cars, etc.) degrades safety relative to the posts alone (removal of these other physical separations is expected to decrease crashes by 40%).

The overly broad and thinly supported marketing claims around SBLs are frequently cited by state, regional, and local policy-/decision-makers and their transportation staffs, as well as many bicycle advocacy groups and enthusiastic constituents. This has led to a veritable movement in some communities, including several in San Diego County, to install plastic posts, wheel stops, and other vertical elements under the assumption that they will increase safety. Unfortunately, SBL projects seem to be done in a rather rushed and indiscriminate manner, without assessing appropriate sites and

designs, and without collecting detailed before-after data on usage and crashes, as recommended in professional guidance documents.

Safety studies on the addition of conventional (painted) bicycle lanes on US roadways have been relatively sparse–some showing reductions in crashes or injury severity, and many others showing no reduction or an increase.[8–17] US-based research has been even sparser for SBLs and has generated similarly contradictory or inconclusive findings.[1,11,15,18–23] The studies are plagued by weak study designs, small sample sizes/lack of statistical significance, unreliable bicycle counts, insufficient accounting for confounding variables, exclusion of large numbers of crashes, ignorance of the crash types relevant to the safety interventions, etc. There is stronger evidence in some European cities, particularly in the Netherlands and Denmark, that SBLs may improve safety, but the cultural, topographic, and overall infrastructural contexts are very different there, including the fact that about one-third of trips are done by bicycle,[22] as opposed to about 1% in the US.[24]

Experience over the last five years in the north coastal region of San Diego County has included at least three fatalities in SBLs (representing most of the bicyclist fatalities in the affected communities, which had no fatalities in the prior five-year period), as well as large increases in crashes and injuries in SBLs on South Coast Highway in the Cardiff area of Encinitas.[25] These fatalities and many of the injuries can be directly attributed to the SBLs themselves. Also, the family of a San Diego city staffer, who has been a longtime advocate of SBLs, is now suing the city alleging an SBL led to the injury and emotional traumatization of their son.[26] While anecdotal, these observations also beg caution.

The primary purpose of this white paper is to detail to officials, who may only be familiar with select headlines, conclusions, and marketing statements about SBLs, the limitations of the 2023 FHWA study. While the 2023 FHWA study seemingly set out to be (and is being promoted as) a definitive safety model "development" and "validation" study, it was beset by similar limitations described above for past bicycle lane studies. It also has substantial data transparency issues. Like the SBL safety studies that came before it, the 2023 FHWA study contributes to a growing body of research, but it remains "exploratory," and the level of evidence it provides is not sufficient to set broad policy.

A secondary purpose of this paper is to highlight several factors that can make SBLs more hazardous than conventional painted buffer bicycle lanes. These factors should be considered when designing future SBL studies and when considering installation of SBLs, because context and design are extremely important.[14] While carefully designed SBLs on some roadways may provide enhanced safety, installation should be considered experimental and only done with caution. The aggressive "every street in every context" marketing, and the resulting well-intentioned but indiscriminate installations endorsed by SBL enthusiasts can have dangerous (sometimes lethal) unintended consequences.

B. Executive summary (critique of the 2023 FHWA study)

- **Key study design limitations:**
    - Very basic, but essential, information was inexplicably not disclosed in the 2023 FHWA SBL study, including the numbers and locations of the studied street corridors, as well as the numbers, types, and severity of the crashes.
    - The authors stated that they were unable to determine the dates of installation of the SBLs in their study, so, instead of using a more robust before-after study design (comparing crashes on the same streets before and after SBL conversion), they were forced to employ a weaker cross-sectional study design (comparing crashes on different SBL and non-SBL streets).
    - Cross-sectional studies are more subject to contamination with "confounders" (characteristics other than the SBLs that may account for observed differences in crashes), and several potentially powerful confounders were not examined in the study, including prevailing vehicle and bicycle speeds and driveway/alley density.
    - The authors acknowledge that the number of crashes in the study was "very small," that many statistical safety models were explored, and that the safety model should only be applied with caution to at least one other city (Denver), suggesting that the model may be "overfit," and that the safety claims may not apply generally to other cities.
    - No evidence of independent peer review has been provided, and no records have been produced in response to a 5/29/2025 Freedom of Information Act (FOIA) request for the underlying datasets, so no independent assessment of the data can be done.
- **Crash reporting gaps:**
    - Unfortunately, the 2023 FHWA study only appears to have included the subset of on-road vehicle-bicycle crashes present in police reports, even though it is widely acknowledged (including by the FHWA itself) that this approach vastly under-reports bicycle crashes. The excluded crashes are ones that do not involve moving motor vehicles (e.g., crashes with fixed objects, opened vehicle doors, debris, other bicyclists, pedestrians, etc.) and/or that occur off legally defined roadways–the very types of crashes that are amplified by SBLs. Large proportions of these unreported crashes result in injuries leading to hospital visits/stays.
    - This limited subset of crashes was then further constrained to only crashes that occurred in the portions of mid-block street segments greater than 250 feet from all intersections along the SBL corridors, because exclusion of intersection crashes was necessary to achieve statistical significance to support the safety conclusion. This,

despite the fact that SBLs can reduce visibility of and increase crashes with bicyclists around intersections.

- Bicyclists cannot avoid intersections when traveling on SBL corridors, meaning that any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analysis.

- **Extrapolated bicycle volume data:**
  - Bicycle volume data (critical to calculate crash rates) was not collected as originally planned due to the pandemic. Instead, statistical model-based extrapolation of limited historical data was used, with inconsistent and sometimes counter-intuitive results.
  - 2020–2021 volume data were excluded without showing the effects or providing a detailed justification, undermining the reliability and transparency of the findings.
- **Safety model inconsistencies/Lack of generalizability:**
  - Study results varied widely between cities; statistically significant improvements were only found in one city (San Francisco), and the main finding of the study (that plastic posts alone resulted in the largest crash reduction) was not supported in the city with the largest number of studied segments (Seattle).
  - Crash data from 2020–2021 and from segments with alleged zero traffic was excluded from the study without showing the effects or providing a detailed justification.
  - Validation of the model with data from Austin and Denver was only an assessment of statistical equivalency, not evidence that SBLs actually reduced crashes in those cities, and the authors cautioned about the applicability (generalizability) of the results to Denver.
  - The model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.
  - The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles. However, no data on crash types or injury severities is presented to assess this alleged benefit.
- **Policy implications:**
  - Bodies like FHWA and NACTO are using inconclusive/contradictory studies to promote SBLs, which, given current evidence, should still be treated as experimental and used with caution–not mandated as universal safety solutions in all contexts.
  - Future studies of SBL safety intended to set national policy should: (1) focus on before-after study designs that fully account for confounders, (2) be powered with sufficient

crash sample sizes to make statistical conclusions without model overfitting, (3) make the underlying data available for independent confirmation, (4) more fully account for bicycle crashes and injuries (e.g., by combining emergency/hospital data with police reports), (5) account for safety through entire SBL corridors, including intersections, and (6) accurately account for changes in bicycle counts.

C. Summary of hazards created by SBLs, plus design guidance

- For a good literature review of many of the following issues, see the Discussion in Cicchino et al., 2020,[18] and for examples of SBL design guidance, see the San Diego County Bicycle Coalition's Cycle Track Toolkit.[27]

- Rideable lane width is a key component that affects many of the risks described below, including maneuverability within an SBL. NACTO "recommends" at least 7.5 feet.[6] If that cannot be achieved, painted bicycle lanes should be considered instead of SBLs. The safety of NACTO's 5-foot "minimum" rideable width is unproven.

- SBLs increase solo bicyclist crash risk due to the large number of fixed vertical objects introduced into a constrained space, like plastic posts/bollards and wheel stops. Many of the crashes in the South Coast Highway SBLs have involved such objects.[25]

- Unexpected transitions into SBLs can lead to solo bicyclist crashes with the vertical elements, so they should be well-marked. At least one of the SBL-involved bicyclist fatalities in north coastal San Diego County can be attributed to this.[25]

- SBLs can increase solo bicyclist crash risk due to debris accumulation arising from less cleaning, combined with reduced maneuverability to avoid the debris.

- SBLs increase bicycle-bicycle crash risk due to speed differentials (e.g., recreational bicyclists, experienced cyclists, and e-bicyclists) in the same constrained space.

- SBLs can increase bicyclist-pedestrian crashes due to pedestrians improperly using the SBL for walking/jogging.

- SBLs tend to reduce visibility/awareness between vehicle operators, bicyclists, and pedestrians at intersections, driveways, and alleys, leading to increased crash risk during vehicle right turns (right hooks), particularly for trucks and other vehicles with larger blind spots. Numerous serious injuries and fatalities related to right hooks have been reported across the US at SBL intersections, including a fatality in Encinitas.[25] If vehicle deceleration or mixing areas are not possible or practical, consider painted bicycle lanes instead of SBLs.

- Two-way SBLs are even more dangerous than one-way at intersections/driveways/alleys, because pedestrians and turning drivers may not be aware of bicyclists traveling in both directions (i.e., oncoming bicyclists are coming from an unexpected direction).
- Steep downhill grades that increase bicyclist speeds can further increase the risks described here due to the lack of space/time for maneuvering in the constrained space.
- SBL vertical barriers can hinder emergency vehicle access and maneuvering of disabled vehicles.

D. Conventional vs. separated bicycle lanes

Conventional bicycle lanes are typically delineated only by painted lines, sometimes with striped buffers between them and travel and/or parking lanes. There is currently a movement to promote construction of SBLs, distinguished by the inclusion of vertical elements in the buffer area(s), such as:

- Flexible post delineators (sometimes called "plastic bollards" or "flexposts")
- Wheel stops that create a non-continuous "curb" (similar to those in parking lots)
- Continuous curbs, medians, planters, parking lanes, or other barriers

The rationale for SBLs is that they may increase *perceived* safety and ridership due to "separation" from vehicles.[28] However, despite substantial marketing claims that they also increase *actual* safety, they may only create the *appearance* of safety while making streets more hazardous.

E. FHWA and related SBL safety research

2015 FHWA SBL crash analysis report. In May 2015, the FHWA published a *Separated Bicycle Lane Planning and Design Guide*,[23] which included a "Crash Analysis Report" on 17 street corridors in 9 different cities. The report considered the SBL safety findings to be inconclusive:

> An in-depth analysis of crash and ridership data from implemented separated bike lanes in the U.S was completed to evaluate safety outcomes and inform the recommendations of this guide. While the bicycle collision and volume data that exist for most implemented projects is not yet sufficient to draw broad-based conclusions concerning the overall safety of separated bike lanes, the analysis did uncover useful insights to build upon in future analyses.

Crash Modification Factors. The 2015 FHWA report went on to call for additional safety studies, including the establishment of Crash Modification Factors (CMFs) for SBLs, emphasizing how it was imperative that future studies use more robust data collection and study design methods, which were outlined in an evaluation checklist and data collection section. Recommended methods for the development of CMFs have been published by multiple transportation organizations, as well.[29,30]

Note that a CMF is a number that, when multiplied by expected crashes under current conditions (typically derived from historical crashes), is intended to estimate a change in future crashes when a certain modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF greater than 1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

2023 FHWA study. The study includes the 0.47 CMF for conversion of a generic bicycle lane into an SBL with plastic delineator posts. It includes data from an unspecified number of street corridors in five different cities, although the statistical model that produced the CMFs only included three of the cities (San Francisco, CA, Cambridge, MA, and Seattle, WA) due to limited sample sizes in the other two (Austin, TX and Denver, CO).

It is evident from the published material that the study did not go as originally planned due to profound challenges in collecting the data, as well as inconsistencies in the data. The authors clearly did a lot of work (in fact, a lot more creative statistical work than they likely originally planned), and they seemingly did the best they could under the circumstances to support their premise that SBLs improve safety. However, as detailed below, this new study has many limitations and failed to meet the more robust data collection and evaluation standards considered imperative in the 2015 report.

SANDAG on SBLs. The San Diego Association of Governments (SANDAG), the Metropolitan Planning Organization for San Diego County, has apparently partnered with FHWA and NACTO to some extent on SBLs (based on webinar comments). SANDAG recently released its draft 2025 Regional Plan,[31] which says they will follow the “NACTO Contextual Guidance for Selecting All Ages & Abilities Bikeways" that includes SBLs or other separated paths on all streets with speed limits >25 mph (Figure 3). This appears to create an inappropriate mandate for local jurisdictions to construct SBLs on all streets other than local neighborhood streets in order to receive or compete for SANDAG funding, which could unintentionally make conditions more hazardous for people of all ages and abilities.

F. Challenges to design reliable safety studies

Study basics and confounding factors. It is beyond the scope of this paper to delve deeply into the designs of roadway safety studies. Generally, though, safety “outcome” data (e.g., numbers or rates of crashes, injuries, and/or injury severities) is compared for streets based upon the presence or absence of a safety “countermeasure” (in this case SBLs). Most studies will either compare the same streets before and after SBLs were installed (before-after/longitudinal study), or they will compare different streets with and without SBLs during a single time period (cross-sectional study).

Every comparison will include some potential “confounding factors”—differences between the streets other than the absence or presence of SBLs—which could explain part or all of any differences in safety outcomes independent of the SBLs. Therefore, to establish a clear cause-effect of the SBLs, it is critical to control for potential confounders, such as:

- Traffic volumes (vehicle, transit, bicycle, and pedestrian)
- Different types of vertical SBL elements
- Bicycle lane/buffer widths, presence of green paint, etc.
- Population density/land use
- Vehicle speeds
- Bicycle speeds
- Corridor length
- Grades
- Intersection/driveway/alley numbers and spacing
- Length of vehicle/bicycle mixing zones at intersections
- Vehicle turning frequency
- Intersection control types
- One-way vs. two-way vehicle lanes
- Through- and turn-lane numbers and configurations
- Parking lanes and/or medians
- Lighting
- Crash reporting method changes

Before-after (longitudinal) studies. Studies that compare the *same streets* before and after installation of an SBL are the strongly preferred and most robust study type to estimate CMFs, because there tend to be far fewer known or potentially unknown confounding variables.[30,32,33] The physical characteristics tend to stay the same, except the ones that arise from the SBL installation under study. Factors that vary over time, such as traffic volumes, and perhaps changes in crash reporting, might be examples of the limited variables that need to be controlled.

Cross-sectional studies. Before-after studies typically require several years of data both before and after SBL installation, which requires the existence and collection of more data. A less data-intensive design is a cross-sectional study, in which several different streets are analyzed during the same time period—some with SBLs and some without. However, it is difficult to identify sets of comparable control streets to assess whether differences in crashes are due solely to the SBLs, or whether they are due to one or more of the numerous other confounding variable differences, such as those listed above and, for example, why SBLs were installed on certain streets and not others.

Examples of weak study designs. A 2013 study of 19 US SBLs (**Lusk et al., *Bicycle Guidelines and Crash Rates on Cycle Tracks in the United States***) concluded that SBLs have lower vehicle/bicycle crash rates than a national average crash rate.[34] However, comparing crash rates to an alleged national average is an extremely weak cross-sectional study design that does not account for any confounding variables. In fact, it was subsequently pointed out that the observed crash rate differences were more correlated to intersection density than the presence of SBLs, among other weaknesses. The streets with higher intersection densities had crash rates much higher than the national average and the streets with lower densities had lower crash rates—all independent of the presence of SBLs.[35]

Another widely publicized 2019 study of crashes in 12 large US cities over a 13-year period (**Marshall and Ferenchak, *Why cities with high bicycling rates are safer for all road users***) proclaimed that the presence of SBLs in the cities was associated with better safety outcomes.[21] Although this study was presented as having a very large sample size, its conclusions are specious due to several methodological flaws. For example, the study appears to have included 1,300 miles of off-street trails in its definition of SBLs with only 12.5 miles of actual SBLs, and it failed to account for key confounding variables including population densities and traffic volumes/speeds, among several other statistical problems.[36]

Selection bias. Another factor that affects all studies is potential "selection bias." This arises from the fact that interventions, such as SBL conversions, that do not perform well (and perhaps even removed) are less likely to be included in safety studies, biasing results to locations where they tend to work better.

FHWA study critique:

Study design. The 2015 FHWA report used the more robust and preferred before-after study design on a limited set of sites, but, given an inconsistent mix of findings, the SBL safety results were ultimately considered inconclusive. The report stated:

> …[I]t is imperative…to collect bicycle and motor vehicle crash and volume data for a sufficient period of time before and after separated bike lane installation. This will improve understanding of safety benefits and design considerations…

The 2023 FHWA study was an opportunity to conduct a before-after analysis on a larger set of sites with more robust data. However, the authors used the less robust cross-sectional approach, because, as they describe in the study, they were unable to determine the dates of conversion to SBLs for the sites they were studying.

As described above, cross-sectional studies are more subject to bias from confounding variables when comparing SBL and non-SBL facilities. Adding to that concern, the authors lamented that the 2020 pandemic limited their data collection to pre-existing databases. Further, the authors did not identify any of the specific streets studied as SBL vs. non-SBL. They only identified the cities, preventing any independent comparison.

Confounders. The 2023 study employed a statistical method called "propensity score weighting" (PSW) to help reduce potential confounding variable bias, but PSW can only estimate the effects of variables that are chosen to be included. For example, the authors do not appear to have included vehicle speeds, bicycle speeds, and driveway/alley density, among other variables, in their modeling, all of which have been shown to affect crash frequencies.[22,35,37] And there could be other unknown differences between the undisclosed streets that bias the results.

The study also does not account for variations in the individual SBLs beyond the presence of flexible posts or "other" elements. These potential confounders include variations in lane widths or the types of

other elements (e.g., wheel stops vs. planters vs. parking lanes), which are likely to have very different effects on safety.

Lack of transparency. Beyond just the design, the study has a noteworthy lack of transparency in that very basic, but absolutely essential information, like the numbers and identities of the studied street corridors, as well as the numbers, types, and severity of the crashes, are not disclosed. In addition, bicycle volume and crash data from 2020–2021 and street segments with alleged zero traffic were excluded from the study without showing the effects or providing a detailed justification.

Lack of peer review and inability to confirm results independently. In addition, there is no evidence that the study has undergone any sort of formal peer review (particularly from a statistical modeling standpoint); instead, it was just published directly by the FHWA. A FOIA request was submitted to the FHWA on 5/29/2025 (FOIA Control Number 2025-0509) for access to the databases used for the study. The request was forwarded to the academic institution of the authors (Texas A&M University) and then back to the FHWA, but no responsive information has been received. Without peer review or independent assessment of the data, any findings should be treated with great skepticism.

While cross-sectional studies *can* be acceptable to help establish CMFs, several other limitations in the 2023 FHWA study further compromised it, as described below.

G. Challenges in measuring overall safety throughout street corridors

The ultimate goal of decision-makers should be to improve *overall* safety *throughout* a bicycling corridor. Safety is typically measured by the number or rate of bicycle crashes and injury severity types. However, these measurements are challenging for any bicycle study, particularly for SBLs.

G.1. Under-reporting of bicycle crashes and injuries in police reports

State motor vehicle department crash data is derived from police reports, and a crash is generally defined as "an accident that involved a motor vehicle that occurred on a public highway or road in the U.S. and that resulted in property damage or personal injury."[38] Ironically, while the vast majority of bicycle crash studies have relied almost exclusively on such data, most bicycle crashes and injuries do not involve motor vehicles and/or occur off the legal “roadway.” This includes crashes caused by fixed objects like vertical components adjacent to the bikeway, opened vehicle doors, debris, other bicyclists, pedestrians, animals, etc.--the very types of crashes that are amplified by SBLs–and the SBLs themselves are typically legally considered to be “off-roadway.”

- **Fixed objects.** SBLs add significant numbers of new vertical elements to the roadway, such as the flexible posts and curbs, and concurrently reduce the space to maneuver. This factor directly increases the likelihood that bicyclists will crash into fixed objects.

- **Debris.** Vehicles tend to push road debris to the edges of streets, where SBLs are usually located. The vertical elements of SBLs often amplify debris-related crash risk, because they tend to create lanes that are not accessible by conventional street cleaning equipment. Rain and snow also can differentially affect SBLs due to drainage and plowing issues.

- **Other bicyclists.** The limited widths of most SBLs prevents safe passing. So, with the speed differentials of recreational cyclists, experienced cyclists, and ebikes, there is a higher likelihood of crashes with other bicyclists, or with SBL infrastructure in attempts to leave the SBL to pass.

- **Pedestrians.** Walkers and/or joggers often end up in bikeways for a variety of reasons. For example, some joggers prefer the asphalt of a bikeway to the concrete of a sidewalk. In addition, lack of right-of-way width may mean that an SBL installation reduces or eliminates pedestrian areas. These increase the likelihood of bicycle/pedestrian conflicts and crashes.

References demonstrating crash under-reporting

- 1999: The FHWA published a comprehensive literature review of studies comparing police report-based crashes with emergency department (ED) visits and hospitalizations.[39] Their conclusion was that police reports/crash statistics fail to include about 40-50% of ED visits (up to 82% in one jurisdiction) and 25-40% of hospitalizations of injured bicyclists.

- 2016: Based on data from the Massachusetts Department of Public Health, Boston police reports miss 76% of bicyclist ED visits and 60% of hospital admissions.[40]

- 2018: A University of California, Berkeley SafeTREC group published a more recent literature review, concluding that 54-93% of hospital visits were not linked to police reports.[41]

- 2021: A study in Orlando, Florida showed that 73% of ED visits and 57% of hospital admissions of bicyclists arose from crashes that did not involve motor vehicles, and, thereby, likely would not be reflected in police reports.[37]

- 2024: A study of bicyclist crashes/injuries in Toronto showed that 92% of bicyclist visits to EDs were not reflected in police reports.[42]

- 2025: In a report on the Cardiff-area Coast Highway SBL in Encinitas, CA, over 60% of emergency vehicle dispatches for bicycle-related crashes did not have a corresponding police report.[25]

The references cited above also discuss under-reporting of bicycle crashes from other studies too numerous to cite or detail here. The discordances in crash numbers between police reports and other sources varied greatly among the studies, but the common themes are: (1) most bicycle crashes do not appear in police reports or motor vehicle department statistics, because they do not involve moving motor vehicles and/or occur off-roadway, and (2) substantial percentages of these crashes result in ED visits and hospitalizations. Accordingly, the authors emphasize the need to assess records related to hospital visits, in addition to police reports, to avoid under-reporting of bicycle crashes and to avoid erroneous conclusions about the benefits of proposed safety countermeasures.

FHWA study critique:

The 2015 FHWA report acknowledged that their "[c]rash data includes only reported crashes involving a bicycle and a motor vehicle." In its call for development of CMFs for SBLs and other future studies, it went on to recommend comprehensive collection of crash and injury severity data. Unfortunately, the 2023 FHWA study provides very little information on the source of its crash data, but it, too, included only moving vehicle-bicycle crashes, with the authors stating:

> Possibly, other bicycle crashes may have occurred and were not reported. The research team was unable to incorporate these unreported crashes into the scope of this study.

A study comparing bicyclist visits to San Francisco General Hospital (SFGH) and police crash reports showed that: (1) 41.5% of injuries were bicyclist-only (did not involve a motor vehicle), (2) bicyclist-only injuries were four times more likely to require hospital admission than vehicle-bicycle injuries, and (3) there was no police report associated with 54.5% of all bicyclist injuries.[43] SFGH is the only Level I trauma center serving San Francisco, which is the primary city contributing crash data in the 2023 FHWA study. This under-reporting raises direct questions about the conclusion that SBLs reduce crashes, including those leading to severe injuries.

In summary, the 2023 FHWA study and the vast majority of other SBL safety studies do not account for any of the above-described non-vehicle-involved crashes or vehicle-involved crashes at intersections, which tend to be the majority of bicycle-involved crashes, particularly in SBLs. Therefore, any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analyses.

G.2. Unreliability of bicycle crash rate comparisons/aggregation bias

Bicycle crash *rates* are calculated by dividing the number of crashes by the number of bicycle trips/volume or mileage traveled (e.g., "crashes per 100,000 trips" or "crashes per million miles"). These should provide a more accurate reflection of safety, because different streets have very different amounts of bicycle usage (sometimes called "exposure")—both baseline and changes over time. The previous section described how systematic under-reporting of bicycle crash numbers, particularly in SBLs, has the potential to skew safety results. Guesses at bicycle counts (exposure) can further skew the results.

FHWA study critique:

The 2015 FHWA report emphasizes the importance of collecting accurate bicycle count data when developing CMFs.[23] For the 2023 FHWA study, the original intent was to collect bicycle counts at the study sites in the Spring of 2020 to produce the SBL CMFs, but the authors apparently canceled that due to travel restrictions arising from the pandemic. Instead, they had to rely on limited historical counts from various areas in the cities from which they attempted to develop predictive statistical models to extrapolate counts at the actual sites. Also, many of the bicycle counts appear to be based primarily on

extrapolation from vehicle traffic adjusted for variables like the presence of bicycle lanes, population density, land use, etc., which is an even wilder guess. AASHTO/FHWA guidance on CMF-development protocols points out the likelihood of bias due to data aggregation, averaging, and/or incompleteness.[30]

For the three cities used to produce the SBL CMFs, two of them used different methods, and multiple variables had opposite (and sometimes counter-intuitive) effects, while a statistical model could not even be developed for the third. For San Francisco, a Poisson mixed–effect model was produced to predict the bicycle counts, with higher counts being predicted for streets with more bicycle lanes and higher population density (Table 34). In contrast, for Seattle, a Gaussian mixed-effect model was produced, with *lower* counts counter-intuitively being predicted for streets with bicycle lanes and higher population density (Table 42). For Cambridge, the authors stated: "Although the research team made several attempts to statistically develop a nested mixed-effect negative binomial model, they were unable to identify any models that converged."

The San Francisco model also had the seemingly counter-intuitive observation that bicycle counts were *higher* in commercial and industrial areas relative to residential, public, and mixed-use areas. Also, essentially two different models had to be produced for Seattle (one for data from 2016-2018, and another for data from 2014-2015 plus 2019), because the results were so different in these sets of years.

Further, the authors excluded all bicycle exposure data from 2020 and 2021 for all cities, which they justified by citing the different travel patterns in those years due to the pandemic. However, no quantitative assessments were presented, so it is impossible to determine the impacts on the conclusions, or whether the exclusion was justified.

The authors stated:

> Ideally, this assessment should have included known bicycle exposure volumes…However, the implementation of SBLs in the United States is in its infancy, and multiyear bicycle counts are limited. In addition, the recent COVID-19 pandemic created challenges for research team members to travel to locations and conduct additional counts. Ultimately, the bicycle exposure variable…was estimated based on a variety of bicycle count types that included short-term bicycle counts, periodic counts that occurred regularly (usually every 2 yr), and a few permanent bicycle count stations.
>
> …[T]he team allowed some variability for how much bicycle count data could be used and potentially extrapolated to surrounding facilities.

In summary, despite the critical importance of accurate bicycle exposure data to determine crash rates, the authors of the 2023 FHWA study were unable to collect that data and, instead, had to rely upon guesses from statistical models that included multiple counter-intuitive variables and were different for each city and different time periods. This was not consistent with standards called for by AASHTO/FHWA.

G.3. Intersection crashes (within 250 feet) had to be excluded to achieve statistical significance

SBLs are typically installed on street "corridors" that are comprised of "intersections" linked by the street "segments" between them (as opposed to being installed on single, isolated segments with no intersections). Even setting aside the crash number and bicycle exposure data limitations described above, most SBL safety studies, including the 2023 FHWA study, only report safety improvements within individual segments—not when intersections or complete corridors are included in the analyses.

Obviously, though, it is not possible for bicyclists to skip the intersections, where a majority of vehicle/bicycle crashes occur.[22,44] Ironically, the vertical elements of SBLs tend to make vehicle drivers and bicyclists less aware of and/or less visible to each other, which increases vehicle/bicycle crash risks during turning movements at intersections. SBL separation with parked cars or vegetation further exacerbates the awareness/visibility problem.

In many cases, the vertical elements of an SBL are installed right up to the turning area, so right-turning vehicles must remain in the through lane (often with through-traveling vehicles behind them) until the last second, then suddenly turn right—across the SBL with potentially less visible cyclists. This is in contrast to the more traditional dashed mixing areas, where the bicycle lane becomes a shared right-turn lane for vehicles, or where vehicles move right across the bike lane into a dedicated right-turn lane. Although these mixing areas are potential vehicle/bicycle conflict points, they are designed to be lengths that allow safe mixing, rather than last-second, potentially unexpected turns across the bike area.

Several fatalities and serious injuries have been reported arising from vehicles making right turns across SBLs. For example, in 2020, a bicyclist was killed in the westbound SBL on Leucadia Boulevard at Moonstone Court in Encinitas, CA when he struck the side of a right-turning truck.[45] Plastic post delineators had been installed all the way up to the turning area at the intersection, eliminating any mixing zone. The City of Encinitas eventually settled a lawsuit[46] that alleged: "[These] dangerous conditions created a trap that a reasonably careful person would not notice or anticipate as being dangerous, since the lack of dashed lines, and presence of bollards/stanchions created a false sense of safety while operating a bicycle in the bikeway while at the same time, depriving automobiles adequate opportunity to merge into the bikeway to turn right onto Moonstone Court." Several of the SBL plastic posts leading up to the intersection were removed after the fatality to create a mixing area.

In 2024, two bicyclist fatalities occurred at intersections in SBLs in Cambridge, Massachusetts under virtually identical circumstances to the fatality in Encinitas.[47] Also in 2024, a life-altering traumatic brain injury occurred in Seattle when an SUV made a right turn across an SBL at a driveway (neighbors have reported frequent yelling there due to other close calls).[48] That incident also led to a lawsuit against the city for its dangerous design and insufficient sight distance. In July 2025, a bicyclist riding in an SBL in Montreal struck the side of a right-turning truck (dashcam video available in the linked news story).[49] In each of these cases, the vertical elements (plastic posts or curbs) were installed right up to the intersections, the vehicle drivers appear to have been unaware of the bicyclists traveling in the same direction (blind spot), and the bicyclists were unaware that the right turns were happening until it was too late.

In San Francisco, the Market Street/Octavia Boulevard intersection has been considered one of the most dangerous to bicyclists due to vehicles turning right across an SBL there.[50]. Note that this is not an exhaustive list of right hook crashes in SBLs–just a few recent incidents that include the cities in the 2023 FHWA study (San Francisco, Cambridge, and Seattle).

FHWA study critique:

The 2015 FHWA report observed:

> Increases in bicycle crashes after separated bike lanes were built were especially pronounced at intersections…
>
> It appears that the introduction of separated bike lanes may result in increased challenges at intersections, relative to separated or protected midblock locations. All six of the sites where the analysis included consideration of intersection vs. midblock crashes saw an increase in the percentage of crashes that occurred at an intersection relative to crashes at midblock. This was true for bicycle crashes as well as those not involving a bicycle.

The 2023 FHWA study reported:

> Initially, the research team hoped to develop CMFs for segments and intersections, but their attempts to model intersections and/or entire corridors were unsuccessful. Consequently, the team focused on developing robust CMFs for segments. Future work may be to conduct research that estimates the safety effect of the various types of SBL-to-intersection transitions…
>
> The research team assessed the prospect of using intersection-only and corridor-type models but found that for the available dataset, these two options did not yield statistically viable results.

First, it is particularly bizarre that none of the actual street names/locations of the SBLs were ever revealed for any of the cities in the 2023 FHWA study. Second, the fact that intersection crashes had to be excluded in order to achieve statistical significance is a critical flaw in the safety claim. In fact, all of the SBL intersection-based fatalities and serious injuries described above would have been excluded from the crash analysis.

In addition to excluding all crashes at the intersections themselves, the 2023 FHWA study also excluded crashes that occurred within 200 to 250 feet on both sides, which was not disclosed in the report itself but was described by the primary author in a webinar describing the results.[7] Although those distances are commonly accepted as being within an intersection's "area of influence," it means that the entire study was based only on crashes that happened in the middles of the "blocks" extracted from the full SBL corridors.

Also, block lengths can vary significantly between cities and different parts of the same city, which is not addressed in the study. There is no indication of what proportions of the corridors were actually included in the analysis.

In summary, while the 2023 FHWA study sought to demonstrate the corridor-level safety of SBLs, the inclusion of crashes that happened within 250 feet of both sides of intersections clearly caused the statistical models to fail. In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

G.4. Vehicle safety, emergency vehicle response times

There also are safety concerns with SBLs independent of bicycle crashes. The barriers do not allow disabled vehicles to go to the edge of the street, and they reduce the ability of vehicles to yield to the edge when emergency response vehicles need to pass—requiring them to remain in active through-lanes. This is particularly true of streets with few through-lanes. This could negatively affect emergency vehicle response times and/or put drivers of disabled vehicles at risk.

H. Crash modification factor modeling

FHWA study critique:

The statistical modeling of the crash data to produce the CMFs also was quite muddled in the 2023 FHWA study. Table 1 (below) contains a summary of segment numbers and CMFs for "flexible posts" compared to "traditional or flush buffered bicycle lanes." Although numerous other comparisons were described in the study, this was the main reported finding, so this critique will focus on that area (although it applies to the other comparisons as well).

Table 1

Safety model development sites	Total Segments	Non-SBL Segments	SBLs both directions*	SBLs single direction	CMF	Estimate	Standard Error	*p* -Value	Table[1]
San Francisco (SF)	384	320	28	36	0.338	-1.0849	0.3602	0.0026	47
Cambridge	179	155	24	0	0.592	-0.5244	0.7486	0.4836	50
SF + Cambridge	563	475	52	36	0.316	-1.1507	0.3366	0.0006	52
Seattle	660	541	71	48	1.178	0.164	0.883	0.853	58
All three	1223	1016	123	84	0.468	-0.758	0.267	0.005	60
"Validation" sites									
Austin	68	40	24	4					
Denver	384	368	13	3					

*Either one-way SBLs on both sides of a roadway or a two-way SBL on one side.

Overfitting/small crash sample size. In statistical modeling, when sample/event sizes are small, many variables are included, and many different models are explored, there is a risk of something called "overfitting." This could mean that, while an apparently very good model can describe crashes in the specific data being analyzed, the model does not reflect reality and will not "generalize" to accurately predict crashes in other data/cities.[30] In this regard, the authors stated:

> The research team found the number of bicycle crashes [events] to be very small…
>
> The research team developed several regression models for Cambridge, San Francisco, and Seattle (both independently and with a merged dataset).

The actual numbers of crashes in each city/corridor are never revealed in the study, and many variables (some counter-intuitive) and models seem to have been tested in many different combinations, raising concerns about potential overfitting.

Lack of statistical significance in individual cities. San Francisco was the only individual city for which a statistically significant CMF could be developed (0.338, $p = 0.0026$). It is curious that the addition of Cambridge, which had a worse and not statistically significant CMF as its best model (0.592, $p = 0.4836$), to San Francisco produced a better CMF than San Francisco alone (0.316, $p = 0.0006$). And although Seattle had the largest sample sizes (by far) of both non-SBL and SBL segments, the authors also were unable to develop a statistically significant CMF, and the best case model there showed an *increase* in crashes in SBLs vs. non-SBL segments (CMF = 1.178, $p = 0.853$). Note that Austin and Denver were completely excluded from CMF development, presumably due to low sample sizes of segments and/or crashes.

Disparate Seattle safety element results. The optimal statistical model developed on the Seattle data (although not statistically significant) suggested that SBLs with only flexible posts essentially imparted no safety improvement, while SBLs with flexible posts plus other vertical elements imparted a small safety improvement. This is in contradiction with the overall finding in the model developed from the combined Seattle/San Francisco/Cambridge data that flexible posts alone impart a large safety improvement that is degraded when combined with other vertical elements.

Significant differences between cities. In the final model developed from the combined Seattle/San Francisco/Cambridge data, the city locations themselves showed up as the most impactful coefficients, indicating that the crash rates were substantially different in each city and raising questions about the generalizability of the calculated CMFs to cities other than San Francisco and, perhaps, Cambridge.

Insufficiently characterized data exclusions. For the three-city final model, it appears that the authors removed all segments for which their estimate of average daily vehicle traffic (ADT) or annual average daily bicycles (AADB) was zero. It is unclear why some street segments would have had zero traffic. More importantly, it is unclear how many segments were removed, because the table with the results (Table 59[1]) claims that all 1,223 segments from the three cities were analyzed.

The authors discounted this as a "housekeeping issue." However, there was no explanation of what effect inclusion of those segments would have had on the model, and there was no mention of excluding segments with zero estimated traffic in the separate statistical modeling done on the San Francisco and Cambridge data.

On a related matter, similar to the situation described above for bicycle exposure data, the authors excluded crash data from 2020 and 2021 for all cities, stating in the Tech Brief (and not the main paper):

> Note that data for 2020 and 2021 were excluded from the CMF development efforts because those data were atypical.

However, no further justification was made for the exclusion of this data, beyond the claim that it was "atypical." In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

Inconclusive validations. The so-called "exploratory validation" of the model with the Austin and Denver data was only an assessment of statistical equivalency—without any evidence that SBLs actually reduced crashes in those cities. In addition, while the equivalency test appeared to work for Austin, the Denver findings were quite different, and the authors rationalized this as follows in the Tech Brief with no further justification:

> …[T]he CMF for Denver conditions should be applied cautiously. The team was not completely sure about why these data differed, but Colorado has different weather patterns (particularly in the winter) and has a greater elevation than the other study sites.

This further amplifies the concern that the model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.

Lack of crash type or injury severity data. The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles, which are the ones that occur mid-block.[1] However, the study includes no data on crash types or injury severities to assess this alleged benefit, which could have helped support the safety conclusions. Further, mid-block vehicle overtaking crashes tend to be a small minority (<10%) of overall bicycle crashes,[37] so the study and its crash reduction conclusion ignore the vast majority of bicycle crashes, including the many bicycle crash types that can increase substantially in SBLs (e.g., intersection hooks, crosses, and T-bones, as well as fixed objects, debris, other bicyclists/pedestrians, etc.).

I. Inconsistencies in findings between studies

Flexible posts (bollards) alone vs. bollards plus other elements. It is not uncommon for different studies by different researchers to reach somewhat different conclusions or, for example, suggest some differences in the *magnitude* of safety benefits. However, when it comes to research on SBL safety, the inconsistencies in the findings within individual studies and between studies tends to be quite large. This indicates the need for larger, better-controlled studies.

One example is the alleged impact of different vertical elements on crashes. The 2015 FHWA report concluded:

> Plastic bollards applied in conjunction with other characteristics…were associated with a decrease in average annual total crashes while plastic bollards applied on their own were associated with an increase.

In stark contrast, the main finding of the 2023 FHWA study is that plastic bollards (flexible posts) alone had a CMF of 0.468 relative to conventional bicycle lanes (predicting a 53.2% reduction in crashes[51])--see the red box in Table 60 of the study below. However, when other vertical elements were added to the bollards, crashes increased relative to the bollards alone, and the results were no longer statistically significant (orange box in the table).

In fact, the FHWA CMF Clearinghouse reports a CMF of 0.605 for "Convert Blended vertical element Bike Lane to Flexible Delineator Post Bike Lane" based on the 2023 FHWA study.[52] In other words, for an SBL that includes both plastic posts and wheel stop curbs, *removal* of the wheel stops (leaving only the plastic posts) would be expected to nonsensically reduce vehicle-bicycle crashes by 39.5%.

Table 60. CMFs for bicycle crashes in San Francisco, Seattle, and Cambridge.

Condition	CMF	Estimate	Standard Error	*p*-Value	Significance
Flush buffer[a]	1.128	0.121	0.173	0.484	—
Flexible posts[a]	0.498	−0.698	0.264	0.008	**
Flexible posts[b]	0.441	−0.819	0.297	0.006	**
Flexible posts[c]	0.468	−0.758	0.267	0.005	**
Blended[a]	0.822	−0.196	0.252	0.437	—
Blended[b]	0.729	−0.316	0.300	0.292	—
Blended[c]	0.774	−0.256	0.263	0.331	—
Flexible posts[d]	0.605	−0.502	0.318	0.114	—
Flexible posts or blended[a]	0.640	−0.447	0.203	0.028	*
Flexible posts or blended[b]	0.567	−0.568	0.253	0.025	*
Flexible posts or blended[c]	0.602	−0.507	0.212	0.017	*

—Not statistically significant.
*Statistically significant at the 0.05 level.
**Statistically significant at the 0.01 level.
aBase condition: traditional bicycle lane.
bBase condition: flush buffered bicycle lane.
cBase condition: traditional or flush buffered bicycle lane.
dBase condition: blended vertical element.

Mixing zones. Another area of controversy is the safety of so-called "mixing zones," where vehicles and bicycles conflict at intersections. The 2015 FHWA report stated:

> Mixing zones in combination with other treatments was associated with a decrease in average annual total crashes.

However, FHWA and NACTO guidance recommend minimizing the use of mixing zones, because they allegedly increase the lengths of conflict areas.[3,6]

J. Conclusions

Given the study limitations detailed above, any claims of SBL-based crash reductions or published CMFs should be accompanied by prominent warning statements, such as:

- This claim only applies to vehicle-bicycle crashes in the midblock portions of SBL corridors more than 250 feet on either side of intersections.
- There is evidence that crashes are likely to increase with vehicles within the intersection areas and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout the corridor, which could lead to serious injury or death.
- This claim may not validate to SBLs outside of those included in the underlying study.

Planning of SBL projects and future SBL safety studies should strictly adhere to guidance and best practices, and the concerns listed in Section C above should be considered.

Glossary of abbreviations and terms in the context of transportation safety

AASHTO (American Association of State Highway and Transportation Officials): A national transportation standards-setting organization that publishes guidelines for highway design.

Bollard: A vertical pillar-like object used for traffic control. In the context of SBLs, they are typically flexible plastic posts. In other cases, they can be rigid/crash-resistant for security.

Before-after (longitudinal) study: A study comparing data collected from the same set of sites both before and after safety modifications like SBLs are installed. Less subject to confounders than cross-section studies.

Class I, II, II, and IV bikeways: California classifications. Class I “bike paths” are off-roadway. Class II “conventional bike lanes” are on-roadway with only paint striping. Class III “bike routes” are on-roadway lanes shared with vehicles (sharrows). Class IV “separated bikeways” are on-roadway but separated from vehicle lanes with vertical elements (same as cycle tracks, separated bike lanes, or protected bike lanes).

CMF (Crash Modification Factor): A number that is multiplied by the future estimated crashes without treatment to estimate expected future crashes with a modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF >1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

Confounder (confounding factor): When assessing cause and effect of a safety modification, confounders may prevent accurate assessment of the actual effect of the modification, because the confounder(s) are responsible for part or all of the effect.

Cross-sectional study: A study comparing data collected from different sites during the same period of time—more subject to confounding factors than a longitudinal (before-after) study.

Cycle track: Same as Class IV bikeways, separated bike lanes, or protected bike lanes.

FHWA (Federal Highway Administration): US Department of Transportation division that sponsors roadway safety programs, among many other functions.

Flex post: A type of flexible plastic bollard frequently used for SBLs.

Longitudinal study: Same as before-after study.

NACTO (National Association of City Transportation Officials): Coalition of Departments of Transportation in North American cities that publishes roadway design standards.

Overfitting: While an overfit statistical model can predict safety outcomes in the data from which it was created, it fails to generalize to predict outcomes in other data, because it was based on ”noise.” Overfitting is a particular problem when many complex models are explored in small datasets.

Rideable width: The usable width of a bikeway for riding, excluding any shy distance, gutter pans, vertical SBL elements, or other unrideable areas.

SBL (separated bike lane): Same as Class IV bikeway, cycle track, or protected bike lane (PBL).

SANDAG (San Diego Association of Governments): An association of local governments that serves as the Metropolitan Planning Organization for San Diego County.

Selection bias: Failure to analyze a truly random sample for statistical analysis. For example, in SBL research, unsafe SBLs that have been removed cannot be analyzed, and SBLs that have better safety records may be more likely to be selected for analysis, thereby exaggerating their overall safety.

Wheel stop: Short section of “curb” or “berm” similar to those in individual stalls in parking lots that can serve as vertical elements in SBLs. They can be made of concrete, asphalt, or other materials, and glued or poured in-place.

Figure 1. Images from the FHWA website regarding SBLs.

Figure 2. Additional FHWA marketing regarding SBLs posted on Facebook and elsewhere.

Figure 3. Figure K.4 from the SANDAG draft 2025 Regional Plan.

Roadway Context				All Ages & Abilities Bicycle Facility
Target Motor Vehicle Speed*	Target Motor Vehicle Volume (ADT)	Motor Vehicle Lanes	Key Operational Considerations	
Any		*Any*	*Any of the following:* high curbside activity, frequent buses, motor vehicle congestion, or turning conflicts‡	**Protected Bicycle Lane**
≤ 10 mph	Less relevant	No centerline, or single lane one-way	Pedestrians share the roadway	**Shared Street**
≤ 20 mph	≤ 1,000 – 2,000		< 50 motor vehicles per hour in the peak direction at peak hour	**Bicycle Boulevard**
≤ 25 mph	≤ 500 – 1,500			
	≤ 1,500 – 3,000	Single lane each direction, or single lane one-way	Low curbside activity, or low congestion pressure	**Conventional or Buffered Bicycle Lane, or Protected Bicycle Lane**
	≤ 3,000 – 6,000			**Buffered or Protected Bicycle Lane**
	Greater than 6,000			**Protected Bicycle Lane**
	Any	Multiple lanes per direction		
Greater than 26 mph†	≤ 6,000	Single lane each direction	Low curbside activity, or low congestion pressure	**Protected Bicycle Lane, or Reduce Speed**
		Multiple lanes per direction		**Protected Bicycle Lane, or Reduce to Single Lane & Reduce Speed**
	Greater than 6,000	*Any*	*Any*	**Protected Bicycle Lane**
High-speed limited access roadways, natural corridors, or geographic edge conditions with limited conflicts		*Any*	High pedestrian volume	**Bike Path with Separate Walkway or Protected Bicycle Lane**
			Low pedestrian volume	**Shared-Use Path or Protected Bicycle Lane**

Source: NACTO

About the author

The author has a PhD in Biology from the University of California, San Diego. He is a retired researcher who conducted basic science and clinical studies for the development and validation of cancer diagnostics. He is a former traffic commissioner from the City of Carlsbad, CA, who has dealt with transportation issues in San Diego County for over 14 years.

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Outlook

Input regarding 2025 Regional Plan

From Albert Perdon <albertperdon@gmail.com>
Date Wed 7/16/2025 8:07 PM
To RegionalPlan <RegionalPlan@sandag.org>

2 attachments (9 MB)
SANDAG has invited San Diegans to provide input to the Draft 2005 20250715.pdf; The Making of a Modern New California 20250717.pdf;

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CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

The following input is provided to the SANDAG Board, staff and public in response to SANDAG's request for input on the Draft 2025-2029 Regional Plan.

SANDAG staff have provided a mountain of data to inform the Board of Directors and the public on the staff recommendations for consideration by the Board, in preparation for a final 2025-2029 Regional Plan. These recommendations appear to be largely driven by prior and current policy decisions made by elected officials in the county's 18 cities and county government. There appears to be little force-of-power or influence from the county's tribal nations.

There is too much data to read and analyze. It is impossible to comb out the most critical information that has the largest bearing on the outcomes of greatest interest to San Diegans. It is difficult to distinguish the "big impact" actions from those that are more mundane or have minimal impact on the majority of residents. Costs and benefits are not easily understood; or who benefits and who pays for the benefit.

The review of the Draft Plan did lead to five key issues of concern. The Draft Plan, if approved as is, will likely result in some or all of the following outcomes:

Failure to adequately recognize the legal mandate and responsibility to adjust land use plans and contribute local funding to the California high-speed train and connected local transit system approved by 17 million voters (74%) in November 2008.
Failure to achieve the opportunities and promised outcomes for population and economic growth, where people will live and how they will move about; constraining growth and creation of better health and greater wealth for all.
Failure to avoid limits on housing, and continued reliance on dangerous and costly auto ownership, resulting in increased VMT, little growth in transit alternatives and use, and increasing reliance on taxpayer roadway and transit subsidies, while keeping 58% or more of the population in low income or poverty status.
Failure to secure all private, local, state and federal funding needed to achieve the improvements listed in the Draft Regional Plan and RTIP; the federal government requires that SANDAG has secured or can secure all the funds needed to complete the mandated and hoped for projects within set budget/schedule parameters.

Failure to make needed changes in its a governing structure that currently denies a large percent of the county's population voting power; under its current weighted fractional voting scheme imposed by State law, it takes only 9 of 15 people, mayors and members of city councils of San Diego and Chula Vista, to decide the outcome of a vote by the SANDAG Board of Directors.

There are solutions that overcome the shortcomings identified above. Those solutions are described in the two attachments to this message to the Board and staff, including the recommendations from the Wolford-Chalekian Brief aimed at making a modern new County and California that offers greater health, wealth and prosperity for all current and future residents of San Diego County. The lives of Lauren Wolford of San Marcos and Emery Chalekian of Encinitas were cut short due to prior actions of SANDAG. The Brief is titled in their names to remind Board members that their decisions have consequences.

The Board is urged to make the attachments readily available to the public so that more than a few hundred or few thousands are able to see them and contribute their ideas and recommendations, with the understanding that 17 million voters have already approved relevant actions in November 2008 that are now the law of the land. SANDAG must not ignore the will of the voters or the laws. SANDAG's new Regional Plan must adhere to the requirements imposed by law established with overwhelming voter support.

Albert Perdon
De Luz
[redacted]

Input to SANDAG regarding final adoption of a new 2025-2029 Regional Plan and Regional Transportation Improvement Program (RTIP)

By Albert Perdon – albertpredon@gmail.com – [redacted] – 7/4/2025

SANDAG has invited San Diegans to provide input to the Draft 2025-2029 Regional Plan on or before July 18, 2025. SANDAG has also given notice that it is scheduled to give final approval to Amendment 8 to the Regional Transportation Improvement Program (RTIP) on July 25, 2025, and is seeking input on the RTIP by July 17, 2025. This report replies to the invitations to provide public input on both documents.

SANDAG's Draft Regional Plan and Regional Transportation Improvement Program (RTIP) violate the law in SEC. 9. Chapter 20 (commencing with Section 2704) of Division 3 of the Streets and Highways Code. This law was enacted by voter approval of Proposition 1A in November 2008.

SANDAG must revise the Draft Plan and RTIP before final adoption of a new 2025-2029 Regional Plan and RTIP. SANDAG approval of the current draft plans as final plans, without modifications proposed in this report, will put the county's current 3.3 million residents and future new residents at extreme risks.

These risks, and recommendations to avoid these risks, are identified in this report and its adjoining Wolford-Chalekian Brief. Following is a summary of the five dominant issues with the draft plans and the proposed solutions and recommendations:

	Issue	Recommendation
1.	SANDAG does not recognize the legal mandate and responsibility to adjust land-use plans and contribute local funding to the California high-speed train and connected local transit system approved by 17 million voters (74%) in November 2008.	SANDAG and its 18 local cities and San Diego County should enter into a joint power agreement with the California High-Speed Rail Authority to enforce the requirements established in SEC. 9. Chapter 20 (commencing with Section 2704) of Division 3 of the Streets and Highways Code.
2.	The action element of the Draft Regional Plan will not achieve the opportunities and promised outcomes for population and economic growth, where people will live and how they will move about. It constrains growth and creation of better health and greater wealth for all.	SANDAG should consider and adopt the recommendations in the Wolford-Chalekian Brief calling for the creation of 6-to-7 homeowner-only "New Cities" connected without the need to own and operate an automobile, while protecting existing communities in the county; or adopt an alternative that achieves equal or better outcomes.
3.	The Draft Regional Plan limits housing and continues reliance on dangerous and costly auto ownership, resulting in increased VMT, little growth in transit alternatives and use, and increasing reliance on taxpayer transit subsidies, while keeping 58% or more of the population in low-income or poverty status.	SANDAG's backward-looking-plan constrains annual population growth; The Brief recommends 1% annual growth, along with zoning to enable creation of very high-density population centers and transit corridors with walk access to high-frequency transit services. This approach will enable an increase in average family wealth over 50 years to as high as $31 million.
4.	SANDAG is unable to secure all the state and federal funding needed to achieve the improvements listed in the Draft Regional Plan and RTIP. The federal government requires that SANDAG has secured or can secure all the funds needed to complete the projects within set budget/schedule parameters.	Funding needed for the California High-Speed Train could be secured from user fees and benefit-assessments on new connected housing developments. Costs could be financed from proposed local-city Enhanced Infrastructure Financing District (EIFD). Costs might also by financed by ISRF funding from IBank, California's Infrastructure and Economic Development Bank.
5.	SANDAG's governing structure denies a large percent of the county's population voting power. Under a weighted fractional voting scheme imposed by State law, it takes only 9 of 15 people, mayors and members of city councils of San Diego and Chula Vista, to decide the outcome of a vote by the SANDAG Board of Directors.	The Wolford-Chalekian Brief offers a solution and plan for increased transit-oriented housing development (TOD) in high-speed transit station-areas. It offers reduced housing and mobility costs and faster, safer access to important destinations, such as a new Marine/civil airport/housing complex at Miramar and a new housing/electric VTOL airfield complex at Lindberg Field.

Following are a number of exhibits that give sample evidence to the shortfalls in the Draft Plan.

The summary reveals the outcomes described in the Draft Plan are ill-defined and misleading. Descriptors such as “more”, “shorter”, “closer” and “fewer” do not give significance to the actual, quantifiable value outcomes. A doubling of transit ridership from a tiny 3% to a tiny 6% of regional travel is insignificant. Total transit travel is still tiny as auto vmt increases. There exists the possibility to achieve an increase to over 25% of total travel, if recommendations of the Wolford-Chalekian Brief are adopted.

A summary of these key performance measures is included below, with additional detail available in **Appendix N**.

- **Access to Basic Needs**: Our model looks at how many people can reach places like retail, parks, and medical facilities within a short trip – 15 minutes to retail or parks and 30 minutes to healthcare – using different modes of transportation to get around. The investments in the 2025 Regional Plan show that more people in our communities now have better access to everyday essential needs.
- **Access to Opportunities**: Our transportation system also provides access to employment centers and higher education which helps people advance economically. Our model looks at how many adults can reach these places by transit within 30 or 45 minutes. The 2025 Regional Plan shows that more people across the region will be able to get to work or school by transit.
- **SB 375 Greenhouse Gas (GHG) Emissions**: Reducing vehicle emissions is one way our transportation system supports a healthier environment. We measure how much these emissions will go down compared to 2005 levels. Unlike the other performance areas, the state sets a required target under SB 375 to reduce our per capita GHG emissions by 19% by 2035 from 2005 levels. The 2025 Regional Plan achieves a 19.3% GHG reduction per capita by 2035.
- **Vehicle Miles Traveled (VMT)**: Reducing the number of miles driven across the region is a key strategy in advancing a more sustainable and efficient transportation system. VMT is calculated both regionally and on a per capita basis to evaluate how well the transportation network supports shorter and fewer drive alone trips. The 2025 Regional Plan reduces VMT by investing in high-quality transit, active transportation infrastructure, and a land use pattern that supports such investments. These investments help more people meet their daily needs closer to home and provide viable alternatives to driving alone. Lower VMT supports regional goals to improve air quality, reduce congestion, and enhance quality of life throughout the San Diego region.

Data in Table N4.3 give evidence to the lack of signicant improvements in corridor travel times. In some cases the travel times worsen, such as for travel by transit from Escondido to Downtown San Diego. Data for 2050 are totally speculative and fail to document the worsening travel on many segments, as there is no funding commitment or reasonable expectation that the needed funding to achieve the outcomes will ever be secured. The expectation that funding will be secured is based upon hopes and prayers.

Table N4.3: Corridor Travel Times (AM peak period) (in minutes)

Corridor and Modes	2022 Base Year	2035 No Build	2050 No Build	2035 Build	2050 Build
Oceanside – Downtown San Diego					
By Transit	62	49	49	40	38
By Auto	65	65	64	60	60
By Carpool	65	64	64	53	52
Escondido – Downtown San Diego					
By Transit	47	49	50	54	52
By Auto	46	48	49	47	47
By Carpool	41	43	44	40	39
El Cajon – Kearny Mesa					
By Transit	101	87	86	62	57
By Auto	30	29	28	24	23
By Carpool	30	29	28	23	22
Mid City – UTC					
By Transit	64	64	64	54	43
By Auto	28	29	28	25	25
By Carpool	28	29	28	21	20
Western Chula Vista – Mission Valley					
By Transit	75	75	75	45	28
By Auto	29	28	29	26	24
By Carpool	29	28	29	25	23
Carlsbad – Sorrento Mesa					
By Transit	37	30	30	26	26
By Auto	42	41	40	39	37
By Carpool	42	41	40	36	35

Appendix N: Network Development and Performance N.43

The data in Appendix N: Network Development and Performance, page N.37, reveals an increase in VMT from 78 million miles to 81 million miles from 2022 to 2050, as well as an increase in miles per capita. These data do not reconcile with the descriptors displayed in the Summary. “Access to opportunities” does not ensure ability to take advantage of these opportunities. On-road CO_2 emissions increase from 35,142 tons per day in 2022 to 35,563 tons per day in 2050. The number of vehicles per capita increases under SANDAG’s Draft Plan from 2022 to 2050. It reflects a “business-as-usual” approach.

Performance Measure and Description	Modes or Units	2022 Base Year	2035 No Build	2050 No Build	2035 Build	2050 Build
Access to Opportunities – Higher Education						
% of adult population within 30 mins of higher education	Transit: accessed by walk or microtransit/NEV	68.2%	69.3%	69.7%	75.2%	76.1%
% of adult population within 45 mins of higher education	Transit: accessed by walk or microtransit/NEV	75.2%	75.7%	75.9%	80.4%	81.2%
SB 375 GHG Emission Measures						
On-road CO_2 emissions - regionwide	Tons/day	35,142	37,007	37,432	35,651	35,563
Change in on-road CO_2 emissions from 2005 level - regionwide	Tons/day	-4,369	-2,504	-2,079	-3,860	-3,948
On-road CO_2 emissions - per capita	Pounds/day	21.4	21.8	22.0	21.0	20.9
Change in on-road CO_2 emissions from 2005 level - Per Capita	Pounds/day	-4.6	-4.2	-4.0	-5.0	-5.1
VMT Measures						
All vehicle classes - regionwide	Miles	77,898,460	83,026,484	84,788,117	81,005,512	81,524,632
All vehicle classes - per capita	Miles	23.73	24.43	24.95	23.83	23.99

Predicted travel data presented in the Wolford-Chalekian Brief reveal the potential for dramatic improvements in lowering vehicle-miles travelled. The changes in vehicle-miles travelled are made possible with adoption of land-use and local funding policies and development of transit-oriented, high-density new cities served by and connecting California's legally-mandated but ignored 800-mile high-speed train and connected local transit system.

Projected Peak Period Work Trips - Drive Alone & Carpool Travel Mode		
SANDAG Plan	Year	The Brief
4,228,000	**2022**	4,228,000
5,719,000	**2050**	3,997,000
+1,491,000	Change	-231,000
12,305,000	**2122**	3,500,000

The "highlights" presented in the "officially released" Draft Regional Plan lack any significant information that offers the public a quick look and understanding of the actions to be undertaken, the costs to be incurred, the benefits to be realised and the funding sources committed to get the job completed on schedule and within budget.

The narrative presents an image of a plan that is focused on responding to state and federal mandates, in order for the region to be eligible for transportation funding, and not on the outcomes anticipated pertaining to the main issues of concern to the region's near and long-term future.

SANDAG Seeks Public Input on Blueprint for Future of Transportation in the San Diego Region

Draft 2025 Regional Plan Comment Period Open Through July 18

SANDAG has officially released the **Draft 2025 Regional Plan**, a long-range vision for improving the San Diego region's transportation system over the next two decades. The draft plan is now available for public review and comment through July 18, 2025.

The Regional Plan is a federal and state mandated blueprint that ensures the region remains eligible for billions of dollars in transportation and infrastructure funding. It addresses transportation, housing, land use, and climate change goals, including a strategy to meet the state's mandate for a 19% reduction in greenhouse gas emissions. The Draft 2025 Regional Plan focuses on delivering more convenient, equitable, healthy, and safe transportation choices in the San Diego region.

The draft plan balances near-term improvements with long-term goals, incorporating community input and the latest post-pandemic travel data. With a projected cost of $126 billion, the federal, state, and locally funded draft plan is more fiscally lean than previous versions and includes a funding strategy for construction, operations, and maintenance.

Draft 2025 Regional Plan highlights:

- Expanded transit service, including 35 new Rapid bus routes by 2035
- Enhanced transit, with more frequent trips and longer service hours
- Improved rural transit options, with more routes and daily service throughout the week
- Expanded on-demand transportation, featuring 36 flexible fleet service areas offering community shuttles
- A complete network of Managed Lanes to improve highway traffic flow and travel reliability
- Complementary programs, including the Youth Opportunity Pass, safety investments, and a regional vanpool program

SANDAG will host a series of public learning sessions across the region to provide an overview of the Draft 2025 Regional Plan and gather feedback:

SANDAG is committing a major error in its development of its new 2025-2029 Regional Plan. It's shaping the future of the county based upon "forecasts" predicated on a "looking back" computer-assisted planning and business model. It should be shaping the future based upon a forward-looking approach that is policy-driven by clearly-defined, voter-approved, near and long-term public interest goals for the future. The outcome of this strategic error is evidenced in the issues that are at the center of the county's angst and displeasure, including rising costs and a general decline in the quality-of-life in all segments of the population.

The need to adopt a forward-looking approach is evidenced with the paradigm shift occurring in the insurance industry.

> *The traditional insurance model is often described as "looking back," meaning it primarily relies on historical data and claims experience to assess risk and set premiums. This is often called indemnity-based insurance, where the insurer pays out a set amount based on the documented loss.*
>
> *The industry is currently shifting towards a "forward-looking" approach, driven by advancements in technology and data analytics. This involves focusing on predicting and*

preventing risks before they occur. This is becoming a preferred approach, especially for accurately predicting liability risk.

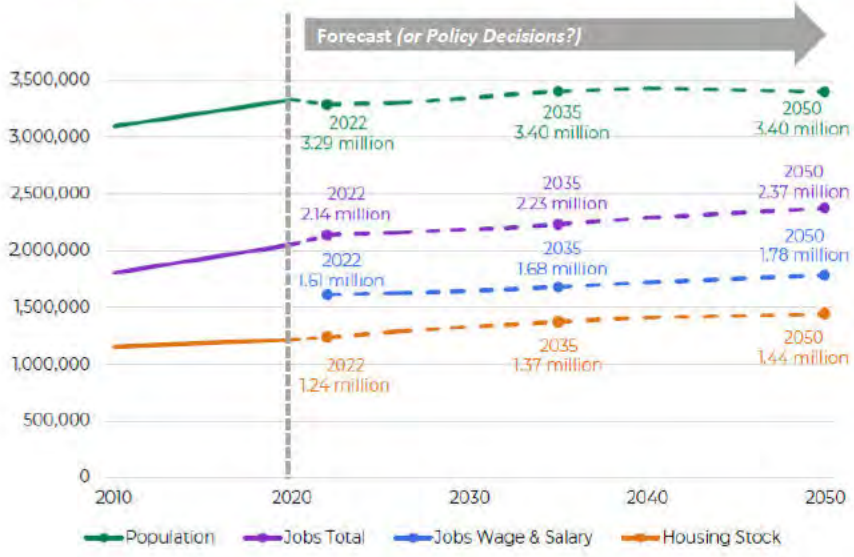
The shift to a forward-looking approach signifies a fundamental transformation in the insurance industry, moving from a reactive model to a more proactive and predictive one. This shift is driven by technology and data, with the potential to benefit both insurers and policyholders. However, addressing the ethical and regulatory considerations related to data usage is critical for the responsible implementation of this new paradigm.

SANDAG's critical details and underlying assumptions in its planning approach, and its "well-proven and verified computer models," are hidden from public view in an obscure Appendix F of the Draft Plan that few will see or read. Following is the data from Appendix F that is at the heart of the SANDAG error. This information deserves to put at or near the beginning of the report to give it the attention it deserves. It establishes the key decisions made that impact everything else.

Since 1971, SANDAG has produced long-range forecasts of population, housing, and employment that are used as a resource by elected officials, planners, academics, and the public. These forecasts represent the best assessment of the changes we can anticipate for the region and its communities based on the best available information and well-proven, verified computer models. As explained below, they are based on the most recent planning assumptions, considering local general plans and other factors, per Senate Bill 375 [see Government Code Section 65080(b)(2)(B)]. The SANDAG forecasts are meant to help policy- and decision-makers prepare for the future and are not an expression for or against growth. The forecasts are developed through a collaborative effort with experts in demography, housing, economics, and other disciplines, and the close cooperation of the local planning directors and their staff. The purpose of this appendix is to explain the data, assumptions, and results of the Series 15 Regional Growth Forecast with Sustainable Communities Strategy (SCS) land use pattern. The Regional Growth Forecast includes the forecast of population, housing, and employment for the San Diego region. These region-level data are then allocated to the subregional areas using the most recent planning assumptions considering local general plans and other factors about housing unit and job capacity. The SCS land use pattern is a subregional allocation that is a vision for land use in the region. It includes data and assumptions that help meet goals for greenhouse gas (GHG) emissions reductions and assess transportation investments in the region. The SCS land use pattern is used for transportation modeling for the 2025 Regional Plan as discussed in Appendix M: Travel Demand Modeling Tools. Overview of Forecasted Growth Between 2022 and 2050, the San Diego region is expected to grow by approximately 113,000 people, reflecting slower growth than previous forecasts due to shifts in migration patterns and declining birth rates. Despite this slower population growth, the region's existing housing shortages will continue to drive demand for

housing and job opportunities, leading to the addition of approximately 203,000 housing units and about 234,000 jobs by 2050. Figure F.1 provides historical, current, and projected population, housing units, and job counts for the region. Figure F.2 describes the components of population change for the San Diego region from 2010 to 2050.

Figure F.1: Population, Jobs, and Housing Forecast, San Diego Region 2010-2050

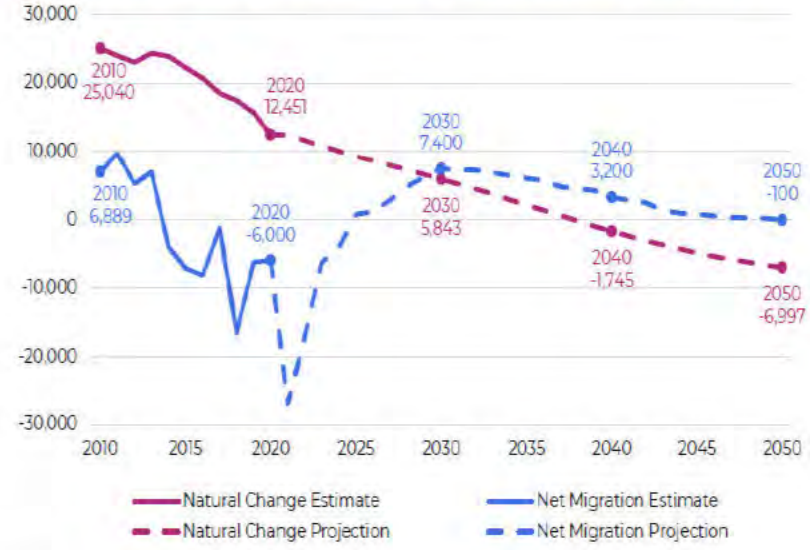


Source: SANDAG Series 15 Regional Growth Forecast with SCS Land Use Pattern

The Titanic
SANDAG Regional Plan
Now you see it.
Now you don't.
Is the declining population from 2040 to 2050 by personal individual choices or by policy decisions of the "SANDAG 9" Board Members?

Population	Housing Units	
3,400,000	1,440,000	2050
3,290,000	1,240,000	2020
110,000	200,000	30 years
3,667	6,667	0.6
per year	per year	population per housing unit

Figure F.2: Components of Population Change, San Diego Region 2010–2050



Source: DOF E-2 Population Estimates and Components of Change by Year, 2010-2019; SANDAG Cohort Component Model (CCM) output, 2020-2050

The devil is in the details. The inputs used by SANDAG to produce the outcomes shown in Figures F.1 and F.2 are predicated on key assumptions driving future population growth projections. The first key assumptions are derived from SB 375.

> *SB 375, Steinberg. Transportation planning: travel demand models: sustainable communities strategy: environmental review.*
>
> *(1) Existing law requires certain transportation planning activities by the Department of Transportation and by designated regional transportation planning agencies, including development of a regional transportation plan. Certain of these agencies are designated under federal law as metropolitan planning organizations. Existing law authorizes the California Transportation Commission, in cooperation with the regional agencies, to prescribe study areas for analysis and evaluation.*
>
> *This bill would require the commission to maintain guidelines, as specified, for travel demand models used in the development of regional transportation plans by metropolitan planning organizations. The bill would require the commission to consult with various agencies in this regard, and to form an advisory committee and to hold workshops before amending the guidelines.*
>
> *This bill would also require the regional transportation plan for regions of the state with a metropolitan planning organization to adopt a sustainable communities strategy, as part of its regional transportation plan, as specified, designed to achieve certain goals for the reduction of greenhouse gas emissions from automobiles and light trucks in a region. The bill would require the State Air Resources Board, working in consultation with the metropolitan planning organizations, to provide each affected region with greenhouse gas emission reduction targets for the automobile and light truck sector for 2020 and 2035 by September 30, 2010, to appoint a Regional Targets Advisory Committee to recommend factors and methodologies for setting those targets, and to update those targets every 8 years. The bill would require certain transportation planning and programming activities by the metropolitan planning organizations to be consistent with the sustainable communities strategy contained in the regional transportation plan, but would state that certain transportation projects programmed for funding on or before December 31, 2011, are not required to be consistent with the sustainable communities strategy process. To the extent the sustainable communities strategy is unable to achieve the greenhouse gas emission reduction targets, the bill would require affected metropolitan planning organizations to prepare an alternative planning strategy to the sustainable communities strategy showing how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. The bill would require the State Air Resources Board to review each metropolitan planning organization's sustainable communities strategy and alternative planning strategy to determine whether the strategy, if implemented, would achieve the greenhouse gas emission reduction targets. The bill would require a strategy that is found to be insufficient by the state board to be revised by the metropolitan planning organization, with a minimum requirement that the metropolitan planning organization must obtain state board acceptance that an alternative planning strategy, if implemented, would achieve the targets. The bill would state that the adopted strategies do not regulate the use of land and are not subject to state approval, and that city or county land use policies, including the general plan, are not required to be consistent with the regional transportation plan, which would include the sustainable growth strategy, or the alternative planning strategy. The bill would also require the metropolitan planning organization to hold specified informational meetings in this regard with local elected officials and would require a public participation program with workshops and public hearings for the public, among other things. The bill would enact other related provisions.*

It is clear that the intent of SB 375 is aimed at adopting sustainable communities strategies designed to reduce greenhouse gas emissions. Importantly, SB 375 does not impose state control over land use policies or over development of regional plans or transportation plans. One might argue that if electric vehicles displace all gas-powered vehicles, greenhouse gas emissions from vehicles would be totally eliminated. Regional Plans would then not have to be concerned about continued dependence on and growth of vehicle-miles-travelled. This argument would fail to recognize that eliminating greenhouse gas emissions is but one of the goals important to the county's future wellbeing.

A second set of assumptions used as input to the computer models are derived from the work performed by a series of peer review panels comprised of SANDAG staff and external "experts".

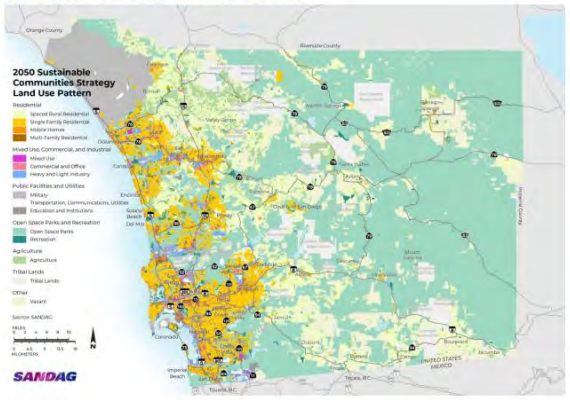
> *At the regional level, SANDAG's forecast framework is built around three core components: population, housing, and jobs. During the model development phase, SANDAG held a series of peer review panels (PRPs) comprised of both SANDAG staff and external experts, including demographers and economists. These panels reviewed the forecast model framework, key assumptions, and model outputs. The feedback provided by the PRPs was essential in refining the models and assumptions used in the forecast.*
>
> *One of the key models influenced by PRPs' feedback was the Cohort Component Model (CCM), which serves as the primary model used to project population changes. The CCM integrates detailed assumptions related to fertility, mortality, and migration, which are the key drivers of population change. Based on PRP's recommendations, the forecast incorporates assumptions that reflect a trend of declining fertility, stable mortality rates, and migration patterns anticipated to align with historical averages over time and taper off near the forecast's horizon year.*
>
> *As Figure F.2 illustrates, both natural change and net migration (the difference between in-migrants and out-migrants) have been declining since 2010. By 2030, natural change is projected to drop below net migration, meaning that net migration will become the primary driver of population growth. These trends reflect broader national patterns of lower birth rates and aging populations.*

A third set of assumptions further serve as input to the computer models. These deal with local plans developed by the county's 18 cities, the County of San Diego unincorporated communities, and the tribal nations.

> *Evolving Population, Housing, and Employment Patterns in Sub-Regional Growth Evolving local plans continue to shape the growth patterns in the San Diego region, focusing on enhancing housing and job opportunities within urbanized areas. Since the early 2000s, over three-quarters of the region's 19 jurisdictions have updated their general plans, emphasizing higher-density, mixed-use developments. The forecast also reflects a move towards more sustainable urban growth models. At the turn of the century, roughly 90% of the region's vacant residential land was slated for single-family homes. However, the Series 15 Forecast anticipates that by 2050, 84% of housing growth consists of multifamily units. The SCS land use pattern shows the*

growth continues to focus on areas with available multimodal transportation to provide convenient, low-VMT options for moving around the region. This shift supports the broader goals of reducing urban sprawl and promoting efficient land use. Additionally, regional conservation efforts have expanded, with more than 50% of the region preserved as open space, parks, or habitat. Figure F.4 and Figure F.5 show 2035 and 2050 forecasted land uses, respectively.

Figure F.5: 2050 Sustainable Communities Land Use Pattern



Source: SANDAG

Another key set of assumptions that shape the computer model outputs upon which SANDAG will determine the county's future and the infrastructure for maintaining and improving the county's mobility system deal with the intensification of land use in specified portions of the county. These assumptions are policy-based. That is to say, they are based upon evolving plans approved by local governing officials in each jurisdiction regarding land use, additional housing and housing density, development standards and transportation improvements.

General intensification of land use is expected because of these evolving plans, leading to denser communities along transportation corridors. For example, Oceanside's Smart and Sustainable Corridors Plan efforts resulted in 13,868 new housing units being projected between 2022 and 2050. These units are concentrated along the city's key transportation corridors, including Mission Avenue and Oceanside Boulevard, and in the downtown area around two Sprinter stations, aligning with regional efforts to promote higher-density housing near transit. San Marcos is projected to experience significant growth between 2022 and 2050, with an addition of projected 10,395 new housing units. This expansion is largely guided by the city's San Marcos Creek District Specific Plan and the University District Specific Plan, which focus on developing mixed-use communities near key areas such as Cal State San Marcos and the SPRINTER rail corridor. The City of San Diego is projected to absorb more than half of the region's housing growth, with Downtown continuing to grow as a key area of development. Mission Valley remains a focal point for new housing as well, leveraging its central location and transit connectivity to accommodate a significant share of the city's housing expansion. These

areas, alongside other communities like Uptown, Greater North Park, and Kearny Mesa support the city's overall shift toward higher-density urban living. Employment growth is expected to remain concentrated in key job centers throughout the region. Downtown, Sorrento Valley, and Kearny Mesa will continue as major employment hubs, maintaining their status as economic drivers in the region. Downtown San Diego remains a vital economic center, with substantial job growth anticipated by 2050, reinforcing its role as a hub for business and cultural activities. The Otay Mesa area is positioned for significant expansion, with a strong increase in employment, further solidifying its role as an economic gateway for the region. Chula Vista is set to see substantial job gains, with over 28,000 new positions expected, driven by developments like the Chula Vista Bayfront, downtown improvements, and new communities in eastern Chula Vista. These changes highlight the region's ongoing transition towards higher-density, transit-oriented growth, in line with the objectives of local general plans and the 2025 Regional Plan. Tables F.1, F.2, and F.3 present base year and forecasted population, housing, and employment data for the 19 local jurisdictions, respectively. Figure F.6 and Figure F.7 show the 2035 and 2050 forecasted housing and employment density, respectively, based on the SR 15 Forecast SCS Land Use Pattern. Further details on the SCS land use pattern and related information can be found in the Regional Plan Chapter 2: Sustainable Communities Strategy.

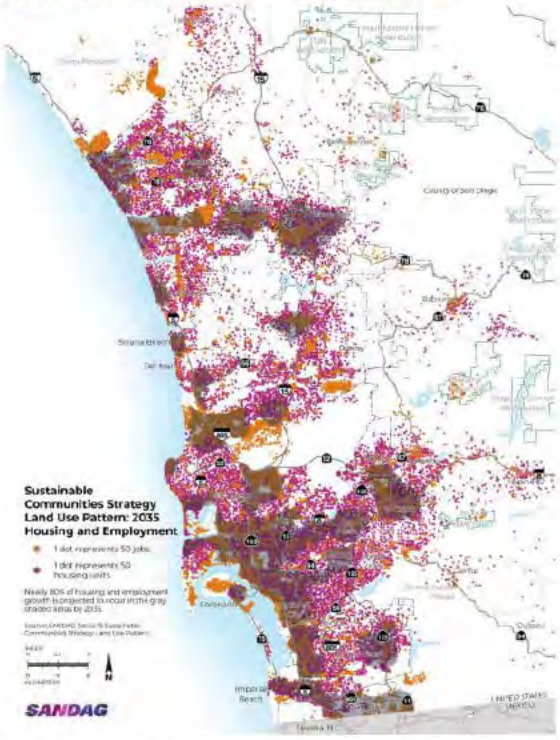
Table F.1: Total Population by Jurisdiction, Series 15 Regional Growth Forecast with SCS Land Use Pattern

Jurisdiction	Actual 2022	Projections 2035	Projections 2050	Change 2022-2050 Number	Change 2022-2050 Percent
Carlsbad	115,585	120,002	116,776	1,191	1.0%
Chula Vista	276,785	307,392	324,927	48,142	17.4%
Coronado	22,277	21,904	21,222	-1,055	-4.7%
Del Mar	3,929	3,835	3,710	-219	-5.6%
El Cajon	105,638	102,051	99,223	-6,415	-6.1%
Encinitas	61,515	61,324	59,822	-1,693	-2.8%
Escondido	150,679	153,717	151,077	398	0.3%
Imperial Beach	26,243	25,688	25,351	-892	-3.4%
La Mesa	60,472	59,628	59,175	-1,297	-2.1%
Lemon Grove	27,242	26,739	26,263	-979	-3.6%
National City	61,471	62,437	61,574	103	0.2%
Oceanside	173,048	185,788	183,389	10,341	6.0%
Poway	48,759	51,059	48,545	-214	-0.4%
San Diego	1,374,790	1,434,871	1,440,765	65,975	4.8%
San Marcos	93,585	112,109	109,891	16,306	17.4%
Santee	59,015	61,513	62,824	3,809	6.5%
Solana Beach	12,812	12,467	12,142	-670	-5.2%
Vista	100,291	101,378	99,000	-1,291	-1.3%
Unincorporated	513,170	500,460	494,574	-18,596	-3.6%
Region Total	**3,287,306**	**3,404,362**	**3,400,250**	**112,944**	**3.4%**

Table F.2: Total Housing Units by Jurisdiction, Series 15 Regional Growth Forecast with SCS Land Use Pattern

Jurisdiction	Actual 2022	Projections 2035	Projections 2050	Change 2022-2050 Number	Change 2022-2050 Percent
Carlsbad	48,104	53,283	54,228	6,124	12.7%
Chula Vista	88,143	103,242	114,473	26,330	29.9%
Coronado	9,665	9,821	9,969	304	3.1%
Del Mar	2,629	2,738	2,740	111	4.2%
El Cajon	36,590	37,475	38,280	1,690	4.6%
Encinitas	26,665	28,235	28,773	2,108	7.9%
Escondido	49,500	53,764	55,686	6,186	12.5%
Imperial Beach	10,034	10,489	10,877	843	8.4%
La Mesa	26,265	27,229	28,180	1,915	7.3%
Lemon Grove	9,186	9,602	9,939	753	8.2%
National City	17,776	19,414	20,238	2,462	13.9%
Oceanside	67,676	78,381	81,544	13,868	20.5%
Poway	16,782	18,711	18,711	1,929	11.5%
San Diego	553,921	627,668	661,533	107,612	19.4%
San Marcos	32,314	41,439	42,709	10,395	32.2%
Santee	21,427	23,476	25,055	3,628	16.9%
Solana Beach	6,528	6,801	6,897	369	5.7%
Vista	33,663	36,102	37,062	3,399	10.1%
Unincorporated	178,774	185,014	191,567	12,793	7.2%
Region Total	**1,235,642**	**1,372,884**	**1,438,461**	**202,819**	**16.4%**

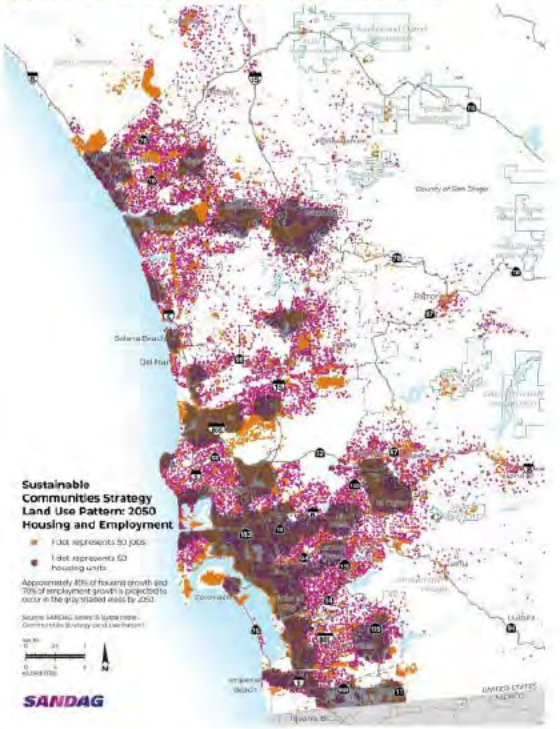
Figure F.6: SCS Land Use Pattern: 2035 Housing and Employment



Source: SANDAG Series 15 Sustainable Communities Strategy Land Use Pattern

SANDAG | 2025 Regional Plan F.16

Figure F.7: SCS Land Use Pattern: 2050 Housing and Employment



Source: SANDAG Series 15 Sustainable Communities Strategy Land Use Pattern

Appendix F: Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern F.17

What stands out in the modeling results and local policies adopted is the dismal 25-year, 0.2% annual growth in population and 0.6% annual growth in housing supply. Who decided that San Diego County should be resigned to a virtual zero percent in growth? Did we miss a public vote where a million voters chose a stagnant economy over the next 25 years for San Diego County? I don't know. But what I do know is that MTS leaders are undertaking a $682,000 taxpayer-funded study to collect data that will help them persuade/sell voters on approving a multimillion-dollar sales tax increase. That increase would largely fund a pending budget shortfall aimed at retaining existing services, plus some amount of money for construction of new rail and bus transit improvements and increased subsidies to transit users. The sales tax measure would be limited to areas served by MTS. North County communities would be excluded because they are "served" by the North County Transit District.

SANDAG's vision and plans for securing additional revenue sources are as misguided and uncertain as are the assumptions on population and economic growth. Table 4.2 2025 Regional Plan Planned Expenditures are extremely speculative. For FY 2025-2035, there is greater certainty that revenues may support expenditures since funding sources are established and more likely to be secured or maintained. Even there, risks still exist that changing policies at the federal, state and local levels will alter the current predictions.

From 2036 to 2050, it's just a guessing game. As a result, a long-term vision for the future is about as certain as shifting winds of time.

Table 4.2 2025 Regional Plan Planned Expenditures

Note: Totals may not add up due to rounding

Expenditure Category	FY 2025-2035	FY 2036-2050	Cost (millions of 2024$)
Complete Corridors	$11,271	$13,517	$24,787
Active Transportation	$1,079	$4,272	$5,351
Transit	$23,675	$50,209	$73,883
Flexible Fleets	$55	$146	$201
Transportation System Management	$109	$128	$237
Supporting Policies and Programs	$1,418	$2,193	$3,611
Local Projects	$6,543	$8,287	$14,830
Debt Service	$1,380	$1,216	$2,596
TOTAL	$45,529	$79,967	$125,496

The Plan calls for spending $5 billion (current value) per year on the county's transportation system over a period of 24 years. The return on investment is highly questionable. The costs of transportation will rise at equal or greater rates than the increase in traffic and traffic congestion, collisions and roadway deaths, or than the costs of car insurance premiums and auto parking costs.

The consequences of SANDAG's short-sighted planning strategies are evidenced in the 6/26/25 San Diego Union-Tribune story by Phil Diehl. The story illustrates the missed opportunities that are replicated throughout the county under the SANDAG Draft Plan.

Transit center redevelopment plan advances

Planners in Oceanside back apartments, hotel, office, shops and more

By Phil Diehl
UNION-TRIBUNE

OCEANSIDE — A proposal to redevelop the Oceanside Transit Center with 547 apartments, a six-story, 170-room hotel, offices, retail shops and more has been endorsed by the city's Planning Commission.

The plan calls for five separate buildings, including a stand-alone parking garage, with Irving Gill-style architecture to match the Oceanside City Hall and other downtown civic structures. Public spaces would include art displays, retail shops and a multistory office building to replace the North County Transit District headquarters now on Mission Avenue.

"This is a pretty exciting project," said Planning Commissioner Louise Balma. "We've got a transportation hub here like no other city (in North County). There is a lot of good stuff going on."

A redevelopment plan for the Oceanside Transit Center, at lower right, could bring 547 apartments, a 170-room hotel, an office building, retail shops, a parking garage and more. JOHN GASTALDO / FOR THE U-T

The commission on Monday voted 4-1, with Commissioner Grace Redgate opposed, to recommend the Oceanside City Council approve the project at a meeting later this year. Commissioner Kevin Dodds was absent, and Commissioner Emily Gonzales abstained.

Redgate said she would like the plan to include more space available to the buildings' residents for recreation. Redgate and Gonzales were both appointed to vacant seats on the commission in April.

City officials, the developer and community leaders have said the project will continue the transformation of downtown Oceanside that's been underway for more than a decade. Two resort hotels, condominium buildings, restaurants and shops have gone up in recent years on a nine-block master-planned area overlooking the Oceanside Municipal Pier.

The 10.15-acre transit center is on Tremont Street, two blocks south of Mission Avenue and a quarter-mile from the beach. A majority of the property is used for street-level parking, much of which is often empty. It is one of 11 train stations across North County that NCTD plans to redevelop with mixed-use projects.

"Together they become a village of over 2,000 households

See TRANSIT on Page B2

TRANSIT

From Page 1

connected by rail," said Lillian Doherty, NCTD's director planning and development.

Residents will be able to shop, work, go to the beach, and visit family and friends without using a car, she said. The station is served by NCTD Coaster and Sprinter trains, Amtrak and Metrolink trains from Orange County, along with NCTD's Breeze buses.

Adding housing and commercial buildings at transit centers is intended to increase ridership on buses and trains and boost the district's revenue from long-term property leases, transit officials have said.

Toll Brothers Apartment Living, the developer, has hosted eight community meetings and dozens of one-on-one sessions with residents to hear their suggestions for the project, said Arlene Tendick, a spokesperson for the company.

"We tried to talk to anyone who would hear from us," Tendick said. "The biggest thing for us is enhancing the transportation experience."

Fifteen percent of the apartments will be reserved as affordable housing for people who qualify based on their income. The project will include $100 million in improvements for public streets and the city water system paid for by the developer, Tendick said.

Most of the commission members and public speakers at Monday's meeting said they liked the plan. A few voiced concerns about the new routes proposed for buses entering and leaving the transit center on Tremont Street, and some brought up lesser issues such as landscaping and the potential for fatal bird strikes into the tall glass buildings.

Buses now enter and exit the transit center from Seagaze Drive, the street behind the Regal Cinema complex. Under the proposed plan, buses could access the center from Michigan and Missouri avenues. Also, the new layout places the bus station farther south on the property and closer to some of the homes on Cleveland Street.

"This of course would be unsightly and noisy for the residential owners on South Cleveland, not to mention the significant diminution of air quality, and be utterly inconsistent with the residential use," states a letter South Cleveland Street resident Marc Jacobs wrote to city planners. "Many of the newer residents paid significant amounts for their property and would suffer economic harm as well."

Transit district CEO Shawn Donaghy said the agency has considered moving the bus station for some time and that it probably would happen with or without the redevelopment project. Also, there could be more adjustments for the traffic plan.

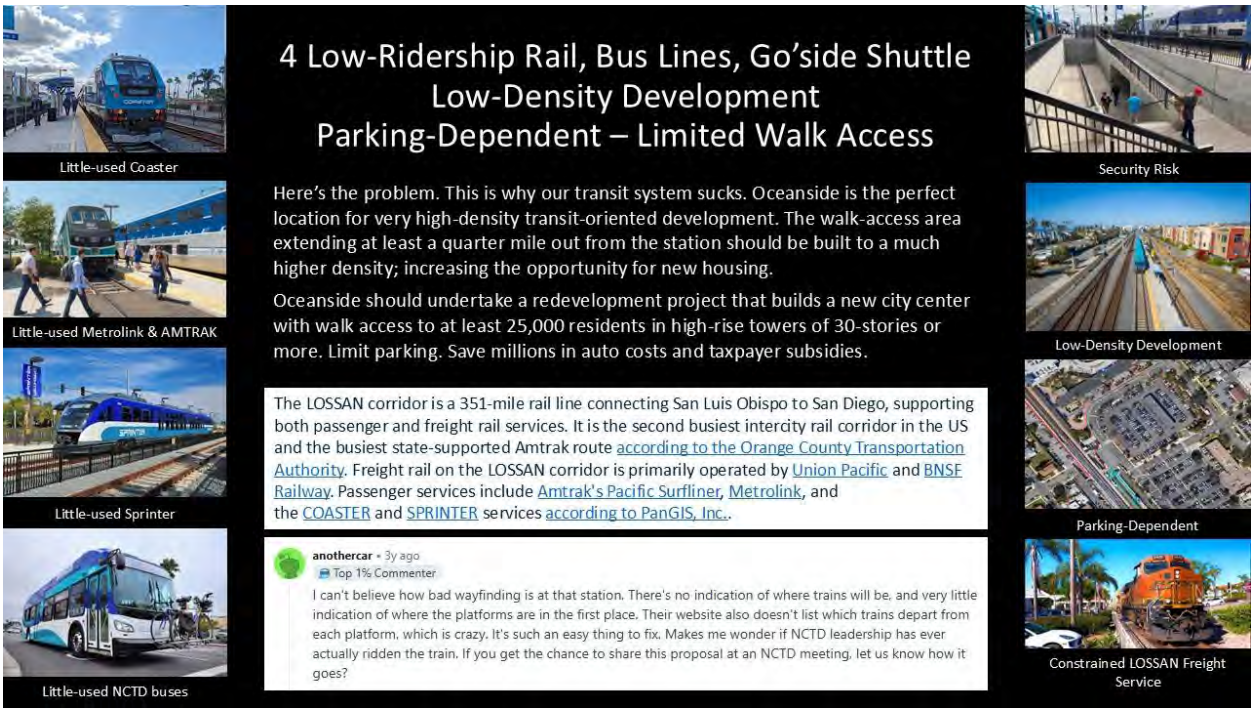
Many of the district's buses run on compressed natural gas, which reduces pollutants, Donaghy said. And the district is transitioning to all zero-emission vehicles.

Toll Brothers Managing Director Michael McCann said he was unfamiliar with the bird strike issue, but that he would look into what might be done about it.

Commissioner Tom Rosales called the project a "logical" development for downtown Oceanside.

"It doesn't solve everything," Rosales said. "It has its own issues. Bus circulation is not perfect, but I think it will be a really good addition to the community."

The details on Oceanside's transit center redevelopment plans reveal the missed opportunities that arise from SANDAG's constrained vision for the county's future.



547 or 50,000?

22 million vehicle-miles travelled per year
Missed opportunity for improved transit and walking access and connections for children and grandchildren of Oceanside and San Diego County

The 10-acre transit-oriented development project at the Oceanside Transit Center, one of several being planned by Oceanside and NCTD, would "facilitate bus to rail connectivity for its riders, provide opportunities for enhanced amenities that would improve customer experience and support regional housing goals."

A train station development within walking distance of 4 rail lines connecting the county and the nation, and a network of county-wide local bus services, designed for 547 apartment units and 1,868 parking stalls.

This precious 10-acre piece of land, and the surrounding area extending out by a half mile, could easily be home to over 100,000 people; homeowners who overtime would be become among the wealthiest in the county and the nation because of the potential access this station could provide.

PRELIMINARY DRAFT

Oceanside Transit Center Specific Plan
Transportation Demand Management (TDM) Plan

Part A: Project Description

Project Name: Oceanside Transit Center (OTC) Specific Plan

Project Location: 235 S. Tremont Street Oceanside, CA 92054. The project site is comprised of the 10.15-acre OTC property owned by North County Transit District (NCTD). The site is generally comprised of the area bounded by Tremont Street to the east, Seagaze Drive to the north, railroad tracks to the west, and Missouri Avenue to the south.

Project Information: The project proposes the demolition of existing structures and construction of a mixed-use transit-oriented community.

Total Square Footage: 849,679 gross square feet and 756,371 gross square feet for parking.

Total Square Footage of Non-Residential Uses:

- 64,085 square-foot office building for the NCTD headquarters;
- 160,656 square-foot boutique hotel (170 rooms) with amenities;
- 29,196 square feet of retail/food/beverage uses,
- 3,124 square-foot intermodal customer service center;
- 1,033 square-foot bus office, and
- 12 commuter bus stalls and bus layover space.

Total Residential Units: 547 multi-family residential units with associated indoor and outdoor amenities.

Estimated number of employees: 448 (approximately 214 employees for the NCTD office, 178 employees for the Hotel, and 58 employees for the Retail/Restaurant).

Estimated total number of parking spaces: 1,868 parking stalls (total public and residential uses).

Estimated total number of carpool/vanpool parking spaces: 19

Estimated total number of bike parking spaces: 274 (total public and residential uses).

- 102 residential spaces,
- 13 hotel spaces,
- 40 public structure spaces, and
- 119 exterior public spaces

End of trip facilities: Showers and lockers.

Estimated total number of electric vehicle (EV) parking spaces: 576 EV parking stalls (total public and residential uses).

Estimated total number of EV charging stations: 139 EV charging stations (total public and residential uses).

547 housing units
Hotel
Retail

1,868 parking stalls

22 million annual VMT
@ $18 million cost

1,134 pages EIR

Less than significant impacts

Less than significant value created

Total Cost?

Oceanside Transit Center Redevelopment Project
Energy Calculations

Vehicle Type	Percent of Vehicle Trips[1]	Daily Trips[2]	Annual Vehicle Miles Traveled	Average Fuel Economy (miles per gallon)[3]	Total Annual Fuel Consumption (gallons)[4]
Passenger Cars	0.50	3,256	10,942,375	22	497,381
Light/Medium Trucks	0.47	3,060	10,250,758	17.3	592,527
Heavy Trucks/Other	0.02	147	493,315	6.4	77,080
TOTAL[5]	**1.00**	**6,453**	**21,686,398**	--	**1,166,988**

Notes:
1. Percent of Vehicle Trip distribution based on trip characteristics within the CalEEMod model.
2. Daily Trips taken from ITE manual.
3. Average fuel economy derived from the Department of Transportation.
4. Total Daily Fuel Consumption calculated by dividing the daily VMT by the average fuel economy (i.e., VMT/Average Fuel Economy).
5. Values may be slightly off due to rounding.

Source: Refer to CalEEMod outputs for assumptions used in this analysis.

Fuel Cost: $5.9 billion

County On-Road 2028
1,477,500,314
0.0790%

Conclusion

In conclusion, the proposed project and its mixed-use components are consistent with more than one VMT screening criteria and therefore would not conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b). Impacts in this regard would be less than significant.

VMT Reduction (CARB Scoping Plan)

Commenters have requested clarification on how the project's VMT meets the intent of the 2022 CARB Scoping Plan. As discussed above, based on the Transportation Guidelines, a project would be screened out from additional VMT analysis and presumed to not result a significant VMT impact if the project meets at least one of the project types listed in the Transportation Guidelines Table 2. As the proposed project meets five of the VMT screening criteria, the project is presumed to not result in a significant VMT impact and would meet the intent for VMT reductions identified as part of the 2022 CARB Scoping Plan.

Table 4.16-3
Planned Roadway Modifications

Facility	Existing (2021)		Planned (2050)	
	# lanes	Classification	#lanes	Classification
North River Road: North River Circle to Wilshire Road	2	Collector	4	Secondary Collector
North River Road: Wilshire Road to Sleeping Indian	2	Collector	4	Major
Oceanside Boulevard: I-5 to El Camino Real	4	Secondary Collector	4	Major
North Coast Highway: SR-76 to Seagaze Drive	4	Secondary Collector	2 w/o TWLTL*	Collector
South Coast Highway: Seagaze Drive to Oceanside Blvd	4	Secondary Collector	2 w/o TWLTL*	Collector
Canyon Drive: SR-76 to Mission Avenue	4	Secondary Collector	2 w/ TWLTL	Collector
El Camino Real: Mesa Drive to Oceanside Boulevard	4	Major	5	Major
Douglas Drive: Vandegrift Blvd. to Via Malaguena	4	Secondary Collector	2 w/ TWLTL	Collector
Vandergrift Blvd: Northern City Limit to North River Road	5	Major	4	Major
College Boulevard: Old Grove Road to Olive Drive	4	Major	6	Major
Melrose Drive: N. Santa Fe Avenue to Sagewood Drive	2	Collector	4	Major

TWLTL = two-way left-turn lane; SR-76 = State Route 76
*Roundabouts are planned along Coast Highway. Where space is constrained, implementation of the TWLTL or raised median will not be necessary.

Roadway widening, more parking, limited transit access and services – this is the vision and strategy for the new 2025-2029 Regional Plan that SANDAG is asking people to weigh in on in community meetings across the county. Voters have mandated a different, more optimistic vision for the future.

The final set of assumptions pertains to funding. This is where the draft 2025-2029 Regional Plan reveals its biggest flaw. It is totally dependent on new funding that is “harder to predict” and “could include new taxes, fees or advertising and naming rights.”

Assumptions

New Revenue Sources

It is harder to predict how much money we'll get from new funding sources than from existing ones. The Regional Plan takes into account assumptions for new funding sources at the local, state, and federal levels. These new sources could include new taxes, fees, or advertising and naming rights agreements. The actual timing and amount of these funds may vary. However, given how funding sources have been approved historically, it is reasonable to assume that new funding sources will continue to be established. We assume that none of the new sources will begin prior to 2028, and they would be required to complete all of the projects in the Regional Plan. Most of this new funding will be locally based, with the remaining funding coming through the state. We do not anticipate any new federal funding for the plan. **Appendix I** contains details on the various types of reasonably anticipated new revenues we can expect to receive, along with their respective risk assessments.

Table 4.2 reveals the following expenditure categories in 2024$ dollars from 2025 to 2050.

Table 4.2 2025 Regional Plan Planned Expenditures

Note: Totals may not add up due to rounding

Expenditure Category	FY 2025-2035	FY 2036-2050	Cost (millions of 2024$)
Complete Corridors	$11,271	$13,517	$24,787
Active Transportation	$1,079	$4,272	$5,351
Transit	$23,675	$50,209	$73,883
Flexible Fleets	$55	$146	$201
Transportation System Management	$109	$128	$237
Supporting Policies and Programs	$1,418	$2,193	$3,611
Local Projects	$6,543	$8,287	$14,830
Debt Service	$1,380	$1,216	$2,596
TOTAL	$45,529	**$79,967**	**$125,496**

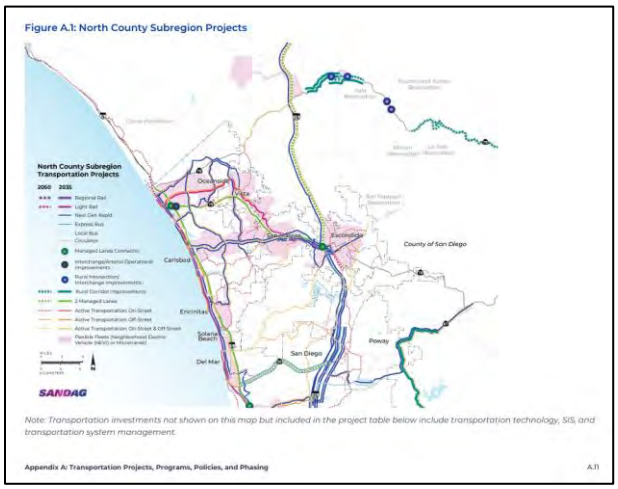
The Draft Plan leaves the public subject to inevitable risks that costs will be much higher than expected. The reason is, "... there may be significant changes that cannot be predicted. These include political shifts, economic downturns, and the approval of new funding sources."

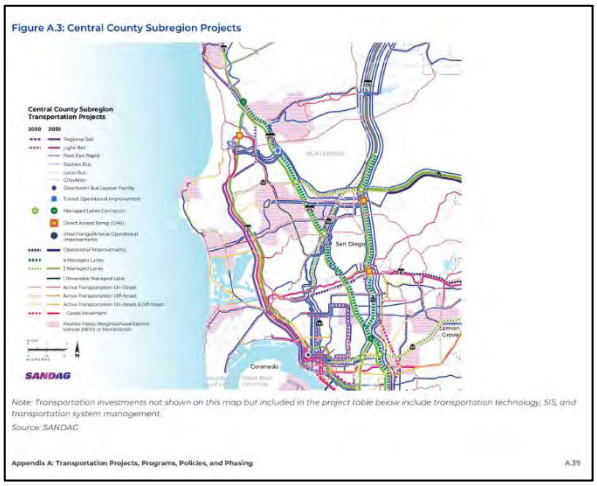
Experience shows that far from being possible shifts and approvals, these changes are certain to be realized. Taxpayers and everyone else are subject to these great uncertainties and possible negative economic and quality-of-life consequences. SANDAG is betting on your uncertain and unpredictable future.

Unplanned Funding Shifts

Planning for investments funded with anticipated revenue can be challenging. Table I.4: Revenue Sources: Availability Assumptions and Risk Assessment, in **Appendix I**, highlights potential risk and risk mitigation for each revenue source and how we might be able to address them in the future. Although future revenue is based on trends for existing revenue sources, there may be significant changes that cannot be predicted. These include political shifts, economic downturns, and the approval of new funding sources. The Regional Plan is updated every four years to take into account these changes and to make the necessary adjustments to the timing and availability of revenue for projects.

Appendix A Transportation Projects, Policies, Programs and Phasing Figures A.1 and A.3 give evidence to the continuing efforts to expand roadway capacity in the north county and central county subregions. Relentless political pressure to address the growing traffic congestion and lack of adequate access is understandable. SANDAG and the public-at-large see no other option to address this issue. The issue is met with the concern that too much emphasis is being given to the huge expenditures planned for Costly transit projects "that no one will use."





Over-sized investments in a few projects with the greatest cost impacts proposed in the Draft Plan are revealed in Appendix A on pages A.54 and A.55. The 3 projects identified as “Transit Regional Rail” show a 2024 cost $16.7 billion. The Regional Rail 598 project alone is proposed at a cost of $4,324,000,000 that includes “realignment in Del Mar”. This project, as currently being envisioned, is aimed at protecting wealthy property owners at the top of the bluff. There is no money committed or secured to implement this vision. If there were commitments, they would divert tax-payer funds away from other more-worthy projects. A more practical and cost-effective solution is available. SANDAG has not considered this alternative.

				accommodations; streetscape, safety, and parking improvements	
TL001	2035	Transit: Airport Connection	Airport Transit Connection	Airport to Downtown	$3,186
TL003	2035	Transit: Regional Rail	Regional Rail 398	Oceanside to Downtown San Diego (Double tracking, bridge replacements, realignment in Del Mar, new platform at Fairgrounds)	$4,324
TL098	2035	Transit: Regional Rail	Regional Rail 598	Pacific Surfliner Rail2Rail (LOSSAN)	N/A**

SANDAG | 2025 Regional Plan A.54

Project ID	Phase Year	Project Category	Project Name	Project Description	Cost ($2024) Million
TL004	2050	Transit: Regional Rail	Regional Rail 398	Camp Pendleton to Downtown San Diego (Grade separations, curve straightening, Miramar Tunnel, new station at Camp Pendleton and UTC)	$9,144
TL099	2050	Transit: Regional Rail	Regional Rail 598	Pacific Surfliner Rail2Rail (LOSSAN)	N/A**
TL007	2035	Transit: Light Rail	Blue Line (San Ysidro to UTC)	Grade separations	$239

Table A.6: Systemwide Investments include $23,741,000,000 for “Transit Operations” and $2,348,000,000 ($2024).

Table A.6: Systemwide Investments

Project ID	Phase Year	Project Name	Cost ($2024) Millions
TL310	2035	Transit Vehicles	$1,058
TL311	2050	Transit Vehicles	$3,235
TL300	2035	Transit Operations	$6,907
TL301	2050	Transit Operations	$16,834
TL320	2035	Transit Fare Subsidies	$346
TL321	2050	Transit Fare Subsidies	$2,092
TL401	2035	Transit Amenities	$247
TL402	2050	Transit Amenities	$617
TL058	2035	Transit Maintenance Facilities	$330
TL059	2050	Transit Maintenance Facilities	$907
NO04	2050	Regional Transportation System Management Program	$225
HMO1	2035	Highway Maintenance and Operations	$1,470
HMO2	2050	Highway Maintenance and Operations	$3,854
LSRP1	2035	Local Streets and Roads Program	$6,543
LSRP2	2050	Local Streets and Roads Program	$8,287
DS1	2035	Debt Service	$1,380
DS2	2050	Debt Service	$1,216
RC1	2050	Reconnecting Communities Program	$100

One can question whether transit fare subsidies are an investment or just a transfer of wealth for one segment of the population at the expense of another segment -namely, taxpayers.

None of the maps shown in this part of the Appendix reveal the alignment or existence of California's High-Speed Train system.

SANDAG totally ignores the legal requirements established in the high-speed train Bond Act of 2008 calling for construction of the 24 "new cities" and 800-mile high-speed train and local transit system extending from San Francisco and Sacramento to downtown San Diego. Failure to adhere to federal requirements has already threatened loss of prior funding commitments.

> *2704.07. (In addition to the funds made available in the Bond Act) The Authority shall pursue and obtain other private and public funds, including, but not limited to, federal funds, funds from revenue bonds, and local funds, to augment the proceeds of this chapter.*

SANDAG's draft plan risks redirection or withholding of federal funds due to failure to abide by the legal requirements established in the High-Speed Train Bond Act. Recent letters give evidence

confirming these risks. SANDAG's failure to enact land use changes and provide local funds required to complete construction quickly puts the County at risk.

In June 26, 2025 letters to L.A, Metro and the City of Los Angeles regarding recent "riots" relating to demonstrations against ICE raids, DOT Secretary Sean Duffy wrote, "I appreciate your prompt attention to this matter to avoid further consequences, up to and including redirecting or withholding [federal] funding." Duffy wrote to L.A. Mayor Karen Bass, "I am writing you with deep concern over law-abiding citizens in the Los Angeles metropolitan area being unable to access federally funded transit services because of your failure to stop the violent riots in your city."

These letters reflect an attitude on the part of the Trump Administration indicating that it is threatening federal funding for any reason they can find to punish California for actions or inaction that are in conflict with their political agenda, or for failure to abide by the terms of local/federal funding agreements.

Recent action by the Newsom administration demonstrates a paradigm shift in attitudes about environmental protection and the California Environmental Quality Act (CEQA). Exemptions to the Act are now becoming more common as political pressures are shifting local powers to the state and federal governments. Even China is exerting its influence on SANDAG and the region. Reliance on auto dependent mobility is a security risk for the county now and more so in the future.

Failure to Account for Cost, Environmental and National Security Impacts of Auto Dependence

SANDAG recognizes that there are greater demands for funding to enable more improvement projects than the current budgets allow. The list of "Unconstrained Projects" can be defined as well as the "hopes and Prayers" list. One "Unconstrained Project" is actually fundable. SANDAG has failed to recognize this mandated project and the legal requirement to complete it quickly.

Unconstrained Project List

The Unconstrained Project List defines the region's vision for transportation if funding were available to implement all identified projects. There are several projects in the network for which funding has not yet been identified or which would be funded and implemented by other agencies and the private sector. These projects are described in Table A.7. More information about how a project is included in the Regional Plan is available in Appendix N.

Phase Year	Project Category	Project Name	Description
UNC	Transit	Arterial Rapid Route 233	Downtown to Ocean Beach via Pacific Highway, Sports Arena Boulevard, West Point Loma Boulevard, and Cable Street
UNC	Transit	Arterial Rapid Route 481	Oceanside to SR 76/Vista Way via Mission Avenue/SR 76
UNC	Transit	Arterial Rapid Route 487	East Vista Way
UNC	Transit	Arterial Rapid Route 867	Lakeside to Santee Town Center via SR 67
UNC	Transit	Express Rapid Route 870	El Cajon to UTC via Santee, SR 52, I-805
UNC	Transit	Express Rapid Route 890	El Cajon to Sorrento Mesa via Santee, SR 52, I-805
UNC	Transit	Mixed Rapid Route 910	Coronado to Downtown via Coronado Bridge
UNC	Transit	Skyway Route 573	Aerial gondola between Fashion Valley Trolley station and UC San Diego Medical Center – Hillcrest
UNC	Transit	Skyway Route 592	Aerial gondola between UC San Diego and Mira Mesa
UNC	Transit	Ferry Route 595	Passenger ferry between Chula Vista, National City, Coronado, Downtown, and Harbor Island
UNC	Transit	Ferry Route 596	Express Ferry/Water Taxi Service from Chula Vista to Downtown
UNC	Transit	California High-Speed Rail	Phase 1 of the California High-Speed Rail is under way to connect San Francisco to Los Angeles and Anaheim. Phase 2 of the project is proposed to extend from Los Angeles through the Inland Empire, then follow the I-15 corridor south into the San Diego region. Potential alignments into downtown San Diego are identified on SR 163 or inter-lining with the LOSSAN corridor south of University/Sorrento Valley. The project would be implemented and funded by the California High-Speed Rail Authority
UNC	Goods Movement	US and MX Collaboration on Freight Projects and Policies	Collaborate with U.S. and Mexican agencies, community members, commercial industry representatives, and additional stakeholders on freight projects and policies
UNC	Goods Movement	Rail Logistics Centers	New rail logistics centers at key locations

SANDAG | 2025 Regional Plan A.98

The California High-Speed Rail project requires SANDAG to implement zoning changes and commit local funds (such as benefit assessments) to enable successful completion of the high-speed train and connected local transit system, and the new housing and related development along the high-speed train corridor and within the benefit areas of each station and connected bus stops.

These changes and required local funding support will enable the county to significantly support and attract a significant increase in population, jobs and wages and housing stock. It will enable an increase in population from 3.3 million people today to 9.1 million people by 2125.

Rezoning the land around each of the “New Cities” proposed in the Wolford-Chalekian Brief to accommodate and attract 500,000 people per station area, would ensure that the high-sped train and connected local transit system would generate enough ridership and system revenues to cover the total cost of building and operating the HST and local transit system.

The population, jobs and housing growth differences between the Draft SANDAG Regional Plan and the plan recommended in the Wolford-Chalekian Brief is shown on the following page.

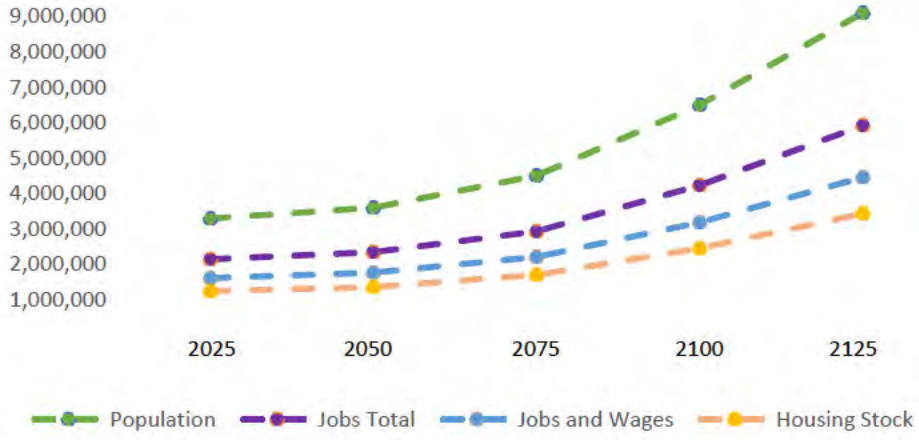
SANDAG

Figure F.1: Population, Jobs, and Housing Forecast, San Diego Region 2010-2050

Source: SANDAG Series 15 Regional Growth Forecast with SCS Land Use Pattern

The Wolford-Chalekian Brief

Figure F.1a: Population, Jobs and Housing Forecast, San Diego Region 2020-2125



The final topic discussed in this review of the Draft Regional Plan and Regional Transportation Improvement Program (RTIP) is Public Safety. The Draft Plan and Program are loaded with a huge amount of information aimed at giving the Board of Directors confidence that the recommendations and actions are rooted in solid defensible data and demonstrated unbiased evidence. What is not clear in the Draft Plan, as currently written, is the priority ranking of the issues to be decided upon. How much importance is given to reducing vehicle-miles-travelled comparted to increasing transit ridership? How much priority is given to reducing or eliminating the threats of collisions, injuries and deaths on the roadways?

The Wolford-Chalekian Brief that accompanies this report to the Board of Directors brings light to the overwhelming damage that comes with reliance on the county's auto-dependence. This report concludes with a final comment on what's at stake as the Board gives final approval to the 2025-2029 Regional Plan and Regional Transportation Plan. How much priority will be given to saving lives that are directly dependent on giving people an option to move about without the threat of being killed in a traffic collision?

Seven people who died in S.D. County crashes ID'd

City News Service

Authorities have publicly identified seven people who lost their lives in recent weeks in San Diego County traffic crashes.

■ The most recent of the roadway fatalities took place June 15, when a car struck 53-year-old Joshua Gentle of San Diego at the intersection of Clairemont Drive and Iroquois Avenue in Bay Park, according to the county Medical Examiner's Office.

■ On June 6, Kevin Webb, 46, was mortally injured in his hometown of El Cajon when the motorcycle he was riding crashed on Interstate 8 near Greenfield Drive shortly after 11:30 p.m., according to the medical examiner. He succumbed to his injuries 17 days later.

■ On June 4, a 21-year-old Riverside County woman was killed in a crash in a Pacific Beach intersection, the county agency reported. Savannah Marquez of Hemet, who was riding in a car that collided with an SUV at Grand Avenue and Mission Bay Drive shortly before 10 p.m., died at the scene.

■ Early that same day, Michael Redzio of Saddle Brook, N.J., died in a crash on East Harbor Drive in National City. Redzio, 24, was driving a pickup truck that veered off the street and struck a forklift at a construction site about 2 a.m., according to the medical examiner.

■ On May 31, 22-year-old Corbin Hamilton of Weatherford, Texas, died after the motorcycle he was riding collided head-on with a truck on state Route 67 in Poway about 11:45 a.m., the county agency reported.

■ A day earlier, Brian Reed, 62, apparently lost control of his truck on Mother Grundy Truck Trail in his hometown of Jamul, sending it crashing into a tree, according to the medical examiner.

■ On the morning of May 29, a vehicle fatally struck a 22-year-old pedestrian alongside the Interstate 805 offramp to 43rd Street in National City, the county agency reported. Claudia Hernandez, a National City resident, succumbed to her injuries at the scene.

Try Everything

Shakira

Sold Out
Snap Dragon Stadium
San Diego, CA
June 27, 2025

A whimsical view and story of the mandate told in Proposition 1A approved in 2008 by 17 million (74%) of California's eligible voters

zootopia try everything video - Google Search

In pdf format, hit the back button to continue the presentation

"To the Youngsters of Today,
I Say Believe in the Future.

Walt Disney

EPCOT, November 1965

Let's Not Deny Them Their Future

due to poor policy decisions or unwarranted deaths of thousands by traffic collisions

Albert Perdon

De Luz, July 2025

Don't deny the future of youngsters like Claire Vlases (19) an environmentalist who scored a groundbreaking clean air lawsuit on August 14, 2023.

Don't deny the future of others, as we did with Lauren Wolford (18) of San Marcos, killed on May 12, 2018 on the sidewalk by her high school classmate, in a deadly traffic collision.

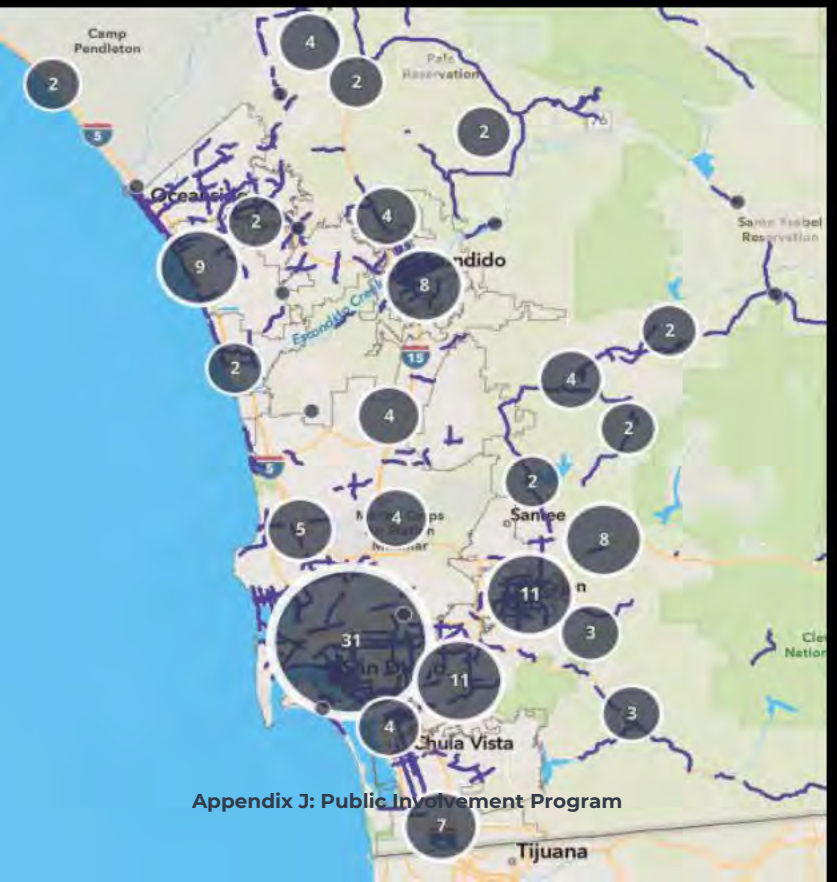
Or Emery Chalekian (12) of Encinitas, killed on April 25, 2025 by an auto driver, in another deadly traffic collision, when she had the right-of-way in a crosswalk.

Omega Law Group Accident & Injury Attorneys' investigation revealed the following data:

County	Most Dangerous Highway	Number of Fatalities in 2023	Primary Source of Accidents	Secondary Source of Accidents
San Bernardino County	I-15	48 fatalities	Speeding (34%)	Drinking (20%)
Riverside County	I-10	31 fatalities	Speeding (31%)	Drinking (26%)
San Diego County	I-5	21 fatalities	Speeding (31%)	Drinking (20%)
Orange County	I-5	16 fatalities	Speeding (34%)	Drinking (23%)
Santa Barbara County	US-101	15 fatalities	Speeding (31%)	Drinking (20%)

New Findings Reveal California's Most Dangerous Highways

Death by Design



Traffic Collisions and Deaths are not Accidents

- SANDAG is denying the opportunity for millions of people to avoid the risk of death from traffic collisions.
- Technology is available to stop speeding. It is not being used.
- Speeding laws are being ignored.
- Land use decisions virtually mandate the use of autos to get around. The consequences are deadly and unnecessary.
- It takes only 9 people from San Diego and Chula Vista to end the tragedies.

The Making of a Modern New California

Success Requires Actions by SANDAG described in The Wolford-Chalekian Brief

Issues and Recommendations for a New SANDAG 2025 - 2029 Regional Plan

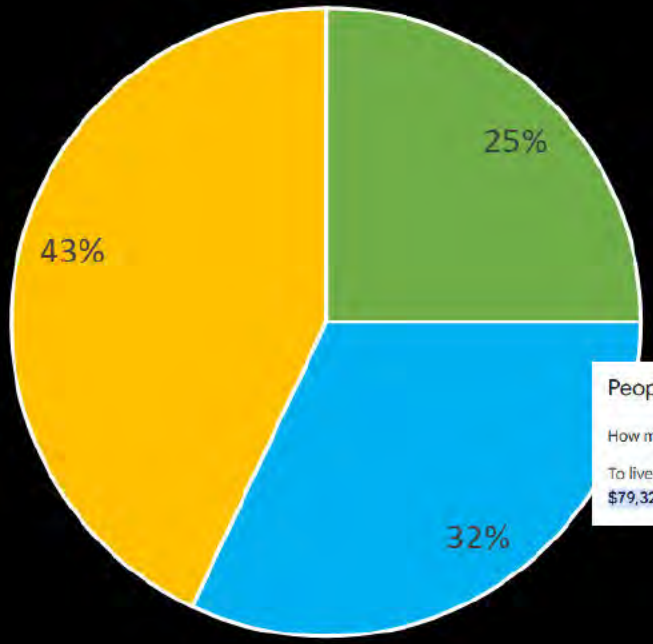
By: Albert Perdon, P.E. De Luz, San Diego/Riverside Counties

1. Limited Population Growth: Higher Growth and Beautiful Higher Density
2. Threatened Housing Mix: Owner Occupied SFR & Multi-Family Housing
3. Auto-VMT Dependence: Auto-free, Transit-Oriented Development
4. Lack of Funding: Benefit Assessments, No Federal or State Funding
5. Governance in Decline: A Return to Majority Rule

The Goal

Create Family Wealth

Auto-Dependent Communities*

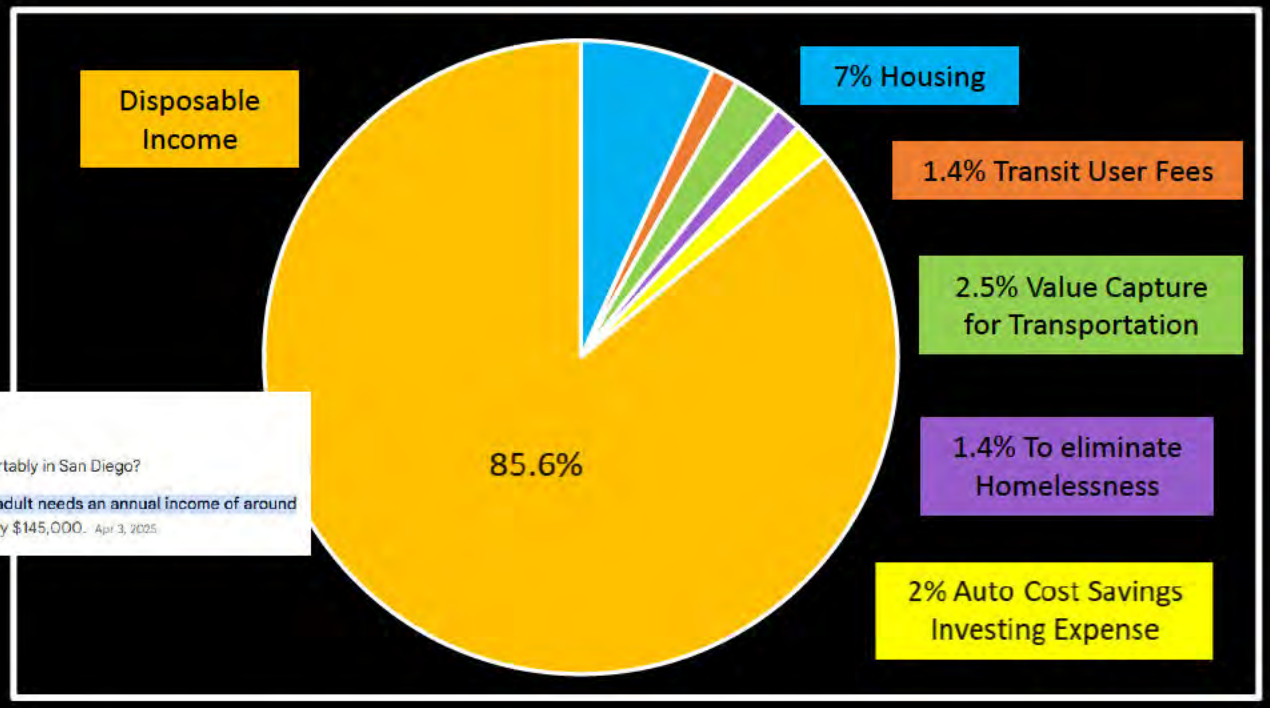


People also ask

How much income is needed to live comfortably in San Diego?

To live comfortably in San Diego, a single adult needs an annual income of around $79,324, while a family of four needs nearly $145,000. Apr 3, 2025

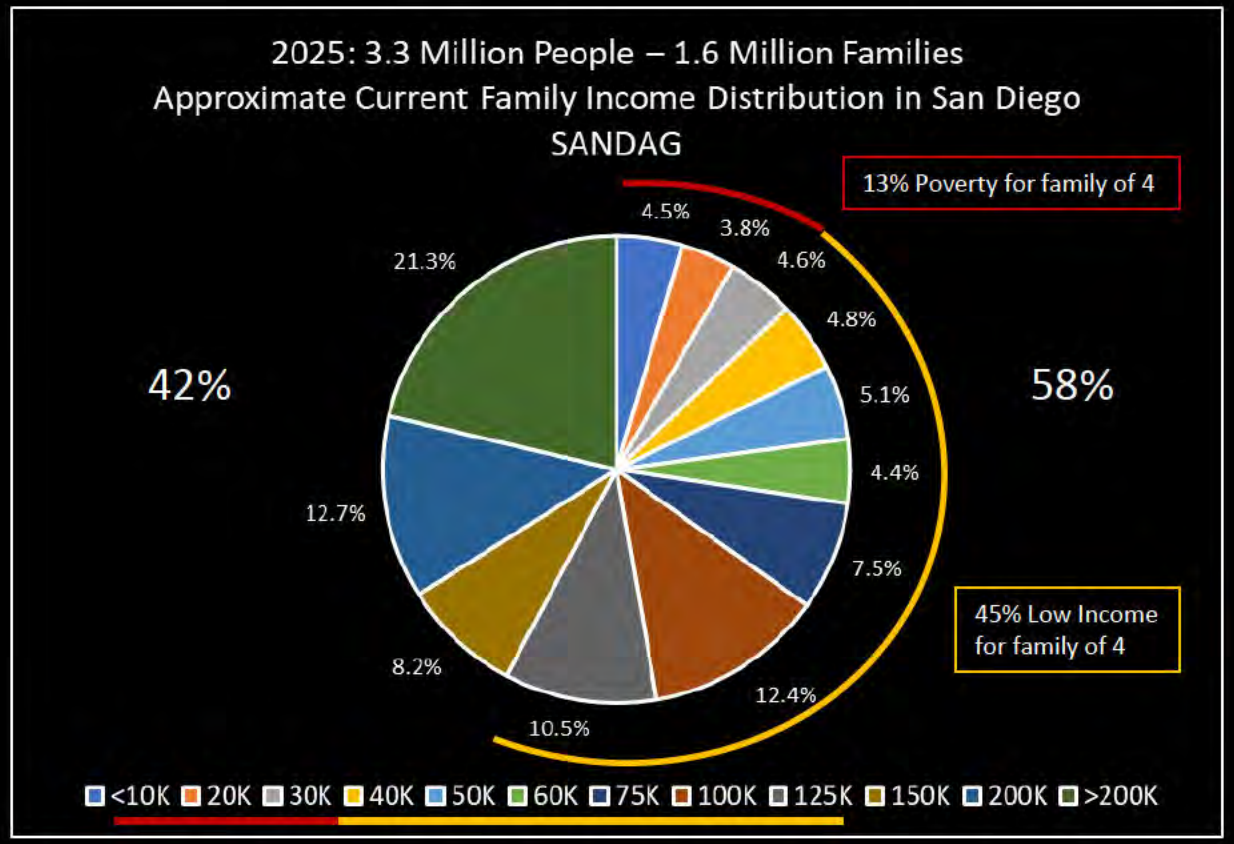
New Cities Transit-Oriented Communities

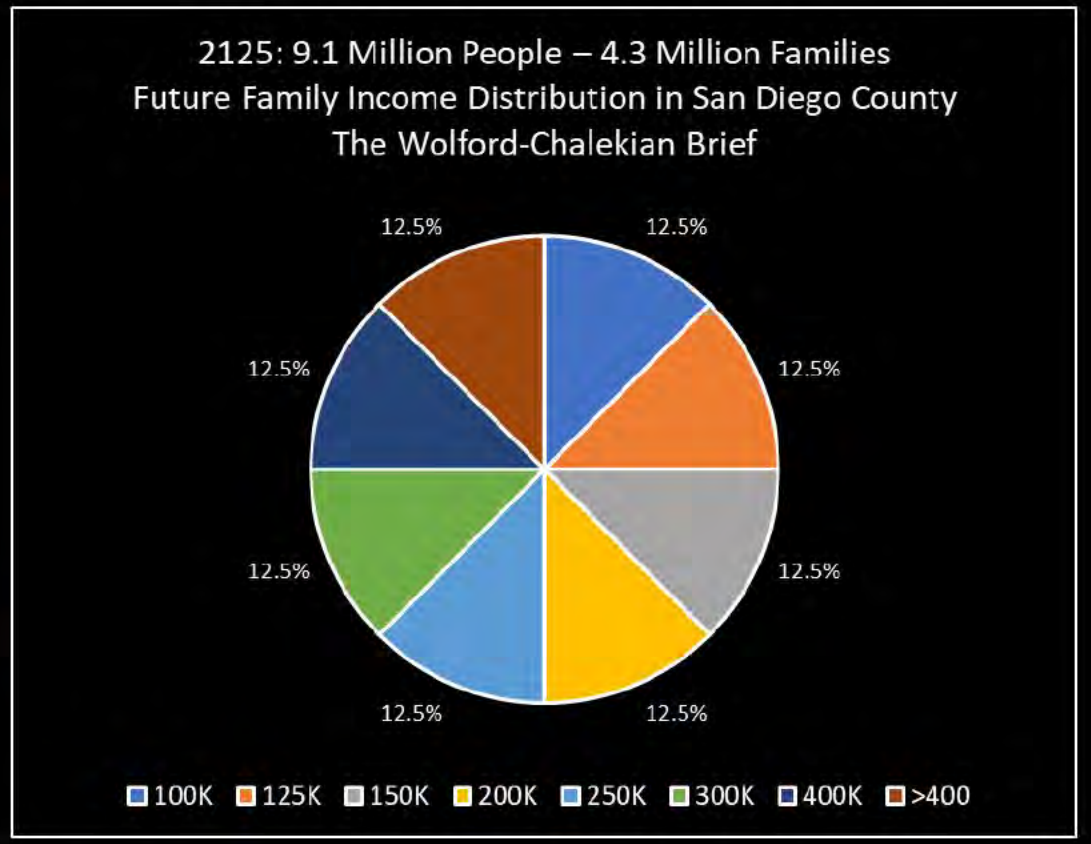


$43 million = 50-year average income for family making $125,000 per year, including $28 million in retained investment earnings from savings in eliminated auto costs.

*Source: Federal Highway Administration and other sources

The Objective: Increase Health, Wealth and Happiness and Freedoms for All San Diegans.





SANDAG has not provided the data called for. The left diagram reveals actual 2023 income distribution for the City of San Diego. The right diagram is illustrative of the potential future growth in income and more equitable distribution of wealth in San Diego County as proposed in the Brief.

SANDAG Board of Directors

The Board of Directors serves as the governing body of SANDAG and is made up of elected mayors, councilmembers, and county supervisors that are appointed from each of the region's 19 local governments. The Board of Directors serves as the forum for bringing together our local governments and public agencies to plan, program, and implement cooperative comprehensive planning across the San Diego region.

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SANDAG is Failing to Abide by the Law

Fact: In November 2008, 74 percent of eligible California voters approved or did not oppose Proposition 1A, the SAFE, RELIABLE HIGH-SPEED PASSENGER TRAIN BOND ACT FOR THE 21ST CENTURY, which calls for construction of up to 24 new high-density megacities and an 800-mile High-Speed Train (HST) and connected local transit system linking Sacramento, San Francisco, Los Angeles and Anaheim, and other cities in California's Central Valley and Inland Empire, and in San Diego County, consistent with the California High-Speed Rail Authority's certified environmental impact reports of November 2005 and July 9, 2008.

Problem: SANDAG has failed to implement key actions required to enable quick completion of the HST system and its up to 24 connected cities.

SANDAG doesn't believe the high-speed train system will ever reach San Diego. That's likely why it has done nothing to take the actions required under the law to enable quick completion of the high-speed train system.

Solution: SANDAG must act to immediately create a local cities/state joint power agreement that fulfills mutual/interlocking legal/financial responsibilities for implementing the integrated 24-new cities and 800-mile high-speed train and connected local transit system prescribed in the 2008 Proposition 1A Bond Act/law.

The Wealth of San Diego County Residents is at Risk

The Wolford-Chalekian Brief reveals how that risk can be avoided

MOST WANTED – "SANDAG's 9"

SANDAG's new 2025-2029 Regional Plan must include provisions that enact the legal requirements in the High-Speed Train Bond Act. It takes only 9 of 15 people (the 9 high-lighted, or others) – mayors and members of city councils of San Diego and Chula Vista – to approve, in December 2025 or earlier, a new 2025-2029 SANDAG Regional Plan that avoids the risks threatening the county's future. All 79 others on the list of official SANDAG representatives can listen and talk, but under a weighted fractional voting scheme imposed by State law, they can't vote. They have no assurance of influencing a deciding vote. Unless the process changes, or voters have a chance to act, neither do most of the other 3.3 million residents of the county.

The "SANDAG 9" must approve appropriate new high-density land use plans in designated areas along the established high-speed train corridor, and approve a benefit assessment-based funding plan, followed by quick construction of the high-speed train and connected local transit system, and ensure timely construction of 6-to-7 new beautiful high-density city centers of 500,000 people each to be linked and served by the high-speed train and connected local transit system.

"Call a meeting! Just do it." Don't kick the can down the road – again!

1. Issue: Limited Population Growth
Solution: Higher Growth and Higher Density

- SANDAG: Projects annual population growth to 2050 of 0.5% to 0.67% (current rate is .002% flat growth), concentrates new population in 18 existing cities, with little growth in the unincorporated areas, increases dependence on autos, increases VMT, and limits access to places and opportunities throughout the county for many people.

- THE BRIEF: Adopts a policy to achieve 1% annual population growth; growing the county from 3.3 million people today to 9.1 million by 2125, and increasing density from 3,800 ppsm* to 6,421 ppsm in existing established communities and to 25,000 ppsm in beautiful new high-density communities with walking access to California's 800-mile high-speed train system.

*ppsm=people per square mile

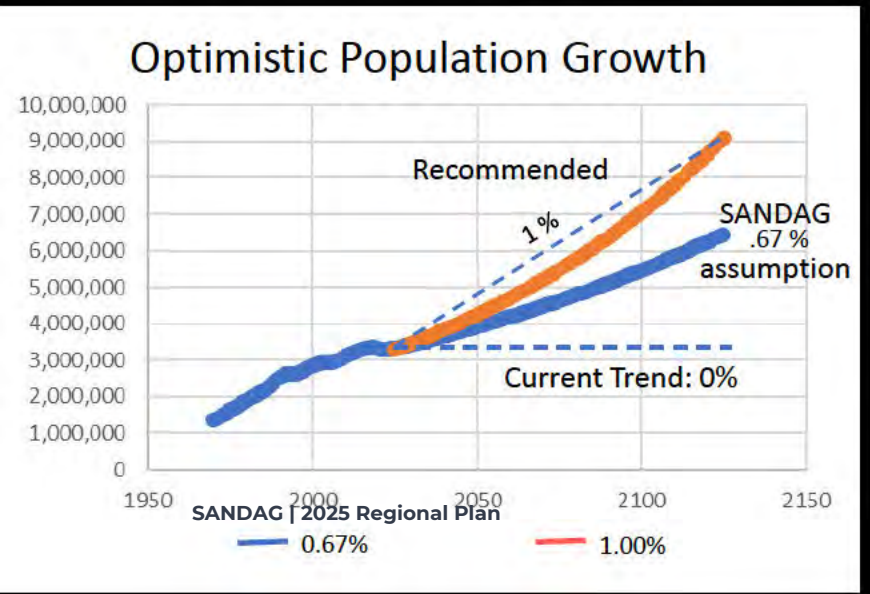
Population change in California counties

The U.S. Census Bureau released population estimates for counties nationwide from July 1, 2022, to July 1, 2023. Here are the numbers for select California counties.

County	2022	2023	Numeric change
Alameda	1,628,259	1,622,188	-6,071
Contra Costa	1,157,019	1,155,025	-1,994
Fresno	1,015,359	1,017,162	1,803
Los Angeles	9,719,765	9,663,345	-56,420
Orange	3,150,372	3,135,755	-14,617
Riverside	2,474,241	2,492,442	18,201
Sacramento	1,584,380	1,584,288	-92
San Bernardino	2,194,908	2,195,611	703
San Diego	**3,277,176**	**3,269,973**	-7,203
San Francisco	807,774	808,988	1,214
Santa Barbara	443,915	441,257	-2,658
Santa Clara	1,878,335	1,877,592	-743
Santa Cruz	264,240	261,547	-2,693

Source: U.S. Census

Michelle Guerrero / The San Diego Union-Tribune



1% Population Growth

SANDAG has adopted a population constraint policy that is the root of the many problems San Diego County is experiencing; rising cost-of-living, rising homelessness, rising traffic congestion, collisions and deaths, and increased parking demands. Consider the increase in traffic and parking at San Diego International Airport to roughly 8,500 parking spots – even more auto parking and traffic are on the way.

Just as in the U.S., population growth and demographics in San Diego County are influenced by public policies – primarily by the "SANDAG Board's 9" controlling members, and secondarily by state and federal agencies.

The starting point in developing its new 2025-2029 Regional Plan should be seeking and securing public approval of more optimistic population growth.

Once near-term and long-term growth trajectories are adopted, optimistic land-use and transportation development alternatives that bring solutions to the top issues can be analyzed; this can lead to public consideration and **final adoption of a new Regional Plan in December 2025** by the "SANDAG Boards 9" and supporting funding and regulatory agencies.

The Issue is Growth – The Solution is Density

SANDAG Assumes .67% Growth

Current Developed Area
3.3 million people
1.2 million cars
36 cars/100 people

→ +2.8 M +0.9 M →

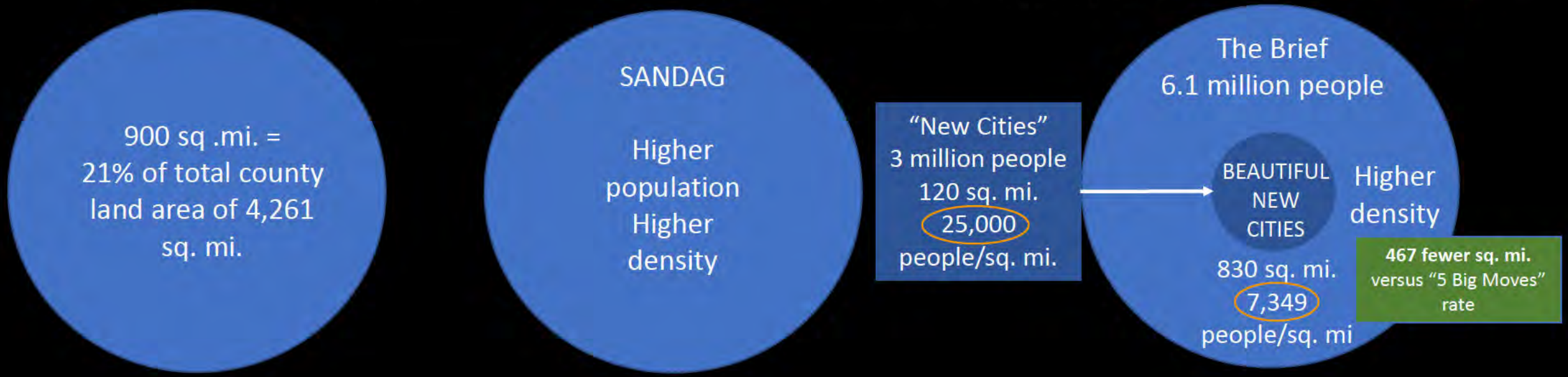
"5 Big Moves" Plan
6.1 million people
2.1 million cars
34 cars/100 people

The Brief Recommends 1% Growth

→ +3.0 M +0.0 M →

"8 Big Moves" Plan
9.1 million people
2.1 million cars
23 cars/100 people

One million fewer cars versus "5 Big Moves" rate of 34 cars/100 people.



900 square miles
3,800 people/sq. mi.

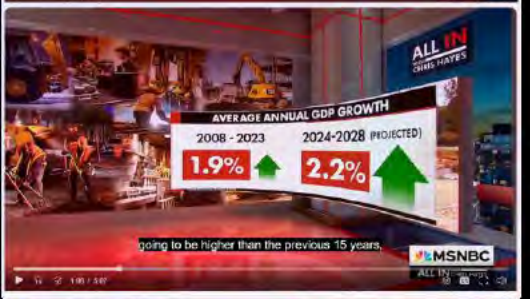
950 square miles
6,421 people/sq. mi.

950 square miles
9,579 people/sq. mi.

SANDAG's Plan is based on a 27-year vision of projects that have immediate, near-term and 100-year impacts. Without a 100-year vision, near-term projects may have 100-year irreversible adverse impacts.

The Best Strategy: Natural Growth + Immigration

'Massive benefit': Immigration surge set to boost U.S. economy by $7 trillion | Watch (msn.com)



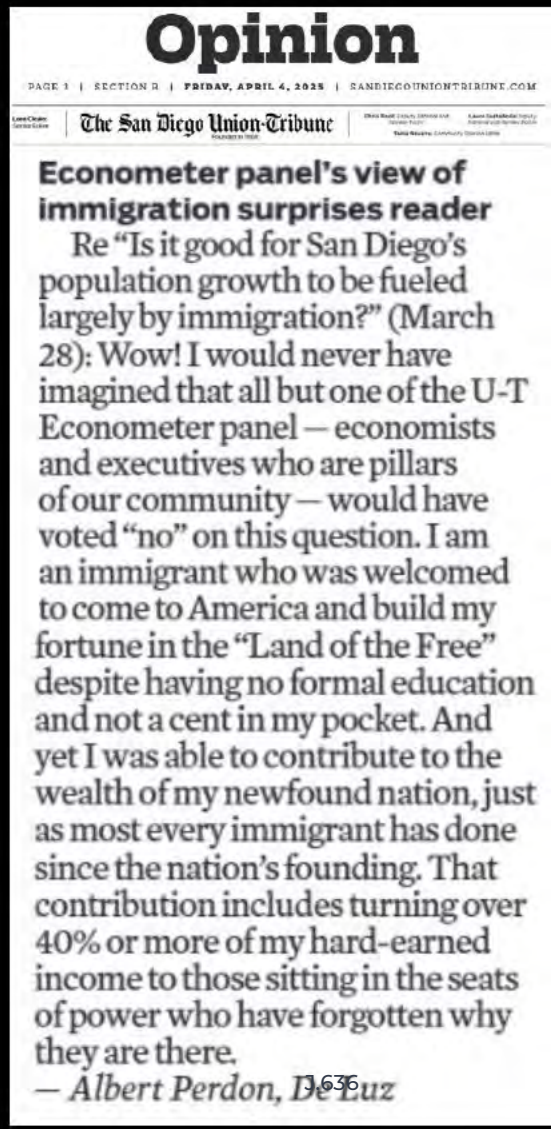
SANDAG has fallen into a trap set by those who instill fear for personal gain. We know who they are. Recent data have shown, that fear is unwarranted. It is the fear that our nation cannot absorb the immigrants who are purportedly taking our jobs, and draining the wealth of our economy – immigrants who are rapists, drug dealers and worse. How stupid is that?

In March, 2025, the Congressional Budget Office released the Budget and Economic Outlook for 2024-2034. It reveals a totally opposite outlook.

It shows that far from taking jobs and wealth, immigration will add jobs and increase the nation's gross domestic product by $7 trillion and U.S. tax revenues by $1 trillion.

SANDAG has a choice to make. Either take advantage of the opportunity provided by this tremendous natural and immigration-induced growth – growth in population and growth in wealth for everyone – or deny that opportunity by adopting a new 2025-2029 Regional Plan that, at its best, constrains growth to 0.67%.

The prospects for constraining growth are described in the following pages, which reveal the issues and concerns that have not been resolved by prior and current Regional Plans. They will not be resolved in the 2025 or 2029 Regional Plans unless the SANDAG Board adopts the strategies and recommendations presented in The Wolford-Chalekian Brief, or similar strategies that achieve the outcomes people seek and what 17 million California voters have already voted for and the law mandates.



Opinion

PAGE 1 | SECTION B | FRIDAY, APRIL 4, 2025 | SANDIEGOUNIONTRIBUNE.COM

The San Diego Union-Tribune

Econometer panel's view of immigration surprises reader

Re "Is it good for San Diego's population growth to be fueled largely by immigration?" (March 28): Wow! I would never have imagined that all but one of the U-T Econometer panel — economists and executives who are pillars of our community — would have voted "no" on this question. I am an immigrant who was welcomed to come to America and build my fortune in the "Land of the Free" despite having no formal education and not a cent in my pocket. And yet I was able to contribute to the wealth of my newfound nation, just as most every immigrant has done since the nation's founding. That contribution includes turning over 40% or more of my hard-earned income to those sitting in the seats of power who have forgotten why they are there.

— *Albert Perdon, De Luz*

With Growth, New Opportunities

Imagine, Engineer, Build, Create New Wealth

Create a new 18 sq. mi.
San Diego Miramar Marine Megacity and Military/Civil Airport/High-Speed Train 4-Platform Station Complex (SDMC)

Re-imagine SAN as a VTOL Airport with Dense Mixed-Use Housing

Rank 2018 (preliminary data)	Airports (large hubs)	IATA Code	2018[1]
1	Los Angeles International Airport	LAX	42,624,050
2	San Francisco International Airport	SFO	27,790,717
3	San Diego International Airport	SAN	12,174,224
4	San Jose International Airport	SJC	7,032,851

No HST station planned
Heavily auto-dependent

Build new SDMC HST 4-platform airport station

SDMC: a 30-million annual passenger HST-accessed Airport

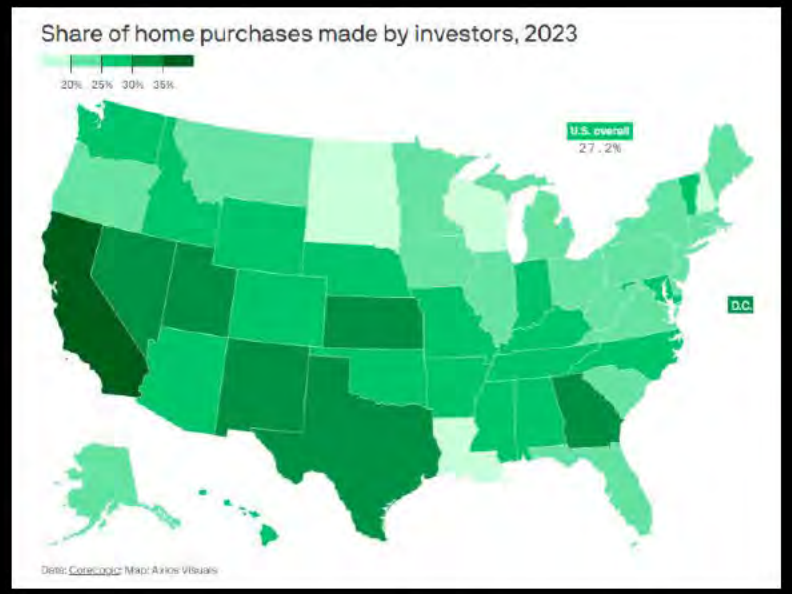
Get it right the first time. Avoid future cost/misery.

2. Issue: Threatened Housing Mix: Solution: Owner-Occupied SFR & Multi-Family

- SANDAG: Enables and fosters an invasion by Wall Street investors that threatens existing single-family owner-occupied homes, overrun not by rapists and drug dealers, but by intrusive multifamily rental housing out of scale with neighboring homes and adding to traffic congestion and a decline in personal wealth and life quality, particularly for renters.

- THE BRIEF: Recommends creation of “New Cities” high-density housing districts along transit corridors, and new “transferrable occupancy rights” created at birth for new residents in public and private housing connected by public transit, funded by public wealth fund bonds. The aim is to eliminate homelessness and increase wealth for everyone, including those who are currently left out of realizing the American Dream.

It's time to act now, before the end of 2025 and approval of a new Regional Plan



We can blame corporations buying our scarce supply of homes as the housing shortage problem; but let's be honest, zoning to constrain housing supply is the real problem.

to do a rezone. Ehlers, who authorized the city's growth-control measure, said he agrees with the city attorney that voter approval would be required for a rezone. He suggested that the council seek a major use permit for the park project, instead of rezoning the land.

July 12, 2024 Update

Dear Albert --

Why is housing so dang expensive? There's a raft of reasons, but one isn't talked about enough.

A **troubling trend** has emerged in the housing market over the last few years. Large corporations and Wall Street investors are increasingly buying up our scarce supply of homes — **driving up prices for their own profit** and making the housing affordability crisis worse.

I think it's time the County took some steps to address this troubling trend. See our policy here.

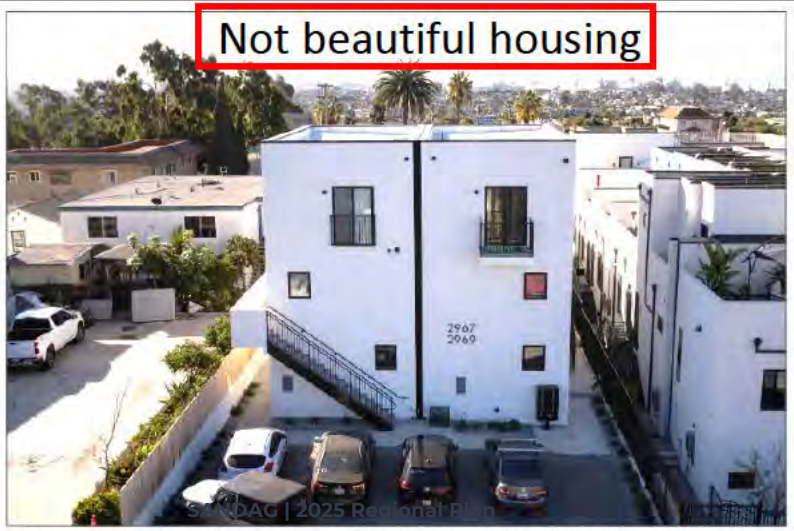
This isn't just about apartments. Corporations are also buying up single-family homes, stripping homeownership opportunities from San Diego families.

Investor home sales reached an all-time high in the fourth quarter of 2023, with **35 percent of California homes sold to institutional investors**, more than any other state. San Diego experienced the second-largest increase in investor home sales among metropolitan areas, and investors project a tenfold increase in corporate home buying by the end of the decade.

A Slow Death of Home Ownership

ADUs are Uglifying Our Neighborhoods

Forced to rent, former homeowners are resigned to living life in an ugly ADU at exorbitant rental prices and destroying views of there new neighbors, with cars jammed end-to-end and increased traffic.



An accessory dwelling unit in the Golden Hill neighborhood of San Diego. Rules on such projects may be modified, concerning both ADU advocates and critics. CALMATTERS

Problem: The American Dream of homeownership is slipping away. Only 54% (609,000) of San Diego County households are owner-occupied while 46% (521,000) are renter-occupied.

High interest rates, followed by politically-induced constraints and regulations on new housing construction, add roughly $94,000 to the price of a new single-family home. Forced to rent, former homeowners now face daunting rent increases. In June 2023, typical monthly rent in San Diego was $3,175, surpassing San Francisco's average rent of $3,168. For rent increases in San Diego that take effect on Aug. 01, 2025 through July 31, 2026, the allowable increase is 8.8%.

The “solution” to building more housing, crowded in as an ugly auxiliary dwelling unit, adds to the decline in quality of life.

Solution: SANDAG must act to provide home ownership for all San Diego County residents. Sounds crazy? It’s not. It can be done. “SANDAG’s 9” are intentionally making sure it doesn’t get done.

The Young Will Decide

Under 6.5 million or over 9.1 million? Poverty or Prosperity?

Population Growth Scenarios					
		5 Big Moves		8 Big Moves	
			Growth Rate	Growth Rate	
(2019's Growth Rate: 0.13%)			0.67%	1.00%	
Year	Years	Population	Growth	Growth	Population
2025	0	3,347,000			3,347,000
2035	10	3,674,994	352,617	538,763	3,885,763
2050	25	4,062,166	389,766	625,487	4,511,250
2075	50	4,800,201	742,979	1,274,121	5,785,372
2100	75	5,672,325	877,968	1,633,974	7,419,346
2125	100	6,526,233	859,629	1,724,196	9,143,542
		6,526,233	**3,222,959**	**5,796,542**	**9,143,542**
% of CA Pop		8%	2125 San Diego vs California		11%

Talk about increasing population and expect an outcry from angry constituents (and voters). It's a war between the NIMBYs and YIMBYs. More importantly, it's a war between those who profit from a lack of housing and those who suffer from a lack of housing.

The problem is, the fights are all based upon greed and the experiences of the recent past, and not on the opportunities and promises of the future.

Existing land use and transportation systems are tied to policy decisions made primarily by prior and current local and state elected officials turned conflicted politicians.

Changes to those policies are made easier when current and new leaders and the public are able to understand why and how things have turned wrong, and image and act on the possibilities for a better future.

Build Owner-Occupied-Only Housing

A meaningful step to reverse the "troubling trend"

Left: The San Diego Housing Commission is under fire over plans to purchase and convert three hotels into public housing for the homeless that comes with a price tag of $400,000 per room. Critics of the plan argue it's a waste of taxpayer money that fails to address the root causes of homelessness. Below: 13-story Cityfront Terrace located in Marina, has residences ranging from 879 to 1,804 sq ft, and starting prices of $575,000.

"California's got about a third of the homeless of the entire country. And we just keep throwing more and more tax-payer dollars at this problem, (*attracting more homeless)*, without really getting to the root cause of mental health or alcohol abuse or drug abuse," San Diego County Supervisor Jim Desmond said on "Fox & Friends" Friday.

Here's an idea. Imagine residents who desire to live in a publicly-built or purchased high-rise condo in any one of the 24 "new cities" located along the California high-speed train corridor. Rather than a unit being sold to them, they are granted transferable owner occupancy rights in anyone of the available comparably-priced housing units located along the 800-mile HST corridor from San Diego to San Francisco and Sacramento.

Occupancy rights would be acquired through a funding process that provides a government-financed home loan available to every resident citizen of the new cities at the time of birth. Funding to acquire occupancy space would be made available from public wealth funds at the time income earnings make loan payments possible. When the loans are paid off, the occupancy rights are secured. The earned occupancy rights would be transferable to any available comparable housing space in the new cities. Low-income or disabled residents would be provided subsidies under a voter-approved separate and distinct social welfare funding net supported by all state/fed taxpayers and not just new homebuyers; eliminating a big equity issue under current low-income housing policies. Such residents would have the freedom to access all of the available units and not be forced to live in low-income housing at increasing monthly rent payments.

President Trump Agrees. But we can do better.

A government-financed home loan available to every resident citizen of the new cities at the time of birth

BABY GRAND

HOW THE $1,000 'TRUMP ACCOUNTS' FOR NEWBORNS WILL WORK

Many questions remain over program's exact details, but advisers point out that it's free money

Many questions remain over program's exact details, but advisers point out that it's free money

By Ann Carrns
THE NEW YORK TIMES

American babies born this year through 2028 are eligible to receive $1,000 from the government for a new type of account aimed at helping families get their children off to a strong economic start.

The so-called Trump accounts, created as part of the tax and spending plan signed into law by President Donald Trump, are structured as a sort of hybrid individual retirement account, financial experts said. The unique twist comes in the form of seed money from the federal government. About 3.6 million babies are born in the United States annually, potentially putting the tab at several billion dollars for each year that the seed money is provided.

The accounts had initially included requirements that encouraged spending the funds before the children reached age 30. But their structure underwent significant changes during negotiations in the Senate.

"It has shifted more to a retirement product," said Madeline Brown, a senior policy associate with the Urban Institute who studies financial security. That's somewhat puzzling, she added, since several types of retirement accounts are already available. "It's hard for me to tell what the goal of this program is," she said.

Nevertheless, for eligible newborns, the one-time contribution can be a boon, financial experts say.

"Who's going to say no to $1,000?" said Cheryl Costa, a financial adviser in Framingham, Mass.

Policy and tax analysts said they had been wading through the law's text and that many details about the accounts, like how they would be opened and funded, awaited clarification from the Treasury Department.

The Treasury Department and the IRS did not respond to emails seeking comment.

"My sense is there is still work to be done to get it up and running," said Alex Muresianu, a senior policy analyst at the Tax Foundation, a think tank that generally favors lower taxes.

Q: When will the accounts become available?
A: They are expected to become available next July.

Tom O'Saben, director of tax content and government relations at the National Association of Tax Professionals, said details of how the accounts will be opened and funded remain to be seen. "It isn't clear," he said.

Q: Who is eligible for the one-time government deposits?
A: The government will make a one-time contribution of $1,000 to each account for babies who are U.S. citizens born during 2025 through 2028 (aligning them with Trump's current term in the White House) and have been assigned Social Security numbers. There are no income criteria.

Q: Are there limits on contributions?
A: Parents, family members and employers can contribute additional funds to the accounts, up to $5,000 a year. There's no tax deduction for contributions made before a child turns 18, but funds provided by employers — up to $2,500 a year — won't count as taxable income.

Brown noted that lower-income Americans might not have the ability to contribute extra money to the accounts while more affluent families could more easily afford to max out contributions. "I don't see a way that this reduces wealth disparities," she said.

Q: How can the money be invested?
A: Money in the accounts must be invested in low-cost stock mutual funds or exchange-traded funds tracking a U.S. stock index, like the S&P 500. It's not clear why accounts are restricted to stock funds, rather than holdings that may also include less volatile options, like bonds or cash.

But the idea behind the new accounts is that starting to invest early will give the money time to grow and to ride out market swings. Sen. Ted Cruz, R-Texas, said in a news release that they would "unleash the power of compound growth and create new generations of capitalists."

Q: How soon can the money be withdrawn?
A: Funds generally can't be withdrawn before the year in which the beneficiary turns 18.

Q: What happens after the child turns 18?
A: At that point, it appears, the account will be treated as a traditional IRA, subject to the usual contribution limits and other requirements, said Ian Berger, an analyst with Ed Slott and Co., an IRA advisory firm. Under IRS rules, contributions to traditional IRAs are tax deductible for people who qualify based on their income and other criteria.

Withdrawals from traditional IRAs before age 59½ are generally taxed as ordinary income, plus a 10% penalty, which is waived in certain circumstances, such as using the funds to pay for higher education, for the birth of a child or to make a down payment on a first home. Additional guidance is expected from the IRS to clarify this, O'Saben said.

Q: How can children benefit from treating the accounts as IRAs?
A: Costa said the accounts could create a powerful IRA because funds deposited for a very young child could remain invested and grow for decades. Many people don't start saving for retirement until their early 30s. "To me, it's a supercharged IRA," she said.

Costa often advises clients that they can save for their children's retirement in an IRA — typically a Roth version, which doesn't offer a tax deduction for contributions but allows tax-free withdrawals — as soon as the children have earned income, which is often when they become teenagers. But with the newly created accounts, there's no such earned income requirement for children. Parents can get them started on saving for retirement far earlier.

Might some parents balk at saving in an account so closely associated with Trump, who is a polarizing personality? Perhaps, Costa said, but they would need to weigh that against the prospect of building future savings for their child. "I'd say try to get past that, because it's free money," she said.

Q: Are the new accounts helpful for college savings?
A: College savings plans known as 529 accounts are generally a better option if the goal is saving for college, Costa said.

The state-sponsored accounts have higher contribution limits and favorable tax treatment. (Some states offer tax breaks for 529 contributions, and withdrawals aren't subject to income tax when spent on eligible education expenses.) "For college," she said, "I prefer the 529 account."

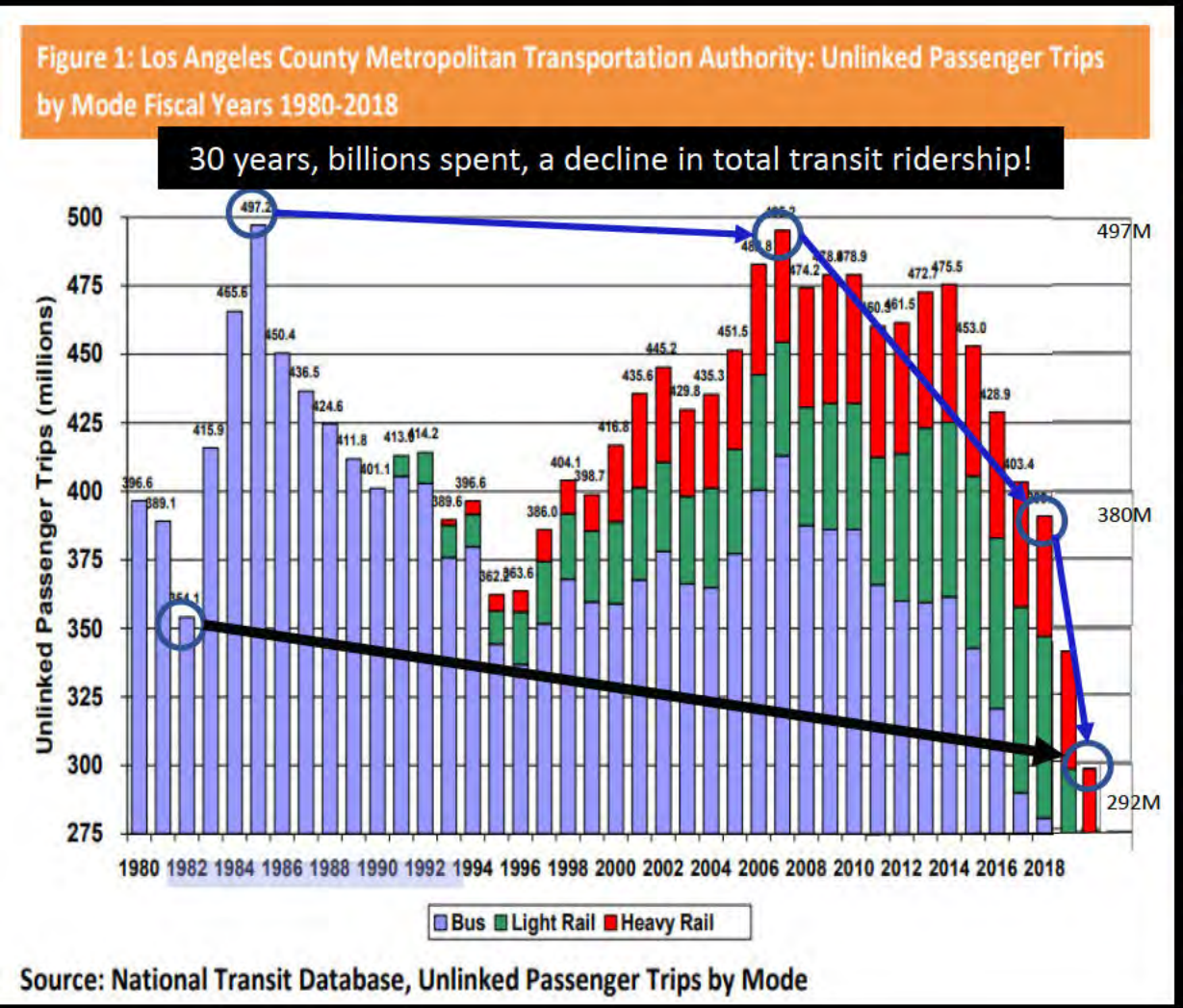
ADOBE STOCK

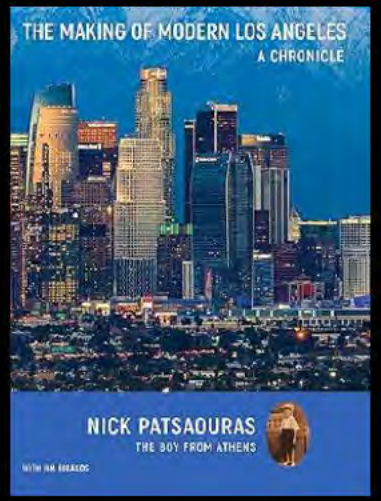
3. Issue: Auto-VMT Dependence
Solution: Auto-free, Transit-Oriented Development

- SANDAG: Fosters "prejudicial abuse of discretion" in its infill and small project VMT screening, leading to continued increases in vehicle-miles travelled, excessive mobility costs, traffic congestion and collisions, higher insurance premiums and limits on more cost-effective dense, beautiful urban design.
- THE BRIEF: Protects and enhances existing communities and builds new high-density housing and related development along rail and bus corridors and surrounding connection points where auto and parking ownership and use are not needed or wanted, and where transit pays for itself, without subsidies from general taxpayers – such as sales taxes.

DATA Confirm: SANDAG's Approach

Will result in the same or worse outcome witnessed at the L.A. County MTA.





In his recently-published book, Nick Patsaouras, an immigrant from Greece and former Chairman of the Board of the Southern California Rapid Transit District (now MTA), chronicles his efforts to build a modern transit system. Readers are taken behind the scenes, "where colossal egos clashed, where politics prevailed over principles, where the art of compromise flourished." The politically-charged results are made clear in the graph shown here.

Bus ridership in the MTA district peaked at 500 million unlinked trips in 1985 following a new transit tax increase in 1982 and a 3-year 50-cent reduced cash fare, and further-discounted elderly-users fare policy. Fares gradually increased beginning in 1985 and bus ridership fell until new rail projects came on-line, but never recovered their historic high.

In 2018, bus and rail ridership dropped to 380 million unlinked passenger trips, and to 292 million unlinked bus and rail passenger trips in 2022. **A dramatic decline from 500 million to 292 million passenger trips**.

SANDAG can avoid this miserable outcome by building adequately-scaled high-density housing and related developments along transit corridors and surrounding transit stations and stops. Funding needed to maintain and increase transit services can be secured through user fees and benefit assessments – in the same way telephone, electric, water, internet and other utilities are charged for benefiting public facilities and services.

The Flaw with 5 Big Moves

– Many travel options, limited transit users

The Blue Line has proven to be an increasingly popular route, since the opening of the extension from Downtown San Diego to the UTC Transit Center in November 2021 – helping to increase Trolley ridership 35% since 2008, 16 years after voters approved Proposition 1A.

Year	Avg Weekday Trolley Ridership	Change
1996	48,650	
1997	56,525	16%
1998	71,750	27%
1999	74,100	3%
2000	87,625	18%
2001	78,150	-11%
2002	73,500	-6%
2003	73,650	0%
2004	84,825	15%
2005	93,033	10%
2006	102,275	10%
2007	111,600	9%
2008	107,700	-3%
2009	93,400	-13%
2010	90,725	-3%
2011	100,400	11%
2012	93,650	-7%
2013	103,450	10%
2014	121,150	17%
2018	113,473	-6%
2019	117,700	4%
2020	98,191	-17%
2021	59,366	-40%
2022	90,744	53%
2023	109,500	21%
2024	145,000	32%

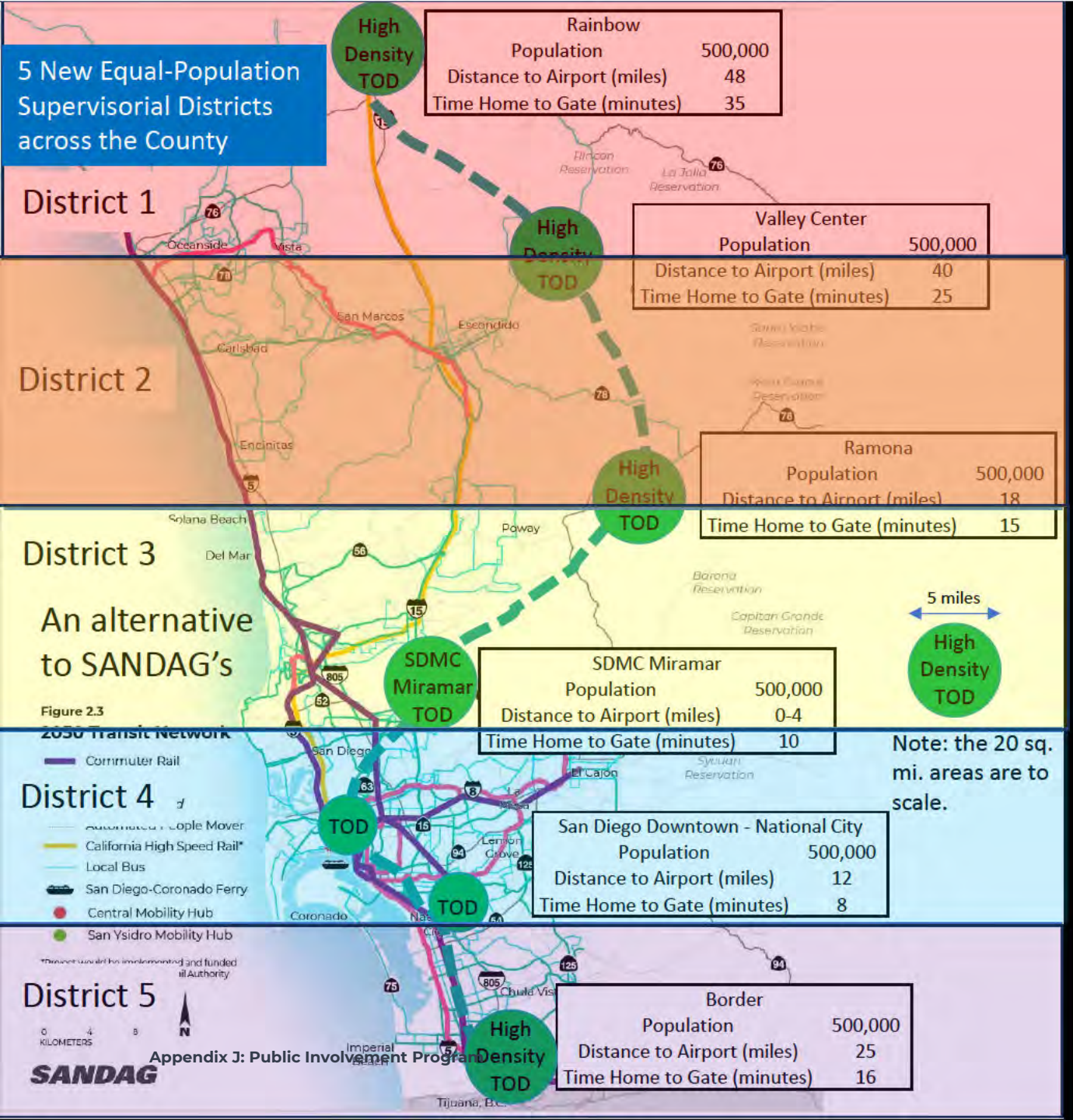
MTS generates 300,000 bus and rail passenger trips each weekday. The agency schedules 7,000 trips each weekday, and has 128 trolley cars, 800 buses in its fleet (FY18) and 10,000 parking spaces.

Despite major public investments in bus/rail transit from taxpayers throughout the county of 3.3 million people, 2023 weekday round-trip rail ridership is largely stagnant at a mere 58,000; for a measly average of 800 people per each of 73 rail stations. Had growth in rail ridership kept up with growth in the length of the system, current daily rail roundtrip ridership would be over 180,000 – not 73,000. Had the MTS increased housing density around stations, ridership today could have exceeded 500,000 rail passengers per day.

FACTORS AFFECTING TRANSIT USE – a survey

The top three reasons respondents are forced to use MTS are "no car to use" (69 percent), "save money" (34 percent), and "no driver's license" (31 percent).

Approximately 72 percent of bus riders stated not having a car as one of the top three reasons they are forced to use transit compared to 65 percent of Trolley riders. These transit-dependent populations are likely forced to use transit on a regular basis



A Proposed Solution

Citizenship is not just about opposing bad proposals – it's also about proposing good solutions – whether by government officials or by informed citizens.

Despite SANDAG staff's best attempts to bring forward an effective transit-oriented plan for San Diego County, *The Wolford-Chalekian Brief* reveals data deficiencies result in big weaknesses in SANDAG's "5 Big Moves" plan.

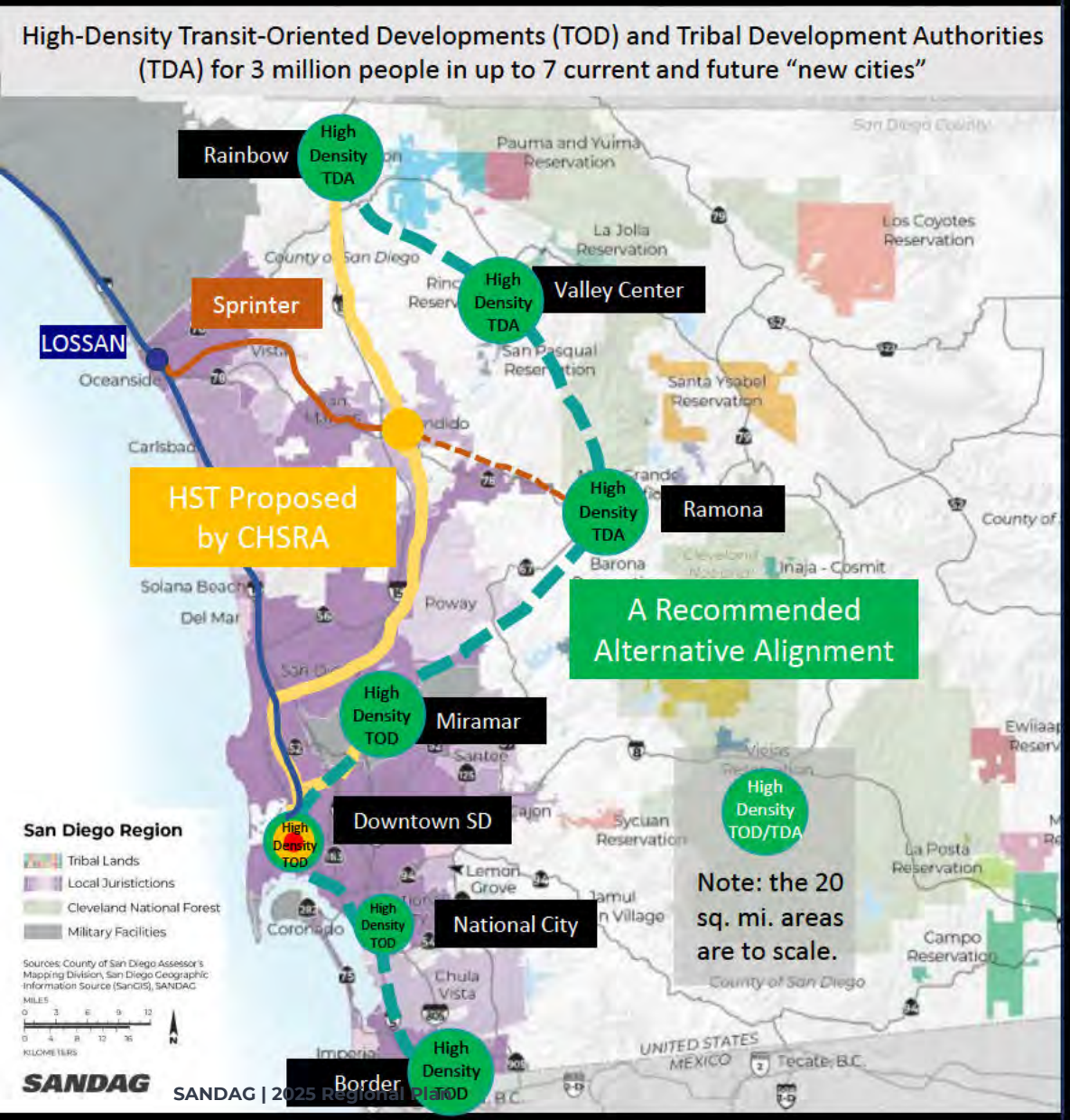
The set of proposals presented here offers an alternative – one alternative – that achieves many of the goals SANDAG is trying to realize, and more.

This Brief offers a solution and plan for increased transit-oriented housing development (TOD) in high-speed transit station-areas. It offers reduced housing and mobility costs and faster, safer access to important destinations, such as a new Marine/civil airport/housing complex at Miramar and a new housing/electric VTOL airfield complex at Lindberg Field.

The data shown here are generalized to indicate the possibilities for a better future for San Diego County.

The Future: Seven "New Cities" and High-Speed Connections

High-Density Transit-Oriented Developments (TOD) and Tribal Development Authorities (TDA) for 3 million people in up to 7 current and future "new cities"



California voters overwhelmingly approved the November 2008 ballot measure creating a new vision for growing California; fewer than 26% of eligible voters voted no.

Voters envisioned creating new transit-oriented-developments (TOD) in up to 24 existing or new cities along an 800-mile corridor from Sacramento and San Francisco to San Diego, linked by a new high-speed train and connected local transit system.

The California High-Speed Rail Authority and relevant local agencies are charged with funding and quickly completing construction of the 800-mile high-speed train and connected local transit system and the new cities the system will serve and connect. Required funding and construction of the new housing and transportation system are stalled by Governor Newsom, who says California can't afford the HST system. TOD/TDA communities are not being built.

The Wolford-Chalekian Brief proposes a new funding strategy and an alternate alignment in San Diego County to that proposed by the Authority that greatly increases the project's success and benefit to new-cities communities and to the entire county.

4 Low-Ridership Rail, Bus Lines, Go'side Shuttle
Low-Density Development
Parking-Dependent – Limited Walk Access

Little-used Coaster

Little-used Metrolink & AMTRAK

Little-used Sprinter

Little-used NCTD buses

Metrolink's farebox recovery ratio of 15% is indicative of the problem. This is why our transit system sucks. Oceanside is the perfect location for very high-density transit-oriented development. The walk-access area extending at least a quarter-mile out from the station should be built to a much higher density; increasing the opportunity for new housing and more transit users and fare revenues.

Oceanside should undertake a redevelopment project that builds a new city center with walk access to at least 25,000 residents in high-rise towers of 30-stories or more. Limit parking. Save millions in auto costs and taxpayer subsidies.

The LOSSAN corridor is a 351-mile rail line connecting San Luis Obispo to San Diego, supporting both passenger and freight rail services. It is the second busiest intercity rail corridor in the U.S. and the busiest state-supported Amtrak route according to the Orange County Transportation Authority. Freight rail on the LOSSAN corridor is primarily operated by Union Pacific and BNSF Railway. Passenger services include Amtrak's Pacific Surfliner, Metrolink, and the COASTER and SPRINTER services according to PanGIS, Inc..

anothercar • 3y ago
Top 1% Commenter

I can't believe how bad wayfinding is at that station. There's no indication of where trains will be, and very little indication of where the platforms are in the first place. Their website also doesn't list which trains depart from each platform, which is crazy. It's such an easy thing to fix. Makes me wonder if NCTD leadership has ever actually ridden the train. If you get the chance to share this proposal at an NCTD meeting, let us know how it goes?

Security Risk

Low-Density Development

Parking-Dependent

Constrained LOSSAN Freight Service

547 or 50,000?

22 million vehicle-miles travelled per year
Missed opportunity for improved transit and walking access and connections for children and grandchildren of Oceanside and San Diego County

The 10-acre transit-oriented development project at the Oceanside Transit Center, one of several being planned by Oceanside and NCTD, would "facilitate bus to rail connectivity for its riders, provide opportunities for enhanced amenities that would improve customer experience and support regional housing goals."

A train station development within walking distance of 4 rail lines connecting the county and the nation, and a network of county-wide local bus services, designed for 547 apartment units and 1,868 parking stalls.

This precious 10-acre piece of land, and the surrounding area extending out by a half mile, could easily be home to over 100,000 people; homeowners who overtime could become among the wealthiest in the county and the nation because of the potential access this station could provide.

PRELIMINARY DRAFT

Oceanside Transit Center Specific Plan
Transportation Demand Management (TDM) Plan

Part A: Project Description

Project Name: Oceanside Transit Center (OTC) Specific Plan

Project Location: 235 S. Tremont Street Oceanside, CA 92054. The project site is comprised of the 10.15-acre OTC property owned by North County Transit District (NCTD). The site is generally comprised of the area bounded by Tremont Street to the east, Seagaze Drive to the north, railroad tracks to the west, and Missouri Avenue to the south.

Project Information: The project proposes the demolition of existing structures and construction of a mixed-use transit-oriented community.

Total Square Footage: 849,679 gross square feet and 756,371 gross square feet for parking.

Total Square Footage of Non-Residential Uses:

- 64,085 square-foot office building for the NCTD headquarters,
- 160,656 square-foot boutique hotel (170 rooms) with amenities,
- 29,196 square feet of retail/food/beverage uses,
- 3,124 square-foot intermodal customer service center,
- 1,033 square-foot bus office, and
- 12 commuter bus stalls and bus layover space.

Total Residential Units: 547 multi-family residential units with associated indoor and outdoor amenities.

Estimated number of employees: 448 (approximately 214 employees for the NCTD office, 178 employees for the Hotel, and 56 employees for the Retail/Restaurant).

Estimated total number of parking spaces: 1,868 parking stalls (total public and residential uses).

Estimated total number of carpool/vanpool parking spaces: 19

Estimated total number of bike parking spaces: 274 (total public and residential uses)

- 102 residential spaces,
- 13 hotel spaces,
- 40 public structure spaces, and
- 119 exterior public spaces

End of trip facilities: Showers and lockers.

Estimated total number of electric vehicle (EV) parking spaces: 576 EV parking stalls (total public and residential uses).

Estimated total number of EV charging stations: 139 EV charging stations (total public and residential uses).

547 housing units
Hotel
Retail

1,868 parking stalls

22 million annual VMT
@ $18 million annual cost

1,134 pages EIR
few people will read

"Less than significant impacts"
NOT

Less than potential
value created

Total Cost?

Source: CallisonRTKL Inc, May 2025

Michael Baker INTERNATIONAL

NOT TO SCALE

OCEANSIDE TRANSIT CENTER REDEVELOPMENT
ENVIRONMENTAL IMPACT REPORT

Overall Site Plan

Exhibit 3-5a

Oceanside Transit Center Redevelopment Project
Energy Calculations

Vehicle Type	Percent of Vehicle Trips[1]	Daily Trips[2]	Annual Vehicle Miles Traveled	Average Fuel Economy (miles per gallon)[3]	Total Annual Fuel Consumption (gallons)[4]
Passenger Cars	0.50	3,256	10,942,375	22	497,381
Light/Medium Trucks	0.47	3,050	10,250,708	17.3	592,527
Heavy Trucks/Other	0.02	147	493,315	6.4	77,080
TOTAL [5]	***1.00***	***6,453***	***21,686,398***	--	***1,166,988***

Fuel Cost: $5.9 billion

County On-Road
2028
1,477,500,314
0.0790%

Notes:
1. Percent of Vehicle Trip distribution based on trip characteristics within the CalEEMod model.
2. Daily Trips taken from ITE manual.
3. Average fuel economy derived from the Department of Transportation.
4. Total Daily Fuel Consumption calculated by dividing the daily VMT by the average fuel economy (i.e., VMT/Average Fuel Economy).
5. Values may be slightly off due to rounding.

Source: Refer to CalEEMod outputs for assumptions used in this analysis.

Conclusion

In conclusion, the proposed project and its mixed-use components are consistent with more than one VMT screening criteria and therefore would not conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b). Impacts in this regard would be less than significant.

VMT Reduction (CARB Scoping Plan)

Commenters have requested clarification on how the project's VMT meets the intent of the 2022 CARB Scoping Plan. As discussed above, based on the Transportation Guidelines, a project would be screened out from additional VMT analysis and presumed to not result a significant VMT impact if the project meets at least one of the project types listed in the Transportation Guidelines Table 2. As the proposed project meets five of the VMT screening criteria, the project is presumed to not result in a significant VMT impact and would meet the intent for VMT reductions identified as part of the 2022 CARB Scoping Plan.

More traffic lanes

More vehicle-miles travelled

Table 4.16-3
Planned Roadway Modifications

Facility	Existing (2021)		Planned (2050)	
	# lanes	Classification	#lanes	Classification
North River Road: North River Circle to Wilshire Road	2	Collector	4	Secondary Collector
North River Road: Wilshire Road to Sleeping Indian	2	Collector	4	Major
Oceanside Boulevard: I-5 to El Camino Real	4	Secondary Collector	4	Major
North Coast Highway: SR-76 to Seagaze Drive	4	Secondary Collector	2 w/o TWLTL*	Collector
South Coast Highway: Seagaze Drive to Oceanside Blvd	4	Secondary Collector	2 w/o TWLTL*	Collector
Canyon Drive: SR-76 to Mission Avenue	4	Secondary Collector	2 w/ TWLTL	Collector
El Camino Real: Mesa Drive to Oceanside Boulevard	4	Major	5	Major
Douglas Drive: Vandegrift Blvd. to Via Malaguena	4	Secondary Collector	2 w/ TWLTL	Collector
Vandergrift Blvd: Northern City Limit to North River Road	5	Major	4	Major
College Boulevard: Old Grove Road to Olive Drive	4	Major	6	Major
Melrose Drive: N. Santa Fe Avenue to Sagewood Drive	2	Collector	4	Major

TWLTL = two-way left-turn lane; SR-76 = State Route 76

*Roundabouts are planned along Coast Highway. Where space is constrained, implementation of the TWLTL or raised median will not be necessary.

4. Issue: Lack of Funding:
Solution: Benefit Assessments, No Federal or State Funding

- SANDAG: Continues dependence on highly-subsidized low-quality transit services, on unreliable local sales taxes, and on state and federal funding, all resulting in diminished prospects for the county's security and prosperity threatened by competing nations that are building new cities with high-speed train and local transit networks.

- THE BRIEF: Grows the county to accommodate greater population and economic wealth, and secures transit funding from transit system fares, cargo revenues and benefit assessments on new higher-density housing, without relying on onerous state and federal taxpayer-subsidized funding.

"It's interest. You know during the campaign, it was called a tax and now it's changed to a fee, to a charge, and I think they're doing that to deceive the residents. Quite frankly, I think SANDAG thinks that we're stupid. They want to take our money. They want to spend it on public transit, which most of us don't use. They want to force us out of our vehicles into public transit. Which just doesn't work for most of the residents of the City of Escondido. We're comfortable in our cars. And we don't mind paying for our roads. But we already have. And that's what they need to understand. We've already paid for it and we don't want to pay anymore."

We don't want to pay anymore.

We are not for the newly-proposed AB 1421 mileage tax.

The California Mileage Tax (AB 1421) just introduced in the State Assembly would require tracking every driver's mileage and charging them 6-9 cents per mile they drive. That is the equivalent of an 80-cent-per-gallon hike in the gas tax!

The typical California driver will be forced to pay $900 to $1,200 a year in higher taxes just to drive on poorly maintained freeways they already paid for with the original gas and sales taxes! When you add the new MILEAGE TAX to the existing GAS TAX and CAR TAX, the typical two-car family will end up paying more than $3,000 in taxes a year for just the privilege of driving in California – not including the cost of the car itself!

Creating New Cities for Greater Wealth

Nation-wide Auto Purchase Cost

15,700,000	New cars per year
$47,870	Cost per car
$751,559,000,000	Cost per year
50	Years
$37,577,950,000,000	Auto Purchase Costs over 50 years

Building New Cities in San Diego County

1,000,000	"New-cities auto-free" families (3M people)
$105,780	Annual family income in 2024
$12,081,600	Family income, with inflation, over 50 years

Wealth created from costs saved/investment interest revenue gained

$24,000	Annual auto ownership/operating costs
$702,419	Auto costs per family avoided over 50 years
$17,500	Saved annual auto costs invested in stock market
$28,328,495	Family Investment gains over 50 years

New Costs for transit / Transit Agency Revenues

Assumed at 25% of monthly auto cost savings

$6,150	Annual transit cost per family
$171	Monthly transit passes for 3 family-member users
$6	Daily single transit user pass

For 3 million "New City" transit users

$6,150,000,000	Transit user fees/agency revenues per year
$307,500,000,000	Transit user current$ fees/Revenues - 50 yrs

Summary Increase-in-Family-Wealth Calculation

$12,081,600	Current Avg family income over 50 years
$31,138,170	Additional Discretionary Income over 50 years
$42,517,351	New Avg family income over 50 years
23%	Auto costs as percent of income
2%	Transit costs as percent of income
$2,107,256	Reduction in Transportation expense over 50 years

Increasing Wealth in San Diego County

Building "New Cities" Reducing Auto Dependence, Improving Public Transit

SANDAG is going to great lengths to prepare a new 2025 Regional Plan that will shape San Diego County's future for decades to come. If the current 2021 Regional Plan offers any insight as to what's in store for the new 2025 plan, we should be concerned that the most important issues facing the County may not be given serious consideration or be resolved.

SANDAG's primary mission is to set the foundation and strategies for increasing the well-being of all County residents. It means improving the health and wealth of the County's current 3.3 million and possible future 9+ million residents over the next 100 years.

The Wolford-Salekian Brief identifies the wealth that can be created if SANDAG adopts and acts on the recommendations described in the Brief to preserve and protect existing communities, and to create new high-density cities that reduce auto-dependence and provide safe, reliable, high-quality and frequent, high-speed public transit services.

The median household income in San Diego, California is $105,780, as of 2023. This is based on the 2023 American Community Survey 1-Year Estimates.

The average purchase price of new car in California 2024 - Google Search

Q: What's the annual cost of owning a car?
A: You're not done spending after you drive your car home. The total cost to own and operate a new car is about $12,300 a year, or $1,025 a month, including finance costs, depreciation, fuel, maintenance and repair, insurance, tires and other costs, according to the latest analysis from AAA, the automobile owners group.

What is the forecast for new car sales in 2024?

Both Cox and Edmunds expect light-duty U.S. vehicle sales to total about 15.7 million vehicles in 2024. Edmunds has maintained its guidance since the beginning of the year, while Cox lowered it from an initial forecast of 16 million. Sep 26, 2024

AI Overview

As of September 2024, the average price of a new car in the United States is $47,870, which is a 4.3% decrease from the peak of $49,929 in December 2022. However, prices have been fluctuating since the beginning of 2024.

U.S. Energy Information Administration: The average miles per gallon for a car in 1975 was around 14 mpg, while in 2023, the average new car gets approximately 27 mpg, showing a significant increase in fuel efficiency over the years.

There is a Viable HST Financial Plan

Summary Net Project Cash Flow Phases 1 & 2 (YOE dollars in millions)

24-station+, 800-mile High Speed Train and Connected Local Transit System from Sacramento and San Francisco to Los Angeles, Inland Empire and San Diego	2025-2072
Operating Revenue	$634,077
Less: Operating & Maintenance (O&M) Costs	($175,127)
Net Operations Cash Flow (NOCF)	$458,950
Capital replacement costs	($66,192)
NOCF after capital replacement	$392,759
Value Capture (Local Benefit Assessment EIFD Funding)	$116,648
Phase 1 Capital cost (521 miles @ 228 million per mile) by 2039	($118,560)
Phase 2 Capital cost (279 miles) @ 337 million per mile) by 2042	($94,107)
Public Benefit Fund	($26,014)
Cumulative net project cash flow	$270,726
Cumulative Finance Cost by 2072	($236,361)
Cumulative Interest Earnings	$7,299
Cumulative net project cash flow after finance cost/interest	$41,665
Present value cumulative net project cash flow after finance cost + interest earnings	$10,385

Note: This plan is a largely user-funded funding plan. The $266 million YOE per-mile cost is considerably higher than for other high-speed train projects, but so are the revenues the system will generate from its operations.

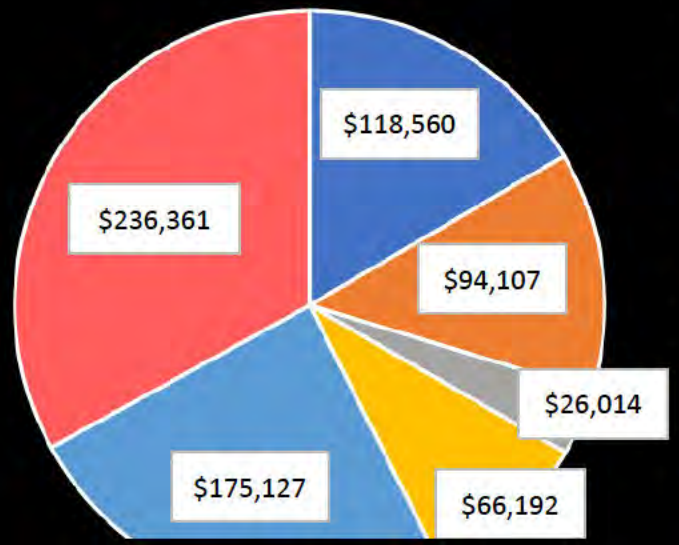
November 2008 Proposition 1A

2704.07. (In addition to the funds made available in the Bond Act) The Authority shall pursue and obtain other private and public funds, including, but not limited to, federal funds, funds from revenue bonds, and local funds, to augment the proceeds of this chapter.

What's missing from the Authority's financial plan is required local funding (benefit assessments on new residential property owners) provided by responsible local agencies located along the 800-mile route.

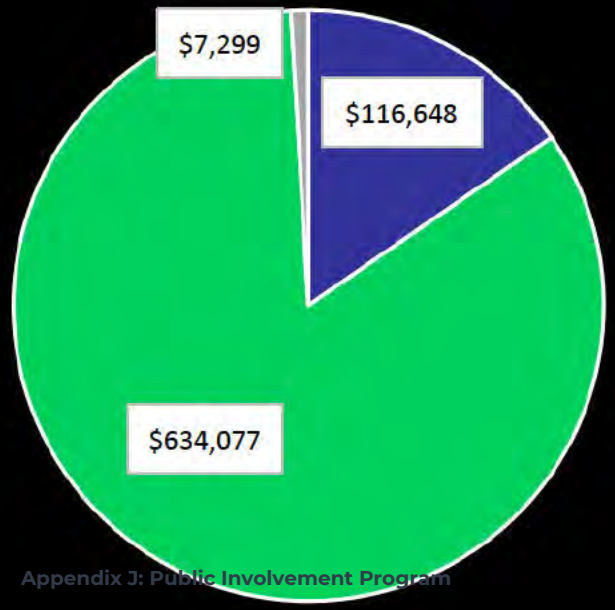
The updated cash flow analysis (prepared in November 2024) shown to the left includes proposed local-city Enhanced Infrastructure Financing District (EIFD). It might also include ISRF funding from California's Ibank – Infrastructure and Economic Development Bank. San Diego County and its cities are included.

The plan calls for the 24 cities identified for an HST station to adopt new high-density land-use plans and benefit assessments on new housing in beneficially-impacted HST station areas.



Year-of-Expenditures $millions

- Phase 1 Capital cost (521 miles @ 228 million per mile) by 2039
- Phase 2 Capital cost (279 miles) @ 337 million per mile) by 2042
- Public Benefit Fund
- Capital replacement costs
- Operating & Maintenance (O&M) Costs



Revenues $millions

- Value Capture (Local Benefit Assessment EIFD Funding)
- Operating Revenue
- Cumulative Interest Earnings

Assumptions

The cash flow analysis shown on the previous slide and here for the 800-mile high-speed train system was adapted from the California High-Speed Rail Authority's 2014 and 2016 Business Plans.

The analysis was modified to include value capture local funding, which the Authority has chosen to not include in its analysis, and inflationary impacts.

Value capture is based upon a benefit assessment rate of 4% of the purchase price of new residence in 16 "new cities" neighborhoods growing to 500,000 residents, each directly served by the HST. Not included are assessments for an additional 8 cities. The data are thus conservative.

The data show sufficient cash flow from operating revenue and value capture to complete the 800-mile HST system promised to voters and mandated in the law in the November 2008 Proposition 1A Bond Act.

"I Just Wasn't Smart Enough."

"I spent my time and didn't succeed. I realized the system didn't work," said Michael Tennenbaum, the first chairman of the California High-Speed Rail Authority 20 years ago. "I just wasn't smart enough. I don't know how they can build it now." A political appointment landed Michael Tennenbaum as Chairman of the Authority, despite having no experience in land use planning or in building a high-speed train system. He aimed to get private funding for the system. There were no takers because the Authority failed to secure a dependable funding source. Thomas Richards is the current Chairman of the Authority. He is CEO of a real estate investment, development and construction company. His projects have extended from Sacramento to the Central Valley, Bakersfield the Inland Empire, Corona and Victorville.

Ian Choudri is the latest in the string of CEOs at the Authority. He was appointed by the Board of Directors in August 2024. He previously worked on a project to develop a rail connection between the Ontario Airport with the future Las Vegas Brightline West passenger train terminus in Rancho Cucamonga. He is also hoping to get private investors to pay for the project, just as Michael Tennenbaum tried to do more than 20 years ago.

What all of these leaders, and many others on the Board of Directors and as staff to the Board need to do, is what 17 million voters directed them to do. Pursue and secure local funds and necessary land use changes to quickly get the 800-mile HST and connected local transit system built. They have just chosen not to do so.

A Reconfiguration is Required

The High-Speed Rail Authority has made a big mistake in selecting conventional rail versus maglev technology. The Brief recommends that the Authority reconfigure further work on the project and act to adopt maglev as the chosen technology.

San Diego to San Francisco: 4 hrs

More like a plane than a train

To the untrained eye, the difference between America's new Acela train and China's Maglev may not appear significant. Don't be fooled. Notice the number of first class and economy seats in the two sets of pictures.

Maglev uses a wider "wrap around" vehicle and guideway design, sort of like the Disneyland Monorail, but on a larger scale than Acela's narrower-gauge trains and cabins that run above steel rail tracks. This design gives maglev 50% more capacity and higher speeds and acceleration than Acela, thereby saving time and money – billions of dollars-a-year in cost savings.

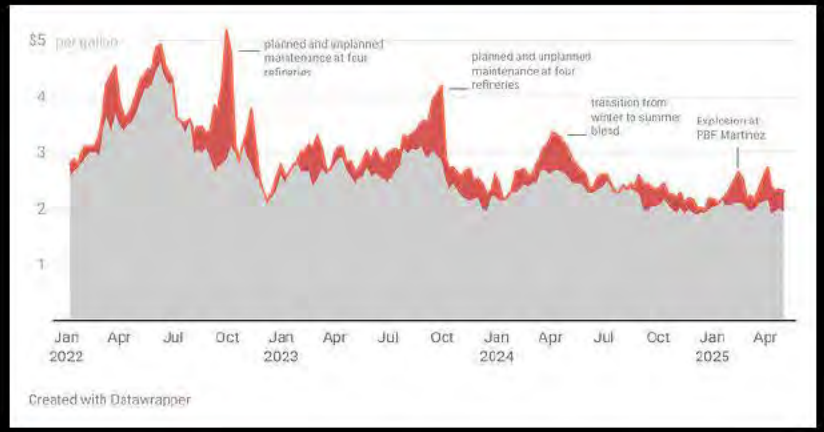
In the time since 2008, when voters approved construction of the high-speed train system, China has built over 24,000 miles of high-speed service. During a non-commercial test-run on January 20, 2021, a maglev achieved a **Chinese record speed of 385 mph**.

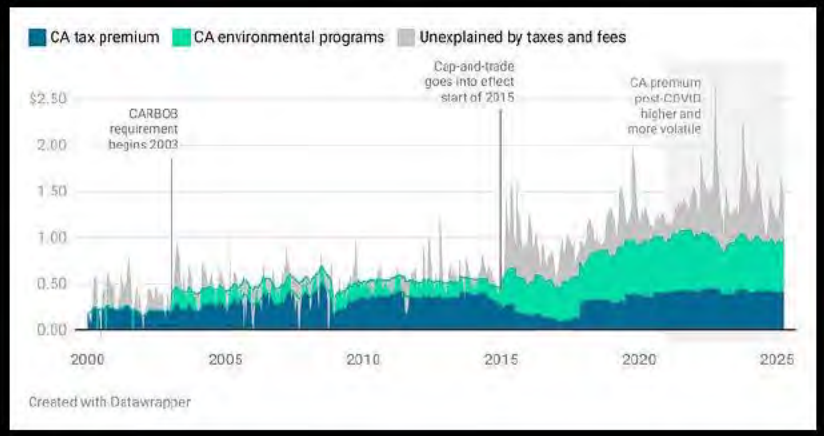
The Brief recommends that California enter into a bi-national U.S.-China agreement for implementing the high-speed train service. We import junk from China, why not high-speed maglev? It will last much longer and create greater value for 100+ years. Move out of the way and allow implementation of the 800-mile system in 10 years; saving billions of $s.

San Diego to San Francisco: 2 hrs

The Horrendous Cost of Auto Dependence

How California Regulated Itself Into an Energy Crisis





In 2023, California's average monthly gasoline consumption was 12 billion gallons. In June 2025, in San Diego County, gas prices hovered around $4.64 per gallon. Transportation costs, which include automobile maintenance, vehicle parts and car insurance, were up 2.5% over the past year.

Governor Newsom: *"California Cannot Afford the High-Speed Train"*				
Gasoline Consumption	Gallons per Month / Annual VMT	$ per Gallon / $ per VMT	Monthly Cost	Annual Cost
Current prices	12,045,000,000	$4.64	$4,657,400,000	$55,889,000,000
Potential prices	12,045,000,000	$8.00	$8,030,000,000	$96,360,000,000
Vehicle-miles travelled	335,000,000,000	$0.81	$22,612,500,000	$271,350,000,000

Governor Newsom is dead wrong! Californians can afford it, but not if they have to spend $271B/yr on their cars; such that supposedly no money is left to pay for the one-time cost of $250 billion for the state-wide, voter-approved and legally-mandated, 800-mile high-speed train and connected local transit system.

Data show that the Governor's own policies are partly responsible for the energy crisis that's rising costs of auto dependence – a lack of respect for the voters.

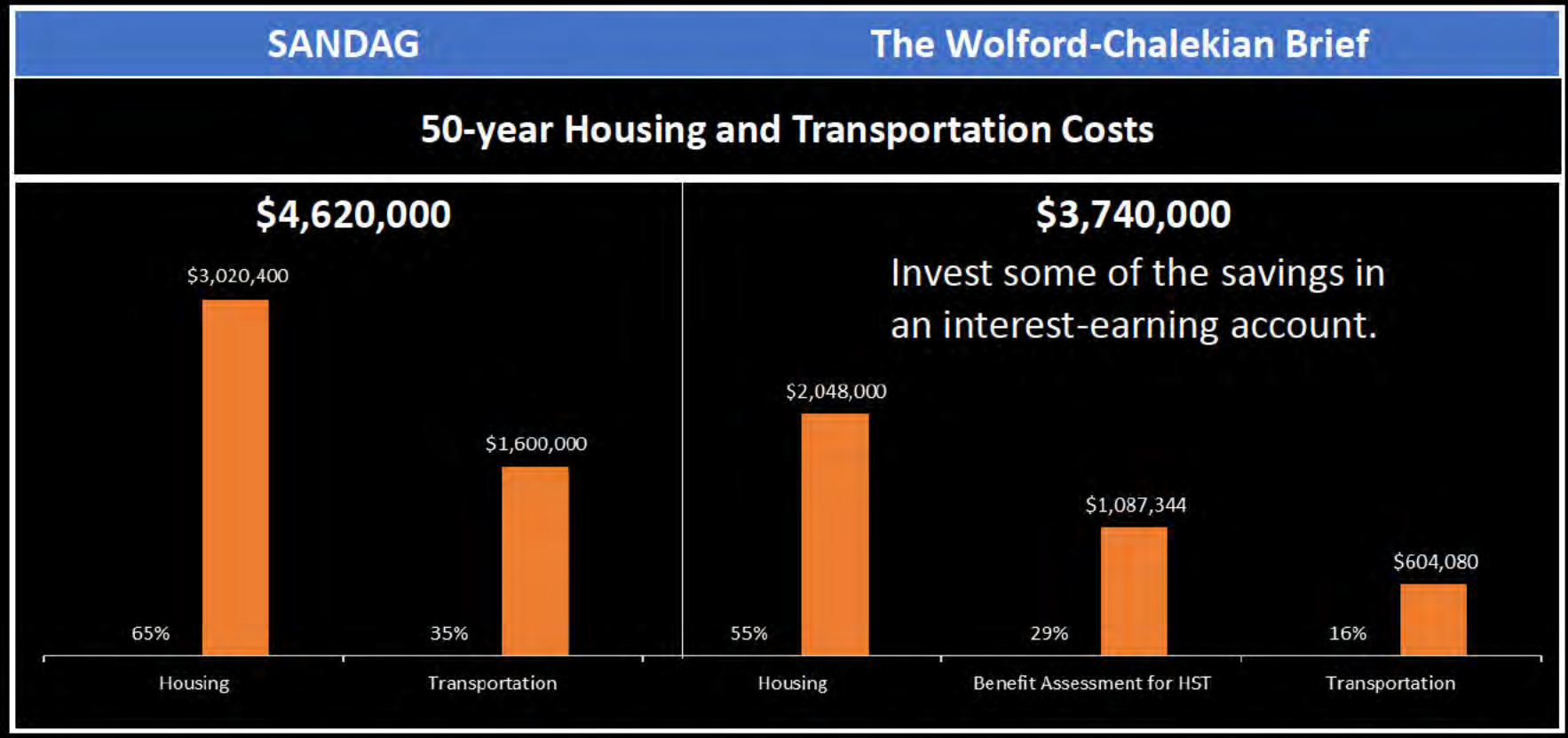
As the state grows over the next century, we can expect the annual auto costs to grow by even more. Projections that gas prices will grow to $8 per gallon increases current threats facing the county's economic future.

California's high-speed train will enable elimination of billions of dollars of future auto costs. By eliminating these costs, California's high-speed train will be affordable. Newsom is refusing to secure the money needed and authorized to quickly complete the HST system – not from taxpayers, but from benefit assessments on those who directly benefit and profit from the system.

The “One Big Beautiful Bill Act”

The Act enables taxpayers to deduct up to $10,000 in auto loan interest payments from their taxable income for the 2025 through 2028 tax years. The deduction only applies to cars made in the U.S. and the maximum deduction phases down when income surpasses $100,000.

Do the Math!



$43 million = 50-year average income for family making $125,000 per year, including $28 million in retained investment earnings from savings in housing and auto costs.

5. Issue: Governance in Decline
Solution: A Return to Majority Rule

- SANDAG: Continues manipulation of SANDAG's voting scheme to limit power and control by "The "SANDAG 9" – local city mayors and council members representing the City of San Diego and City of Chula Vista — while leaving a large segment of the population without effective voting opportunities.
- THE BRIEF: Establishes a new voting scheme that leaves local control of unincorporated communities in Districts 2 and 5 with their representative on the Board of Supervisors, and grants local control of 3 new cities to the county's tribal nations.

Before San Diego County: Tribal Lands

Today will be History Tomorrow

The fine print: Setting the stage for what will be written in 2125.

American settler colonialism (1848–)

In the fiscal year of 1851–1852, California reimbursed approximately $1 million of expenses for militia groups engaged in "the suppression of Indian hostilities", although in fact, they were massacring native people.[8] Volunteer militia groups were also indirectly subsidized by the U.S. federal government, who reimbursed money to the state for the militias.[6]

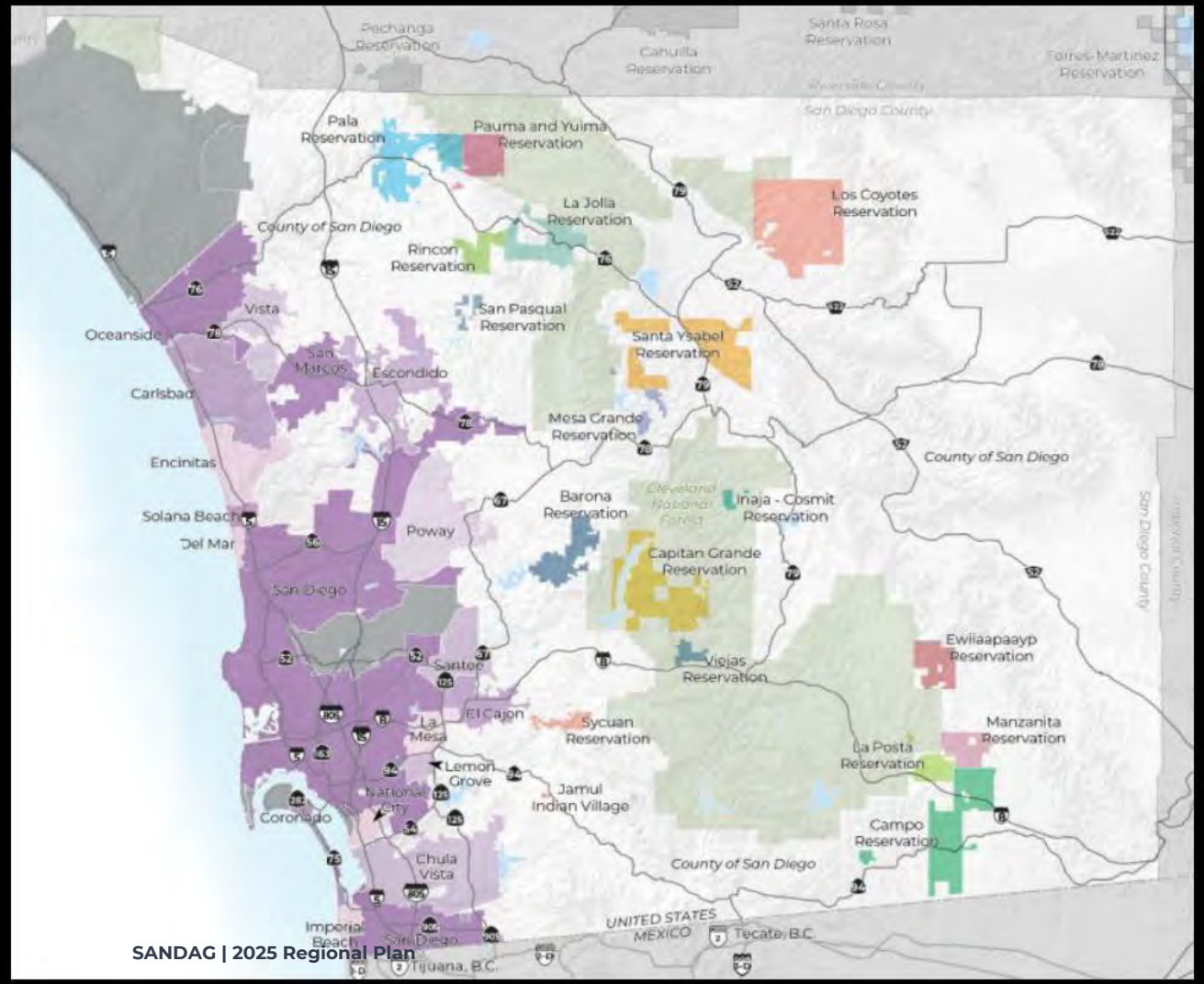
California Gold Rush and forced labor (1848–1855)

The discovery of gold at Sutter's Mill in 1848 inspired a mass migration of Anglo-American settlers into areas where native people had avoided sustained encounters with invaders. The California Gold Rush involved a series of massacres and conflicts between settlers and the indigenous peoples of California lasting from about 1846 to 1873 that is generally referred to as the California genocide.[7]

Raids on native villages were common, where adults and children were threatened with fatal consequence for refusing what was essentially slavery. Although this was in legal terms *illegal*, the law was established not to help protect indigenous people, so there were rarely interventions to stop kidnappings and the circulation of stolen children into the market by law enforcement.[48] What were effectively slave auctions occurred where laborers could be "purchased" for as low as 35 dollars.[49]

In 2025, the Lay of the Land and Who is in Control

State of California, San Diego County, 18 Cities, 145 Unincorporated Communities, 17 Dispersed Tribal Governments



Great Expectations

In 1975, the bullet train caught Democratic Governor Jerry Brown's eye and his imagination, though it also courted controversy. "It's not always easy to be a man of tomorrow."

In 2002, Governor Davis commemorates signing of SB 1856 Safe, Reliable High-Speed Passenger Train Bond Act for the 21st Century, seen as leading to the biggest public works construction program ever undertaken in the United States.

In 2008, Governor Arnold Schwarzenegger, a Republican, championed and signed the Proposition 1A High-Speed Train Bond ACT. We have to figure out how to do it. "Failure's not an option here."

In 2015, Governor Brown is frustrated and embarrassed as China builds more than 20,000 miles of high-speed rail in about two decades and California has completed nothing and has no plan to finish it.

In 2025, despite encouraging voters to approve Prop 1A in 2008, Governor Newsom has no plan to finish the construction project. He says the project is too costly and California cannot afford it. That's a lie. California can afford it.

"It's too costly. We can't afford it."

"After fifty years, nothing accomplished"

Bad Politics Upends Good Governance

HOME INSURANCE: WHAT THE DATA SHOWS AND WHAT TO KNOW

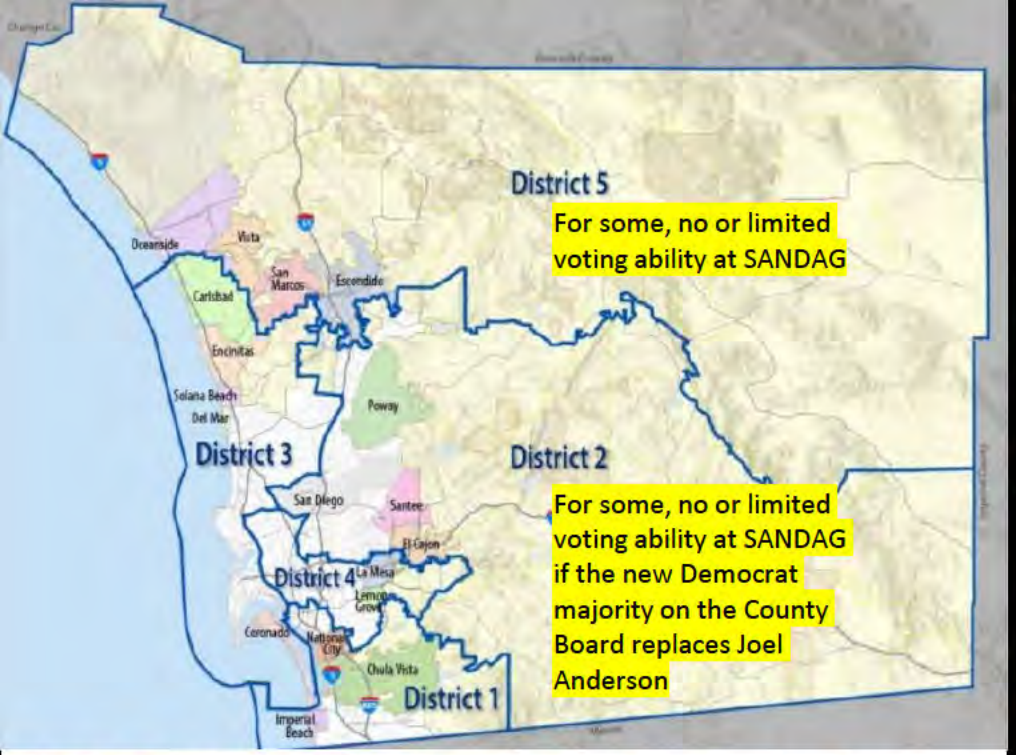
Altadena residents embrace outside of a burning property as the Eaton fire swept through their neighborhood. As of Saturday, nearly 9,000 structures had been destroyed in the blaze, according to Cal Fire. ETHAN SWOPE / AP FILE

Governor Newsom says California "can't afford the high-speed train."

But during his time in office, and under previous administrations, there's been little evidence to suggest we will resolve a more costly issue – global warning. Now we're seeing it in real time with wildfires that are costing much more than that of the $250 million high-speed train; with more than 16,200 structures destroyed as flames ripped through Pacific Palisades, Malibu, Pasadena and Altadena.

Newsom is asking Congress (meaning taxpayers throughout the state and country) to approve nearly $40 billion in grants and loans to help property owners recover from January's devastating wildfires. Not so fast. We created this problem. We need to own it and solve it ourselves.

SANDAG Cities and County Representatives



Paloma Aguirre
District 1

Joel Anderson
District 2

Terra Lawson-Remer
District 3

Monica Montgomery Steppe
District 4

Jim Desmond
District 5

19 Voting Members and areas served on SANDAG Board of Directors

1. Chula Vista
2. Imperial Beach
3. National City
4. El Cajon
5. Poway
6. Santee
7. Carlsbad
8. Coronado
9. Del Mar
10. Encinitas
11. Solano Beach
12. County A (Currently Joel Anderson District 2)
13. La Mesa
14. Lemon Grove
15. San Diego A
16. Escondido
17. Oceanside
18. San Marcos
19. Vista

County B* Some San Diego Residents

San Diego B*

*Non-voting members

SANDAG has a unique governing structure comprising 18 local incorporated cities and a county government. Decision-making is done through a 21-member Board of Directors. Members are appointed to serve on the SANDAG Board by their respective local and county government agencies.

Two San Diego city representatives and two members designated by the County Board of Supervisors participate in SANDAG Board meetings. However, only one of each agency's representative participates in voting.*

Voting is done under one of two voting schemes, one by vote per-member, the other by population. Under a "normal" voting scheme, actions by the SANDAG Board require a majority vote (at least 10 votes) of the 19 eligible voting members.

Under a "fractional" (AB 805) voting scheme, voting is based on population. Chula Vista and San Diego hold a 53% majority voting power under this scheme; all of the 79 other representatives shown on SANDAG's letterhead can debate and give they're opinions, and may have influence in the vote outcome, but they have no voting power.

SANDAG's AB 805 Weighted-Voting Scheme

500,000 San Diego County Unincorporated Area Voters Were Disenfranchised

The data and evidence suggest that SANDAG's AB 805 voting scheme is as highly-politicized as ever.

In a recent SANDAG Board election for Board Chair, under the normal voting scheme, Del Mar, with 0.13% of the population received 1 of 19 votes (5%), gaining the advantage to win the vote.

When the Board decided to use the AB 805 voting scheme, the outcome was quite different.

It takes just two cities – San Diego and Chula Vista – to control vote outcomes under the AB 805 fractional voting scheme.

In the County's 2nd and 5th supervisorial districts, up to a million residents have could have little to no representation on the SANDAG Board.

Voting Board Members	Member Agencies	Population	Percent	Normal voting Result	Fractional Voting Share Unadjusted	Fractional Voting Result*
1	Carlsbad	115,400	3.49%	No	4	4
2	Chula Vista*	274,500	8.30%	No	9	9
3	Coronado	23,639	0.71%	Yes	1	1
4	County A County B	503,320 Unincorporated	15.21%	No	16	16
5	Del Mar	4,331	0.13%	Yes	1	1
6	El Cajon	102,700	3.10%	Yes	4	2
7	Encinitas	62,800	1.90%	No	2	1
8	Escondido	151,600	4.58%	Yes	5	5
9	Imperial Beach	27,315	0.83%	Yes	1	1
10	La Mesa	59,556	1.80%	No	2	1
11	Lemon Grove	26,802	0.81%	No	1	1
12	National City	61,100	1.85%	No	2	1
13	Oceanside	175,800	5.31%	Yes	6	6
14	Poway	49,701	1.50%	Yes	2	1
15	San Diego A* San Diego B	1,423,900	43.04%	No	44	44
16	San Marcos	96,700	2.92%	Yes	3	2
16	Santee	57,797	1.75%	Yes	2	1
18	Solano Beach	13,356	0.40%	No	1	1
19	Vista	101,600	3.07%	Yes	4	2
*Hold 53% majority fractional voting power		3,308,613	100.70%		110	100
Del Mar Mayor Terry Gaasterland (D) would have been elected 2nd Vice Chair under the Normal voting scheme.		Population		Normal voting scheme	Per AB 805	Adjusted fractional share
		2,540,734	Voted No	9	Winner	78
		791,183	Voted Yes	10	Loser	1.669 22

SANDAG Board of Directors

The Board of Directors serves as the governing body of SANDAG and is made up of elected mayors, councilmembers, and county supervisors that are appointed from each of the region's 19 local governments. The Board of Directors serves as the forum for bringing together our local governments and public agencies to plan, program, and implement cooperative comprehensive planning across the San Diego region.

Chair Hon. Lesa Heebner
Vice Chair Hon. Joe LaCava
Second Vice Chair Hon. John Minto
Chief Executive Officer Mario Orso

City of Carlsbad
Hon. Kevin Shin, Councilmember
(A) Hon. Priya Bhat-Patel, Mayor Pro Tem
(A) Hon. Keith Blackburn, Mayor

City of Chula Vista
Hon. Carolina Chavez, Deputy Mayor
(A) Hon. Cesar Fernandez, Councilmember
(A) Hon. Michael Inzunza, Councilmember

3

City of Coronado
Hon. John Duncan, Mayor
(A) Hon. Carrie Downey, Councilmember
(A) Hon. Mark Fleming, Councilmember
(A) Hon. Amy Steward, Councilmember

City of Del Mar
Hon. Terry Gaasterland, Mayor
(A) Hon. Tracy Martinez, Deputy Mayor
(A) Hon. John Spelich, Councilmember

City of El Cajon
Hon. Bill Wells, Mayor
(A) Hon. Steve Goble, Councilmember

City of Encinitas
Hon. Bruce Ehlers, Mayor
(A) Hon. Marco San Antonio, Councilmember
(A) Hon. Joy Lyndes, Deputy Mayor

City of Escondido
Hon. Dane White, Mayor
(A) Hon. Judy Fitzgerald, Councilmember
(A) Hon. Joe Garcia, Councilmember

City of Imperial Beach
Hon. Jack Fisher, Councilmember
(A) Hon. Mitch McKay, Councilmember
(A) Hon. Matthew Leyba-Gonzalez, Councilmember

City of La Mesa
Hon. Mark Arapostathis, Mayor
(A) Hon. Lauren Cazares, Councilmember
(A) Hon. Laura Lothian, Councilmember

City of Lemon Grove
Hon. Alysson Snow, Mayor
(A) Hon. Jennifer Mendoza, Mayor Pro Tem
(A) Hon. Jessyka Heredia, Councilmember

City of National City
Hon. Luz Molina, Councilmember
(A) Hon. Ron Morrison, Mayor
(A) Hon. Ditas Yamane, Councilmember

City of Oceanside
Hon. Esther Sanchez, Mayor
(A) Hon. Eric Joyce, Deputy Mayor
(A) Hon. Jimmy Figueroa, Councilmember

City of Poway
Hon. Steve Vaus, Mayor
(A) Hon. Peter De Hoff, Councilmember
(A) Hon. Christopher Pikus, Councilmember

City of San Diego
Hon. Joe LaCava, Council President
(A) Hon. Vivian Moreno, Councilmember
(A) Hon. Sean Elo-Rivera, Councilmember
Hon. Todd Gloria, Mayor
(A) Hon. Kent Lee, Councilmember
(A) Hon. Marni Von Wilpert, Councilmember

6

City of San Marcos
Hon. Rebecca Jones, Mayor
(A) Hon. Ed Musgrove, Councilmember
(A) Hon. Mike Sannella, Councilmember

9 people can make it happen.

City of Santee
Hon. John Minto, Mayor
(A) Hon. Laura Koval, Councilmember
(A) Hon. Ronn Hall, Councilmember

City of Solana Beach
Hon. Lesa Heebner, Mayor
(A) Hon. David A. Zito, Councilmember
(A) Hon. Jewel Edson, Councilmember

City of Vista
Hon. Katie Melendez, Deputy Mayor
(A) Hon. Dan O'Donnell, Councilmember
(A) Hon. John Franklin, Mayor

County of San Diego
Vacant
Hon. Joel Anderson, Supervisor
(A) Hon. Terra Lawson-Remer Supervisor
(A) Hon. Monica Montgomery Steppe, Supervisor

Advisory Members

Imperial County
Jesus Eduardo Escobar, Supervisor
Imperial County
(A) Vacant

California Department of Transportation
Ann Fox, Executive District 11 Director
(A) Everett Townsend, Deputy District Director
(A) Roy Abboud, Supervising Transportation Planner

Metropolitan Transit System
Hon. Matthew Leyba-Gonzalez
(A) Hon. Patricia Dillard
(A) Hon. Ronn Hall

North County Transit District
Hon. Jewel Edson
(A) Hon. Priya Bhat-Patel
(A) Hon. Mike Sannella

U.S. Department of Defense
Dennis Keck, Navy Region Southwest Executive Director
(A) Anna Shepherd, Navy Region Southwest
(A) Muska Laiq, Navy Region Southwest

Port of San Diego
Dan Malcolm, Commissioner
(A) Job Nelson

San Diego County Water Authority
Hon. Joy Lyndes
(A) Joel Scalzitti
(A) Valentine Macedo, Jr.

San Diego County Regional Airport Authority
Gil Cabrera, Chair
(A) James Sly, Board member

Southern California Tribal Chairmen's Association
Hon. Cody Martinez, Chairman, Sycuan Band of the Kumeyaay Nation
Hon. Erica Pinto, Chairwoman, Jamul Indian Village of California

Mexico
Hon. Alicia Kerber-Palma
Cónsul General of Mexico
(A) Hon. Gilberto Luna
Deputy Cónsul General of Mexico

Association of Planning Groups
Hon. Robin Joy Maxson
(A) Hon. Eileen Delaney

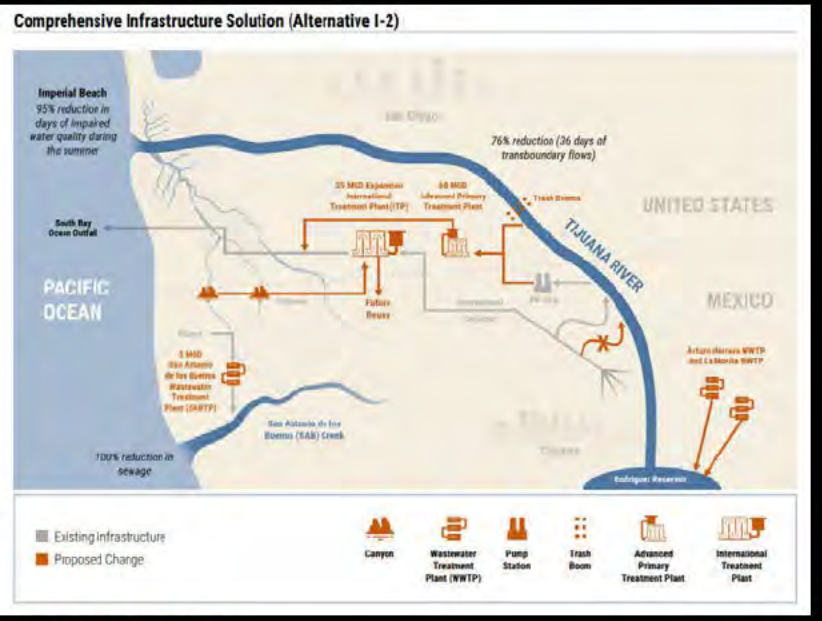
Democracy Lost

How 9 people can kill a critical infrastructure project

Fact: In November 2008, 74 percent of eligible California voters (17 million) approved or did not oppose Proposition 1A, the SAFE, RELIABLE HIGH-SPEED PASSENGER TRAIN BOND ACT FOR THE 21ST CENTURY, which calls for construction of up to 24 new high-density megacities and an 800-mile High-Speed Train (HST) and connected local transit system linking millions of people from San Diego to San Sacramento to San Francisco. SANDAG plays a key role in completing this 800-mile system.

Problem: SANDAG has failed to implement key actions required to enable quick completion of the HST system and its up to 24 connected cities. It's costing San Diegans dearly. SANDAG doesn't believe the high-speed train system will ever reach San Diego. That's likely why it hasn't invited or accepted the California High-Speed Rail Authority as an Advisory Member on its Board of Directors.

Solution: Nine people representing SANDAG Board Members – can and must act to immediately approve a SANDAG/High-Speed Rail Authority joint power agreement that fulfills SANDAG's part in enacting mutual/interlocking legal/financial responsibilities for implementing the integrated 24-new cities and 800-mile high-speed train and connected local transit system prescribed in the 2008 Proposition 1A Bond Act/law.



There are solutions

The Wolford-Chalekian Brief offers solutions that are escaping SANDAG's staff and Board Members. Some examples:

The key issue of housing can be resolved by embarking on new methods for housing construction that can dramatically reduce the cost of housing, and by focusing on transit-oriented housing development.

The daunting issue of border pollution has a solution. Building a toll gate on the southbound I-5 just before the border and charging a minimal toll for those benefitting from crossing the border from and into Tijuana can raise enough funding to pay for quick resolution of the decades-long pollution problem along the coastal land, air and waters.

Realignment and improvement of the LOSSAN corridor along the bluff in Del Mar and in San Clemente can be achieved without relying on federal funds that will never appear. The Brief shows how.

In finalizing the 2025-2029 Regional Plan, SANDAG needs to consider the recommendations presented in the Wolford-Chalekian Brief. Not doing so will put millions of county residents at risk.

October 20, 2003, boarding the 271 mph Shanghai Maglev at Longyang Road Station.

How high-speed trains and maglev could come to San Diego County

How China Is Beating the World in Futuristic Transport! - YouTube

The Wolford-Chalekian Brief: The Author

Public Agency and Private Sector Experience

Graduate, University of Disneyland and Attraction Operator, Disneyland, Anaheim, CA

Instructor and Graduate, School of Engineering, Cal-State University, Long Beach, CA

Post Graduate Studies in City Planning, University of Southern California

Public Agency Management Certificate, Management Training Institute, University of Indiana.

California Professional Civil Engineer and Caltrans transportation engineer

Commuter Transportation Services, Inc., Director of Marketing: Commuter Computer Carpools

Los Angeles Community Redevelopment Agency and Los Angeles

Downtown People Mover Authority people mover planner

SCRTD/LACMTA (LA METRO) bus and rail executive officer and General Manager Pro Tem

In the private sector; Sverdrup/Jacobs Senior Project Manager

Founder/Owner, Albert Perdon & Associates

Southern California Association of Governments (SCAG), in cooperation with

California High-Speed Rail Commission, High-Speed Maglev Program Manager

L.A./Orange Counties 15 local cities JPA; Orangeline (High-Speed Maglev) Development Authority Executive Director

San Diego Association of Governments (SANDAG) informal pro bono adviser

California High-Speed Rail Authority informal pro bono adviser

Boards, Commissions and Associations

Life-Member, American Society of Civil Engineers (ASCE)

Former Member Federal Urban Aid Commission (Governor Deukmejian appointment)

Former Board Member, U.S. High-Speed Ground Transportation Association

Former Elected Member and President City of Cerritos, CA Shadow Park Homeowners Association

Candidate for Board Member, ABC Unified School District, Cerritos, CA

Member, North San Diego Business Chamber

Outlook

Follow-up additional input to the 2025-2029 Regional Plan

From Albert Perdon <albertperdon@gmail.com>
Date Thu 7/17/2025 10:19 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from albertperdon@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Follow-up Input to SANDAG regarding final adoption of a new 2025-2029 Regional Plan and Regional Transportation Improvement Program (RTIP)

By Albert Perdon – albertpredon@gmail.com – [redacted] – 7/17/2025

I attended the ZOOM session SANDAG held on 7/16/2025 and reviewed the recording on 7/17/25

Following is supplemental input for consideration by SANDAG and the public as SANDAG finalizes the 2025-2029 Regional Plan and Regional Transportation Improvement Program (RTIP) The time stamp reveals when the conversation occurred.

The ZOOM session began with introductory remarks by Antoinette Meier that included the following:

I can't talk about every project or program because there are literally hundreds, but we'll highlight a few that we think might of interest to the unincorporated communities, and then we'll talk about, um, how you can provide public input, comment beyond this evening, and next steps for getting the plan approved.

Putting forward this plan is one of our core requirements.

We're not responsible for local streets and roads, and county roads.

We're focused on the state highway system, state routes, interstate, um, however we do provide funding to local agencies through Transnet um, half-cent sales tax, we administer that program, and a portion of that goes to, um local governments for investing in their local streets and roads potholes, restoration, operation, maintenance, building new infrastructure, etc.

One thing a lot of people don't know about SANDAG, is, um, that we have a very robust environmental mitigation program, so over the years we've acquired over 9,000 acres of sensitive lands, um, that we manage and monitor and maintain and that we've rehabilitated and that serves as mitigation for major transportation projects, and then we provide a lot of resources, so programs like our youth opportunity pass program that has made transit free for youth 18 and under. I mentioned the funding that we pass through the local agencies for their local streets and roads, and we have a lot of grant programs for local agencies as well.

Next slide

I think it's no surprise to probably anyone in our workshop that our region is very unique. We have mountains, oceans, suburban communities, urban communities, rural communities, state parks, national parks. We have the most native American reservations in any county and the entire country. We have a lot of military bases. So, there's a lot of unique needs the region has when it comes to transportation. And that's why there are so many projects in the Regional Plan.

We partner up with a lot of different organizations and groups to do the work that we do.

So, what is the Regional Plan? The Regional Plan is one of SANDAG's most important responsibilities, and it's important because it's really required to get federal and state funding for transportation projects and a majority of the funding that comes into the region for transportation is federal and state funding. It's a plan that we call the Blueprint for how the regional transportation system will grow and how the region will develop and it looks out at least 20 years, our plan goes out to 2050 and we largely think of it as a transportation plan, which it is, but it covers a lot really important topics, like housing, meeting housing needs for the region, the environment, air quality, climates. It's something that we're required to update every four years. We have to submit it to state and federal agencies to be approved.

5:24 of 14:16

There's a number of laws and requirements we have to comply with. I'll talk about a handful of those in the next slide. But essentially, we have to use the latest data when we put it together, the Plan, so the plan takes about four years to put together, so we're constantly working on it, so we finish one and we start another one. But we all start it by collecting a lot of travel data, updating our population growth forecast so that the Plan is correct. We also work with our partner agencies – the cities, the county – to make sure their plans and assumptions are considered as we put together the Regional Plan as well.

The Plan isn't just a list of transportation projects. There's also policies and there's programs, and we have to show how we can pay for everything in the Plan. So, it can't be a wish list. We have to demonstrate that there is reasonable funding source – sources – to cover all of the projects and programs that are in the Plan.

6:19 of 14:16

We have a lot of laws and requirements that we have to comply with. We have to show how the Plan improves equity and accessibility. We have to show how we are going to accommodate the housing needs of the region and the state provides that number. We have to show how we will improve air quality. So, the San Diego region doesn't have air quality that meets national standards right now. So, we have to demonstrate how the Plan won't worsen air quality and make it better. We have to coordinate with local government agencies on their land use planning. And then probably the most difficult law requirement to meet is a state one called Senate Bill 375, and that's focused on greenhouse gas emissions, by reducing vehicle-miles travelled. So, we have to show how the Plan will accomplish that by 19% per capita – per person – by 2035. And that's a very difficult thing to do.

7:08 of 14.16

So, you'll notice in the Plan, that a lot of the projects in the earlier parts of the Plan are really focused on providing people with more transportation choices and reducing the greenhouse gas emissions.

Next slide

Reprint from the slide

To get to this point, we've done a lot of outreach.

- More than 2,000 comments online

- More than 8,000 unique visits to the website
- 8 community workshops
- 45 pop-up events by Community Based Organizations
- 7 Board of directors workshops
- 7 workshops with SANDAG Working Groups and Policy Advisory Committees

We have received a lot of comments. We have an on-line tool where people can put comments on a map. And we did in-person workshops. We've done virtual workshops. We've gone out to different groups and made presentations, just the speaker was in some of the unincorporated community planning groups to Valley Center and went to Jamul. We did workshops like that all around the region. We've worked very closely with our Board of Directors to understand their priorities so we could come up with this Draft Regional Plan.

Next slide at 8:10 of 14:16

Feedback themes

We heard a lot. Thousands of thousands of comments. Can't share them all but they generally follow into these categories.

Nobody likes traffic. Everyone wants roads improved. People have a lot of different ideas about how we should do that. Some folks want us to expand roadways. Other folks really don't want us to expand roadways. They want us to provide more transit and other transportation options.

Speaking of transit, that's something we hear a lot about. That it needs to be faster, it needs to be more frequent, it needs to go more places. School connections, we hear that you know because there's not school bus service everywhere in the region, that public transit should really go all to all of the schools. Improving rural transportation is something we've heard a lot about. Having more mobility options. Ensuring that roadways in our rural communities are safe.

Micro transit or neighborhood shuttles is something that has become very popular, and we're getting a lot of requests for. We also hear a lot about making walking and biking safer and having better infrastructure for communities to walk and bike in safely.

9:14 of 14:26

OK, now the maps.

So, you're not going to make any sense out of this map. This is a screenshot of an online mapping tool that you can use. You can click on any dot or line or blob on the map and get a lot of information about the project. But essentially, there's improvements for all our major roadways and our major state routes. The rural communities were really focused on safety and making sure that our intersections are improved and curbs are straightened and shoulders are widened, so that our roadways are safer for our communities.

We also have a lot of community shuttle services. So those sort of yellow blobs that you see all around on the map are areas where we're proposing circulators and community shuttle services. We have a lot of transit services in the plan. Especially for long-distance commutes. So, we have a new transit line from Temecula, down to Escondido and San Marcos. One on the 67 which we just started planning as well. And 35 total in the Plan; bus rapid transit routes.

Next slide. 10:24 of 14:16

We can go to the next slide. It will highlight some of the projects; actually, first policies and programs.

So, like I mentioned, the Plan isn't just projects, and since the things you don't see on the map are programs like our youth opportunity pass program, which provides, you know, free transit to youth 18 and under. Our vanpool program that helps long-distance commuters that don't have good access to transit. Our habit programs that I mentioned earlier. And even digital infrastructure. We're working with partners trying to expand broadband infrastructure into communities that don't have good access today. So those are just some examples.

Next slide 10:58 of 14:16

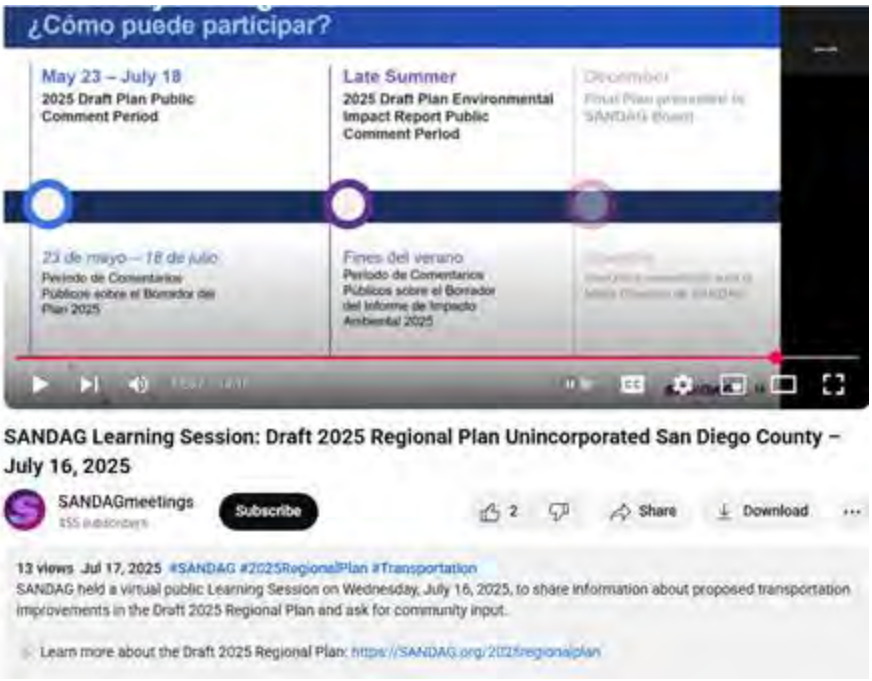
Okay, now we'll dig into a handful of projects. Obviously, not everything but we'll make sure you have access to that mapping tool so you can explore the projects after this meeting and then of course you'll have plenty of opportunity to talk to staff about projects in just a few minutes.

Ok, highway improvements I mentioned are really focused on safety, so curb straightening, shoulder widening, intersection improvements on a lot of the rural state routes – 76, 79, 67 and 94, a connector at highway 94 and highway 125, interchange improvement on the I-8 at Willows Road, and expansion of the managed lane on the I-15 from Highway 78 to the county line.

Next slide at 11:49 of 14:16

In terms of transit improvements, there are, I mentioned 35 rapid routes. Six of those routes touch unincorporated communities from (Ramona to Lemon Grove). The neighborhood shuttles service areas, there are 6 that are proposed in unincorporated areas. And so on.

12:52 of 14:16



.....

Ultimately, we need our Board to adopt the final Plan in December. So, once the public comment period closes this Friday, we'll be working on making any changes that we need to make to the Plan so that we can bring a final version of it back to our Board in December.

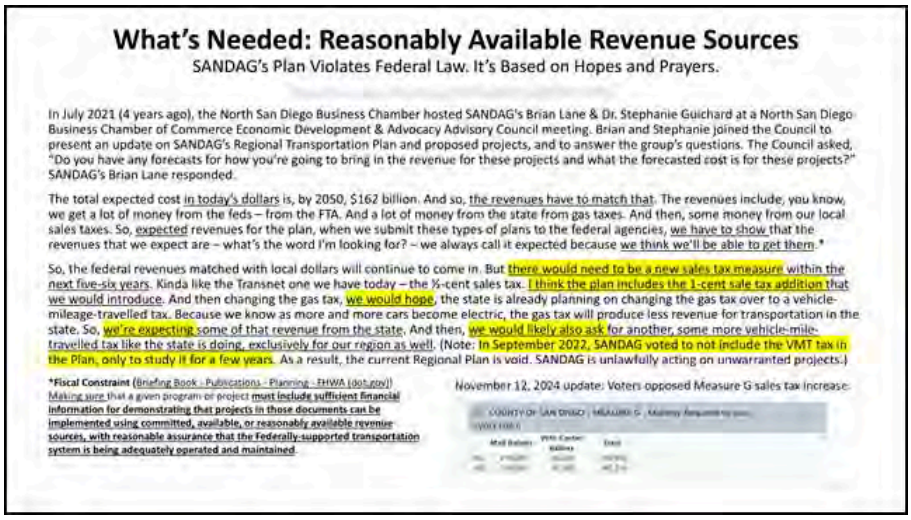
Reaction to the presentation by SANDAG staff and co-presenters.

The underlying issue of concern with the presentation is that it feels like a "spoon-fed" sales job to get people to buy into a plan that is required by the federal government and responds to mandates and regulations that are not necessarily in the best interests of people and businesses in the county or in California.

Despite the input from the community that is mandated to be sought by the regulations, it appears more like "we checked the box" evidence that the will of the people has been considered. That's far from the truth based upon the evidence of public support and the mandate evidenced in the 2008 Proposition 1A vote by 17 million Californians (74%) and 1.5 million San Diegans (71%) who voted yes or did not oppose enactment of the high-speed train Bond Act.

Further evidence is provided below that reveals SANDAG is ignoring the law and risks that threaten the 2025-2029 Regional Plan will not pass required regulatory checkpoints. The action by the Trump Administration to cancel a federal funding agreement for California's high-speed train, on the very same day of the ZOOM meeting, is a sign of what may be coming.

If Trump is looking for an excuse to make life even more difficult for California, here is some evidence from the Wolford-Chalekian Brief to support this fear and possible outcome.



What's Needed: Reasonably Available Revenue Sources

SANDAG's Plan Violates Federal Law. It's Based on Hopes and Prayers.

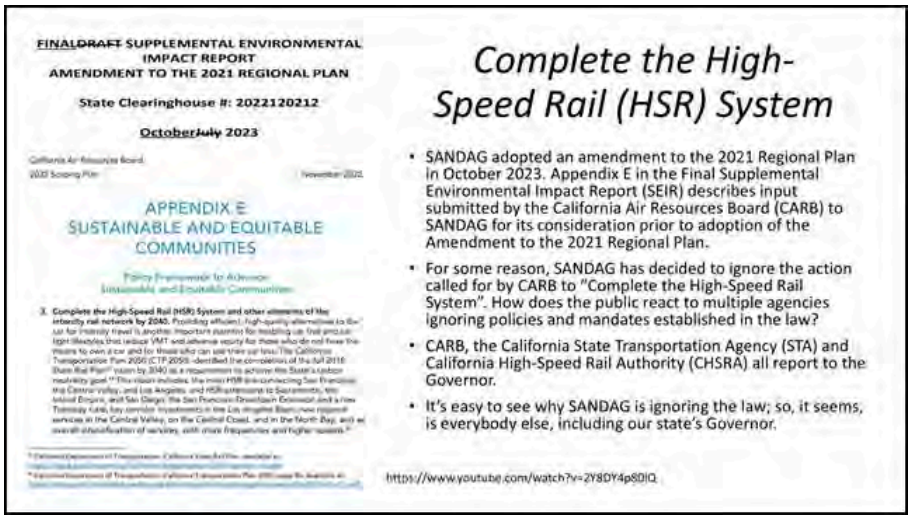
In July 2021 (4 years ago), the North San Diego Business Chamber hosted SANDAG's Brian Lane & Dr. Stephanie Guichard at a North San Diego Business Chamber of Commerce Economic Development & Advocacy Advisory Council meeting. Brian and Stephanie joined the Council to present an update on SANDAG's Regional Transportation Plan and proposed projects, and to answer the group's questions. The Council asked, "Do you have any forecasts for how you're going to bring in the revenue for these projects and what the forecasted cost is for these projects?" SANDAG's Brian Lane responded.

The total expected cost in today's dollars is, by 2050, $162 billion. And so, the revenues have to match that. The revenues include, you know, we get a lot of money from the feds – from the FTA. And a lot of money from the state from gas taxes. And then, some money from our local sales taxes. So, expected revenues for the plan, when we submit these types of plans to the federal agencies, we have to show that the revenues that we expect are – what's the word I'm looking for? – we always call it expected because we think we'll be able to get them.*

So, the federal revenues matched with local dollars will continue to come in. But there would need to be a new sales tax measure within the next five-six years. Kinda like the Transnet one we have today – the ½-cent sales tax. I think the plan includes the 1-cent sale tax addition that we would introduce. And then changing the gas tax, we would hope, the state is already planning on changing the gas tax over to a vehicle-mileage-travelled tax. Because we know as more and more cars become electric, the gas tax will produce less revenue for transportation in the state. So, we're expecting some of that revenue from the state. And then, we would likely also ask for another, some more vehicle-mile-travelled tax like the state is doing, exclusively for our region as well. (Note: In September 2022, SANDAG voted to not include the VMT tax in the Plan, only to study it for a few years. As a result, the current Regional Plan is void. SANDAG is unlawfully acting on unwarranted projects.)

*Fiscal Constraint (Briefing Book - Publications - Planning - FHWA (dot.gov)) Making sure that a given program or project must include sufficient financial information for demonstrating that projects in those documents can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the Federally-supported transportation system is being adequately operated and maintained.

November 12, 2024 update: Voters opposed Measure G sales tax increase.



FINAL~~DRAFT~~ SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
AMENDMENT TO THE 2021 REGIONAL PLAN

State Clearinghouse #: 2022120212

~~October~~July 2023

APPENDIX E
SUSTAINABLE AND EQUITABLE COMMUNITIES

Complete the High-Speed Rail (HSR) System

- SANDAG adopted an amendment to the 2021 Regional Plan in October 2023. Appendix E in the Final Supplemental Environmental Impact Report (SEIR) describes input submitted by the California Air Resources Board (CARB) to SANDAG for its consideration prior to adoption of the Amendment to the 2021 Regional Plan.
- For some reason, SANDAG has decided to ignore the action called for by CARB to "Complete the High-Speed Rail System". How does the public react to multiple agencies ignoring policies and mandates established in the law?
- CARB, the California State Transportation Agency (STA) and California High-Speed Rail Authority (CHSRA) all report to the Governor.
- It's easy to see why SANDAG is ignoring the law; so, it seems, is everybody else, including our state's Governor.

https://www.youtube.com/watch?v=2Y8DY4p8DIQ

SANDAG's Draft Regional Plan asserts that California's High-Speed Train is being funded by the California High Speed Rail Authority. In fact, the law requires local funding contributions to the project, as well as land use and zoning adjustments that create sufficient population growth and corridor density to generate the ridership and revenue needed for a financially-viable project. These requirements began on or soon after the Bond Act was approved. In a similar situation at SCAG, failure to comply with federal requirements threatened all federal transportation funding for the SCAG region.

These requirements and potential consequences are not discussed in the Draft Plan, and while the ZOOM session highlighted highway projects and transit projects, there was no slide and no mention of the high-speed train project or of the local funding and land use changes that are required to be implemented. The thinking that this project is an Authority project is misconstrued. This project is a San Diego project and part of a California project.

The public input process also suffers from lack of county-wide discussion of the issues of major concern to San Diegans. The ZOOM meeting "for Unincorporated San Diego County" did not reveal the disparity in the magnitude of taxpayer investments along the coastal corridor and the northern and eastern county communities. These investments result in a massive redistribution of wealth from taxpayers throughout the county to those already more-wealthy along the coastal cities identified in the table below.

Regional Rail 398	Oceanside to Downtown San Diego (Double tracking, bridge replacements, realignment in Del Mar, new platform at Fairgrounds). For Del Mar realignment, see sandag.org/LOSSAN for information about alignments being studied.	Regional Rail	by 2035	$4,324	Carlsbad, Del Mar, Encinitas, Oceanside, City of San Diego, Solana Beach
Airport Transit Connection	Airport to Downtown	Airport Connection	by 2035	$3,186	City of San Diego

Note: costs are in millions of dollars

The improved access and wealth these investments create are being denied to current and future residents in northern and eastern parts of the county and to the tribal nations. It is imperative that SANDAG re-imagine the growth plan to reflect the mandate for high-speed train corridor development and improved access that does not totally rely on autos for mobility. The Draft Plan reveals that it will result in a miniscule increase in transit availability and use, while increasing vehicle-miles travelled. The cost and benefit impacts for all residents are not being fully revealed in the Draft Plan and were not discussed in the ZOOM session.

Of particular concern is the message regarding collection of data and the assumptions that form the basis of the recommendations that result therefrom.

But we all start it by collecting a lot of travel data, updating our population growth forecast so that the Plan is correct. We also work with our partner agencies – the cities, the county – to make sure their plans and assumptions are considered as we put together the Regional Plan as well.

If we assume the high-speed train is not considered in the Plan, which is clearly the case, then outcomes will be drastically different compared to when the train is considered and included in the Plan. I believe this is a fatal flaw and invalidates the Draft Plan for consideration by the Board and the public.

Due to the limited time to review the available information, and the silo strategy employed in the public participation scheme, it is highly likely that few of the county's residents fully understand tthe implications of what SANDAG has put forward at this time.

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From Dev Gupta <noreply@adv.actionnetwork.org>
Date Thu 7/17/2025 2:24 PM
To RegionalPlan <RegionalPlan@sandag.org>

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Regional Plan Team Regional Plan,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

The future of transportation in this region must prioritize access, safety, and sustainability. That means rejecting highway expansions—including managed lanes—and fully funding a transit system that is frequent, reliable, and equitable.

The 10 demands outlined by the People's Platform of San Diego offer a clear path forward. These are actionable, data-backed policies that would deliver real improvements in transit access, emissions reduction, and public health:

7½-minute trolley frequencies system-wide by 2029

10-minute peak / 15-minute weekend service on the ten highest-ridership bus routes

Clock-face scheduling for COASTER and SPRINTER, with full vehicle and infrastructure upgrades

Countywide all-door boarding on every MTS and NCTD bus

A rebuilt PRONTO system with tap-to-pay and student pass access by 2026

Permanent funding for Youth Opportunity Passes beyond 2026

Transit Signal Priority at over 250 intersections in high-ridership, equity-focused corridors

100 miles of protected, camera-enforced bus-only lanes on key corridors

A unified countywide bike-share system with 7,000 bikes and 500 stations

A public, real-time transit accountability dashboard by 2026

These demands are not radical. They are baseline requirements for any region that claims to care about climate action, racial justice, and livability. They are grounded in feasibility, performance metrics, and a vision for transit that puts people first.

San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Dev Gupta
devguptapb@gmail.com
[redacted]

Outlook

Comments on SANDAG Draft 2025 Regional Plan

From Doris Nguyen <dorisynguyen@gmail.com>
Date Thu 7/17/2025 3:27 PM
To RegionalPlan <RegionalPlan@sandag.org>
Cc Doris Nguyen <dorisynguyen@gmail.com>

You don't often get email from dorisynguyen@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

My name is Doris Nguyen and I am a County resident. The 2025 Regional Plan should not have ANY expansion of freeways (managed lanes included). Study after study indicates that **when you add freeway lanes you INDUCE demand.** That means you may get a temporary respite on traffic but then everyone eyes new lanes and decides to hop into their cars for more trips or less uses of public transportation,

WE ARE STILL IN A CLIMATE EMERGENCY!

Also we need to spend more on developing more public transportation. This helps workers and employers. We would take many cars off the road if the purple line was developed NOW rather than kicking the can down the road.

Thank you for your consideration.

Doris Yen H. Nguyen
[redacted]

Outlook

Adopt the 10 Demands for a Just, Transit-First Regional Plan

From Victoria Olivares <noreply@adv.actionnetwork.org>
Date Thu 7/17/2025 9:29 PM
To RegionalPlan <RegionalPlan@sandag.org>

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Regional Plan Team Regional Plan,

The 2025 Regional Plan must reflect the urgency of San Diego's overlapping climate, mobility, and equity crises. A plan that continues to fund freeway expansions while underinvesting in public transit, walkability, and bike infrastructure is a plan that ignores the needs of the people it is supposed to serve.

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San Diego cannot afford another four years of delay, half-measures, or investments that further lock in car-dependence. Adopt the 10 demands and build the system this region needs.

Victoria Olivares
victoria.carmina.olivares@gmail.com
[redacted]
[redacted]

Outlook

Please Help....

From Mark Maydahl <markmaydahl@gmail.com>
Date Thu 7/17/2025 6:22 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from markmaydahl@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

DAG has classified incorrectly! WE ARE BEGGING YOU!!! PLEASE LISTEN.

Please remove the Shelter Island area from the SANDAG mobility/transportation plan it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
2. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents.
3. This area of the bus line **cannot accommodate a dedicated bus lane (see photo below)**. Route 28 or 228 will never become a Next Gen Rapid Route in this area.
4. The peak traffic hours are completely congested and will not allow a bus to pass even with a **transit signal priority.**
5. The bus route runs every 30-60 minutes with minimal passengers. You **cannot justify increasing service hours for high-frequency service** or intervals. MTS has a deficit and this area is at the bottom of their priority list
6. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. **Bike lanes will not be added to mobility zone 4** - this area.
7. There are no **major activity centers** in this area. The closest one is Pechanga Arena on Sports arena 3.3 miles away.
8. There is **no room to add upgraded stations** in this area.
9. There is no way to **limit the stops** this route already has.
10. There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.

11. The closest major hub is 3.2 miles away in Old Town.
12. The closest pharmacy is 1.7 miles away.
13. The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA.....

1. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the **devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals:**
    a. More cars, not less,
    b. More congestion, not less,
    c. More greenhouse gases, not less
    d. More parking problems, not less
    e. More health and safety issues, not less
    f. More evacuation issues, not less
    g. Increase vehicles miles traveled (VMT), not reduce it
    h. Decrease San Diegans' quality of life, not improve it
    i. Decrease access to resources and opportunities to improve the quality of life, not add to it
    j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure **(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
    k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the Transportation Plan. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

Outlook

Comment: SANDAG mobility/regional transportation plan

From Megan Bryan <megan@meganbryan.com>
Date Thu 7/17/2025 6:42 PM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from megan@meganbryan.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

From: Megan Bryan <megan@meganbryan.com>
Date: July 17, 2025 at 6:13:59 PM PDT
To: regionplan@sandag.org
Subject: Comment: SANDAG mobility/transportation

Subject: Re: CORRECTION, PLEASE!! Shelter Island/LaPlaya/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs Area of Point Loma SANDAG has classified incorrectly! WE ARE BEGGING YOU!!! PLEASE LISTEN.

Please remove the Shelter Island area from the SANDAG mobility/transportation plan it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
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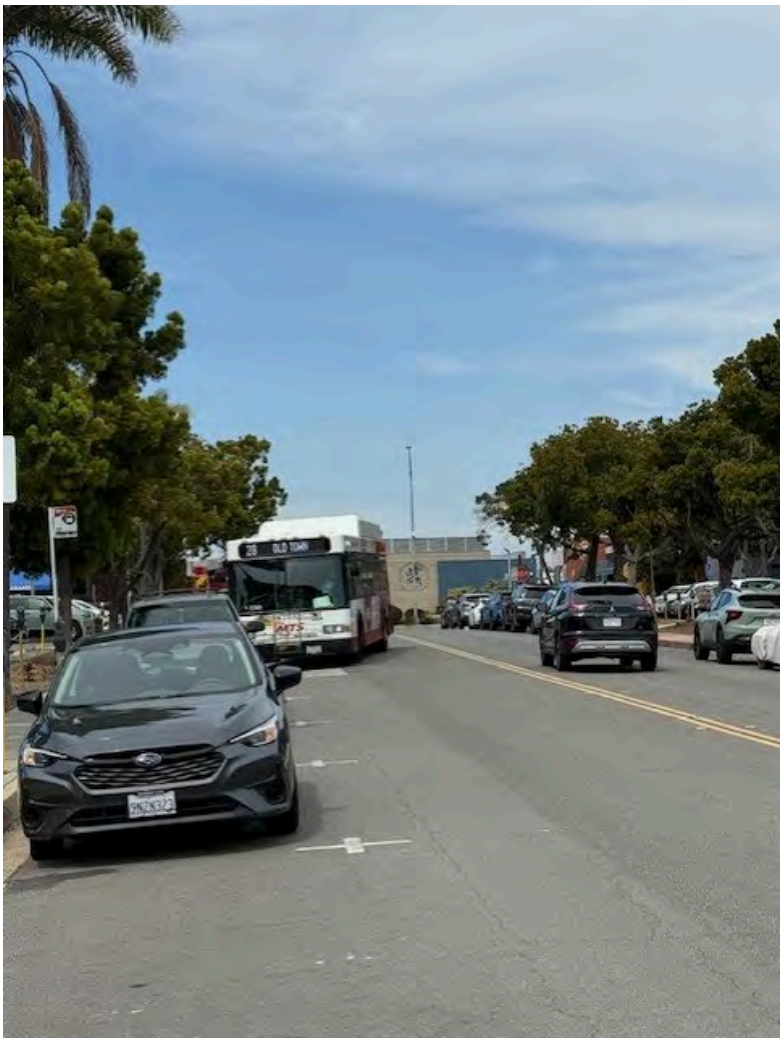
j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure **(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the Transportation Plan. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

This is the end if the line for route 28. Next Rapid Transit "Planned" for 2035 is not realistic. There is no way to add dedicated lanes, or in this area as you can see by the photo.. Most of this area is two lane roads. This includes the Navy Submarine base major ingress and egress from the point. 12,000-22,000 people occupy this area daily. It is located in a Very High Fire Hazard Safety Zone. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.


28
OLD TOWN
MTS

Megan Bryan Studio: Interiors Inc.

[redacted]

@MEGANBRYANSTUDIO

Outlook

Sandag regional planning : Point Loma/Shelter Island

From Deborah Allen <dede3284@gmail.com>
Date Fri 7/18/2025 1:14 AM
To RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from dede3284@gmail.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Please remove the Shelter Island area from the SANDAG mobility/transportation plan it is classified incorrectly. Point Loma is a Peninsula Surrounded by Water on three sides. This is why the designation needs to change as it cannot meet the necessary criteria now or in 2035-2050:

1. Point Loma is a peninsula surrounded by water on three sides.
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3. This area of the bus line **cannot accommodate a dedicated bus lane (see photo below)**. Route 28 or 228 will never become a Next Gen Rapid Route in this area.
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11. The closest major hub is 3.2 miles away in Old Town.
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Implications of this area remaining a TPA/SDA.....

1. More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the**devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions and the City's goals:**
    a. More cars, not less,
    b. More congestion, not less,
    c. More greenhouse gases, not less
    d. More parking problems, not less
    e. More health and safety issues, not less
    f. More evacuation issues, not less
    g. Increase vehicles miles traveled (VMT), not reduce it
    h. Decrease San Diegans' quality of life, not improve it
    i. Decrease access to resources and opportunities to improve the quality of life, not add to it
    j. It does NOT shape a future that works for all with housing, mobility, parks and infrastructure **(that will NOT actually happen NOW or in 2035)** nor will it create a thriving neighborhood.
    k. You will cause small businesses to go out of business because there will be no parking

San Diego housing relies on your data and classification to allow upzoning and densification in already congested areas without any infrastructure funded or likely to actually happen in the future (2035) just because it says **"planned".** The state of California is following suit with SB79. **The impact of the words "planned" is devastating** to our community. We are not against building as long as it is reasonable and to current zoning with discretionary approval, not ministerial.

When the infrastructure is actually in place, or funded, put us back in the Transportation Plan. Until then, all you will do is devastate a community with building and no infrastructure to support it. This is not a one size fits all, Point Loma is a unique area.

Thank you for taking your time to read this email.

Deborah Tharp Allen (Dede)
[redacted]

Outlook

SANDAG Mobility Study - Point Loma comments

From Kirk Jackson <KJACKSON@jacksonandblanc.com>
Date Fri 7/18/2025 9:23 AM
To RegionalPlan <RegionalPlan@sandag.org>

1 attachment (18 KB)
SANDAG mobility study.docx;

You don't often get email from kjackson@jacksonandblanc.com. Learn why this is important

CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

Kirk Jackson
CEO
www.jacksonandblanc.com
[redacted]
kjackson@jacksonandblanc.com

What is your comment on transit?

The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is the Navy Submarine Base, located in a very High Fire Hazard Safety Zone. The major ingress and egress for 12,000-22,000 people are Rosecrans' two-way street. If a fire breaks out there will be horrific evacuation issues for base personnel and local residents. This area of the bus line cannot accommodate a dedicated bus lane. Route 28 or 228 will never become a Next Gen Rapid Route in this area. The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority. There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away. There is no room to add upgraded stations in this area.

Implications of this area remains a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG’s goals:

More cars, not less,
More congestion, not less,
More greenhouse gases, not less
More parking problems, not less
More health and safety issues, not less
More evacuation issues, not less
Increase vehicles miles traveled (VMT), not reduce it
Decrease San Diegans' quality of life, not improve it
Decrease access to resources and opportunities to improve the quality of life, not add to it.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking.

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on bikeways and walkways?

The Shelter Island area of Point Loma must be taken off of the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area per Complete Communities. This two lane road area will be extremely dangerous to share with bikes, cars and buses.

Implications of this area remains a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
More congestion, not less,
More greenhouse gases, not less
More parking problems, not less
More health and safety issues, not less
More evacuation issues, not less
Increase vehicles miles traveled (VMT), not reduce it
Decrease San Diegans' quality of life, not improve it
Decrease access to resources and opportunities to improve the quality of life, not add to it

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on transportation technology?

The Shelter Island area of Point Loma bus line cannot accommodate a dedicated bus lane a most streets are two lanes. Route 28 or 228 will never become a Next Gen Rapid Route in this area.

The peak traffic hours are completely congested and will not allow a bus to pass even with a transit signal priority.

The bus route runs every 30-60 minutes with minimal passengers. You cannot justify increasing service hours for high-frequency service or intervals. MTS has a deficit and this area is at the bottom of their priority list

This area is in mobility zone 4, per Complete Communities website you would need to build 27 miles of bike lane in mobility zone 4 to equal 1 mile of VMT reduction in mobility zone 3. Bike lanes will not be added to mobility zone 4 - this area.

There are no major activity centers in this area. The closest one is Pechanga Arena on Sports Arena 3.3 miles away.

There is no room to add upgraded stations in this area.
There is no way to limit the stops this route already has.
There is no major route that crosses route 28. Route 84 is a small mini-bus with hourly intervals that does a circle to Cabrillo Monument, with extremely limited ridership.
The closest major hub is 3.2 miles away in Old Town.
The closest pharmacy is 1.7 miles away.
The closest hospital is 5.6 miles away.

Implications of this area remaining a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
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You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on climate, energy, and air quality?

Implications of this area remaining a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
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Increase vehicles miles traveled (VMT), not reduce it
Decreases San Diegans' quality of life, not improve it
Decreases access to resources and opportunities to improve the quality of life, not add to it

It violates the City's CAP goals.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What is your comment on state and federal regulations?

The state requires the reduction of greenhouse gases and vehicle miles traveled. Leaving this area in the Regional Transportation Plan is a violation of the requirements to be met by the State.

Implications of this area remaining a TPA/SDA.....

More development that does not coincide with planned communities which brings the following with no infrastructure in place (even if planned for 2035) the devastation happens NOW and it violates the core value and purpose of Complete Communities Housing Solutions, the City's and SANDAG's goals:

More cars, not less,
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It violates the City's CAP goals.

It does NOT shape a future that works for all with housing, mobility, parks and infrastructure (that will NOT actually happen NOW or in 2035) nor will it create a thriving neighborhood.

You will cause small businesses to go out of business because there will be no parking

This is NOT CONVENIENT, EQUITABLE, HEALTHY OR SAFE FOR ANYONE!!!

What area in the San Diego region is your comment related to?

Entire region

The Shelter Island area of Point Loma must be taken off the Regional Transportation Plan as it fails to meet any of the goals mandated in this study. This is a two-lane area with no room for expansion. The tip of Point Loma in the LaPlaya/Shelter Island/Wooded Area/Roseville-Fleet Ridge/Sunset Cliffs area is surrounded on three sides by water. The tip of the peninsula is home to the Navy Submarine Base.

Outlook

FW: Regional Plan

From Antoinette Meier <antoinette.meier@sandag.org>
Date Fri 7/18/2025 1:35 PM
To RegionalPlan <RegionalPlan@sandag.org>
Cc Tuere Fa'aola <Tuere.Faaola@sandag.org>; Sara Toma Ischep <Sara.Toma.Ischep@sandag.org>

fyi

Antoinette Meier
Senior Director, Regional Planning

619.699.7381 office
1011 Union Street, Suite 400, San Diego, CA 92101

SANDAG | *Pursuing a brighter future for all*

SANDAG office hours are Tuesday – Friday and every other Monday from 8 a.m. – 5 p.m.

From: Mary Davis <sdmary33@yahoo.com>
Sent: Friday, July 18, 2025 1:31 PM
To: Clerk of the Board <clerkoftheboard@sandag.org>; Antoinette Meier <antoinette.meier@sandag.org>
Subject: Regional Plan

You don't often get email from sdmary33@yahoo.com. Learn why this is important
CAUTION: This email originated from outside of SANDAG. Do not click links or open attachments unless you are expecting the content.

I submitted comments for the draft Regional Plan but it did not allow for attachments. (It would also be helpful to have a box to check to send ourselves a copy of our comments).

Please add the info below to the draft Regional Plan feedback.

East County Wishlist
for the SANDAG 2025 Regional Plan

Westbound 8 to Northbound SR-67
& Southbound SR-67 to Eastbound 8

SR-67 Lakeside to Ramona

Southbound SR-125 to Eastbound 94

SR-52 In & Out of Santee

1. Prioritize fire safety and evacuation. More lanes on 67 (and consider a center divide)

2. Add dedicated transition ramps for 67/8.
3. NO to bump-outs, sharrows, and bike lanes that take road lanes.
4. 'Active Transportation' in East County means horses (& livestock).

Outlook

Regional Plan - Feedback

From Gregory Essayan <gpessayan@gmail.com>
Date Fri 7/18/2025 1:48 PM
To RegionalPlan <RegionalPlan@sandag.org>

[You don't often get email from gpessayan@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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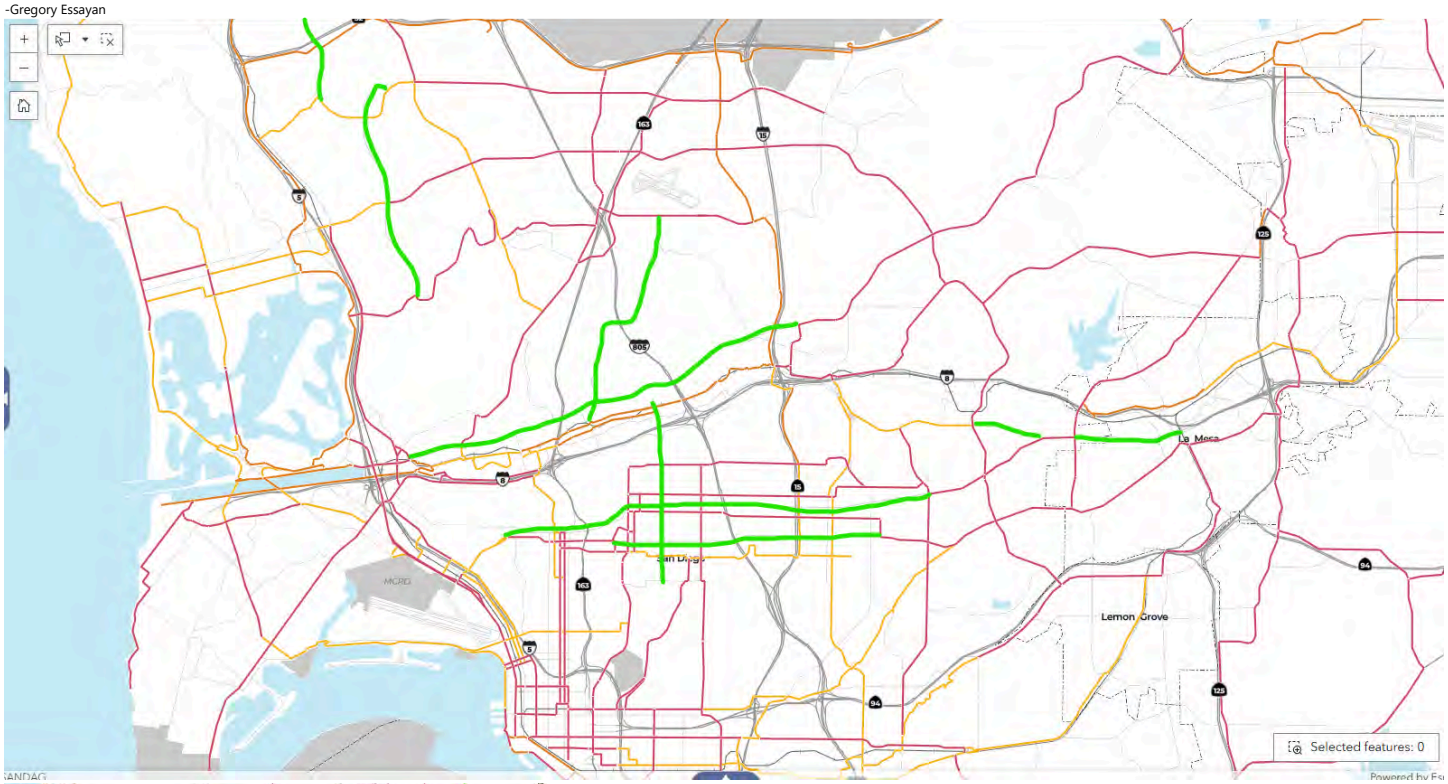
Hi,

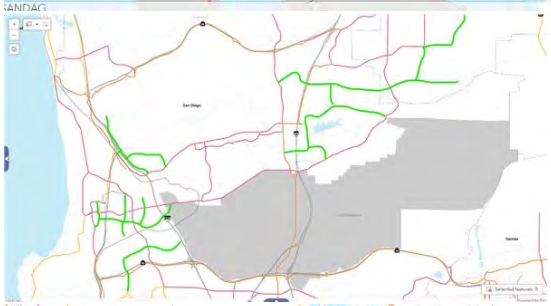
I submitted feedback through the official portal on the regional plan, but I wanted to expand upon my feedback with some quick MS Paint visual aids. Thank you again for collecting this feedback, and apologies for the rushed illustrations.

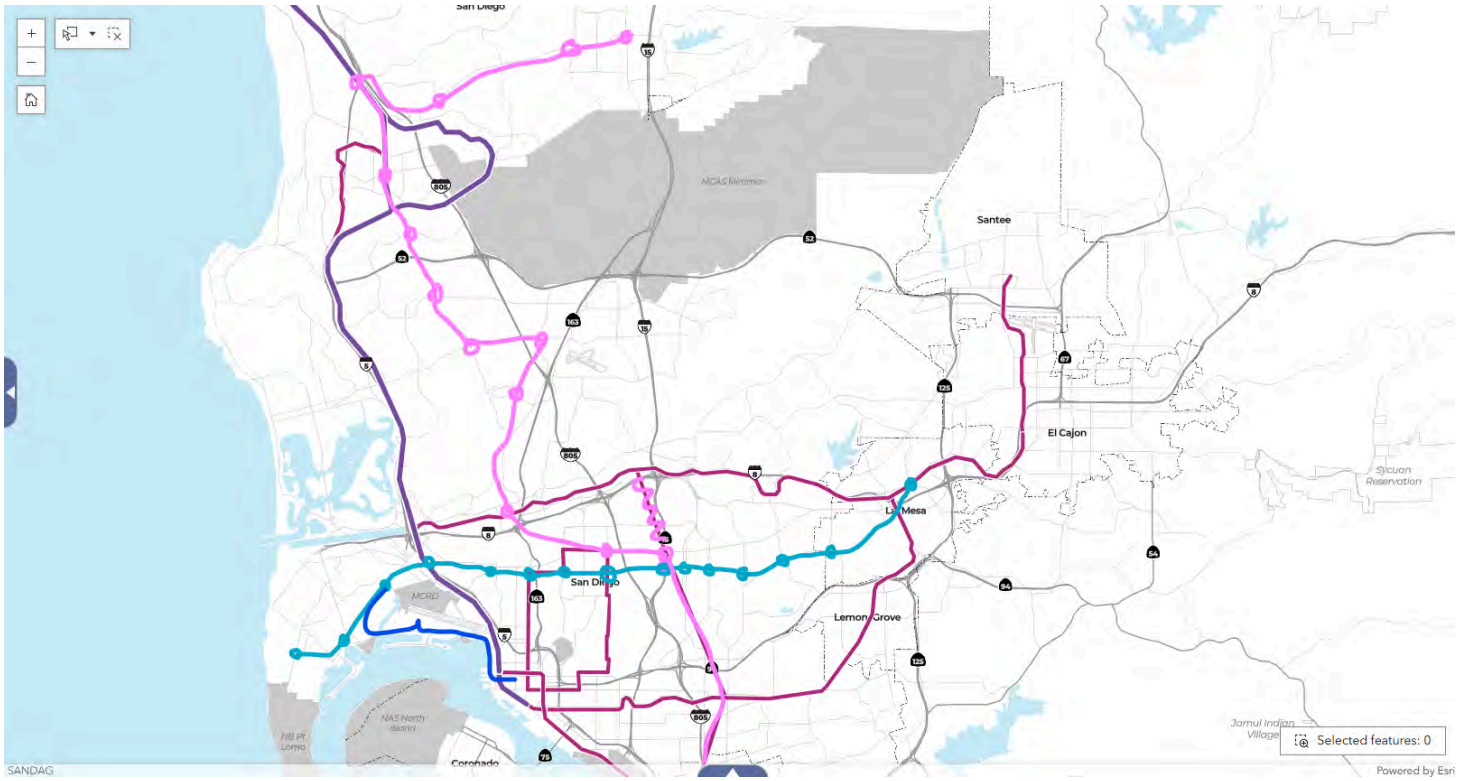
Note: green line images illustrate proposed protected cycle path; last picture illustrates proposed light rail routes.

I'm looking forward to the work SANDAG has planned!

All the best,
-Gregory Essayan







Sent from my iPhone

Outlook

Comments - draft 2025 Regional Plan

From Craig Jones <bananashke@sbcglobal.net>
Date Fri 7/18/2025 3:58 PM
To SANDAG PIO <PIO@sandag.org>; RegionalPlan <RegionalPlan@sandag.org>

You don't often get email from bananashke@sbcglobal.net. Learn why this is important

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Please accept and forward these comments on the draft 2025 Regional Plan. The online Webform does not allow attachments, please accept the following:

1. What projects in the Draft 2025 Regional Plan would you like to leave a comment on? Required

What is your comment on transit? Required(Please try to be succinct: 3,000 characters maximum)

The draft 2025 regional plan/RTP recedes from needed the policies and focus of the 2021 plan by de-emphasizing and de-funding public transportation and neighborhood access, and increasing funding for conventional auto highways and streets. This is detrimental to controlling GHGs and saving the broad environmental value of this region's backcountry. See map exhibit submitted separately by email. [below]

What is your comment on flexible fleets? Required(Please try to be succinct: 3,000 characters maximum)

More funding for the key piece of neighborhood transportation access is vital to making public transportation competitive to the private car. Such funding is necessary in the near term rather than the long term.

What is your comment on bikeways and walkways? Required(Please try to be succinct: 3,000 characters maximum)

More funding for the key piece of neighborhood transportation access is vital to making public transportation competitive to the private car. Such funding is necessary in the near term rather than the long term.

What is your comment on highways and local roadways? Required(Please try to be succinct: 3,000 characters maximum)

The draft 2025 regional plan/RTP recedes from needed the policies and focus of the 2021 plan by de-emphasizing and de-funding public transportation and neighborhood access, and increasing funding for conventional auto highways and streets. This is detrimental to controlling GHGs and saving the broad environmental value of this region's backcountry. See map exhibit submitted separately by email. [below]

2. What other parts of the plan would you like to comment on? Required

What is your comment on housing and land use? Required(Please try to be succinct: 3,000 characters maximum)

The draft 2025 regional plan/RTP pulls back from the 2021 plan by eliminating the mobility hub areas and related policies to concentrate needed regional development in these efficient already-urbanized areas. This pull-back will encourage regional sprawl and endanger the ability to reduce GHGs as well as increase inequity in housing, access to services, etc. in our already-historically underserved communities. SANDAG should fully encorporate the Regional Decarbonization Framework as a foundation for the 2025 plan. See map submitted separately by email [below]

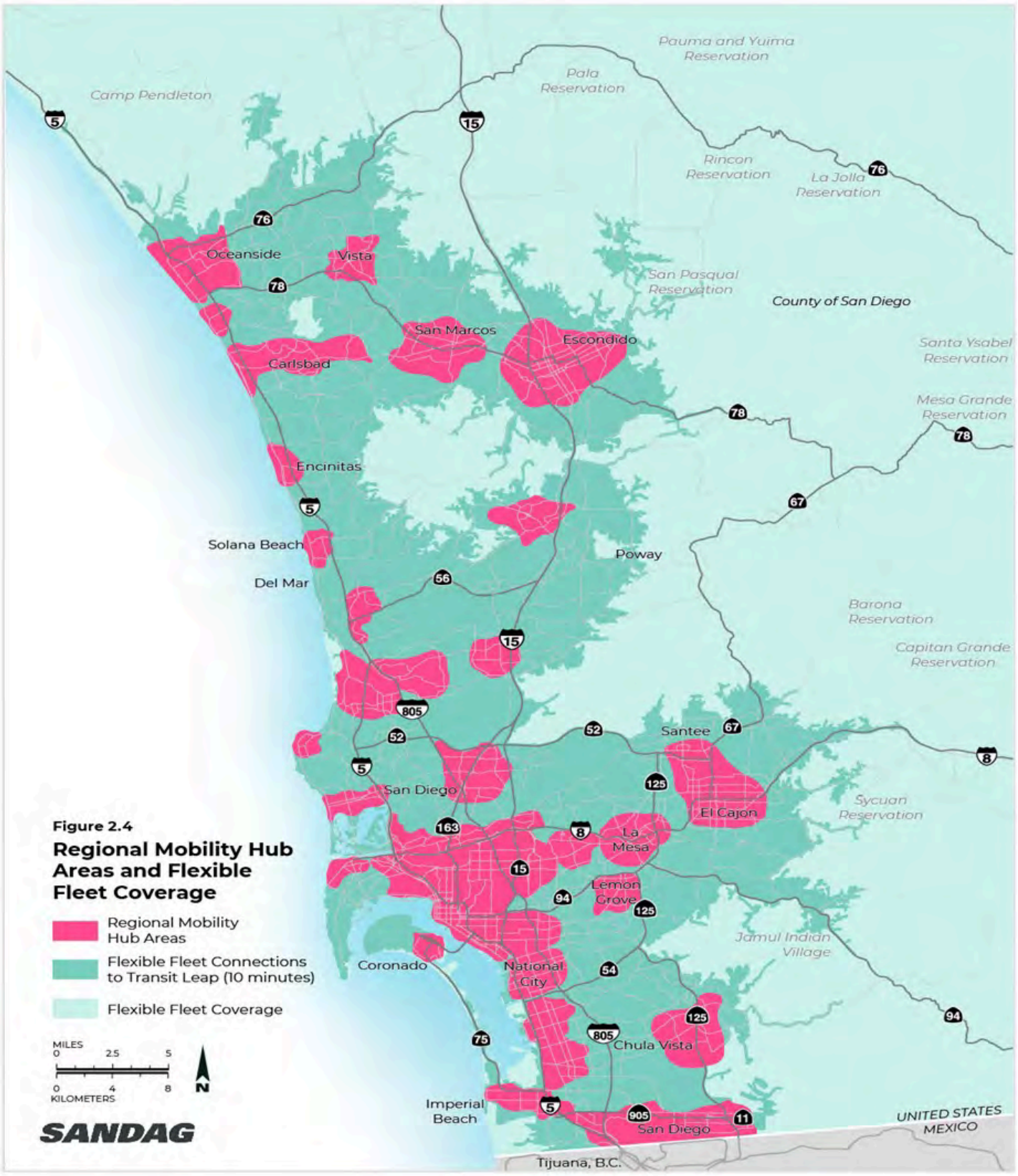
What is your comment on climate, energy, and air quality? Required(Please try to be succinct: 3,000 characters maximum)

See above comments; the result of these pull-backs from the 2021 plan will be to increase climate change GHGs, degrade possible improvements in air quality, and make our region significantly more energy inefficient.

What is your comment on social equity? Required(Please try to be succinct: 3,000 characters maximum)

See above comments. By encouraging more sprawl than the 2021 plan the result of implementing the draft 2025 plan will be to suck available resources away once again from historically disadvantaged communities, increasing inequity.

The below map exhibit is a SANDAG analysis of how the San Diego region would enjoy *10 min. or less access* into the full regional public transportation system, *IF* the 2021 plan were to be fully implemented. The draft 2025 plan would seem to pull back greatly from this potential, to the detriment of underserved communities and the ability to meet desperately needed GHG reductions.



Craig Jones
[redacted]
bananashke@sbcglobal.net

Outlook

Comments From Pete Penseyres

From Pete Penseyres <cyclovet11@yahoo.com>
Date Fri 7/18/2025 11:57 PM
To RegionalPlan <regionalplan@sandag.org>

4 attachments (2 MB)

Oceanside Bike and Ped Ltr on 2025 Draft Regional Plan 7-18-25.pdf; Dixon-FHWA study critique v0.91-DRAFT.pdf; Calle Barcelona Class II and Class I and IV Bike facilities.jpg; Calle Barcelona Safe Routes to School.jpg;

You don't often get email from cyclovet11@yahoo.com. Learn why this is important

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I still have almost an hour to submit my comments.
1. Oceanside has provided a list of projects that rely almost completely on Class I off-road facilities that virtually all cyclists prefer. Please prioritize those projects. I was Co-Chair of the Oceanside Bike Ped Committee with Howard LaGrange before moving to Carlsbad. I agree with Tom Lichterman's comments sent to you earlier. A copy is attached.
2. When Carlsbad developed its Mobility Plan, the City rejected the consultant recommendation to turn more than 60 miles of Class II Bike Lanes into Class IV Cycletracks with plastic bollards. Instead, the City has created buffered Class II Bike Lanes on east-west roads that remain straight when new Right-Turn-Only Lanes are added. La Costa WB, Poinsettia EB and Cannon WB all use this feature to provide clear Right Of Way at intersections. Please support the Carlsbad preference for wider buffered Class II Bike Lanes and off-road completely separated Class I facilities.
3. There is a "model" Class I and IV safe routes to school facility on Calle Barcelona built in the year 2000. It includes a separate Class I overpass partway between El Camino Real and Rancho Santa Fe. It also includes Class II Bike Lanes on both sides of the road. Please refer to Google Earth to see this facility that precedes the Class IV Bikeway designation.
4. I agree with the attached studies that have cast doubt on the safety of Class IV facilities.

Pete Penseyres
League of American Bicyclists Certified Instructor #2020
Carlsbad Traffic Safety and Mobility Commissioner
Former Oceanside Transportation Commissioner

City of Oceanside Bicycle and Pedestrian Committee
BikeWalk Oceanside
Phone: 619-200-6133 • E-Mail: lichtermanti@gmail.com

July 18, 2025

Board of Directors
Regional Planning Staff
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, CA 92101

Subject: Comments on Draft 2025 SANDAG Regional Plan

Dear SANDAG Board and Staff,

The Oceanside Bicycle and Pedestrian Committee is a citizen's advisory committee whose role is to advise the City on programs, projects, and policies which improve bicycling and walking in the community. The Committee's membership includes over 90 Oceanside residents who are concerned about bicycling and walking infrastructure and opportunities. Our goals are to promote bicycling and walking in the community for health, recreation, and transportation, to promote bicycle and pedestrian safety, and to improve and increase bicycling and pedestrian facilities.

The Committee has reviewed the Draft Regional Plan's Appendix A, Table A.1, North County Subregion Projects, with regard to Active Transportation. The Committee strongly supports the Oceanside- and Oceanside-area projects from the Plan listed in the table on the next page. All of these projects support Committee goals of improvements to major bikeways and improving cycling and walking infrastructure and inter-community connections.

The Committee would like to make the following comments on each of these projects:

AT019, Coastal Rail Trail Oceanside (Oceanside Blvd. to Cassidy)
The Coastal Rail Trail, along with the Inland Rail Trail, are our Committee's highest priority projects for improvement and completion. Please note that the City has recently completed a specific alignment study for this segment of the Coastal Rail Trail, and requests that SANDAG work with City staff to ensure the Community's preferred alignment is developed for this project.

AT036, Inland Rail Trail (Melrose to the coast)

The Inland Rail Trail, along with the Coastal Rail Trail, are our Committee's highest priority projects for improvement and completion. In particular, the Inland Rail Trail project has been on the books since 1995, when the five communities along the corridor agreed by Memorandum of Understanding . . .

> *. . . to create a multi-modal transportation facility which will help these communities achieve a higher quality of life by promoting alternative transportation opportunities, reducing automobile trips, improving air quality, reducing congestion, providing recreational opportunities, and increasing access to desired North County destinations.*[1]

It should be noted that completion of the Inland Rail Trail will have been on the books for **40 years** if SANDAG's current projected Phase Year of 2035 is met. This is a long time for the communities on the corridor to wait for a bike trail project to be completed. We respectfully request that SANDAG work to expedite this project. The City is just now completing studies for the preferred alignment for the IRT in Oceanside and we trust that SANDAG will use that preferred alignment in advancing this important project.

Project ID	Phase Yr	Project Category	Project Name	Project Descript.	Project Limits	Cost ($2024) Millions
AT019	2035	Active Transport. Off-Street Bikeway	Coastal Rail Trail Oceanside	Early Action Program (Tier 2), Local Bike Plan	O'side Blvd. to Cassidy	$6
AT036	2035	Active Transport. Off-Street Bikeway	Inland Rail Trail: Vista to Oceanside	Early Action Program (Tier 2), Regional Bike Plan, Safety Focus Network	Melrose to the Coast	$98
AT082	2050	Active Transp. On-Street and Off-Street Bikeway	San Luis Rey River Trail	Regional Bike Plan, Upgrade Existing Bikeway	Santa Fe to I-15	$95
AT091	2050	Active Transp. On-Street and Off-Street Bikeway	Camp Pendleton Trail	Regional Bike Plan, Safety Focus Network, Upgrade Existing Bikeway	Oceanside to San Clemente	$135
AT108	2050	Active Transp. On-Street Bikeway	Coastal Rail Trail Segment 1 ALT	Local Bike Plan, Safety Focus Network, Upgrade Existing Bikeway	North end of current trail to Tyson	$7
AT153	2050	Active Transp. On-Street Bikeway	San Luis Rey River to Coast	Safety Focus Network, Systemic Safety Network, Upgrade Existing Bikeway	Douglas to the Coast	$35

[1] Memorandum of Understanding between the North San Diego County Transit Development Board and the City of San Marcos, City of Escondido, City of Oceanside, City of Vista, and San Diego County, February 16, 1995.

AT082, San Luis Rey River Trail (N. Santa Fe to I-15)
This project would extend the current, heavily used San Luis Rey River Trail from its terminus near N. Santa Fe and Highway 76, out to I-15. This long-term project would provide a needed safe alternative for cyclists and pedestrians to use vs. the current bike lanes on Highway 76, where highway traffic speeds reach 65 mph or more.

AT091, Camp Pendleton Trail (Oceanside to San Clemente)
This project would provide a viable alternative for cyclists and pedestrians on the west side of Interstate 5. Currently, cyclists must use either the shoulder of I-5 between Oceanside and Las Pulgas, or internal base roads for this segment, if they have a valid Base Pass. The Base has also been known to stop issuing Base Passes on occasion. Providing this project would create a permanent safe and stress-free link between Oceanside and San Clemente for cyclists.

AT108, Coastal Rail Trail Segment 1 ALT (approx. north end of current trail to Tyson)
This project would improve a portion of the Coastal Rail Trail which currently operates partly on local streets where traffic conflicts can occur.

AT153, San Luis Rey River to Coast (Douglas to the Coast)
This project would provide improvements to the heavily-used San Luis Rey River Trail between Douglas and the coast. The current trail has had some erosion issues along the edges and is in need of repaving. City crews try to keep up with the holes that develop between the trail edge and the concrete/rip-rap embankment.

Additional Project Request
In addition to the above projects which our Committee strongly supports, we request that SANDAG work with Caltrans on an additional project which will connect two parts of our community that were separated by I-5. Currently, cyclists in south Oceanside who wish to travel to the Pacific Coast Plaza (Walmart and other major stores) east of I-5 and north of Highway 78 have an extremely difficult and steep route to get there. We have discussed this issue with David Calkins, Caltrans District 11's Complete Streets Program Manager. We proposed that Caltrans study the possibility of using some Caltrans right-of-way between Soto Street and the Highway 78-to-I-5 merge to create a far easier connection to Pacific Coast Plaza. This could be a relatively inexpensive way to re-link two important parts our our Community. We request that SANDAG include this as a future project.

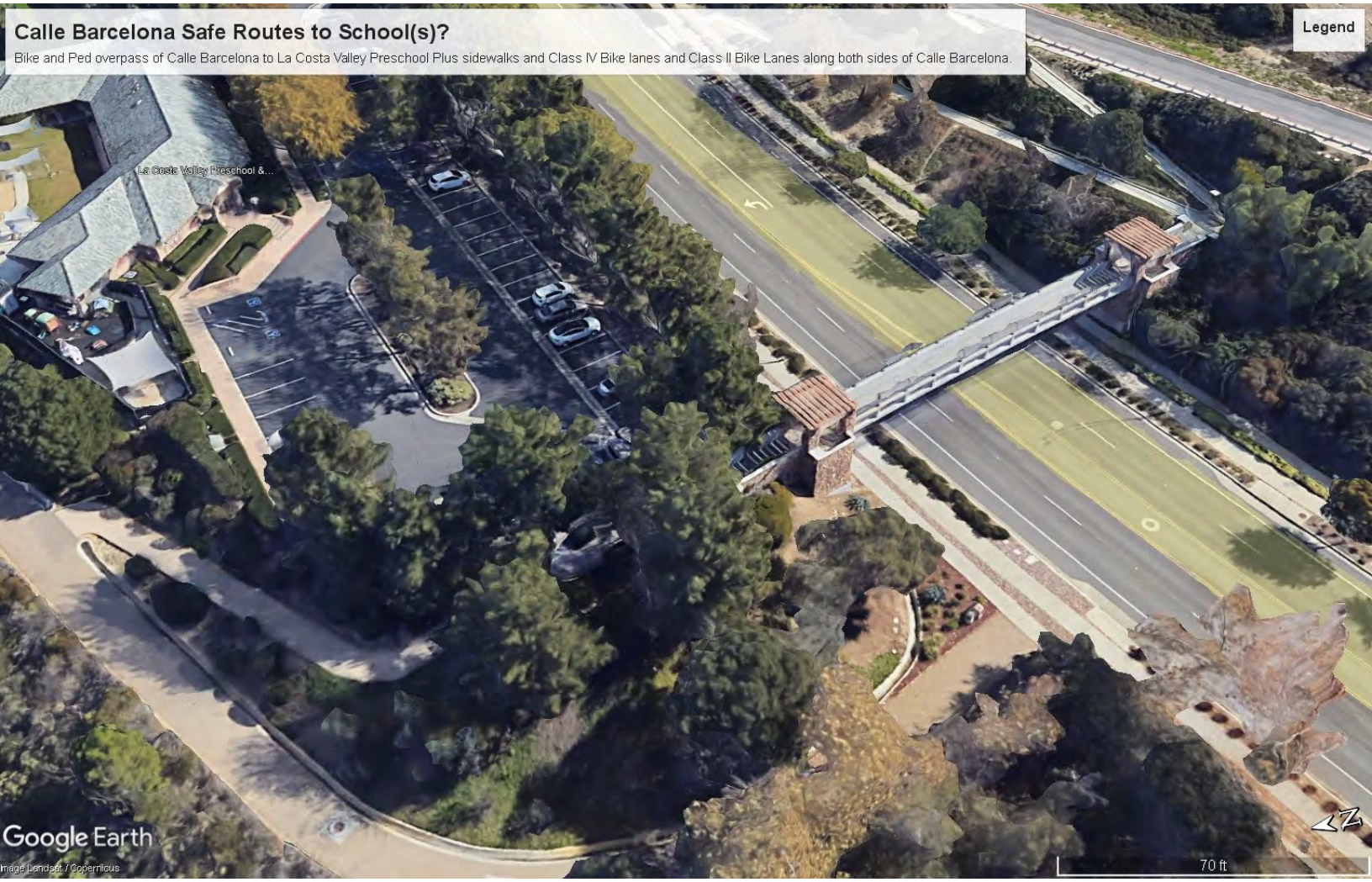
Thank you for your consideration of our comments on the Draft SANDAG Regional Plan.

Sincerely,

Tom Lichterman
Chairman, Oceanside Bicycle and Pedestrian Committee

cc: Oceanside City Council
Oceanside City Manager
Oceanside Bicycle and Pedestrian Committee Members
Teala Cotter, City Traffic Engineer
Kris Martinez, City Active Transportation Coordinator

Calle Barcelona at Paseo Aliso
Class I at intersections and Class IV with adjacent sidewalks between plus Class II Bike Lanes along Calle Barcelona from El Camino Real to RSF (?)
Legend
Paseo Aliso
Paseo Aliso
Google Earth
Image Landsat / Copernicus
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
60 ft


Calle Barcelona Safe Routes to School(s)?
Bike and Ped overpass of Calle Barcelona to La Costa Valley Preschool Plus sidewalks and Class IV Bike lanes and Class II Bike Lanes along both sides of Calle Barcelona.
Legend
La Costa Valley Preschool &...
Google Earth
Image Landsat / Copernicus
70 ft

Unproven separated bicycle lane safety: Overreaching conclusions and marketing

Steven P. Linke, PhD, Carlsbad, CA (splinke.traffic@gmail.com)

A. Introduction/Purpose

In 2023, the Federal Highway Administration (FHWA) published a report on separated bicycle lane (SBL) safety ("2023 FHWA study").[1,2] SBLs add vertical elements in the boundaries between bicycle and vehicle lanes to "separate" them (known in California as "Class IV separated bikeways," and sometimes called "cycle tracks" or "protected bicycle lanes"). Based largely on the alleged statistical rigor of this study,[3] the FHWA is now claiming that SBLs are established as "proven safety countermeasures" that "reduce crashes by up to 53%" (see Figures 1 and 2).[4,5] In addition, the National Association of City Transportation Officials (NACTO) is now claiming that SBLs are "appropriate for all streets in all contexts."[6]

However, closer scrutiny the 2023 FHWA study and most other studies on the subject reveals that the claim of an expected 53% reduction in crashes should, at a minimum, be accompanied by the following qualifications and warnings:

- The expected 53% reduction in bicycle crashes applies only to crashes with moving vehicles in mid-block locations more than 250 feet away from intersections. Crashes with moving vehicles at and within 250 feet of intersections had to be excluded from the study in order to make the crash reduction estimate statistically significant, and other crash types (e.g., those with fixed objects, debris, other bicyclists, pedestrians, and related hazards) were not studied.[1,7]
- Other studies indicate that crashes with moving vehicles at intersections and with fixed objects, debris, other bicyclists, pedestrians, and related hazards are likely to increase in SBL corridors, which could lead to net increases in injuries and fatalities.
- The expected 53% reduction in bicycle crashes was established for SBL designs with flexible post delineators only. Inclusion of other physical separation (e.g., wheel stops, curbs, or parked cars) degraded safety relative to the posts alone, and removal of these other physical separations is expected to decrease crashes by 40%.

The overly broad and thinly supported marketing claims about SBLs are frequently cited by state, regional, and local policy-/decision-makers and their transportation staffs, as well as many bicycle advocacy groups and enthusiastic constituents. This has led to a veritable movement in some communities, including several in San Diego County, to install plastic posts, wheel stops, and other vertical elements under the assumption that they will increase safety. Unfortunately, SBL projects seem too often done in a rushed and indiscriminate manner, without assessing the appropriateness of either

sites or designs, and without collecting detailed before-after data on usage and crashes, as recommended in professional guidance documents.

Safety studies on the addition of conventional (painted) bicycle lanes on US roadways have been relatively sparse–some showing reductions in crashes or injury severity, and many others showing no reduction or an increase.[8–17] US-based research has been even sparser for SBLs and has generated similarly contradictory or inconclusive findings.[1,11,15,18–23] The studies are plagued by weak study designs, small sample sizes/lack of statistical significance, unreliable bicycle counts, insufficient accounting for confounding variables, exclusion of large numbers of crashes, ignorance of the crash types relevant to the safety interventions, etc. There is stronger evidence in some European cities, particularly in the Netherlands and Denmark, that SBLs may improve safety, but the cultural, topographic, and overall infrastructural contexts are very different there, including the fact that about one-third of trips are done by bicycle,[22] as opposed to about 1% in the US.[24]

Experience over the last five years in the north coastal region of San Diego County has included at least three fatalities in SBLs (representing most of the bicyclist fatalities in the affected communities, which had no fatalities in the prior five-year period), as well as large increases in crashes and injuries in SBLs on South Coast Highway in the Cardiff area of Encinitas.[25] These fatalities and many of the injuries can be directly attributed to the SBLs themselves. Also, the family of a San Diego city staffer, who has been a longtime advocate of SBLs, is now suing the city alleging an SBL led to the injury and emotional traumatization of their son.[26] While anecdotal, these observations also beg caution.

The purpose of this report is two-fold. First, to detail to officials, who may only be familiar with select headlines, conclusions, and marketing statements about SBLs, the limitations of the 2023 FHWA study. While the 2023 FHWA study seemingly set out to be (and is being promoted as) a definitive safety model "development" and "validation" study, it was beset by similar limitations described above for past bicycle lane studies. It also has substantial data transparency issues. Like the SBL safety studies that came before it, the 2023 FHWA study contributes to a growing body of research, but it remains "exploratory," and the level of evidence it provides is not sufficient to set broad policy.

Second, to highlight several factors that can make SBLs even more hazardous than conventional bicycle lanes. These factors should be considered when designing future SBL studies and when considering installation of SBLs.[14] While carefully designed SBLs on some roadways may provide enhanced safety, installation should be considered experimental and only done with caution. The aggressive "every street in every context" marketing, and the resulting well-intentioned but indiscriminate installations endorsed by SBL enthusiasts can have dangerous, even lethal, unintended consequences.

B. Executive summary (critique of the 2023 FHWA study)

- **Key study design limitations:**
    - Very basic, but essential, information was inexplicably not disclosed in the 2023 FHWA SBL study, including the numbers and locations of the studied street corridors, as well as the numbers, types, and severity of the crashes.
    - The authors stated that they were unable to determine the dates of installation of the SBLs in their study, so, instead of using a more robust before-after study design (comparing crashes on the same streets before and after SBL conversion), they were forced to employ a weaker cross-sectional study design (comparing crashes on different SBL and non-SBL streets).
    - Cross-sectional studies are more subject to contamination with "confounders" (characteristics other than the SBLs that may account for observed differences in crashes), and several potentially powerful confounders were not examined in the study, including prevailing vehicle and bicycle speeds and driveway/alley density.
    - The authors acknowledge that the number of crashes in the study was "very small," that many statistical safety models were explored, and that the safety model should only be applied with caution to at least one other city (Denver), suggesting that the model may be "overfit," and that the safety claims may not apply generally to other cities.
    - No evidence of independent peer review has been provided, and no records have been produced in response to a 5/29/2025 Freedom of Information Act (FOIA) request for the underlying datasets, so no independent assessment of the data can be done.
- **Crash reporting gaps:**
    - Unfortunately, the 2023 FHWA study only appears to have included the subset of on-road vehicle-bicycle crashes present in police reports, even though it is widely acknowledged (including by the FHWA itself) that this approach vastly under-reports bicycle crashes. The excluded crashes are ones that do not involve moving motor vehicles (e.g., crashes with fixed objects, opened vehicle doors, debris, other bicyclists, pedestrians, etc.) and/or that occur off legally defined roadways–the very types of crashes that are amplified by SBLs. Large proportions of these unreported crashes result in injuries leading to hospital visits/stays.
    - This limited subset of crashes was then further constrained to only crashes that occurred in the portions of mid-block street segments greater than 250 feet from all intersections along the SBL corridors, because exclusion of intersection crashes was necessary to achieve statistical significance to support the safety conclusion. This,

despite the fact that SBLs can reduce visibility of and increase crashes with bicyclists around intersections.

- Bicyclists cannot avoid intersections when traveling on SBL corridors, meaning that any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analysis.

- **Extrapolated bicycle volume data:**
  - Bicycle volume data (critical to calculate crash rates) was not collected as originally planned due to the pandemic. Instead, statistical model-based extrapolation of limited historical data was used, with inconsistent and sometimes counter-intuitive results.
  - 2020–2021 volume data were excluded without showing the effects or providing a detailed justification, undermining the reliability and transparency of the findings.
- **Safety model inconsistencies/Lack of generalizability:**
  - Study results varied widely between cities; statistically significant improvements were only found in one city (San Francisco), and the main finding of the study (that plastic posts alone resulted in the largest crash reduction) was not supported in the city with the largest number of studied segments (Seattle).
  - Crash data from 2020–2021 and from segments with alleged zero traffic was excluded from the study without showing the effects or providing a detailed justification.
  - Validation of the model with data from Austin and Denver was only an assessment of statistical equivalency, not evidence that SBLs actually reduced crashes in those cities, and the authors cautioned about the applicability (generalizability) of the results to Denver.
  - The model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.
  - The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles. However, no data on crash types or injury severities is presented to assess this alleged benefit.
- **Policy implications:**
  - Bodies like FHWA and NACTO are using inconclusive/contradictory studies to promote SBLs, which, given current evidence, should still be treated as experimental and used with caution–not mandated as universal safety solutions in all contexts.
  - Future studies of SBL safety intended to set national policy should: (1) focus on before-after study designs that fully account for confounders, (2) be powered with sufficient

crash sample sizes to make statistical conclusions without model overfitting, (3) make the underlying data available for independent confirmation, (4) more fully account for bicycle crashes and injuries (e.g., by combining emergency/hospital data with police reports), (5) account for safety through entire SBL corridors, including intersections, and (6) accurately account for changes in bicycle counts.

C. Summary of hazards created by SBLs, plus design guidance

- For a good literature review of many of the following issues, see the Discussion in Cicchino et al., 2020,[18] and for examples of SBL design guidance, see the San Diego County Bicycle Coalition's Cycle Track Toolkit.[27]

- Rideable lane width is a key component that affects many of the risks described below, including maneuverability within an SBL. NACTO "recommends" at least 7.5 feet.[6] If that cannot be achieved, painted bicycle lanes should be considered instead of SBLs. The safety of NACTO's 5-foot "minimum" rideable width is unproven.

- SBLs increase solo bicyclist crash risk due to the large number of fixed vertical objects introduced into a constrained space, like plastic posts/bollards and wheel stops. Many of the crashes in the South Coast Highway SBLs have involved such objects.[25]

- Unexpected transitions into SBLs can lead to solo bicyclist crashes with the vertical elements, so they should be well-marked. At least one of the SBL-involved bicyclist fatalities in north coastal San Diego County can be attributed to this.[25]

- SBLs can increase solo bicyclist crash risk due to debris accumulation arising from less cleaning, combined with reduced maneuverability to avoid the debris.

- SBLs increase bicycle-bicycle crash risk due to speed differentials (e.g., recreational bicyclists, experienced cyclists, and e-bicyclists) in the same constrained space.

- SBLs can increase bicyclist-pedestrian crashes due to pedestrians improperly using the SBL for walking/jogging.

- SBLs tend to reduce visibility/awareness between vehicle operators, bicyclists, and pedestrians at intersections, driveways, and alleys, leading to increased crash risk during vehicle right turns (right hooks), particularly for trucks and other vehicles with larger blind spots. Numerous serious injuries and fatalities related to right hooks have been reported across the US at SBL intersections, including a fatality in Encinitas.[25] If vehicle deceleration or mixing areas are not possible or practical, consider painted bicycle lanes instead of SBLs.

- Two-way SBLs are even more dangerous than one-way at intersections/driveways/alleys, because pedestrians and turning drivers may not be aware of bicyclists traveling in both directions (i.e., oncoming bicyclists are coming from an unexpected direction).
- Steep downhill grades that increase bicyclist speeds can further increase the risks described here due to the lack of space/time for maneuvering in the constrained space.
- SBL vertical barriers can hinder emergency vehicle access and maneuvering of disabled vehicles.

D. Conventional vs. separated bicycle lanes

Conventional bicycle lanes are typically delineated only by painted lines, sometimes with striped buffers between them and travel and/or parking lanes. There is currently a movement to promote construction of SBLs, distinguished by the inclusion of vertical elements in the buffer area(s), such as:

- Flexible post delineators (sometimes called "plastic bollards" or "flexposts")
- Wheel stops that create a non-continuous "curb" (similar to those in parking lots)
- Continuous curbs, medians, planters, parking lanes, or other barriers

The rationale for SBLs is that they may increase *perceived* safety and ridership due to "separation" from vehicles.[28] However, despite substantial marketing claims that they also increase *actual* safety, they may only create the *appearance* of safety while making streets more hazardous.

E. FHWA and related SBL safety research

2015 FHWA SBL crash analysis report. In May 2015, the FHWA published a *Separated Bicycle Lane Planning and Design Guide*,[23] which included a "Crash Analysis Report" on 17 street corridors in 9 different cities. The report considered the SBL safety findings to be inconclusive:

> An in-depth analysis of crash and ridership data from implemented separated bike lanes in the U.S was completed to evaluate safety outcomes and inform the recommendations of this guide. While the bicycle collision and volume data that exist for most implemented projects is not yet sufficient to draw broad-based conclusions concerning the overall safety of separated bike lanes, the analysis did uncover useful insights to build upon in future analyses.

Crash Modification Factors. The 2015 FHWA report went on to call for additional safety studies, including the establishment of Crash Modification Factors (CMFs) for SBLs, emphasizing how it was imperative that future studies use more robust data collection and study design methods, which were outlined in an evaluation checklist and data collection section. Recommended methods for the development of CMFs have been published by multiple transportation organizations, as well.[29,30]

Note that a CMF is a number that, when multiplied by expected crashes under current conditions (typically derived from historical crashes), is intended to estimate a change in future crashes when a certain modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF greater than 1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

2023 FHWA study. The study includes the 0.47 CMF for conversion of a generic bicycle lane into an SBL with plastic delineator posts. It includes data from an unspecified number of street corridors in five different cities, although the statistical model that produced the CMFs only included three of the cities (San Francisco, CA, Cambridge, MA, and Seattle, WA) due to limited sample sizes in the other two (Austin, TX and Denver, CO).

It is evident from the published material that the study did not go as originally planned due to profound challenges in collecting the data, as well as inconsistencies in the data. The authors clearly did a lot of work (in fact, a lot more creative statistical work than they likely originally planned), and they seemingly did the best they could under the circumstances to support their premise that SBLs improve safety. However, as detailed below, this new study has many limitations and failed to meet the more robust data collection and evaluation standards considered imperative in the 2015 report.

SANDAG on SBLs. The San Diego Association of Governments (SANDAG), the Metropolitan Planning Organization for San Diego County, has apparently partnered with FHWA and NACTO to some extent on SBLs (based on webinar comments). SANDAG recently released its draft 2025 Regional Plan,[31] which says they will follow the “NACTO Contextual Guidance for Selecting All Ages & Abilities Bikeways" that includes SBLs or other separated paths on all streets with speed limits >25 mph (Figure 3). This appears to create an inappropriate mandate for local jurisdictions to construct SBLs on all streets other than local neighborhood streets in order to receive or compete for SANDAG funding, which could unintentionally make conditions more hazardous for people of all ages and abilities.

F. Challenges to design reliable safety studies

Study basics and confounding factors. It is beyond the scope of this paper to delve deeply into the designs of roadway safety studies. Generally, though, safety “outcome” data (e.g., numbers or rates of crashes, injuries, and/or injury severities) is compared for streets based upon the presence or absence of a safety “countermeasure” (in this case SBLs). Most studies will either compare the same streets before and after SBLs were installed (before-after/longitudinal study), or they will compare different streets with and without SBLs during a single time period (cross-sectional study).

Every comparison will include some potential “confounding factors”—differences between the streets other than the absence or presence of SBLs—which could explain part or all of any differences in safety outcomes independent of the SBLs. Therefore, to establish a clear cause-effect of the SBLs, it is critical to control for potential confounders, such as:

- Traffic volumes (vehicle, transit, bicycle, and pedestrian)
- Different types of vertical SBL elements
- Bicycle lane/buffer widths, presence of green paint, etc.
- Population density/land use
- Vehicle speeds
- Bicycle speeds
- Corridor length
- Grades
- Intersection/driveway/alley numbers and spacing
- Length of vehicle/bicycle mixing zones at intersections
- Vehicle turning frequency
- Intersection control types
- One-way vs. two-way vehicle lanes
- Through- and turn-lane numbers and configurations
- Parking lanes and/or medians
- Lighting
- Crash reporting method changes

Before-after (longitudinal) studies. Studies that compare the *same streets* before and after installation of an SBL are the strongly preferred and most robust study type to estimate CMFs, because there tend to be far fewer known or potentially unknown confounding variables.[30,32,33] The physical characteristics tend to stay the same, except the ones that arise from the SBL installation under study. Factors that vary over time, such as traffic volumes, and perhaps changes in crash reporting, might be examples of the limited variables that need to be controlled.

Cross-sectional studies. Before-after studies typically require several years of data both before and after SBL installation, which requires the existence and collection of more data. A less data-intensive design is a cross-sectional study, in which several different streets are analyzed during the same time period—some with SBLs and some without. However, it is difficult to identify sets of comparable control streets to assess whether differences in crashes are due solely to the SBLs, or whether they are due to one or more of the numerous other confounding variable differences, such as those listed above and, for example, why SBLs were installed on certain streets and not others.

Examples of weak study designs. A 2013 study of 19 US SBLs (**Lusk et al., *Bicycle Guidelines and Crash Rates on Cycle Tracks in the United States***) concluded that SBLs have lower vehicle/bicycle crash rates than a national average crash rate.[34] However, comparing crash rates to an alleged national average is an extremely weak cross-sectional study design that does not account for any confounding variables. In fact, it was subsequently pointed out that the observed crash rate differences were more correlated to intersection density than the presence of SBLs, among other weaknesses. The streets with higher intersection densities had crash rates much higher than the national average and the streets with lower densities had lower crash rates—all independent of the presence of SBLs.[35]

Another widely publicized 2019 study of crashes in 12 large US cities over a 13-year period (**Marshall and Ferenchak, *Why cities with high bicycling rates are safer for all road users***) proclaimed that the presence of SBLs in the cities was associated with better safety outcomes.[21] Although this study was presented as having a very large sample size, its conclusions are specious due to several methodological flaws. For example, the study appears to have included 1,300 miles of off-street trails in its definition of SBLs with only 12.5 miles of actual SBLs, and it failed to account for key confounding variables including population densities and traffic volumes/speeds, among several other statistical problems.[36]

Selection bias. Another factor that affects all studies is potential "selection bias." This arises from the fact that interventions, such as SBL conversions, that do not perform well (and perhaps even removed) are less likely to be included in safety studies, biasing results to locations where they tend to work better.

FHWA study critique:

Study design. The 2015 FHWA report used the more robust and preferred before-after study design on a limited set of sites, but, given an inconsistent mix of findings, the SBL safety results were ultimately considered inconclusive. The report stated:

> …[I]t is imperative…to collect bicycle and motor vehicle crash and volume data for a sufficient period of time before and after separated bike lane installation. This will improve understanding of safety benefits and design considerations…

The 2023 FHWA study was an opportunity to conduct a before-after analysis on a larger set of sites with more robust data. However, the authors used the less robust cross-sectional approach, because, as they describe in the study, they were unable to determine the dates of conversion to SBLs for the sites they were studying.

As described above, cross-sectional studies are more subject to bias from confounding variables when comparing SBL and non-SBL facilities. Adding to that concern, the authors lamented that the 2020 pandemic limited their data collection to pre-existing databases. Further, the authors did not identify any of the specific streets studied as SBL vs. non-SBL. They only identified the cities, preventing any independent comparison.

Confounders. The 2023 study employed a statistical method called "propensity score weighting" (PSW) to help reduce potential confounding variable bias, but PSW can only estimate the effects of variables that are chosen to be included. For example, the authors do not appear to have included vehicle speeds, bicycle speeds, and driveway/alley density, among other variables, in their modeling, all of which have been shown to affect crash frequencies.[22,35,37] And there could be other unknown differences between the undisclosed streets that bias the results.

The study also does not account for variations in the individual SBLs beyond the presence of flexible posts or "other" elements. These potential confounders include variations in lane widths or the types of

other elements (e.g., wheel stops vs. planters vs. parking lanes), which are likely to have very different effects on safety.

Lack of transparency. Beyond just the design, the study has a noteworthy lack of transparency in that very basic, but absolutely essential information, like the numbers and identities of the studied street corridors, as well as the numbers, types, and severity of the crashes, are not disclosed. In addition, bicycle volume and crash data from 2020–2021 and street segments with alleged zero traffic were excluded from the study without showing the effects or providing a detailed justification.

Lack of peer review and inability to confirm results independently. In addition, there is no evidence that the study has undergone any sort of formal peer review (particularly from a statistical modeling standpoint); instead, it was just published directly by the FHWA. A FOIA request was submitted to the FHWA on 5/29/2025 (FOIA Control Number 2025-0509) for access to the databases used for the study. The request was forwarded to the academic institution of the authors (Texas A&M University) and then back to the FHWA, but no responsive information has been received. Without peer review or independent assessment of the data, any findings should be treated with great skepticism.

While cross-sectional studies *can* be acceptable to help establish CMFs, several other limitations in the 2023 FHWA study further compromised it, as described below.

G. Challenges in measuring overall safety throughout street corridors

The ultimate goal of decision-makers should be to improve *overall* safety *throughout* a bicycling corridor. Safety is typically measured by the number or rate of bicycle crashes and injury severity types. However, these measurements are challenging for any bicycle study, particularly for SBLs.

G.1. Under-reporting of bicycle crashes and injuries in police reports

State motor vehicle department crash data is derived from police reports, and a crash is generally defined as "an accident that involved a motor vehicle that occurred on a public highway or road in the U.S. and that resulted in property damage or personal injury."[38] Ironically, while the vast majority of bicycle crash studies have relied almost exclusively on such data, most bicycle crashes and injuries do not involve motor vehicles and/or occur off the legal “roadway.” This includes crashes caused by fixed objects like vertical components adjacent to the bikeway, opened vehicle doors, debris, other bicyclists, pedestrians, animals, etc.--the very types of crashes that are amplified by SBLs–and the SBLs themselves are typically legally considered to be “off-roadway.”

- **Fixed objects.** SBLs add significant numbers of new vertical elements to the roadway, such as the flexible posts and curbs, and concurrently reduce the space to maneuver. This factor directly increases the likelihood that bicyclists will crash into fixed objects.

- **Debris.** Vehicles tend to push road debris to the edges of streets, where SBLs are usually located. The vertical elements of SBLs often amplify debris-related crash risk, because they tend to create lanes that are not accessible by conventional street cleaning equipment. Rain and snow also can differentially affect SBLs due to drainage and plowing issues.

- **Other bicyclists.** The limited widths of most SBLs prevents safe passing. So, with the speed differentials of recreational cyclists, experienced cyclists, and ebikes, there is a higher likelihood of crashes with other bicyclists, or with SBL infrastructure in attempts to leave the SBL to pass.

- **Pedestrians.** Walkers and/or joggers often end up in bikeways for a variety of reasons. For example, some joggers prefer the asphalt of a bikeway to the concrete of a sidewalk. In addition, lack of right-of-way width may mean that an SBL installation reduces or eliminates pedestrian areas. These increase the likelihood of bicycle/pedestrian conflicts and crashes.

References demonstrating crash under-reporting

- 1999: The FHWA published a comprehensive literature review of studies comparing police report-based crashes with emergency department (ED) visits and hospitalizations.[39] Their conclusion was that police reports/crash statistics fail to include about 40-50% of ED visits (up to 82% in one jurisdiction) and 25-40% of hospitalizations of injured bicyclists.

- 2016: Based on data from the Massachusetts Department of Public Health, Boston police reports miss 76% of bicyclist ED visits and 60% of hospital admissions.[40]

- 2018: A University of California, Berkeley SafeTREC group published a more recent literature review, concluding that 54-93% of hospital visits were not linked to police reports.[41]

- 2021: A study in Orlando, Florida showed that 73% of ED visits and 57% of hospital admissions of bicyclists arose from crashes that did not involve motor vehicles, and, thereby, likely would not be reflected in police reports.[37]

- 2024: A study of bicyclist crashes/injuries in Toronto showed that 92% of bicyclist visits to EDs were not reflected in police reports.[42]

- 2025: In a report on the Cardiff-area Coast Highway SBL in Encinitas, CA, over 60% of emergency vehicle dispatches for bicycle-related crashes did not have a corresponding police report.[25]

The references cited above also discuss under-reporting of bicycle crashes from other studies too numerous to cite or detail here. The discordances in crash numbers between police reports and other sources varied greatly among the studies, but the common themes are: (1) most bicycle crashes do not appear in police reports or motor vehicle department statistics, because they do not involve moving motor vehicles and/or occur off-roadway, and (2) substantial percentages of these crashes result in ED visits and hospitalizations. Accordingly, the authors emphasize the need to assess records related to hospital visits, in addition to police reports, to avoid under-reporting of bicycle crashes and to avoid erroneous conclusions about the benefits of proposed safety countermeasures.

FHWA study critique:

The 2015 FHWA report acknowledged that their "[c]rash data includes only reported crashes involving a bicycle and a motor vehicle." In its call for development of CMFs for SBLs and other future studies, it went on to recommend comprehensive collection of crash and injury severity data. Unfortunately, the 2023 FHWA study provides very little information on the source of its crash data, but it, too, included only moving vehicle-bicycle crashes, with the authors stating:

> Possibly, other bicycle crashes may have occurred and were not reported. The research team was unable to incorporate these unreported crashes into the scope of this study.

A study comparing bicyclist visits to San Francisco General Hospital (SFGH) and police crash reports showed that: (1) 41.5% of injuries were bicyclist-only (did not involve a motor vehicle), (2) bicyclist-only injuries were four times more likely to require hospital admission than vehicle-bicycle injuries, and (3) there was no police report associated with 54.5% of all bicyclist injuries.[43] SFGH is the only Level I trauma center serving San Francisco, which is the primary city contributing crash data in the 2023 FHWA study. This under-reporting raises direct questions about the conclusion that SBLs reduce crashes, including those leading to severe injuries.

In summary, the 2023 FHWA study and the vast majority of other SBL safety studies do not account for any of the above-described non-vehicle-involved crashes or vehicle-involved crashes at intersections, which tend to be the majority of bicycle-involved crashes, particularly in SBLs. Therefore, any alleged reduction in crashes could be largely or entirely the result of reduced reporting and shifts to other crash types and locations that were excluded from analyses.

G.2. Unreliability of bicycle crash rate comparisons/aggregation bias

Bicycle crash *rates* are calculated by dividing the number of crashes by the number of bicycle trips/volume or mileage traveled (e.g., "crashes per 100,000 trips" or "crashes per million miles"). These should provide a more accurate reflection of safety, because different streets have very different amounts of bicycle usage (sometimes called "exposure")—both baseline and changes over time. The previous section described how systematic under-reporting of bicycle crash numbers, particularly in SBLs, has the potential to skew safety results. Guesses at bicycle counts (exposure) can further skew the results.

FHWA study critique:

The 2015 FHWA report emphasizes the importance of collecting accurate bicycle count data when developing CMFs.[23] For the 2023 FHWA study, the original intent was to collect bicycle counts at the study sites in the Spring of 2020 to produce the SBL CMFs, but the authors apparently canceled that due to travel restrictions arising from the pandemic. Instead, they had to rely on limited historical counts from various areas in the cities from which they attempted to develop predictive statistical models to extrapolate counts at the actual sites. Also, many of the bicycle counts appear to be based primarily on

extrapolation from vehicle traffic adjusted for variables like the presence of bicycle lanes, population density, land use, etc., which is an even wilder guess. AASHTO/FHWA guidance on CMF-development protocols points out the likelihood of bias due to data aggregation, averaging, and/or incompleteness.[30]

For the three cities used to produce the SBL CMFs, two of them used different methods, and multiple variables had opposite (and sometimes counter-intuitive) effects, while a statistical model could not even be developed for the third. For San Francisco, a Poisson mixed–effect model was produced to predict the bicycle counts, with higher counts being predicted for streets with more bicycle lanes and higher population density (Table 34). In contrast, for Seattle, a Gaussian mixed-effect model was produced, with *lower* counts counter-intuitively being predicted for streets with bicycle lanes and higher population density (Table 42). For Cambridge, the authors stated: "Although the research team made several attempts to statistically develop a nested mixed-effect negative binomial model, they were unable to identify any models that converged."

The San Francisco model also had the seemingly counter-intuitive observation that bicycle counts were *higher* in commercial and industrial areas relative to residential, public, and mixed-use areas. Also, essentially two different models had to be produced for Seattle (one for data from 2016-2018, and another for data from 2014-2015 plus 2019), because the results were so different in these sets of years.

Further, the authors excluded all bicycle exposure data from 2020 and 2021 for all cities, which they justified by citing the different travel patterns in those years due to the pandemic. However, no quantitative assessments were presented, so it is impossible to determine the impacts on the conclusions, or whether the exclusion was justified.

The authors stated:

> Ideally, this assessment should have included known bicycle exposure volumes…However, the implementation of SBLs in the United States is in its infancy, and multiyear bicycle counts are limited. In addition, the recent COVID-19 pandemic created challenges for research team members to travel to locations and conduct additional counts. Ultimately, the bicycle exposure variable…was estimated based on a variety of bicycle count types that included short-term bicycle counts, periodic counts that occurred regularly (usually every 2 yr), and a few permanent bicycle count stations.
>
> …[T]he team allowed some variability for how much bicycle count data could be used and potentially extrapolated to surrounding facilities.

In summary, despite the critical importance of accurate bicycle exposure data to determine crash rates, the authors of the 2023 FHWA study were unable to collect that data and, instead, had to rely upon guesses from statistical models that included multiple counter-intuitive variables and were different for each city and different time periods. This was not consistent with standards called for by AASHTO/FHWA.

G.3. Intersection crashes (within 250 feet) had to be excluded to achieve statistical significance

SBLs are typically installed on street "corridors" that are comprised of "intersections" linked by the street "segments" between them (as opposed to being installed on single, isolated segments with no intersections). Even setting aside the crash number and bicycle exposure data limitations described above, most SBL safety studies, including the 2023 FHWA study, only report safety improvements within individual segments—not when intersections or complete corridors are included in the analyses.

Obviously, though, it is not possible for bicyclists to skip the intersections, where a majority of vehicle/bicycle crashes occur.[22,44] Ironically, the vertical elements of SBLs tend to make vehicle drivers and bicyclists less aware of and/or less visible to each other, which increases vehicle/bicycle crash risks during turning movements at intersections. SBL separation with parked cars or vegetation further exacerbates the awareness/visibility problem.

In many cases, the vertical elements of an SBL are installed right up to the turning area, so right-turning vehicles must remain in the through lane (often with through-traveling vehicles behind them) until the last second, then suddenly turn right—across the SBL with potentially less visible cyclists. This is in contrast to the more traditional dashed mixing areas, where the bicycle lane becomes a shared right-turn lane for vehicles, or where vehicles move right across the bike lane into a dedicated right-turn lane. Although these mixing areas are potential vehicle/bicycle conflict points, they are designed to be lengths that allow safe mixing, rather than last-second, potentially unexpected turns across the bike area.

Several fatalities and serious injuries have been reported arising from vehicles making right turns across SBLs. For example, in 2020, a bicyclist was killed in the westbound SBL on Leucadia Boulevard at Moonstone Court in Encinitas, CA when he struck the side of a right-turning truck.[45] Plastic post delineators had been installed all the way up to the turning area at the intersection, eliminating any mixing zone. The City of Encinitas eventually settled a lawsuit[46] that alleged: "[These] dangerous conditions created a trap that a reasonably careful person would not notice or anticipate as being dangerous, since the lack of dashed lines, and presence of bollards/stanchions created a false sense of safety while operating a bicycle in the bikeway while at the same time, depriving automobiles adequate opportunity to merge into the bikeway to turn right onto Moonstone Court." Several of the SBL plastic posts leading up to the intersection were removed after the fatality to create a mixing area.

In 2024, two bicyclist fatalities occurred at intersections in SBLs in Cambridge, Massachusetts under virtually identical circumstances to the fatality in Encinitas.[47] Also in 2024, a life-altering traumatic brain injury occurred in Seattle when an SUV made a right turn across an SBL at a driveway (neighbors have reported frequent yelling there due to other close calls).[48] That incident also led to a lawsuit against the city for its dangerous design and insufficient sight distance. In July 2025, a bicyclist riding in an SBL in Montreal struck the side of a right-turning truck (dashcam video available in the linked news story).[49] In each of these cases, the vertical elements (plastic posts or curbs) were installed right up to the intersections, the vehicle drivers appear to have been unaware of the bicyclists traveling in the same direction (blind spot), and the bicyclists were unaware that the right turns were happening until it was too late.

In San Francisco, the Market Street/Octavia Boulevard intersection has been considered one of the most dangerous to bicyclists due to vehicles turning right across an SBL there.[50]. Note that this is not an exhaustive list of right hook crashes in SBLs–just a few recent incidents that include the cities in the 2023 FHWA study (San Francisco, Cambridge, and Seattle).

FHWA study critique:

The 2015 FHWA report observed:

> Increases in bicycle crashes after separated bike lanes were built were especially pronounced at intersections…
>
> It appears that the introduction of separated bike lanes may result in increased challenges at intersections, relative to separated or protected midblock locations. All six of the sites where the analysis included consideration of intersection vs. midblock crashes saw an increase in the percentage of crashes that occurred at an intersection relative to crashes at midblock. This was true for bicycle crashes as well as those not involving a bicycle.

The 2023 FHWA study reported:

> Initially, the research team hoped to develop CMFs for segments and intersections, but their attempts to model intersections and/or entire corridors were unsuccessful. Consequently, the team focused on developing robust CMFs for segments. Future work may be to conduct research that estimates the safety effect of the various types of SBL-to-intersection transitions…
>
> The research team assessed the prospect of using intersection-only and corridor-type models but found that for the available dataset, these two options did not yield statistically viable results.

First, it is particularly bizarre that none of the actual street names/locations of the SBLs were ever revealed for any of the cities in the 2023 FHWA study. Second, the fact that intersection crashes had to be excluded in order to achieve statistical significance is a critical flaw in the safety claim. In fact, all of the SBL intersection-based fatalities and serious injuries described above would have been excluded from the crash analysis.

In addition to excluding all crashes at the intersections themselves, the 2023 FHWA study also excluded crashes that occurred within 200 to 250 feet on both sides, which was not disclosed in the report itself but was described by the primary author in a webinar describing the results.[7] Although those distances are commonly accepted as being within an intersection's "area of influence," it means that the entire study was based only on crashes that happened in the middles of the "blocks" extracted from the full SBL corridors.

Also, block lengths can vary significantly between cities and different parts of the same city, which is not addressed in the study. There is no indication of what proportions of the corridors were actually included in the analysis.

In summary, while the 2023 FHWA study sought to demonstrate the corridor-level safety of SBLs, the inclusion of crashes that happened within 250 feet of both sides of intersections clearly caused the statistical models to fail. In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

G.4. Vehicle safety, emergency vehicle response times

There also are safety concerns with SBLs independent of bicycle crashes. The barriers do not allow disabled vehicles to go to the edge of the street, and they reduce the ability of vehicles to yield to the edge when emergency response vehicles need to pass—requiring them to remain in active through-lanes. This is particularly true of streets with few through-lanes. This could negatively affect emergency vehicle response times and/or put drivers of disabled vehicles at risk.

H. Crash modification factor modeling

FHWA study critique:

The statistical modeling of the crash data to produce the CMFs also was quite muddled in the 2023 FHWA study. Table 1 (below) contains a summary of segment numbers and CMFs for "flexible posts" compared to "traditional or flush buffered bicycle lanes." Although numerous other comparisons were described in the study, this was the main reported finding, so this critique will focus on that area (although it applies to the other comparisons as well).

Table 1

Safety model development sites	Total Segments	Non-SBL Segments	SBLs both directions*	SBLs single direction	CMF	Estimate	Standard Error	*p* -Value	Table[1]
San Francisco (SF)	384	320	28	36	0.338	-1.0849	0.3602	0.0026	47
Cambridge	179	155	24	0	0.592	-0.5244	0.7486	0.4836	50
SF + Cambridge	563	475	52	36	0.316	-1.1507	0.3366	0.0006	52
Seattle	660	541	71	48	1.178	0.164	0.883	0.853	58
All three	1223	1016	123	84	0.468	-0.758	0.267	0.005	60
"Validation" sites									
Austin	68	40	24	4					
Denver	384	368	13	3					

*Either one-way SBLs on both sides of a roadway or a two-way SBL on one side.

Overfitting/small crash sample size. In statistical modeling, when sample/event sizes are small, many variables are included, and many different models are explored, there is a risk of something called "overfitting." This could mean that, while an apparently very good model can describe crashes in the specific data being analyzed, the model does not reflect reality and will not "generalize" to accurately predict crashes in other data/cities.[30] In this regard, the authors stated:

> The research team found the number of bicycle crashes [events] to be very small…
>
> The research team developed several regression models for Cambridge, San Francisco, and Seattle (both independently and with a merged dataset).

The actual numbers of crashes in each city/corridor are never revealed in the study, and many variables (some counter-intuitive) and models seem to have been tested in many different combinations, raising concerns about potential overfitting.

Lack of statistical significance in individual cities. San Francisco was the only individual city for which a statistically significant CMF could be developed (0.338, $p = 0.0026$). It is curious that the addition of Cambridge, which had a worse and not statistically significant CMF as its best model (0.592, $p = 0.4836$), to San Francisco produced a better CMF than San Francisco alone (0.316, $p = 0.0006$). And although Seattle had the largest sample sizes (by far) of both non-SBL and SBL segments, the authors also were unable to develop a statistically significant CMF, and the best case model there showed an *increase* in crashes in SBLs vs. non-SBL segments (CMF = 1.178, $p = 0.853$). Note that Austin and Denver were completely excluded from CMF development, presumably due to low sample sizes of segments and/or crashes.

Disparate Seattle safety element results. The optimal statistical model developed on the Seattle data (although not statistically significant) suggested that SBLs with only flexible posts essentially imparted no safety improvement, while SBLs with flexible posts plus other vertical elements imparted a small safety improvement. This is in contradiction with the overall finding in the model developed from the combined Seattle/San Francisco/Cambridge data that flexible posts alone impart a large safety improvement that is degraded when combined with other vertical elements.

Significant differences between cities. In the final model developed from the combined Seattle/San Francisco/Cambridge data, the city locations themselves showed up as the most impactful coefficients, indicating that the crash rates were substantially different in each city and raising questions about the generalizability of the calculated CMFs to cities other than San Francisco and, perhaps, Cambridge.

Insufficiently characterized data exclusions. For the three-city final model, it appears that the authors removed all segments for which their estimate of average daily vehicle traffic (ADT) or annual average daily bicycles (AADB) was zero. It is unclear why some street segments would have had zero traffic. More importantly, it is unclear how many segments were removed, because the table with the results (Table 59[1]) claims that all 1,223 segments from the three cities were analyzed.

The authors discounted this as a "housekeeping issue." However, there was no explanation of what effect inclusion of those segments would have had on the model, and there was no mention of excluding segments with zero estimated traffic in the separate statistical modeling done on the San Francisco and Cambridge data.

On a related matter, similar to the situation described above for bicycle exposure data, the authors excluded crash data from 2020 and 2021 for all cities, stating in the Tech Brief (and not the main paper):

> Note that data for 2020 and 2021 were excluded from the CMF development efforts because those data were atypical.

However, no further justification was made for the exclusion of this data, beyond the claim that it was "atypical." In the absence of quantitative assessments of all of the excluded data, or shared access to the underlying datasets to allow independent analysis, it is impossible to determine the overall safety impacts of the SBLs.

Inconclusive validations. The so-called "exploratory validation" of the model with the Austin and Denver data was only an assessment of statistical equivalency—without any evidence that SBLs actually reduced crashes in those cities. In addition, while the equivalency test appeared to work for Austin, the Denver findings were quite different, and the authors rationalized this as follows in the Tech Brief with no further justification:

> …[T]he CMF for Denver conditions should be applied cautiously. The team was not completely sure about why these data differed, but Colorado has different weather patterns (particularly in the winter) and has a greater elevation than the other study sites.

This further amplifies the concern that the model may not be generalizable to cities beyond San Francisco and, perhaps, Cambridge.

Lack of crash type or injury severity data. The primary proposed safety benefit of SBLs is reduction of overtaking-type crashes with vehicles, which are the ones that occur mid-block.[1] However, the study includes no data on crash types or injury severities to assess this alleged benefit, which could have helped support the safety conclusions. Further, mid-block vehicle overtaking crashes tend to be a small minority (<10%) of overall bicycle crashes,[37] so the study and its crash reduction conclusion ignore the vast majority of bicycle crashes, including the many bicycle crash types that can increase substantially in SBLs (e.g., intersection hooks, crosses, and T-bones, as well as fixed objects, debris, other bicyclists/pedestrians, etc.).

I. Inconsistencies in findings between studies

Flexible posts (bollards) alone vs. bollards plus other elements. It is not uncommon for different studies by different researchers to reach somewhat different conclusions or, for example, suggest some differences in the *magnitude* of safety benefits. However, when it comes to research on SBL safety, the inconsistencies in the findings within individual studies and between studies tends to be quite large. This indicates the need for larger, better-controlled studies.

One example is the alleged impact of different vertical elements on crashes. The 2015 FHWA report concluded:

> Plastic bollards applied in conjunction with other characteristics…were associated with a decrease in average annual total crashes while plastic bollards applied on their own were associated with an increase.

In stark contrast, the main finding of the 2023 FHWA study is that plastic bollards (flexible posts) alone had a CMF of 0.468 relative to conventional bicycle lanes (predicting a 53.2% reduction in crashes[51])--see the red box in Table 60 of the study below. However, when other vertical elements were added to the bollards, crashes increased relative to the bollards alone, and the results were no longer statistically significant (orange box in the table).

In fact, the FHWA CMF Clearinghouse reports a CMF of 0.605 for "Convert Blended vertical element Bike Lane to Flexible Delineator Post Bike Lane" based on the 2023 FHWA study.[52] In other words, for an SBL that includes both plastic posts and wheel stop curbs, *removal* of the wheel stops (leaving only the plastic posts) would be expected to nonsensically reduce vehicle-bicycle crashes by 39.5%.

Table 60. CMFs for bicycle crashes in San Francisco, Seattle, and Cambridge.

Condition	CMF	Estimate	Standard Error	*p*-Value	Significance
Flush buffer[a]	1.128	0.121	0.173	0.484	—
Flexible posts[a]	0.498	−0.698	0.264	0.008	**
Flexible posts[b]	0.441	−0.819	0.297	0.006	**
Flexible posts[c]	0.468	−0.758	0.267	0.005	**
Blended[a]	0.822	−0.196	0.252	0.437	—
Blended[b]	0.729	−0.316	0.300	0.292	—
Blended[c]	0.774	−0.256	0.263	0.331	—
Flexible posts[d]	0.605	−0.502	0.318	0.114	—
Flexible posts or blended[a]	0.640	−0.447	0.203	0.028	*
Flexible posts or blended[b]	0.567	−0.568	0.253	0.025	*
Flexible posts or blended[c]	0.602	−0.507	0.212	0.017	*

—Not statistically significant.
*Statistically significant at the 0.05 level.
**Statistically significant at the 0.01 level.
aBase condition: traditional bicycle lane.
bBase condition: flush buffered bicycle lane.
cBase condition: traditional or flush buffered bicycle lane.
dBase condition: blended vertical element.

Mixing zones. Another area of controversy is the safety of so-called "mixing zones," where vehicles and bicycles conflict at intersections. The 2015 FHWA report stated:

> Mixing zones in combination with other treatments was associated with a decrease in average annual total crashes.

However, FHWA and NACTO guidance recommend minimizing the use of mixing zones, because they allegedly increase the lengths of conflict areas.[3,6]

J. Conclusions

Given the study limitations detailed above, any claims of SBL-based crash reductions or published CMFs should be accompanied by prominent warning statements, such as:

- This claim only applies to vehicle-bicycle crashes in the midblock portions of SBL corridors more than 250 feet on either side of intersections.
- There is evidence that crashes are likely to increase with vehicles within the intersection areas and with fixed objects, debris, other bicyclists, pedestrians, etc. throughout the corridor, which could lead to serious injury or death.
- This claim may not validate to SBLs outside of those included in the underlying study.

Planning of SBL projects and future SBL safety studies should strictly adhere to guidance and best practices, and the concerns listed in Section C above should be considered.

Glossary of abbreviations and terms in the context of transportation safety

AASHTO (American Association of State Highway and Transportation Officials): A national transportation standards-setting organization that publishes guidelines for highway design.

Bollard: A vertical pillar-like object used for traffic control. In the context of SBLs, they are typically flexible plastic posts. In other cases, they can be rigid/crash-resistant for security.

Before-after (longitudinal) study: A study comparing data collected from the same set of sites both before and after safety modifications like SBLs are installed. Less subject to confounders than cross-section studies.

Class I, II, II, and IV bikeways: California classifications. Class I “bike paths” are off-roadway. Class II “conventional bike lanes” are on-roadway with only paint striping. Class III “bike routes” are on-roadway lanes shared with vehicles (sharrows). Class IV “separated bikeways” are on-roadway but separated from vehicle lanes with vertical elements (same as cycle tracks, separated bike lanes, or protected bike lanes).

CMF (Crash Modification Factor): A number that is multiplied by the future estimated crashes without treatment to estimate expected future crashes with a modification is made to a roadway. A CMF less than 1.0 predicts a reduction in crashes, while a CMF >1.0 predicts an increase. For example, a CMF of 0.47 would theoretically predict a 53% reduction in crashes.

Confounder (confounding factor): When assessing cause and effect of a safety modification, confounders may prevent accurate assessment of the actual effect of the modification, because the confounder(s) are responsible for part or all of the effect.

Cross-sectional study: A study comparing data collected from different sites during the same period of time—more subject to confounding factors than a longitudinal (before-after) study.

Cycle track: Same as Class IV bikeways, separated bike lanes, or protected bike lanes.

FHWA (Federal Highway Administration): US Department of Transportation division that sponsors roadway safety programs, among many other functions.

Flex post: A type of flexible plastic bollard frequently used for SBLs.

Longitudinal study: Same as before-after study.

NACTO (National Association of City Transportation Officials): Coalition of Departments of Transportation in North American cities that publishes roadway design standards.

Overfitting: While an overfit statistical model can predict safety outcomes in the data from which it was created, it fails to generalize to predict outcomes in other data, because it was based on ”noise.” Overfitting is a particular problem when many complex models are explored in small datasets.

Rideable width: The usable width of a bikeway for riding, excluding any shy distance, gutter pans, vertical SBL elements, or other unrideable areas.

SBL (separated bike lane): Same as Class IV bikeway, cycle track, or protected bike lane (PBL).

SANDAG (San Diego Association of Governments): An association of local governments that serves as the Metropolitan Planning Organization for San Diego County.

Selection bias: Failure to analyze a truly random sample for statistical analysis. For example, in SBL research, unsafe SBLs that have been removed cannot be analyzed, and SBLs that have better safety records may be more likely to be selected for analysis, thereby exaggerating their overall safety.

Wheel stop: Short section of “curb” or “berm” similar to those in individual stalls in parking lots that can serve as vertical elements in SBLs. They can be made of concrete, asphalt, or other materials, and glued or poured in-place.

Figure 1. Images from the FHWA website regarding SBLs.

Figure 2. Additional FHWA marketing regarding SBLs posted on Facebook and elsewhere.

Figure 3. Figure K.4 from the SANDAG draft 2025 Regional Plan.

Roadway Context				All Ages & Abilities Bicycle Facility
Target Motor Vehicle Speed*	Target Motor Vehicle Volume (ADT)	Motor Vehicle Lanes	Key Operational Considerations	
Any		*Any*	*Any of the following:* high curbside activity, frequent buses, motor vehicle congestion, or turning conflicts‡	**Protected Bicycle Lane**
≤ 10 mph	Less relevant	No centerline, or single lane one-way	Pedestrians share the roadway	**Shared Street**
≤ 20 mph	≤ 1,000 – 2,000		< 50 motor vehicles per hour in the peak direction at peak hour	**Bicycle Boulevard**
≤ 25 mph	≤ 500 – 1,500			
	≤ 1,500 – 3,000	Single lane each direction, or single lane one-way	Low curbside activity, or low congestion pressure	**Conventional or Buffered Bicycle Lane, or Protected Bicycle Lane**
	≤ 3,000 – 6,000			**Buffered or Protected Bicycle Lane**
	Greater than 6,000			**Protected Bicycle Lane**
	Any	Multiple lanes per direction		
Greater than 26 mph†	≤ 6,000	Single lane each direction	Low curbside activity, or low congestion pressure	**Protected Bicycle Lane, or Reduce Speed**
		Multiple lanes per direction		**Protected Bicycle Lane, or Reduce to Single Lane & Reduce Speed**
	Greater than 6,000	*Any*	*Any*	**Protected Bicycle Lane**
High-speed limited access roadways, natural corridors, or geographic edge conditions with limited conflicts		*Any*	High pedestrian volume	**Bike Path with Separate Walkway or Protected Bicycle Lane**
			Low pedestrian volume	**Shared-Use Path or Protected Bicycle Lane**

Source: NACTO

About the author

The author has a PhD in Biology from the University of California, San Diego. He is a retired researcher who conducted basic science and clinical studies for the development and validation of cancer diagnostics. He is a former traffic commissioner from the City of Carlsbad, CA, who has dealt with transportation issues in San Diego County for over 14 years.

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(50) Miner, C. San Francisco Bike Accidents Rise Faster than the Rate of Cycling; Bay Citizen Maps Crash Data | Transportation Nation | WNYC. *WNYC, New York Public Radio*. February 8, 2011. https://www.wnyc.org/story/285480-san-francisco-bike-accidents-rise-faster-than-the-rate-of-cycling-bay-citizen-maps-crash-data/ (accessed 2025-07-05).
(51) CMF Clearinghouse. *CMF ID 11296: Convert Traditional of Flush Buffered Bike Lane to SBL with Flexi-Posts*. https://cmfclearinghouse.fhwa.dot.gov/detail.php?facid=11296 (accessed 2025-07-08).
(52) CMF Clearinghouse. *CMF ID 11300: Convert Blended Vertical Element Bike Lane to Flexible Delineator Post Bike Lane*. https://cmfclearinghouse.fhwa.dot.gov/detail.php?facid=11300 (accessed 2025-07-08).

Table J6.5: Letter-Sourced Public Comments

ID	Commenter Name	Agency or Organization
L001	Walter Koepsell	n/a
L002	Angelina Neglia	Coalition for Safer Trains
L003	Paula Forbis	San Diego County Air Pollution Control District
L004	Jesse Ramirez	City Heights Community Development Corporation (CHCDC)
L005	Lisa Ross	San Diego Sierra Club
L006	Dennis Keck	Navy Region Southwest
L007	Melina Pereira	Caltrans
L008	Leif Gensert	RideSD
L009	Anar Salayev, Ian Hembree, Leif Gensert, Colin Parent, Christopher Roberts, Kesav Gupta	San Diego Vision Zero Coalition
L010	Hamid Bahadori	City of Oceanside
L011	Robin Kaufman	Rancho Bernardo Community Planning Board
L012	Shawn M. Donaghy	North County Transit District
L013	Lesley Nishihira	Port of San Diego
L014	n/a	SanDiego350
L015	Dahvia Lynch	County of San Diego
L016	John Duncan, Tina Friend	City of Coronado
L017	Jessie Schmitte	Coalition for Equitable Development
L018	Thad Winkle	Groundwork San Diego - Chollas Creek
L019	Deborah Knight	Friends of Rose Canyon
L020	Tom Frank	City of Carlsbad
L021	Tom Lichterman	City of Oceanside Bicycle and Pedestrian Committee
L022	Veronica Morones	City of Escondido
L023	Mike Bullock	n/a
L024	Carrie Downey	City of Coronado – Office of Councilmember Carrie Anne Inada Downey
L025	Geoffrey Hueter	Neighbors For A Better San Diego
L026	Adrian Luna	Building Industry Association
L027	Heidi Vonblum	City of San Diego

Report to SANDAG: The Impact of Rising Rents on Public Transportation and Recommendations for San Diego

Date: May 30, 2025

To: San Diego Association of Governments (SANDAG) Transportation Planners

From: Walter Koepsell, WJKoepsell@gmail.com, (442) 888-3372

Subject: Addressing the Interconnected Challenges of Housing Affordability and Public Transportation Access in San Diego

Executive Summary

This report examines the significant impact of rising housing costs and gentrification on public transportation ridership and accessibility, drawing insights from the recent CalMatters article, "How gentrification is killing the bus: California’s rising rents are pushing out commuters" by Ben Christopher. It highlights how the displacement of lower-income residents, who are often the most reliant on public transit, leads to a decline in ridership and exacerbates the state's transit crisis. The report specifically emphasizes that homeless individuals are disproportionately affected by high housing costs and are a demographic highly dependent on public transportation. Based on these findings, we recommend that San Diego transportation planners prioritize neighborhoods with affordable housing initiatives for enhanced bus, trolley, and shuttle services, and that adequate transportation services be extended to San Diego's homeless encampments.

Introduction: The Intertwined Crises of Housing and Transit

California is grappling with a severe housing affordability crisis, which has far-reaching consequences beyond housing itself. As detailed in Ben Christopher's CalMatters article, rising rents and gentrification are directly contributing to a decline in public transportation ridership. This phenomenon, observed across urban centers like Los Angeles, illustrates how the displacement of communities due to escalating housing costs directly undermines the viability and effectiveness of public transit systems. For San Diego, a region experiencing its own housing pressures, understanding and addressing this interconnected challenge is crucial for sustainable urban planning and equitable community development.

The Effect of Rising Rents on Public Transportation

The CalMatters article provides compelling evidence that increasing rents lead to a reduction in public transportation use. Research cited in the article indicates that in Los Angeles, a neighborhood-

wide rental increase of approximately $230 per month was associated with a 22% decline in bus and train boardings. This trend is largely attributed to the displacement of lower- and moderate-income residents from dense urban areas. These individuals, who historically form the core ridership of public transit, are forced to seek more affordable housing in suburban or exurban areas that often lack robust public transportation infrastructure.

When these transit-dependent populations are pushed out, they are replaced by more affluent residents who typically own cars and are less reliant on public transit. This shift not only reduces ridership numbers but also impacts the financial stability of transit agencies, potentially leading to service cuts and further diminishing the appeal and accessibility of public transportation for those who need it most. The "suburbanization of poverty" described in the article means that individuals displaced from transit-rich urban cores often find themselves in areas with limited transportation options, leading to increased car dependency, longer commutes, and heightened social isolation.

Homelessness and Public Transportation: A Critical Nexus

The housing crisis disproportionately affects the most vulnerable populations, notably those experiencing homelessness. As the CalMatters article succinctly states, "Higher rents swell the state's population of homeless and elderly." Individuals experiencing homelessness and elderly, often rely heavily on public transportation as their primary means of mobility. They use buses and trolleys to access essential services such as shelters, food banks, medical appointments, job centers, and social support networks. For many, public transit is not merely a convenience but a lifeline, enabling them to navigate the city and meet their basic needs.

Given their reliance on public transit and their extreme vulnerability to housing market fluctuations, homeless and elderly individuals are among the communities most severely impacted by the high cost of housing. When housing becomes unaffordable, the ranks of the homeless grow, simultaneously increasing the demand for accessible and affordable public transportation while the very conditions that create homelessness (gentrification, displacement) erode transit ridership among other groups.

Recommendations for San Diego Transportation Planners

In light of the profound connections between housing affordability, gentrification, and public transportation, SANDAG and San Diego transportation planners should adopt a strategic approach that integrates housing and transit planning.

1. **Prioritize Affordable Housing Neighborhoods for Enhanced Transit Services:**
    - San Diego's transportation planning should explicitly prioritize neighborhoods designated for new or existing affordable housing developments for robust bus, trolley, and shuttle services. This includes ensuring high frequency, extended operating hours, and comprehensive route coverage in these areas.
    - By investing in transit infrastructure and services where affordable housing is concentrated, SANDAG can directly support the mobility needs of transit-dependent

residents, reduce car dependency, and foster more equitable access to employment, education, and services across the region.
    - This prioritization should extend to planning for future transit expansions, ensuring that new lines and services are designed to serve areas where housing affordability is a key concern.
2. **Provide Adequate Transportation Services to Homeless Encampments (Tent Cities):**
    - San Diego's several homeless encampments, often referred to as "tent cities," represent a critical population with urgent transportation needs. These individuals, by definition, lack stable housing and are highly reliant on public transit to access vital resources.
    - SANDAG, in collaboration with the City of San Diego and social service providers, should explore and implement dedicated transportation solutions for these encampments. This could include:
        - Establishing new or adjusting existing bus routes to include stops in close proximity to major encampments.
        - Implementing shuttle services that connect encampments directly to key service hubs (e.g., shelters, healthcare clinics, food distribution centers, employment agencies).
        - Exploring programs for subsidized or free transit passes for homeless individuals to remove financial barriers to access.
    - Ensuring reliable and dignified transportation for homeless individuals is not only a matter of social equity but also a practical step towards helping them access the support systems necessary for stability and eventual rehousing.

Conclusion

The evidence is clear: California's housing crisis is inextricably linked to its public transportation challenges. As rising rents displace transit-dependent populations, including the growing number of homeless individuals, public transit systems face declining ridership and reduced effectiveness. For San Diego, addressing these intertwined issues requires a proactive and compassionate approach. By prioritizing transit services in affordable housing neighborhoods and extending adequate transportation support to homeless encampments, SANDAG can play a pivotal role in building a more equitable, accessible, and sustainable San Diego for all its residents. These strategic investments will not only bolster public transit ridership but also provide essential mobility for the most vulnerable members of our community, fostering greater social inclusion and economic opportunity.

Response to SANDAG DRAFT 2025 SANDAG Regional Plan

Dated June 12, 2025

Dear SANDAG Regional Planning Team;

The Coalition for Safer Trains appreciate that SANDAG is looking to the future to review the Regional Plan for San Diego and the surrounding communities. We are a grassroots group representing tax paying citizens from Oceanside to Sorrento Valley and want to provide our ideas and comments to SANDAG to create a cohesive transit plan for Southern California for our future generations.

We have all been on our freeways around 2pm, no matter which direction, our freeways are clogged. Adding lanes can only go so far. Southern California is a car society because our rail and bus service routes are limited and don't do the last mile to actually get people to work and home. It is inconvenient, so they commute by car.

SANDAG states, "The 2025 Regional Plan envisions a sustainable and resilient future for our region and economy supported by a transportation network that is convenient, equitable, healthy and safe".

1. The Regional Transportation Plan has to think about what transportation will look like in the next 50 to 100 years, for our future generations. This means where ever SANDAG builds the rail it has to be sustainable and resilient through extreme weather changes that we are experiencing such as; storms, rain, earthquakes, sea level rise, rising ground water, putting infrastructure in a floodplain or lagoon, erosion on the coastline, beaches and bluffs, increased sand on our beaches and in our lagoons from higher tides, taking advantage of electrifying the rail, taking advantage of autonomous technology, and meeting population and commuters needs. Even though ridership has not increased substantially since covid.

2. It should be noted to create this regional plan SANDAG needs to use the correct population and housing numbers to meet the appropriate needs for our region, because the appropriate infrastructure funded and built should be based on the correct numbers so you don't waste taxpayer funding.
3. The increase in population between 2010 and 2050 was originally forecast by SANDAG to be 30% to almost 4.5M people. But over time, the forecast for 2050 has steadily fallen as fertility rates continue to decline, increases in life expectancy stalled, and net migration into California turned negative starting in 2015.

4. The 2024 SANDAG forecast for 2050 calls for under 3.5 million people – not much more than the current population of San Diego County. In fact, San Diego County could only see another 125,000 new residents between now and 2050. Thus, in San Diego County the state's legal mandate to provide housing units to accommodate projected growth has already been met – all the way through 2050.

   The absurdity of planning for the massive number of new San Diego residents envisioned by earlier forecasts is nowhere more evident than in the controversial new plan for University City. It envisions building 29,000 more housing units and supporting infrastructure by 2050. All of our cities and communities are changing for the worst where certain residents are getting on the band wagon taking advantage of city laws to build multiple ADU's in neighborhoods without parking and changing the fabric of the community. There is no serious academic research showing that building sizable numbers of housing units, almost exclusively at the high end of the market, makes housing affordable over a time period relevant for current residents. That is because the process of housing filtering down to a level affordable to lower income households is quite slow.

   Furthermore, while the homeless population is concentrated in major west coast cities which has high housing costs, that population is not very responsive to changes in housing costs. These are issues that have to be tackled directly rather than hoping they will mysteriously go away by encouraging developers to engage in a large scale build out of existing communities to accommodate population growth that is no longer coming.

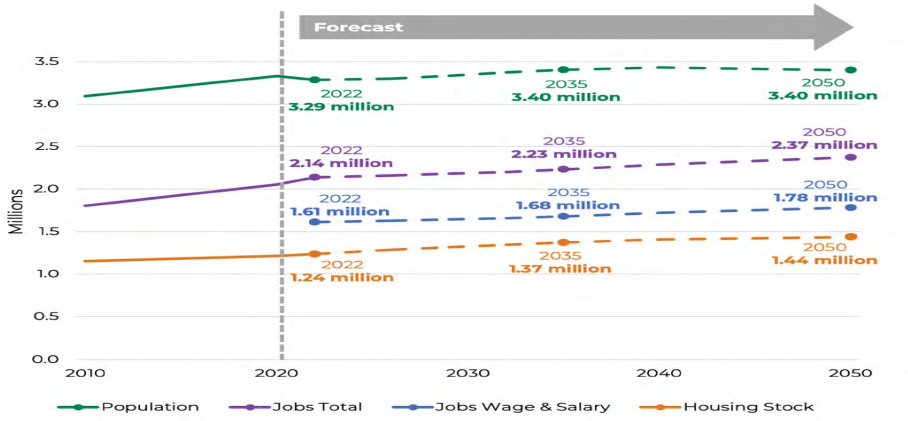
   San Diego and the surrounding constituent cities, need to put updates to community plans on hold until the deep implications of a long-term future with a sharply smaller population is fully understood. It is important to plan for the region's likely future, not one that is no longer reflected by demographics. Likewise, SANDAG and NCTD should use the correct population numbers instead of false numbers to justify rail projects.

Source: www.obrag.org Subject matter supplied by Richad T Carson who is a distinguished Professor of Economics at UC San Diego

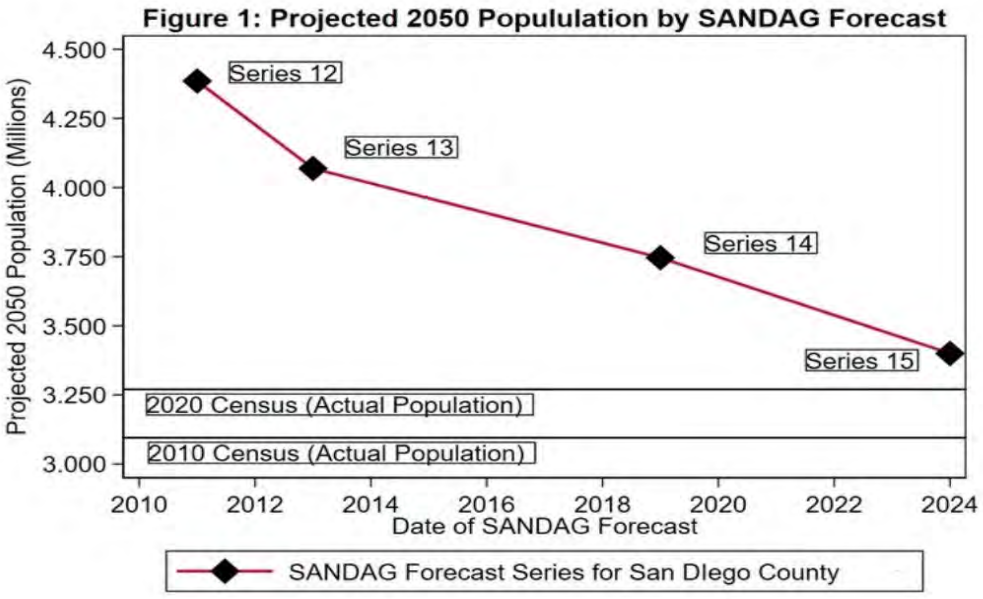
5. How many housing units need to be built for these new residents? To make that calculation, consider the average number of persons per-housing-unit, which is 2.92 based on SANDAG's figures. Divide 125,000 by 2.92 and you get 42,800. Surprisingly, that's almost exactly the 40,000 permits issues in the county since 2020.

See SANDAG's population, jobs and housing estimates below:

Figure 1.1 Population, Jobs, and Housing Forecast, San Diego Region 2010-2050



Source: SANDAG Series 15 Regional Growth Forecast with Sustainable Community Strategy Land Use Pattern



Sources: https://obrag.org/2024/05/san-diego-county-has-already-met-states-housing-unit-mandate-for-projected-population-growth-thru-2050/

www.sandag.org

Convenient and Equitable: The SANDAG statement of making our transit system equitable is a fabulous goal. But funding billions of dollars to keep the commuter rail down the extreme western edge of the eroding coast and county doesn't bring transportation to people living inland. So, when thinking of bringing a cohesive transit plan to the San Diego Region, the inland areas have been neglected. They only have the I-15 freeway going north/south and the Sprinter (which only has 4 cars) going east/west at Oceanside, I-8, and I-94. Then we have the I-5 freeway where there is an elevated electric light rail running parallel to the I-5 from La Jolla down to the border. The I-15, I-805, I-5, I-163, 76 and 78 freeways are all clogged at 2pm in both directions. So, there needs to be a discussion about bringing transit over to the inland communities where the commuters live and many companies are based. The current transportation plan is not convenient or equitable to commuters. Also, the tax payer cannot be asked to pay extra taxes to band aid the eroding bluffs to keep the rail system working. This is not a long term sustainable or resilient option.

The Environment: See below the sand that was dredged in the Los Penasquitos Lagoon and put on the edges of the lagoon. The number one threat, is the lagoon mouth closures cause increase of salinity (from brackish conditions to hypersaline), causing reduced biodiversity. Sedimentation increase, due to greater water flow from the creeks. Deposits cause a loss of salt march, turning it into a coastal scrub or riparian habitat. Increased freshwater runoff from increased storm activity also reduces the salt marsh area, turning the habitat into the riparian or cattail marsh. Widening the bridges over the lagoons for both the freeway and the rail is not an option anymore, given the amount of sand stuck under those structures. We cannot stop climate change or increasing tides bringing in more sand and impacting the lagoons. Then there are the increased costs to dredge, which the cities are burdened with.

1. **Lagoons:** Keeping the **lagoons** inlet open and excavating (dredging) the main lagoon channel are the measures now to increase the water circulation. This is not a good long term sustainable solution. This is impacting the tides and increasing sand deposits in the lagoon. Then you have the double tracking of the tracks and berms being put into the lagoons which further blocks water flow. How is this long- term planning, sustainable and resilient for future generations to enjoy these lagoons? We are already seeing the impacts of this increased infrastructure including the expanded 10 lanes of freeway, (5 lanes going each way on the I-5) going across the lagoons as well. This must be thought about when creating the overall Regional Plan, move in the infrastructure down the I-5 for passenger rail and I-15 for passenger and freight rail to get cars off the road.

2. **The Bluffs/Hillside:** We all know the eroding bluffs up and down the coast where the rail is currently located is not sustainable, as the bluffs are eroding 6 inches per year. With sea level rise, earthquakes, water run-off from irrigation and increased storm activity, increased ground water rising, the water runs downward through the hillside to the bluffs. Even with armoring, the bluffs are fragile porous Torrey Sandstone and will continue to erode around the steel armoring. We cannot hold back nature. Then many areas near the coast, rivers and lagoons are suspectable to flooding, increased tidal changes, ground water rising and major sand being dumped into the lagoons. Is the rail road going to keep increasing the heights of the berms in lagoons? Will SANDAG increase the number of times to dredge the lagoons of sand? This costs the cities $1M each time they dredge. The cities use to dredge once a year, now it is 3 to 4 times per year. The dredging has changed the tides patterns washing into Dog Beach now, so the most northern home at the river now is surrounded by water on the north side even at low tide. The erosion of the sand carved away around this home is extreme. This will continue to erode the sand from under the rocks that surround that house. This is the only thing protecting the house from the tides. Is this good long term planning? I bring this to your attention because this is happening up and down the coast in our lagoons and rivers, when we dredge and play with the tides coming in and causing more erosion.

3. **Erosion and Geotechnical Issues:** Along the Del Mar Bluffs according to the SANDAG Funded Geotechnical Design Report, dated June 20, 2021 prepared by Leighton Consulting, Inc. “The Peninsular Ranges are also traversed by several major active faults. The Whittier-Elsinore, San Jacinto, and the San Adreas Faults are major active fault systems located to the northeast of the site and the Rose Canyon, Newport-Inglewood (offshore), Coronado Bank, and San Diego Trough are active faults located to the west-southwest. Major tectonic activity associated with these and other faults with this regional tectonic framework is right-lateral strike-slip movement. These faults as well as other faults in the region, have the potential for generating strong ground motions at the project site”. It should also be notes in this study of the bluff’s Torrey Sandstone, the survey team noted, “Within both formation that underlie the right of way there are fracture zones that roughly parallel the bluff face. Also confirmed the presence of near horizontal layers of highly fractured claystone within the Del Mar Formation that were identified in some of the earlier borings. In addition to these horizonal claystone beds, steeping dipping fractures and joints are present. Near-vertical fractures and joints can also be observed at wider spacing through the entire right of way. The highly fractured zones near the bluff face can in part be attributed to weathering. East of the bluff face, the formation of these highly fractured claystone beds and the presence of steeply dipping fractures and joints within what is a typically brittle formational unit, are

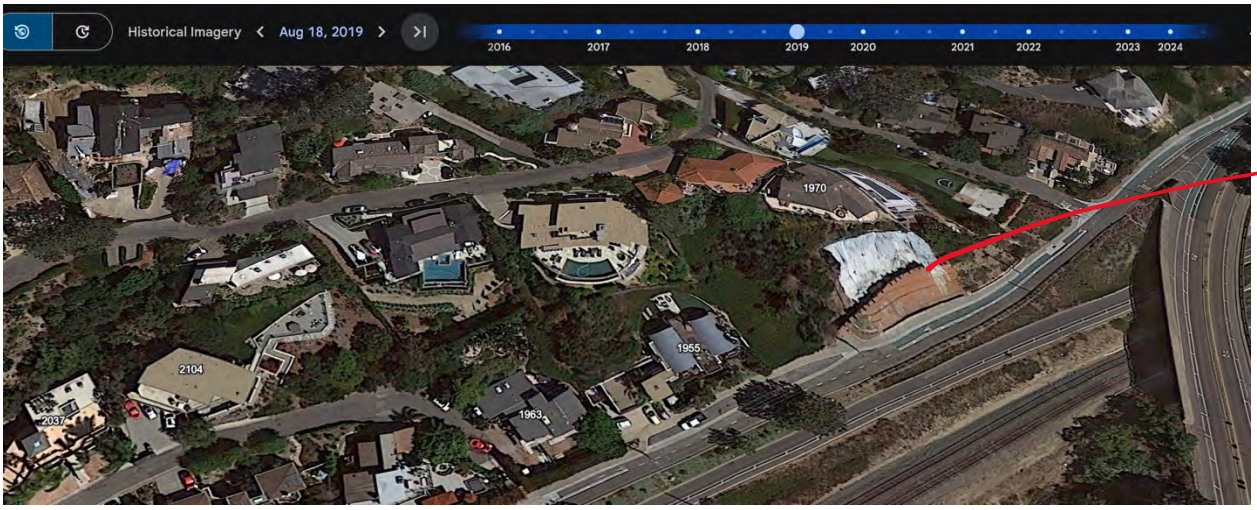
believed to be related to tectonic and/or depositional processes. These joints and fracture zones consist of breaks in the bedrock and provide weak zones on which failures can occur and also conduits for groundwater migration within the bluff."

4. **"Groundwater is a major factor influencing slope stability,** as it accelerates the degradation of the bluff and bluff face erosion. As discussed previously, geologic observations indicate that the near-vertical fractures and joints within the Del Mar Formation are more prevalent near the bluff face, but do extend landward with lesser frequency and typically wider spacing through the entire right of way as observed in numerous borings and trenches. These near-vertical fractures and joints create potential pathways for migration of groundwater throughout the bluff and the right of way. Fluctuation in groundwater levels within the near-surface soils and weathered and fractured material near the bluff face is also anticipated after periods of heavy rainfall resulting in additional seepage zones and a temporary increase in seepage. Therefore, hydro-collapse and settlement within near surface undocumented fills and Beach Deposits is anticipated." For these reasons the rail line needs to move inland to avoid these risks of nature and utilize the Freeway corridors.
   Source: https://www.delmar.ca.us/DocumentCenter/View/7741/01_Appx-B_DMB5-Geotech-Design-Report

Healthy: SANDAG states, "Healthy Communities and Environment for Everyone". When thinking of bringing a cohesive transit plan to our region, we must think where the people live and work, and where to put the rail where it doesn't impact their health and home. You are all familiar with the documented health illnesses caused by living near a rail road with diesel trains spewing toxic fumes, and impacts of noise and vibration. We all know toxic fumes are vented out of tunnels and portal locations into the communities. How can SANDAG meet the goal of providing healthy communities and environments for everyone, when a tunnel, portal and rail is in their backyard, and through the middle of a community? The priority should be putting the rail where people don't live, but easy to access in the community. For example; have passenger rail going down the I-5 and passenger and freight go down the I-15, and have train stations and parking located where there is land and rest stops now. This way commuters from the east side of the county and commuters on the west side of the county can access transportation other than the freeway by car.

If SANDAG, NCTD, and BNSF want safe, resilient, reliable rail service why would you keep the rail going through and propose going under and through densely populated communities when there are less impactful and safer alternatives? The Rail Stakeholders cannot state that there will never be a derailment or explosion in the tunnel under Del Mar or any other densely populated communities the rail goes through down the coast. This is not eliminating risk. No city wants this risk and the Rail Stakeholders preach you want safer communities and eliminate road grade crossings. Look at East Palestine Ohio, their community is still impacted, economically, and the families are suffering loss of their homes, and they suffer from documented medical illnesses as a result of the explosion, meanwhile the rail stakeholders fight over who is paying for the litigation and fines. Meanwhile the residents and town still suffer. This is not caring for a community as the years drag out for any compensation for the victims. If there was a disaster here in Del Mar or any other community it would be the same with SANDAG, NCTD, and BNSF fighting for years over who should pay the fines to the public devastated.

The area shown below is in Del Mar, where the SANDAG NOP for July 2025 proposes two alignments (Crest Canyon and Camino Del Mar routes) that would put a north portal directly at the intersection of Camino Del Mar and Jimmy Durante Boulevards. The boring tunnel and cut and cover tunnels merge at this location and will either demolish this new construction and other homes, as seen below in the two photos. This location (1970 Sea Seaview Avenue, Del Mar) also suffered 2 severe cliff collapses, before any construction started, which completely closed off Jimmy Durante for days creating traffic nightmares.


Historical Imagery
Aug 18, 2019
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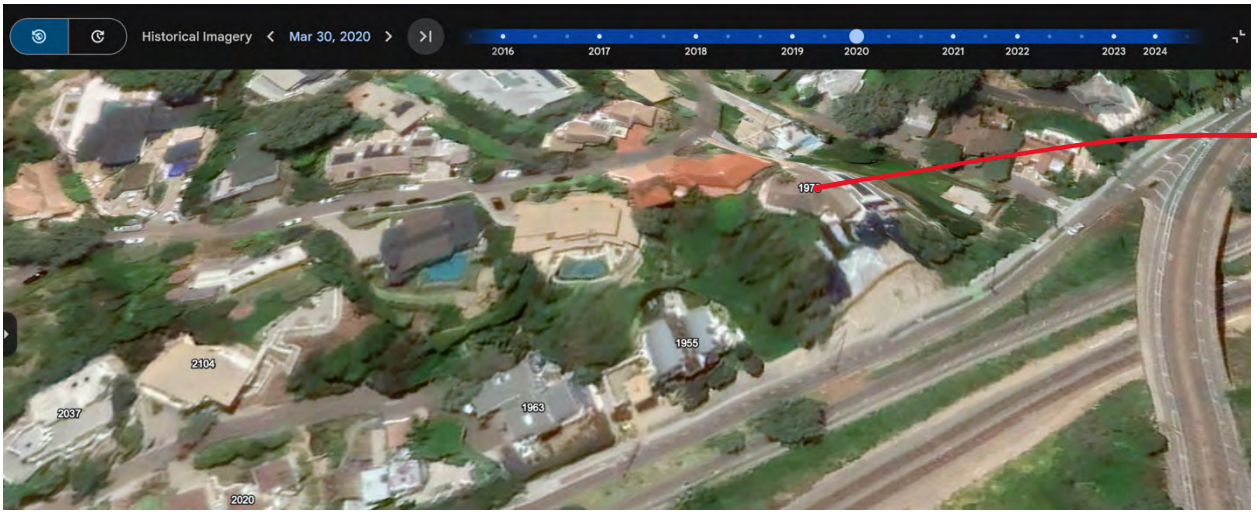
Historical Imagery
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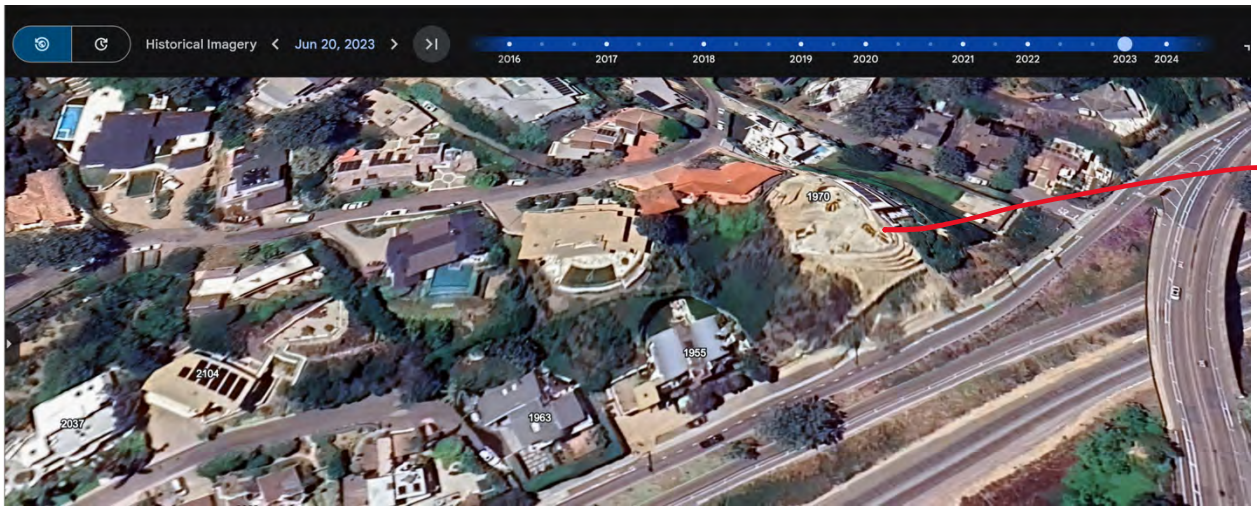
Historical Imagery
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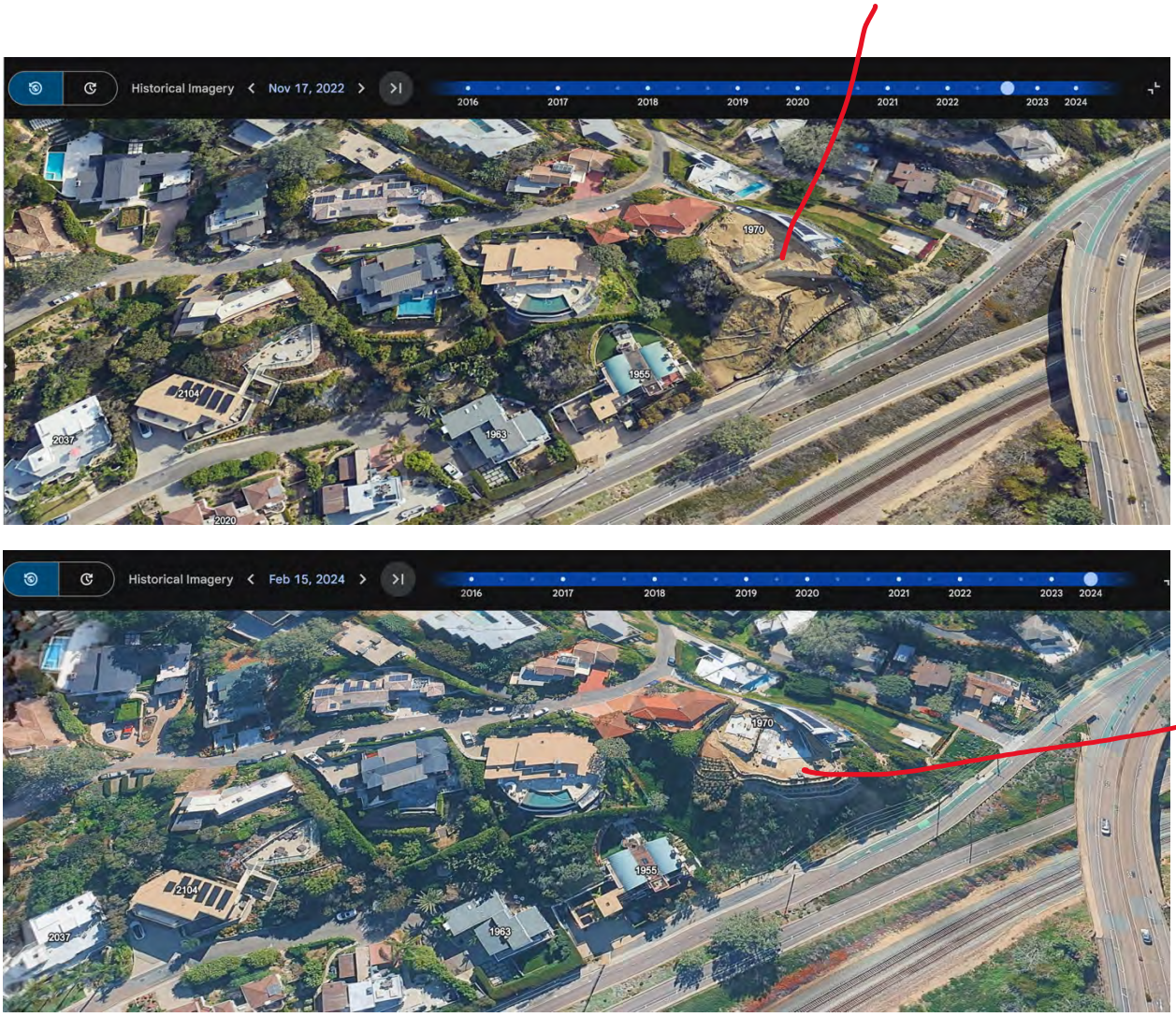


Safe: SANDAG states, "Transportation network for all users". This brings us back to bringing a cohesive transit system that all San Diegans can access no matter if they live inland, on the coast, up north or down south. If the rail utilizes building near or over or under freeways in the transportation corridors then SANDAG will meet its number one goal of eliminating road grade crossings, taking out the curves to go straighter then faster, more reliable, more efficient and make our communities safer, and increase ridership and profits . We are all aware of the deaths of people crossing the tracks from Del Mar up to Oceanside and being killed. Keeping the tracks in the center of communities is unsafe.

See the **"Rail Incidents"** listed below, on the tracks coming down the LOSSAN route. One death is too many. If you eliminated the road grade crossings by

locating the tracks near the freeways, either elevated, in a tunnel or next to the freeway, they would be in the transportation corridor and further away from the communities and more difficult for people to walk over the tracks or have cars stuck on the tracks endangering the communities. If the tracks are located along or over the freeways, then the Rail Stakeholders could implement electrified rail, limit toxic diesel emissions and create a reliable and resilient rail system accessible to the commuters and increase profits. These are all stated goals for SANDAG, NCTD, and BNSF.

The above photo is in the center of Del Mar and the photos below are in the middle of Leucadia and Carlsbad. Unlimited access for residents, children and dogs to cross the tracks, increasing risk for all. This is not demonstrating safety in our communities by double tracking, increasing noise, vibration and tripling the pollution in the communities. (SANDAG is increasing passenger rail from 44 per day to 111 per day, and increasing freight from 6 to 12 per day). The only thing about this plan is consistent risk and increased pollution in the communities. If the SANDAG proposed Double tracking of the bluff is chosen, then this road grade crossing in the middle of town will **not be eliminated**, which defies the Rail Stakeholders number one goal.

Rail Incidents Listed Below:

Section	Location	Date of Incident
MP 112.5 - 114.5,	Mission Rd./N. Pacific St. (MP 114.5)(027574T),	2/4/15
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	3/5/15
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	3/12/15
MP 260.1 - 267.7,	San Clemente Canyon Creek Bridge 3 (MP 259.5),	5/9/15
BNSF,		6/10/15
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	8/12/15
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	9/29/15
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	10/5/15
MP 225.1 - 230.0,	CP Carl (MP 229.4),	11/12/15
MP 114.6 - 116.5,	Marcos St. Ped (MP 115.9)(934296G),	2/9/16
MP 230.1 - 235.0,	Palomar Airport Rd. Overpass Bridge (MP 232.2),	5/12/16
MP 230.1 - 235.0,	Batiquitos Lagoon Bridge (MP 234.8),	6/2/16
MP 118.5 - 119.2,	Rancheros Dr. (MP 118.8)(027581D),	6/4/16
MP 235.1 - 240.0,	D St. (MP 237.87)(026829J),	9/5/16
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	9/24/16
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	10/29/16
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	11/29/16
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	1/26/17
MP 225.1 - 230.0,	CP Longboard (MP 228.4),	2/14/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	2/22/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	3/15/17
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	3/31/17
MP 225.1 - 230.0,	CP Carl (MP 229.4),	4/3/17
MP 116.6 - 118.4,	Bike Trail Crossing #1 (MP 116.70)(943873B) ,	5/16/17
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	5/28/17
MP 225.1 - 230.0,	Wisconsin Ave. (MP 226.84),	5/31/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/22/17
MP 225.1 - 230.0,	CP East Brook (MP 225.3),	6/25/17
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	7/7/17
MP 235.1 - 240.0,	CP Swami (MP 238.04),	8/8/17
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	11/15/17
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	11/19/17
C2 Station - Carlsbad Village,		12/17/17
MP 245.1 - 250.0,	CP Torrey (MP 247.83),	2/11/18
MP 230.1 - 235.0,	Agua Hedionda Bridge (MP 230.6),	3/19/18
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	4/8/18
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	4/24/18
MP 245.1 - 250.0,	CP Pines (MP 249.8),	5/5/18
MP 235.1 - 240.0,	CP Swami (MP 238.04),	5/10/18
MP 235.1 - 240.0,	E St. (MP 237.96)(026830D),	5/15/18
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	5/23/18

MP 260.1 - 267.7,	CP Convair (MP 265.19),	6/1/18
MP 240.1 - 245.0,	Lomas Santa Fe Overpass Bridge (MP 241.9),	6/4/18
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	7/13/18
MP 225.1 - 230.0,	Oceanside Harbor Dr. Overpass Bridge (MP 225.2),	7/22/18
C3 Station - Poinsettia,		7/23/18
MP 260.1 - 267.7,	Hawthorne Street (MP 266.93)(026866L),	7/26/18
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	8/15/18
MP 235.1 - 240.0,	CP Swami (MP 238.04),	12/29/18
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	1/18/19
C2 Station - Carlsbad Village,		2/2/19
MP 230.1 - 235.0,	Tamarack Ave. (MP 230.09)(026822L),	2/27/19
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	3/21/19
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	4/16/19
MP 225.1 - 230.0,	Wisconsin Ave. (MP 226.84),	4/18/19
MP 235.1 - 240.0,	CP Swami (MP 238.04),	4/23/19
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/18/19
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	5/29/19
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	5/30/19
MP 225.1 - 230.0,	Grand Ave. (MP 229.2)(026820X),	9/26/19
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	10/30/19
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	11/14/19
MP 207.4 - 210.0,	County Line (MP 207.4),	11/22/19
MP 225.1 - 230.0,	Mission Ave. (MP 226.22)(027062B),	12/8/19
MP 235.1 - 240.0,	CP Swami (MP 238.04),	12/12/19
MP 260.1 - 267.7,	CP Cudahy (MP 262.25),	1/2/20
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	2/18/20
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	2/29/20
MP 255.1 - 260.0,	Rose Creek (MP 258.0)(967110H),	5/30/20
MP 225.1 - 230.0,	Grand Ave. (MP 229.2)(026820X),	6/15/20
MP 207.4 - 210.0,	County Line (MP 207.4),	9/18/20
C7 Station - Old Town,		10/2/20
C2 Station - Carlsbad Village,		11/19/20
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	1/10/21
MP 260.1 - 267.7,	Noell Street (MP 265.35)(026856F),	1/28/21
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	2/15/21
MP 119.3 - 120.4,	N. Andreason Dr. (MP 120.4)(027593X),	2/17/21
C7 Station - Old Town,		4/15/21
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/4/21
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	7/17/21
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	7/18/21
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	7/26/21
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	10/20/21
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	11/15/21

MP 260.1 - 267.7,	Sea World Dr/Tecolote Rd. Overpass Bridge (MP 263.1),	11/19/21
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	12/6/21
C7 Station - Old Town,		1/1/22
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	1/18/22
MP 225.1 - 230.0,	Loma Alta Creek Bridge (MP 227.7),	2/18/22
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	4/8/22
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	4/30/22
MP 245.1 - 250.0,	Sorrento Valley Blvd. (MP 249.07)(026838H),	5/22/22
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/22/22
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/9/22
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	6/9/22
MP 119.3 - 120.4,	Enterprise St. (MP 119.9)(027590C),	1/18/23
MP 230.1 - 235.0,	Tamarack Ave. (MP 230.09)(026822L),	4/2/23
MP 230.1 - 235.0,	Agua Hedionda Bridge (MP 230.6),	4/11/23
MP 255.1 - 260.0,	CP Morena (MP 260.51),	4/24/23
MP 260.1 - 267.7,	Clairemont Ave. Overpass Bridge (MP 261.7),	5/24/23
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	7/11/23
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	7/13/23
MP 260.1 - 267.7,		8/16/23
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	9/3/23
MP 260.1 - 267.7,		9/4/23
MP 260.1 - 267.7,	Grape Street (MP 267.0)(026867T),	9/13/23
MP 260.1 - 267.7,	Noell Street (MP 265.35)(026856F),	11/29/23
MP 245.1 - 250.0,	CP Torrey (MP 247.83),	1/11/24
MP 260.1 - 267.7,	Sassafras Street (MP 266.08)(026859B),	1/11/24
MP 235.1 - 240.0,		1/13/24
C2 Station - Carlsbad Village,		1/15/24
MP 210.1 - 219.9,		2/3/24
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	2/4/24
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	2/10/24
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	2/29/24
MP 225.1 - 230.0,		3/5/24
MP 245.1 - 250.0,	McGonigle Rd. Underpass Bridge (MP 246.0),	3/17/24
MP 235.1 - 240.0,	Encinitas Blvd. Underpass Bridge (MP 237.7),	4/10/24
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	4/18/24
MP 235.1 - 240.0,		5/4/24
BNSF,		5/8/24
MP 230.1 - 235.0,		6/7/24
MP 260.1 - 267.7,		6/8/24
MP 245.1 - 250.0,	Sorrento Valley Blvd. (MP 249.07)(026838H),	6/14/24
MP 230.1 - 235.0,		6/15/24
MP 225.1 - 230.0,	Carlsbad Blvd. Overpass Bridge (MP 228.9),	8/12/24
MP 235.1 - 240.0,		9/2/24
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	9/14/24

MP 260.1 - 267.7,		9/20/24
MP 245.1 - 250.0,		10/23/24
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	10/27/24
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	11/5/24
MP 225.1 - 230.0,	Mission Ave. (MP 226.22)(027062B),	12/15/24
MP 260.1 - 267.7,	CP Cudahy (MP 262.25),	12/20/24
MP 225.1 - 230.0,		1/14/25
MP 260.1 - 267.7,	Palm Street (MP 266.38)(026861C),	2/13/25
MP 260.1 - 267.7,	Palm Street (MP 266.38)(026861C),	2/25/25
MP 119.3 - 120.4,	Enterprise St. (MP 119.9)(027590C),	3/4/25
MP 225.1 - 230.0,	CP Shell (MP 225.9),	3/12/25
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	3/17/25
MP 240.1 - 245.0,	Hwy 101 Overpass Bridge (MP 243.7),	4/16/25
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/14/25

Sources: www.Sandag.org www.calmatters.digitaldemocracy.org

www.railroads.dot.gov

If other businesses had this many accidents and deaths attributed to their operation, they would be sued and shut down. This is not acceptable considering the Rail Stakeholders state their number one goal is safety of the community. SANDAG and NCTD have this data and should be moving the tracks out of the communities instead of moving forth to increase the risk in the community. Given the public funds provided by taxpaying citizens for these infrastructure projects, the Rail Stakeholders should review how they are abusing the communities in terms of risk, safety, noise, vibration, increased pollution, environmental changes, eminent domain of resident's homes and businesses, and documented medical illnesses for their profits. **A better more common-sense approach is needed if the rail industry wishes to co-exist with communities.**

Regional Ideas:

Ideas for regional planning, the region needs to utilize our transportation corridors, and move passenger rail to run down the I-5 from Oceanside to downtown San Diego and to the Airport, and border. Then utilize the I-5 transportation corridor for passenger (Sprinter) and freight down to the Border and Port. There is much more space around, next to and above the I-5 for this type of infrastructure without having to take people's homes. These routes meet SANDAG's goals for straightening the route, going faster, taking the diesel pollution, noise and vibration away from communities. This also meets the number one priority for SANDAG to eliminate road grade crossings. SANDAG should also be researching and considering Multi-modal Autonomous

Electric freight moving systems that are elevated above the freeways from the border up north to utilize the I-15 up to the Barstow Freight Depot. See FR8WAY System as potential possibility to move freight from the Border and Border and be built over our freeways. It can be built fast like lego.

FR8WAY MARKETS

HIGHWAY CORRIDOR EXPRESS

Connecting large scale production and/or distribution areas, and other highly congested trucking routes.

- Multimodal connectivity
- Direct customer access
- Compatible with existing interchanges
- High capacity (10,000+/day)

CROSS-BORDER EXPRESS

Providing a nonstop link across the border, to inland terminals, while scanning 100% of cargo.

- Eliminates choke point at the border
- Private lane across the border
- Inspect-in-motion
- Direct customer access

SEAPORT EXPRESS

Connects valuable port property to inland land that is more accessible, affordable, and allows ports to increase their capacity without having to sacrifice usable land at the container terminal.

- All elevated
- Small footprint
- Multimodal connectivity

Background on Federal – Transportation Reauthorization of FAST ACT

President Obama signed a five-year surface transportation act – the FAST Act – in November 2015 that provides states with the funding to undertake longer-term transportation projects. The FAST Act is notable for its emphasis on freight and for its creation of a program category for "Intelligent Freight Transportation Systems" (IFTS) which FR8WAY worked for over a year to get into the bill. This provision is permanent and does not expire with the FAST Act in 2020.

The language for IFTS accomplishes several things for FSI:

1. It offers an unambiguous definition of IFTS and defines these systems, under Title 23, US Code of Federal Regulations, as an augmentation of the highway system (Title 23 concerns itself with Highways, Title 49, with Railroads, etc.).
2. It places IFTS under Subchapter K and assigns project oversight to the Federal Highway Administration (FHWA), giving the Administrator authority to determine the (1) need for, and (2) the nature of operating standards for IFTS.
3. It treats IFTS projects as "Federal-aid" highway projects.
4. It includes connections to landside ports of entry and treats them as Federal-aid highway projects.
5. It apportions $6.3 billion in federal funding to states to participate in IFTS projects, qualifying IFTS projects for direct state DOT participation in PPPs associated with IFTS projects.

''(k) INTELLIGENT FREIGHT TRANSPORTATION SYSTEM —

''(1) DEFINITION OF INTELLIGENT FREIGHT TRANSPORTATION SYSTEM — In this section, the term 'intelligent freight transportation system' means —

''(A) innovative or intelligent technological transportation systems, infrastructure, or facilities, including elevated freight transportation facilities—

''(i) in proximity to, or within, an existing right of way on a Federal-aid highway;

''(ii) or that connect land ports-of-entry to existing Federal-aid highways; or

''(B) communications or information processing systems that improve the efficiency, security, or safety of freight movements on the Federal-aid highway system, including to improve the conveyance of freight on dedicated intelligent freight lanes.

''(2) OPERATING STANDARDS. The Administrator shall determine whether there is a need for establishing operating standards for intelligent freight Transportation systems.

''(l) TREATMENT OF FREIGHT PROJECTS. Notwithstanding any other provision of law, a freight project carried out under this section shall be treated as if the project were on a Federal-aid highway.''

Then we now need review the east west connectors throughout the San Diego Region. SANDAG already has plans for bike paths, extra lanes on the existing freeways, light rail, but needs to provide more west to east rail connectors in the region to get the commuter near to where they live and work.

We thank you for looking into the future and trying to think about our region and future generations. Our city is far behind cities like Paris, and London in terms of rail, metro and bus infrastructure. We have more space than those cities, so together we should be able to create a cohesive transit plan that serves all of our communities. Thank you for your consideration.

Kind Regards,

Angelina Neglia

Angelina Neglia

Coalition for Safer Trains

San Diego County
Air Pollution
Control District

July 11, 2025

Mario Orso, Chief Executive Officer
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, CA 92101

Subject: Community-Supported Priorities for SANDAG's Draft 2025 Regional Plan

Dear SANDAG Board Members,

Thank you for the opportunity to comment on the Draft 2025 Regional Plan Transportation Network. Mobile sources account for the majority of air pollution emissions in the region, particularly in environmental justice communities. As such, the selection and prioritization of transportation projects and policies in the proposed 2025 Regional Plan represent a meaningful opportunity to significantly improve community health and quality of life for those most impacted by air pollution. This letter outlines specific community-supported programs and projects that we recommend be included in the final 2025 Regional Plan for completion by 2035.

The San Diego County Air Pollution Control District (SDAPCD) works to improve air quality for communities most affected by air pollution sources. This effort includes participation in the Community Air Protection Program (CAPP or AB 617), a collaborative initiative involving residents, SDAPCD, the California Air Resources Board (CARB), industry representatives, and other public agencies. Through Community Steering Committees (CSCs), these stakeholders work together to develop and implement strategies that reduce air pollution and improve public health. We appreciate SANDAG's partnership in this effort and the active participation of SANDAG staff in the Portside and International Border CSCs.

In the San Diego region, two communities participate in CAPP due to their disproportionate exposure to air pollution sources: the **Portside Community** (West National City, Barrio Logan, Logan Heights, and Sherman Heights) and the **International Border Community** (San Ysidro and Otay Mesa East). These communities have developed community-led **Community Emission Reduction Plans (CERPs)** to address air pollution from industrial and commercial activities, transportation, and other sources. CERP strategies are community-supported and include air quality rule development, incentives for zero- and near-zero-emission technologies, and land use and transportation planning recommendations.

10124 Old Grove Rd. San Diego California 92131-1649
(858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

The Portside Communities are traversed by the I-5 freeway, bordered by SR-94 to the north, and are adjacent to the Port of San Diego and freight-related industries (e.g., the Navy, shipbuilding, warehouses). The International Border Community includes the San Ysidro Port of Entry—North America's busiest land border crossing—and is surrounded by I-5, I-805, and SR-905. According to CalEnviroScreen, San Ysidro ranks in the highest percentile for vehicle traffic in the State and is in the 95th percentile or higher for PM2.5 levels. As such, the transportation-related projects prioritized in the Portside and International Border CERPs have strong potential to reduce emissions in these communities and regionwide.

There are two key strategies at the center of International Border's CERP transportation strategies: *1) Support local, regional, and state plans that reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions throughout the community; 2) Support transit, pedestrian and bicycle infrastructure as a funding priority for local, regional and state transportation authorities.* SDAPCD would like to see these two guiding strategies to be the focal point and goal of the 2025 Regional Plan. There are also a variety of specific community-supported transportation programs and projects in the Portside and International Border CERPs. SDAPCD is pleased to see that several community-supported CERP priorities are already included in the Draft 2025 Regional Plan for completion by 2035 and would like to see them remain in the final 2025 Regional Plan. These include flexible fleet services, improvements to Blue Line and Rapid Bus services, and the development of a Smart Mobility Hub in San Ysidro (see **Appendix A** for a full list).

However, several other CERP priorities are included in the Draft 2025 Regional Plan but are currently scheduled for implementation beyond 2035. ***We respectfully request that the following projects, already listed in the Draft Regional Plan, be moved to Phase 1 for implementation by 2035***:

- Rapid Bus Service: New Rapid bus service connecting the border to the rest of the region (specifically, Project #19: Rapid 227: Otay Mesa East POE to Imperial Beach via 905).
- Implement New Rail Service: e.g., Purple Line to connect between the border, National City, City Heights, Kearny Mesa, and Sorrento Mesa (specifically, Project #11: Purple Line).
- Cross border Trolley: Extension of Blue Line Trolley service 1-mile into Tijuana. Coordinated customs inspection processing for vetting traveler information in advance of trip (specifically, Project #10: U.S.-Mexico Border Transit Connection).

In addition, several community-supported CERP projects and programs are not currently reflected in the Draft Regional Plan or its proposed network. ***We respectfully request that the following be explicitly included in the Plan and designated for Phase 1 implementation by 2035***:

COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS	**RECOMMENDATION**
Transit Demand Management (TDM) ordinance throughout the San Diego region with the intention to provide greater access to healthy foods, healthcare, recreational spaces, etc.	It is understood that SANDAG directly administers many Transportation Demand Management (TDM) programs and supports related policies both directly and indirectly. However, the Regional Plan does not propose a cohesive, region-wide ordinance to unify these efforts.
Coordinated Traffic signals to enhance the flow of traffic	While the Regional Plan supports many multimodal transportation improvements across the region, it typically does

particularly at Dairy Mart, Calle Primera, and San Ysidro Boulevard.	not address specific local streets and arterial roads. It is also understood that local jurisdictions coordinate with SANDAG and other regional and state partners when their local projects include a regional component. However, given the binational context and the fact that San Ysidro ranks in the highest percentile for vehicle traffic in the state—contributing significant economic benefit to the region—the Plan should include a specific focus on improving local streets and arterials in San Ysidro. This should be explicitly listed as a near-term action in the Draft 2025 Regional Plan (page 31).
Evaluate and address the impacts of border traffic on local streets (i.e., the onramp to Mexico from Camino De La Plaza) and determine the best course of action to reduce idling vehicles on City streets.	
Evaluate transportation planning around Plaza de las Americas and support recommendations that improve traffic flow, reduce VMT, support walking, biking, and taking public transit, and reduce emissions from passenger vehicles.	
Pedestrian and Cyclist Amenities/Benefits: Amenities may include installation of shade and cool zones, landscaping to offset the emissions from cars, charging stations and seating, lighting, safety hotline, and patrolling officers to increase perception of safety at the POEs. All facilities would be ADA accessible. Real-time information and signage placed at key points can enhance wayfinding and keep travelers informed of travel and wait time changes.	While the Regional Plan supports multimodal transportation, it does not identify pedestrian and cyclist amenities as standalone projects. There is a missed opportunity to explicitly prioritize the improvement of amenities for people walking or biking—such as shade, cool zones, landscaping to offset vehicle emissions, seating, and lighting—as a performance measure under the goal area of "Safe transportation network for all users" (page 29 of the Draft Regional Plan).
Increase frequency of transit service to 10 mins during evening and weekend service at the Border in San Ysidro. (County of San Diego Regional Decarbonization Framework)	Although Project #13: Blue Line Improvements would evaluate options to increase service frequency, which could address this issue, there is a missed opportunity to include increased transit frequency as a performance measure under the goal area of "Convenient and reliable movement of people and goods" (page 29 of the Draft Regional Plan).
Provide real-time transit information.	While transit user amenities such as real-time information are considered and planned for in many transit projects, this is not identified as a standalone initiative. There is a missed opportunity to include real-time transit information as a performance measure under the goal area of "Convenient and reliable movement of people and goods" (page 29 of the Draft Regional Plan).
Cross border Transit Fare Incentives: Program to coordinate transit fare systems in both San Diego (via MTS) and Tijuana (via SITT) to incentivize use of transit by cross border travelers. Fares would be discounted (i.e., reduced price, free transfer onto either system) for trips taken via the	It is understood that while this isn't specifically called out as a standalone project, SANDAG continues to collaborate with partners in the U.S. and Mexico on joint strategies and advancement of programs and policies that could include fare incentives. However, this action item should be listed in the "near-terms" action list (page 31 of the Draft Regional Plan).

SITT system and MTS system on the same day and/ or specified time.	
Electrify transit equipment and vehicles.	We are pleased to see that the Draft 2025 Regional Plan Network includes electric transit fleets through new Neighborhood Electric Vehicle service areas. While it is understood that management of transit equipment and vehicle fleets is the responsibility of the transit operating agencies (such as MTS), and that SANDAG supports them through actions like securing funding for new vehicle purchases, there is a missed opportunity to explicitly commit to the transition to zero-emission transit vehicles and supporting infrastructure in the performance metrics under "Healthy communities and environment for everyone" (page 29 of the Draft Regional Plan).
Implement pedestrian and cyclist amenities which may include installation of shade and cool zones, landscaping to offset the emissions from cars, seating, lighting, sidewalks, crosswalks, bike lanes, ADA accessible, etc. (Specifically within San Ysidro and Otay Mesa).	While it is understood that these improvements are developed as part of broader regional transportation improvements at the project-level and that the Regional Plan proposes and supports many multimodal transportation improvements throughout the region, it does not specifically call out amenities as a standalone project. This makes it difficult for communities to know what specific improvements they should anticipate in their communities as part of the adoption of the Regional Plan.

We look forward to continuing to work in partnership with you and the communities we serve to ensure that the 2025 Regional Plan supports the sustainable movement of people and goods while protecting the health of residents most overburdened by transportation-related air pollution.

If you have any questions, please feel free to contact Shalem Aboody-López, Program Coordinator, at Shalem.Aboodylopez@sdapcd.org. We look forward to your response.

Sincerely,

Paula Forbis, Air Pollution Control Officer

CC: Zach Hernandez (zachary.hernandez@sandag.org)
Mariela Rodriguez (mariela.rodriguez@sandag.org)
Keri Robinson (keri.robinson@sandag.org)

Appendix A

CERP Actions included in Draft 2025 Regional Plan to be Completed by 2035

COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS	PROJECTS INCLUDED IN DRAFT REGIONAL PLAN MARKED AS "BY 2035"
Smart Mobility Center/Mobility Hub: Multimodal transportation hub with amenities for travelers and to facilitate seamless travel connections. Primary amenities include, but are not limited to, secure bicycle storage, cross border bike share, transit and mobility services, internet access, travel information desks, clean restrooms, and Border Kiosks. Secondary amenities, include but are not limited to, park and ride facilities (with reservation options), safe pick up and drop off locations for shared mobility options (including scooters and bicycles), safe drop-off locations for travelers dropped off in passenger vehicles (including personal vehicles or taxis), rental cars, coffee shops, duty free shopping, and restaurants. All these amenities would be ADA accessible.	Project #36: San Ysidro Mobility Hub
Mobility Hubs: Implement near-term improvements to the San Ysidro Transit Center to enhance access, safety, and efficiency, while developing long-term investments in a future San Ysidro Mobility Hub to accommodate more robust mobility options (i.e., new rail and bus services) to ultimately induce mode shift away from personal vehicle travel through the port of entry. Longer term solutions integrate shared mobility services, transit supportive land uses, and supporting technology to increase mobility options and enhance equity, safety, and accessibility.	Project #36: San Ysidro Mobility Hub
Rapid Bus Service: New Rapid bus service connecting the border to the rest of the region (e.g., between San Ysidro and Downtown San Diego).	Project #29 Rapid 638: Iris Trolley to Otay Mesa; Project #30: San Ysidro to Santa Fe Depot; Project #31: Rapid 688: San Ysidro to UTC via 805; Project #42: Circulator Route 193: Iris Transit Center to San Ysidro High School; Project #43: Circulator Route 661: Otay Mesa Loop
Improve Existing Rail Service: e.g., Blue Line improvements to enhance accessibility, travel times/speeds, capacity, and frequencies for the most constrained segments of the Blue Line corridor. This would also include grade separations at key locations such as 28th St, 32nd St, E St, H St, Palomar St, and Blue/ Orange Track Connections at 12th/ Imperial	Project #13: Blue Line Improvements

Flexible Fleet Services: Implement flexible fleet programs to improve first/last mile connections in the border community (e.g., a free electric shuttle service to key locations to and from the border). This program could also supplement gaps in school shuttle and bus networks, business and work shuttles, shopping district shuttles, etc. Implementation could include public subsidies and public-private partnerships.	Project #50: NEV Service Area: San Ysidro/ U.S.-Mexico Border
COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS	**PROJECTS INCLUDED IN DRAFT REGIONAL PLAN MARKED AS "BY 2035"**
Beardsley St & Harbor Dr: Modification of raised median to restrict EB and SB left turns.	Project# 34: Harbor Dr Multimodal Corridor Improvements
CERP Measure: Prioritize implementation of Blue line trolley grade separation at 28th St and 32nd St (SANDAG MMAS project L-83, & HDMCS project 62 & project 22)	Project #13: Blue Line Improvements

CITY HEIGHTS
COMMUNITY DEVELOPMENT

4001 EL CAJON BLVD. SUITE 205
SAN DIEGO, CA 92105
INFO@CITYHEIGHTSCD.ORG
WWW.CITYHEIGHTSCDC.ORG

July 14, 2025

SANDAG Board of Directors and Staff
1011 Union St Suite 400
San Diego, CA 92101

Re: Comments on the 2025 Regional Plan

Dear SANDAG Board Members and Staff,

City Heights Community Development Corporation (CHCDC) appreciates the opportunity to provide comments on the 2025 Regional Plan. We recognize the time and effort your agency has committed to regional planning, and we share your vision for a more equitable and sustainable transportation system.

As a long-standing community-based organization serving the residents of City Heights-a diverse, transit-dependent neighborhood-we would like to elevate a few key priorities and concerns informed by our ongoing conversations with local families, workers, and youth.

1. Planning and Implementation Timelines Must Improve
Residents are increasingly frustrated with how long it takes for projects to be planned and implemented. Many community members have spent years-sometimes decades-participating in planning efforts, only to see minimal progress. We are hearing from older residents that they no longer see the value in engaging, which is deeply concerning. To regain public trust, SANDAG must meaningfully accelerate the planning and delivery of transit and bike projects. We urge SANDAG to lead efforts not only to streamline its own processes but also to advocate for state-level reforms that reduce unnecessary delays in project delivery.

2. Strong Support for the Rapid 625 Line
We are excited to see the Next Gen Rapid 625 bus route included in the 2025 Regional Plan. This project has strong potential to improve employment opportunities in City Heights. We urge SANDAG to prioritize this route for early implementation and ensure it is delivered with high-quality infrastructure, including dedicated bus lanes and frequent service.

3. Fund and Sustain the Youth Opportunity Pass Program
The Youth Opportunity Pass (YOP) program has been a tremendous success in the region, enabling young people to access school, jobs, and enrichment opportunities. CHCDC strongly supports the continuation and expansion of YOP. We urge SANDAG to identify additional funding to sustain the program and make it permanent beyond the pilot phase.

CITY HEIGHTS
COMMUNITY DEVELOPMENT

4001 EL CAJON BLVD. SUITE 205
SAN DIEGO, CA 92105
INFO@CITYHEIGHTSCD.ORG
WWW.CITYHEIGHTSCDC.ORG

4. Prevent Displacement and Ensure Equitable Access to Benefits
We commend SANDAG for creating the anti-displacement strategies and policy toolkits. However, it is critical that these policies are not treated as optional guidance. They should be actively implemented by local jurisdictions in parallel with SANDAG's infrastructure investments. Without firm leadership, communities like City Heights risk being priced out and displaced just as long-overdue improvements arrive. The residents who have fought hardest for better mobility and quality of life deserve to benefit from those investments—not be pushed out because of them. SANDAG should strongly encourage its member agencies to adopt and enforce anti-displacement protections alongside project delivery.

5. Accelerate the Purple Line Planning Process
The Purple Line is one of the most promising transit investments for connecting working-class communities to job centers, educational institutions, and healthcare facilities. With its potential to provide high-capacity, reliable alternatives to driving, this project could reshape regional mobility and equity outcomes.We are deeply concerned by ongoing delays and the recent decision to shift the Purple Line from heavy rail to light rail—an adjustment that risks compromising the long-term capacity and transformative potential of the corridor. After decades of visioning, we cannot afford to let this project stall or be scaled back. We urge SANDAG to commit to advancing the Purple Line into design and environmental review. Doing so would keep the momentum alive and move this long-envisioned project toward implementation and the future our communities deserve.

We thank you for your continued engagement and partnership and look forward to a Regional Plan that centers the needs of communities like City Heights.

Sincerely,

Jesse Ramirez

Jesse Ramirez
Director of Urban Planning

SIERRA CLUB
SAN DIEGO CHAPTER

July 15, 2025

Re: SANDAG Regional Transportation Plan
Via Email: regionalplan@sandag.org

Subject: Comments on SANDAG's Draft 2025 Regional Plan

Transportation is the largest source of greenhouse gas (GHG) emissions in San Diego County, representing about half of our total emissions. Transportation emissions have fallen only slightly, about 1% per year, since 2019 according to climatedashboard.sandiego.gov, This record is far less than is needed to meet goals mandated in state law and our self-imposed 2035 emission reduction targets. The San Diego Chapter of the Sierra Club calls on SANDAG to demonstrate effective leadership by using its regional transportation mandate and the 2025 Regional Plan (Plan) to reduce GHG emissions, preserve and restore biodiversity, and protect our coast from sea level rise, all while implementing measures that enhance Environmental Justice.

Reduce GHG Emissions

SANDAG's draft 2025 Regional Plan not only fails to prioritize GHG emission reductions, it proposes many projects that will actually increase GHG emissions and contribute to urban sprawl.

A major flaw in the draft Plan is the emphasis on freeway and road projects that will increase GHG emissions over rail public transit that would reduce emissions. The Plan includes at least 61 freeway and road projects benefiting single-occupancy vehicle users that would cost $10.84 billion by 2035. In contrast, the Plan proposes just 6 rail projects that would cost $8.8 billion by 2035.

Many new and harmful freeway lanes are proposed in the Plan including new general purpose freeway lanes, general purpose interchange improvements, and "managed lanes" including "managed lane connectors" at freeway interchanges and "direct access ramps" at freeway entrance/exits. The 2025 RP includes 7 new general purpose freeway lanes and related projects by 2035 for $1.3 billion. And the 2025 RP includes 26 managed-lane and related projects by 2035 for $4.6 billion. Managed lanes benefit privileged single-occupancy vehicle users and discourage public transit by allowing FasTrak paid access and thereby slowing carpool vehicles and express buses during congested periods. And managed lanes are planned

4241 Jutland Dr., Ste. 303, San Diego, CA. 92117 | TEL: 858-569-600| http://sandiego.sierraclub.org

on several freeways with no planned express bus routes and that would again promote single-occupancy vehicle users and GHG emissions.

Several projects are proposed in the Plan that would particularly benefit and induce more sprawl development which will also cause increased GHG emissions. Sprawl-inducing projects include freeway managed and truck lanes on SR 52 between I-15 and I-125, widening SR-67 between Lakeside and Ramona, improvements to rural interchanges on I-8 east of El Cajon, and road improvements like intersection improvements, wider shoulders, and road straightening on SR 76 east of I-15 and SR 94 east of Jamul.

Sierra Club does support several active transportation and public transit projects included in the Plan including double-tracking and grade separations for the Sprinter between Oceanside and Escondido, realigning the LOSSAN corridor off the bluffs in Del Mar and new bridges and double-tracking of the LOSSAN corridor (except in Carroll Canyon/Miramar Hill). Sierra Club also supports inclusion of the proposed 53 new active transportation bicycle and pedestrian projects by 2035.

SANDAG should revise the 2025 Regional Plan to reduce GHG emissions, discourage urban sprawl, and benefit public transit:

- Remove general purpose freeway lanes and interchanges.
- Remove new managed lanes and managed lane connectors, especially where there is no public transit.
- Convert existing managed lanes to public transit lanes open to only buses and other public transit, and carpools.
- Create public transit lanes (or managed lanes) only from converted existing general-purpose lanes.
- To the extent that new managed lanes are constructed, dedicate one managed lane for use only by public transit or carpools.
- Expand Bus Rapid Transit.
- Create a special parking program for EVs or hydrogen fuel cell cars
- Allow for access to managed lanes for EVs or hydrogen fuel cell cars
- Expand rail public transit. Build electric rail public transit by 2035 including several projects proposed in the 2021 Regional Plan: Purple Line commuter rail from the U.S.-Mexico Border to Sorrento Mesa, commuter rail from downtown to El Cajon via San Diego State University and La Mesa, LOSSAN commuter rail from downtown to the U.S.-Mexico Border. Move up the schedule for the LOSSAN University community tunnel to 2035.
- Eliminate proposed projects that induce sprawl including new freeway managed and truck lanes on SR 52 between I-15 and I-125, widening SR-67 between Lakeside and Ramona, improvements to rural interchanges on I-8 east of El Cajon, and intersection improvements of wider shoulders, and road straightening on SR-76 east of I-15 and SR 94 east of Jamul.

- Redirect funding for freeway and road improvements to expand active transportation. Build complete streets in every city, especially in downtown areas.

Limit greenhouse gas emissions to net zero

The 2025 Regional Plan should include a clear policy that any projects should produce net zero GHG emissions. And the Regional Plan should include the following measures and conditions to achieve a policy of net zero GHG emissions.

- Calculate GHG emissions over the actual life of any particular transportation project during environmental review for the purposes of determining: 1) actual total GHG emissions; 2) onsite project design to minimize GHG emissions; and 3) any additional offsite mitigation necessary to achieve net zero emissions. Project lifespans should include the lifespan of GHG emissions from construction GHG emissions and "operational GHG emissions" including "area source emissions", "energy use emissions", "mobile source emissions", "water and wastewater emissions", and "solid waste emissions".[1]
- Transportation projects should be designed to minimize onsite GHG emissions to the maximum extent feasible. Add cooling measures such as trees, shade structures, and reflective pavement.

- To the extent that any onsite minimization of any transportation project's GHG emissions to net zero is not feasible, offsite GHG mitigation should be provided to achieve net zero GHG emissions in accordance with the following:

    - GHG offsite mitigation should be in addition to any existing laws, regulations, or plans already compelling reductions in GHG emissions.

    - GHG offsite mitigation should be entirely within San Diego County.

    - GHG offsite mitigation should be entirely within the same communities of concern[2] as emissions.

    - GHG offsite mitigation may include any of the following examples:

[1] "Area sources emissions" include GHG emissions from the use of landscaping equipment, hearths, and woodstoves. "Energy use emissions" include GHG direct emissions onsite from the combustion of natural gas for cooking, space and water heating, decorative uses, and indirect emissions off-site during the generation of electricity from fossil fuels in power plants. "Mobile source emissions" are GHG emissions from project-specific trips or vehicle miles travelled. "Water and wastewater emissions" are indirect GHG emissions from pumping water and wastewater and methane and other emissions from wastewater generated by a project. *City of San Luis Obispo Final California Environmental Quality Act (CEQA)Greenhouse Gas (GHG) Emissions Thresholds and Guidance* (https://www.slocity.org/home/showpublisheddocument?id=27835).

[2] California Office of Environmental Health Hazard Assessment CalEnviroScreen https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

- Preservation of natural habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or private holdings within the Cleveland National Forest. Preservation of natural habitat land as GHG mitigation should include private property acquisition and conservation stewardship management in perpetuity. The amount of GHG mitigation provided by preservation of natural habitat land should be determined by calculating reduced GHG emissions on the property over one hundred years resulting from avoided conversion to development of the existing number of legally entitled or zoned units and/or square feet on the preserved property.

- Direct replacement of GHG-emitting vehicles and equipment (e.g. diesel or natural gas generators) with electric vehicles and electric equipment including at any site under the authority of the Port of San Diego (including cargo and cruise ship terminals), of the Metropolitan Transit System, of the North County Transit District, of the San Diego Airport Authority, and of any San Diego County school district.

- Establish environmental justice grant programs in communities of concern for direct replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and any other energy efficiency improvements to businesses, residences, or community facilities.

- Cover as many parking spaces as possible with solar panels and batteries.

Preserve and restore biodiversity

Natural ecosystems supporting native plants and animals are an essential element of a sustainable San Diego County. The 2025 Regional Plan should address preservation of biodiversity because this cannot be achieved at the level of jurisdiction of each city in the County and because regional resources are needed to support regional habitat conservation plans.

The draft Plan does not meaningfully address preservation of biodiversity. In contrast to the 2021 Regional Plan in which SANDAG committed to a leadership role in securing a long-promised regional funding source for habitat conservation plans, the current draft 2025 Plan would only update a dated study on funding needs for habitat conservation. At a minimum, the draft 2025 Plan should be revised to include SANDAG's prior commitments to help secure a regional funding source for habitat conservation.

The 2025 Plan should also remove several projects that will significantly harm biodiversity.

- Proposed double-tracking the LOSSAN rail corridor through Carroll Canyon would eliminate one of the only wildlife corridors remaining between Torrey Pines State Natural Reserve, Sorrento Valley, Carroll Canyon, and Miramar Marine Corps Air Base. It would also cost billions of dollars that should be redirected to a more efficient long-term solution and SANDAG's planned realignment of this section of the rail corridor to a tunnel under the University community.

- The proposed transit center at Nobel Drive and I-805 would impact highly sensitive natural open space supporting several sensitive species and provide little benefit for effective public transit given its location at the wrong end of the commute and distance from destination businesses.

- Proposed managed lane connectors at the SR 52/I-805 interchange and widening the I-805 bridge over Rose Canyon would compromise or eliminate other important wildlife corridors just to build managed lanes that primarily benefit single-occupancy vehicle users.

SANDAG should proactively work to benefit biodiversity as it pursues transportation projects. In addition to removing projects that would harm biodiversity, the 2025 Regional Plan should include the following specific measures and conditions to preserve ecosystems and that require a net gain in biodiversity including the following:

- Add or construct any new freeway lanes only within existing developed freeway footprints.

- Avoid construction of new transportation projects in natural habitat and especially sensitive habitat and populations of sensitive species including within existing transportation properties/rights-of-ways to the maximum extent feasible.

- Build green infrastructure. Plant native vegetation along highways and use permeable surfaces and bioswales that can support pollinators, reduce runoff, and create microhabitats for small species.

- Design roads and railways with green bridges, underpasses and wildlife corridors that allow animals to move safely across landscapes, reducing roadkill.

- Provide enlarged space and habitat for wildlife movement between Marian Bear Park and MCAS Miramar as part of any projects at the SR-52/I-805 interchange.

- Include conditions minimizing and mitigating impacts of the LOSSAN rail realignment off the Del Mar bluffs and under the University community (Attachment 1).

- Mitigation for impacts to biological resources should be located in the same local watershed as project impacts to the maximum extent feasible. Condemnation to secure private property for mitigation of biological resources should not be considered infeasible. For example:

- I-5 project impacts to Rose Creek should be mitigated in Rose Creek between SR-52 and Mission Bay.
- I-805 or LOSSAN rail impacts to Carroll and Rose canyons should be mitigated in those same canyons.
- SR-78 project impacts to Buena Vista Creek should be mitigated in Buena Vista Creek.
- LOSSAN rail realignment impacts to coastal wetlands should be mitigated in the same coastal wetland.

- Transportation projects that include acquisition of mitigation property that will be open to the public should fund routine enforcement of recreation use rules and removal and habitat restoration for unauthorized trails.[3]
- Prohibit deliberate planting of invasive non-native plants in transportation properties/right-of-ways and provide a program for permanent control of any invasive non-native plants that will colonize transportation properties/right-of-ways over time, especially prioritizing areas adjacent to conserved lands.[4]

Coastal Resilience

With climate change comes sea level rise and the need to plan for and accommodate managed retreat from infrastructure and development projects along the coastline. SANDAG should proactively incorporate the following concepts in the 2025 Regional Plan to address coastal resilience:

- Work with the California Coastal Commission to ensure transportation projects align with coastal resilience goals. Build smart, resilient transportation projects that can withstand rising seas, storms and erosion and accommodate managed retreat while preserving the natural beauty and biodiversity of the shoreline. Strengthen evacuation routes and coastal highways and reinforce bridges, the port, and transit systems vulnerable to sea level rise, flooding and storm surge. Support nature-based solutions like living shorelines and restored natural wetlands that buffer storm impacts. Develop coastal adaptation strategies using concepts in the city of San Diego's Coastal Resilience Master Plan. The plan rejects traditional seawalls and proposes:
    - Living shorelines with native vegetation and dunes

[3] For example, mountain biking trespass on unauthorized trails on Caltrans mitigation properties is a major ongoing problem on the Del Mar Mesa Preserve and little to no enforcement is being provided due to a lack of funding from preserve agency owner/managers. Regular enforcement measures should be included in the preserve area analysis (PAR)-type review of long-term funding needs for any mitigation property and funded by the agency acquiring the mitigation property.
[4] Invasive non-native plants routinely colonize transportation right-of-ways and transportation agencies rarely institute control measures.

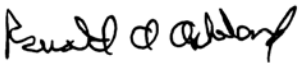
- Terraced seawalls with elevated sand berms that absorb wave energy
- Relocating infrastructure like parking lots and restrooms inland to allow beaches to migrate naturally
- Identifying roads that need to be elevated or relocated away from erosion-prone areas
- Using permeable pavement and bioswales to manage stormwater and reduce runoff
- Planting seagrasses, algae, etc. along the county's shoreline

The San Diego Region Coastal Resilience Roadmap from the San Diego Regional Climate Collaborative, outlines 76 specific actions to strengthen coastal infrastructure while prioritizing equity and environmental health. It promotes multi-jurisdictional collaboration to align transportation, land-use, and climate adaptation across the region. SANDAG should join with SDRCC to implement Roadmap projects to the maximum extent feasible.

- Ensure that vulnerable communities have safe, reliable evacuation routes and access to transit during extreme weather events.
    - Aligning transportation and land-use planning with sea level rise projections
    - Prioritizing projects that benefit underserved communities
    - Promoting multi-benefit solutions, like restoring wetlands that also protect roads and improve water quality.

Thank you for your consideration,

Lisa Ross
San Diego Sierra Club
Chapter Chair



Ronald Askeland
San Diego Sierra Club
Conservation Committee Chair

David Hogan
San Diego Sierra Club
Legal Committee Chair

DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
750 PACIFIC HIGHWAY
SAN DIEGO CA 92132-0058

July 18, 2025

Antoinette Meier, Senior Director of Regional Planning
SANDAG
1011 Union Street, Suite 400
San Diego, CA 92101

SUBJECT: SANDAG Draft 2025 Regional Plan

Ms Meier:

I am writing to provide input on the Draft 2025 Regional Plan on behalf of Navy Region Southwest. As one of the largest employers in the Region, reliant on the local transportation system to move people and goods in support of our national defense mission, we value the opportunity to participate in this plan. Navy Region Southwest supports the plan's goal to make transportation more convenient, equitable, healthy, and safe for everyone in the San Diego region and the inclusion of short- and long-term plans for improving the local transportation system.

Our specific comments, which are attached, relate to the transportation requirements of Naval Base San Diego (NBSD), Naval Base Coronado (NBC), and Naval Base Point Loma (NBPL). These three naval installations are described below to provide context for our comments.

- Naval Base San Diego (NBSD) is the homeport for the U.S. Pacific Fleet. It employs more than 41,500 military and civilian personnel. NBSD sites include the main site at 32nd Street, the Broadway Complex, and the Naval Medical Center San Diego in Balboa Park.

- Naval Base Coronado (NBC) supports over 35,000 military and civilian personnel. It provides a shore-based platform for helicopters, aircraft carriers, SEAL teams, and other commands. NBC sites include Naval Air Station North Island, Naval Amphibious Base Coronado, Naval Outlying Field Imperial Beach, San Clemente Island, Camp Michael Monsoor, Camp Morena, and Remote Training Site Warner Springs.

- Naval Base Point Loma (NBPL) supports over 10,000 military and civilian personnel and four submarines and a floating dry dock. NBPL sites include the main site, the Harbor Drive Annex, and the Old Town Campus.

Thank you for the opportunity to review the plan. My point of contact for this matter is Ms. Anna Shepherd, Navy Region Southwest, Regional Community Plans and Liaison Officer. She may be reached via e-mail at anna shepherd4.civ@us.navy.mil.

Sincerely,

Dennis Keck
Executive Director
Navy Region Southwest

Navy Region Southwest Comments on SANDAG's 2025 Draft Regional Plan

Page	Comment
18, Figure 2.1 SCS Land Use Pattern	Please confirm that the dots in this figure total ~ 25K jobs at NASNI. There do not seem to be enough dots .
18, Figure 2.1 SCS Land Use Pattern	On Figure 18, the Navy's Coastal Campus appears to only show 6 dots, which would equal 300 jobs. There are approximately 3,000 jobs at the Coastal Campus.
32	NRSW supports inclusion of Vesta Street Bridge in the list of near-term activities in support of NBSD.
Appendix A	For Blue Line Trolley grade separations, please include intersections near Naval and Marine Corps installations, such as at 28th Street and Harbor Drive, 32nd Street and Harbor Drive, 8th and Harbor Drive, and at Taylor Street and Pacific Highway to reduce traffic conflicts at the entry control points (gates) at the military installations within the Region.
Appendix A	For projects that are based on local plans (like local bike plan projects) is it possible to provide a link or a more specific source for the project/plan? It's hard to tell what the projects in the appendix are based on the brief information provided, which makes it hard to provide feedback.
Appendix A, A61	In the description of important routes that serve the South County, please include SR75, which is part of the National Highway System and is a STRAHNET facility serving Naval Base Coronado.
Appendix A, A61	The description for managed lanes is as follows: "The reversible lane on the Coronado Bridge (SR 75) has also been included in the MLs system to facilitate high occupancy vehicle (HOV) traffic between the City of Coronado and Downtown San Diego, including traffic to/from the Naval Base Coronado. The reversible lane is identified as HOV by 2035 and high-occupancy toll by 2050. By 2035, the SR 125 toll road will be converted to a freeway facility without tolls. " The traffic on the Coronado Bridge to and from Naval Base Coronado originates regionwide, not just downtown. Please consider revising the wording.
Appendix A, A62	The description for managed lanes is as follows: "The reversible lane on the Coronado Bridge (SR 75) has also been included in the MLs system to facilitate high occupancy vehicle (HOV) traffic between the City of Coronado and Downtown San Diego, including traffic to/from the Naval Base Coronado. The reversible lane is identified as HOV by 2035 and high-occupancy toll by 2050. By 2035, the SR 125 toll road will be converted to a freeway facility without tolls. " Unless this project is accompanied by enhanced public transit, carpooling, and vanpooling, and improvements to the ramps to I-5 from SR-75 (to alleviate existing bottlenecks at these ramps) Navy Region Southwest recommends reconsidering both the 2035 and 2050 projects for managed lanes on SR75.

Appendix B Public Involvement Program

SANDAG – Draft 2025 Regional Transportation Plan (RTP)

RTP Comments Matrix

Agency Name	San Diego Association of Governments (SANDAG)			
RTP	San Diego Association of Governments (SANDAG)			
RTP Refrence Checklist	RTP Checklist			
Date Issued	May 23, 2025			
Comments Due	July 3, 2025			
Point of Contact - Title	Omar Flores omar.flores@dot.ca.gov Regional Transportation Planner	Date Reviewed		

* For your convenience SANDAG's RTP has been linked to excel sheet. You will also find RTP checklist filled out by SANDAG

RTP General Comments

Division	Topic	Comments
Office of Corridor & System Planning	Multimodal	It would be helpful to add language that also illustrates working with Caltrans to find or encourage multimodal approaches to issues facing the region.
Office of Corridor & System Planning	DAC	There is limited information on where disadvantaged communities are located and how the RTP addresses those needs. There are also limited proposals and solutions for individuals who are transit dependent. It would be helpful to include assisting transit dependent demographics as an objective.
Office of Corridor & System Planning	Data	There is a lack of proposed leveraging of data technologies to measure bike/ped usage, there is mention of using data for measuring ridership data. Is there a plan for the county to acquire data for measuring bike/ped usage?
Office of Corridor & System Planning	CAP	I don't see a mention of any Climate Action Plan, or how the region anticipates climate impacts to affect housing/transportation infrastructure/economic stability. There is mention of the fact that the region is coastal, but no mention of anticipated sea level rise, or other climate-related events that may impact the area (is there wildfire vulnerability? High temperatures? Drought?) Is there a Climate Action Plan for the region? If so, I would recommend incorporating it.
Office of Corridor & System Planning	Public Outreach	Limited discussion of public outreach to underserved communities and integrating their comments in the RTP, is there any current input from those communities that can be a part of an action item? It may be good to include in sections like Community needs and issues or Community Policy Element.
Office of Corridor & System Planning	GHG Quantify Data	GHG reduction was mentioned, it would be helpful to include quantifiable targets and current levels. Is the RTP using the most recent CTP?
Office of Corridor & System Planning	Good Movements / Freight	Goods movement and the importance of freight is briefly mentioned in the RTP. Would be good to expand on the importance of freight in the region, particularly how it connects to economic activity, jobs creation, air quality and pollution, etc.
Office of Corridor & System Planning	CAPTI / CTP	Caltrans California Transportation Plan (2050) not mentioned, but other statewide policies were. It is recommended to include reference to statewide transportation planning documents.
Office of Corridor & System Planning	CAPTI / CTP	In general, the RTP aligns with some CAPTI/CTP goals, however the RTP would greatly benefit from a brief section that clearly outlines the CAPTI/CTP goals and how the RTP elements aligns with it.
Office of Corridor & System Planning	System Planning	RTP would benefit from including Caltrans System Investment Strategy (CSS) performance measures and its impact on project selection for the region. This will be helpful for future project in partnership with Caltrans. For more information please contact: MeenaxiRavi@dot.ca.gov
Office of Corridor & System Planning	System Planning	RTP would benefit from sharing any plans for utilizing/applying for Reconnecting Communities grants.
Office of Corridor & System Planning	Typos	Page 12 typo: should be "Through key performance measures, the Plan demonstrates how investment in the transportation network…"
Office of Corridor & System Planning	Typos	Page 17: the table is a little confusing. I would recommend making the right-most column heading something like "SANDAG anticipated GHG reduction" or just "anticipated GHG reduction."
Office of Corridor & System Planning	Typos	Page 19: take out "with" and just have it say "a _% increase." Otherwise the implication is that the increase is in addition to the absolute number.
Office of Corridor & System Planning	Typos	It would be helpful to more clearly delineate which projects are "new" capital projects, and which are maintenance projects. There is a brief paragraph on this on page 41, but more detail would be good.
Office of Aeronautics Program	Public and Private Use Airports in San Diego County - ID - Owner	**Airports** / **ID** / **Owner**
		Bob Maxwell Memorial Airfield / OKB / CITY OF OCEANSIDE
		Borrego Valley / 1O8 / COUNTY OF SAN DIEGO
		Brown Field / SDM / CITY OF SAN DIEGO
		Fallbrook Community Airpark / L18 / COUNTY OF SAN DIEGO
		Gillespie / SEE / COUNTY OF SAN DIEGO
		Jacumba / L78 / COUNTY OF SAN DIEGO
		McClellan-Palomar / CRQ / COUNTY OF SAN DIEGO
		Montgomery-Gibbs Executive / MYF / CITY OF SAN DIEGO
		Ocotillo / 19O / COUNTY OF SAN DIEGO
		Ramona / 89M / COUNTY OF SAN DIEGO
		San Diego International / SAN / SAN DIEGO CNTY REG ARPT AUTHORITY
		Blackington / 2CA4 / BLACKINTON AIRPORT HOA
		Borrego Air Ranch / SECL / BORREGO AIR RANCH
		Camp Joseph /	
		Flying B Ranch / 7775 / STOCKTON FINANCE INC.
		John Nichols Field / SCL3 / TACTICAL AIR OPERATIONS, INC.
		Pauma Valley Air Park / CL33 / 125 RAINBOW, LLC
		Torrey Pines Gliderport / CA84 / CITY OF SAN DIEGO
		Warner Springs / CL35 / WARNER SPRINGS RANCH RESORT, LLC
Office of Aeronautics Program	General Comment	Caltrans Aeronautics Program (Program) commends the county for their efforts to update the Draft 2025 Regional Plan (RTP).
Office of Aeronautics Program	RTP General Comments	It should also be noted that the Airport Land Use Compatibility Plans (ALUCP) have been updated between 2010 and 2025. The California Airport Land Use Planning Handbook states that an ALUCP should have a comprehensive review and update at least every five years. This is of course a guideline, and local jurisdictions are to determine when it appropriate to update. Plans that need to be updated are eligible to apply for California Airport Improvement Program grants if the subject airport is eligible. We also commend the ALUC for ensuring that the current ALUCP are available from the ALUC's website for the public to access.
Office of Aeronautics Program	RTP General Comments	The Program recommends that regional planning agencies prepare, when appropriate, to address the following areas of future focus: •Advanced Air Mobility (AAM) services. •Wayside equipment for electrified aircraft, and electric aviation in general. •Sustainable Aviation Fuel (SAF), currently in the testing stages for commercial aircraft, but will eventually trickle down to general aviation. •Improved ground access for multimodal transportation alternatives.
Office of Aeronautics Program	RTP General Comments	In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when siting future development, and preserve the viability of the aviation system as an economic engine for the region.
Office of Aeronautics Program	Funding Resources (General)	The financial aspect of maintaining airports can be challenging. Although grants are limited to available funds, the following resources may help the County obtain financial assistance through the California Aid to Airports Program (CAAP), particularly the Airport Improvement Program, Acquisition and Development Program or Local Airport Loan Program
Office of Aeronautics Program	Additional Resources	California Airport Land Use Planning Handbook https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf
Office of Aeronautics Program	Additional Resources	California Department of Transportation State Dollars for Your Airport: https://dot.ca.gov/-/media/dot- media/programs/aeronautics/documents/1016-state-dollars-for-your-airport-october-2019-a11y.pdf
Office of Aeronautics Program	Additional Resources	Caltrans Local Airport Loan Program: https://dot.ca.gov/programs/aeronautics/airport-loans
Office of Aeronautics Program	contact information	Please reach out if the County has any questions regarding out comments or if there is interest in our training program, contact: aeronautics-planning@dot.ca.gov
Office of Regional & Community Planning	General Comment	The Office of Regional and Community Planning (ORCP) would like to commend SANDAG for the clear formatting, visual layout, and overall readability of the 2025 Regional Plan. The use of graphics, consistent typography, and concise narrative structure enhances accessibility and supports broader public engagement.
Office of Regional & Community Planning	General Comment	Accessibility: Confirm that all documents and images are fully accessible, including the use of alt text, proper color contrast, and other measures to ensure the final public-facing PDF files are usable by individuals with visual impairments.
Office of Regional & Community Planning	General Comment	While the checklist indicates that the Program EIR is in progress, the RTP itself does not mention the PEIR or specify that mitigation strategies will be provided in that document. It would be helpful if the RTP included a brief reference to the upcoming PEIR and its role in addressing mitigation.
Office of Rail Planning and Implementation	Transit	Could not identify ridership numbers for transit. Would be helpful to have the numbersfor current year as well as previous years and projected years in future.
Office of Rail Planning and Implementation	Transt	Identify the strategies being utilized to increase transit ridership.
Office of Rail Planning and Implementation	General Comment	Consider including strategies for expanding discounted fare programs for low-income, student, senior, and other transit-dependent riders. These programs are important for advancing equity goals and can help grow and sustain transit ridership.
Office of Reail Planning and Implementation		I don't see a project list or even mention of key projects such as San Onofre-Pulgas Phase 2,San Onofre Bridges,Sorrento Valley Blvd Safety Improvements, etc. Maybe this information as well information about the previous comments could be found in the appendex but I think it would helpful to at least briefly touch on these topics in the general plan and not just in the appendix.

Chapter One – Regional Plan Overview			
Page	Division	Office	Comments
7	Planning	Sys Planning	Consider adding direct links to the referenced appendices within the online version of the plan to allow readers quicker and more convinent access to them.
7	Planning	Sys Planning	In the first paragraph that starts with "Chapter 2...", the "California Air Resources Board" is noted without the abbreviation "CARB". The agency is named again in pages 11 and 17 with the full name and abbreviation. Review for consistency.
9	Planning	Sys Planning	Consider utilizing the full agency name "California Department of Transportation," and including the shortened name in parantheses (Caltrans) afterwards.
9	Planning	Sys Planning	The last two paragraphs are similar, consider combining them into one.
	Planning	Sys Planning	Consider adding a page for acronyms at the begining of the plan that covers all chapters.
11	Planning	Sys Planning	Ensure consistency with the California Assembly Bill 805 citation (Gonzalez Fletcher, 2017 or 2018?) on pgs. 11 and 20.
	Planning	Sys Planning	Consider incorporating a discussion in the 2025 Regional Plan of how the 5 Big Moves presented in the 2021 Regional Plan have evolved. The transportation improvement types presented in 2025 Appendix A (p. A6-A8) seem to overlap with the 5 Big Moves (Complete Corridors, Transit, Flexible Fleets, etc.).
	Planning	Sys Planning	In Appendix M (Travel Demand Modeling Tools), there is a typo in the first row of Table M.1 (p. M7): "Tavel by San Diego residents".
11	Planning	Division of Transit Planning	May want to visit the Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990 due to updated circulars for 2025.

Chapter Two – Sustainable Communities Strategies (pages 14-25)			
Page	Division	Office	Comments
7	HQ - Planning	Office of Regional & Community Planning	In At a Glance, spell out CARB prior using the acronym.
20	Planning & Design	Sys Planning	Ensure consistency with the California Assembly Bill 805 citation (Gonzalez Fletcher, 2017 or 2018?) on pgs. 11 and 20.
22	Planning & Design	Sys Planning	(Figure 2.4) I-8 Operational Improvements line should extend east to 2nd St to show improvements between SR 67 and 2nd St.
22	Design	Design	Figure 2.4 2050 Complete Corridors: under the "Rural Corridors" section. The primary focus of SR-67 HIP is emergency evacuation, and $billions may be funded through SANDAG. However, there is no mention of emergency evacuation. The only thing close is "the movement of goods, deliveries, and emergency vehicles." I also understood that emergency evacuation studies were needed for some of the other rural corridors. It seems like this should be mentioned.
24	Planning	Sys Planning	Next Generation Rapid Service section is missing the direct link for Appendix A.
23, 24	Planning	Office of Rail Planning and Implementation	Suggest including intercity rail service on the map in Figure 2.5, and including a brief description in intercity rail services on top of page 24.

Chapter Three – Implementation Actions			
Page	Division	Office	Comments
31	Planning	Sys Planning	Implementation Actions & Near-Term and Continuing Action sections are missing direct links to Appendix N and Appendix A.
34	Planning	Sys Planning	Section C is missing the direct link to Appendix Q.
32	Planning	Sys Planning	The plan assumes optimistic future revenues, if they fall short, Caltrans may face unfunded mandates. Specify WHO pays for the roads and improvements.
34-35	Planning	Sys Planning	Freight expansion (esp. Otay Mesa, binational corridors) will need careful environmental, air quality, and equity reviews: Emphasis on cross -border trade may induce traffic growth.
32, 33	Planning	Division of Transit Planning	Suggest highlighting coastal resilience efforts for rail.

Chapter Four – Financial Plan			
Page	Division	Office	Comments
38	Planning	Sys Planning	Funding Sources section is missing the direct link the Appendix I.
41	Planning	Sys Planning	It seems like Debt Service would be more in 2036-2050 vs 2025-2035 if debt is for future projects. Or is debt service for previous/current projects?
	HQ - Planning	Office of Regional and Community Planning	Appendix A of the RTP contains an extensive list of transportation projects; however, the list does not distinguish which projects are financially constrained versus illustrative, nor does it identify regionally significant projects. For improved transparency and to fully meet the requirements of Government Code §65080(a)(4)(A) and the *CTC 2024 RTP Guidelines for MPOs*, the project list should clearly indicate which projects fall within the financially constrained scenario and which
Suggestion	HQ - Planning	Office of Transit Planning	Suggest adding more context to State of California (SHOPP) program. For instance " State Highway Operation and Protection Program (SHOPP), which is Caltrans' "fix-it-first" program that funds the repair and preservation, emergency repairs, safety improvements, and some operational improvements on the State

Appendices				
Appendix	Page	Division	Office	Comments
C	VAR	HQ - Planning	Office Air Quality and Climate Change	93.106(a)(2)II - We are able to identify the Conformity Analysis Year but are unable to determine open to traffic dates in Table C.12, Table C.13, Table C.14 for the regionally significant projects.
C		HQ - Planning	Office Air Quality and Climate Change	93.109 (c-k) - Confirm page numbers for the Regional Emissions Forecast; we located this on page 22.
C		HQ - Planning	Office Air Quality and Climate Change	93.119 (h,i) - Documentation of how the baseline and action scenarios are not located on the pages referenced; we are also unable to locate this in the document. Please clarify.
C		HQ - Planning	Office Air Quality and Climate Change	§93.122(b)(1)(i) 2 & §93.122(b)(1)(ii) 2 & §93.122(b)(1)(iv) 2 - See below recommendation to easily identify the criteria; we have also recommended this other MPOs. A good example can be found in

Planning Assumptions Table

Assumption	Year and Source of Data (MPO Action)	Modeling	Scheduled Updates
Base Year: Population, Housing & Employment	Base Year, Population and Housing: Census 2015 Building Permit, Land Use & Housing Data: 2018 Base Year, Employment: 2019 Employment Development Department (EDD) point data.	The SLOCOG Regional Land Use Model (CommunityViz) 2015 base year (updated in 2018), is used by the Travel Demand Model, along w/ 2015 Calibration year.	5 MPO Update RLUM Update (2023/4)
Future Years: Population, Housing & Employment:	2035 projections from 2050 Regional Growth Forecast (by Beacon Economics, adopted June 2017, revised Dec. 2017, and reaffirmed 2021). 2023 RTP "preferred growth scenario" for 2035 and 2045 reflects more recent assumptions for growth projections.	2023 RTP modeled (2015, 2020, 2028, 2035, 2045) based on recent projections Interpolated years: 2011 and 2017.	2050 Regional Growth Forecasts update: 2026.
Traffic Counts	Base Year: 2015. The Regional Travel Demand Model was validated to the base year 2015 using traffic counts collected by SLOCOG and local jurisdictions.	The Travel Demand Model was validated using these counts.	Traffic Count collection to occur in 2023
Vehicle Miles of Travel	The Regional Travel Demand Model was validated in Spring 2022 and used California HH Travel Survey data (2012), 2017 National HH Transportation Survey, Census, Employment, and traffic data from 2015	TransCAD v 9.0 is the software used to estimate VMT for the SLOCOG Travel Demand Model	VMT is an output of the Travel Demand Model; VMT is affected by the RTP/FTIP updates and amendments.
Speeds	The Regional Travel Demand Model uses industry standard volume delay curves. Baseline speeds are set according to posted speeds and the speeds are sensitive to the amount of traffic on the roadway segments.	TransCAD v 9.0 and EMFAC 2017.	Posted speeds are included.
Vehicle Registration	EMFAC 2017 is the most recent model for use in CA conformity analysis adopted by the US EPA.	EMFAC 2017 Model	EMFAC 2021 (Nov. 2022)

www.ridesd.org
contact@ridesd.org

July 16th, 2025

Subject: Public Comment on SANDAG's 2025 Regional Plan

To the Honorable SANDAG Board of Directors,

RideSD commends SANDAG for developing a comprehensive 2025 Regional Plan that demonstrates a genuine commitment to addressing our region's transportation challenges. We particularly appreciate the plan's focus on equity, climate action, and multimodal transportation solutions. As advocates for sustainable transportation, we see significant opportunities to strengthen several key elements of the plan.

Celebrating the Plan's Strong Foundation

We're encouraged by several excellent elements in the 2025 Regional Plan:

- **LOSSAN Rail Corridor improvements**: The commitment to double-tracking this critical rail connection between California's two largest cities will significantly improve reliability and capacity for regional rail service
- **Ambitious active transportation goals**: Expanding the bikeway network to 721 miles by 2050 demonstrates real commitment to sustainable mobility options
- **Equity and accessibility focus**: The plan's attention to disadvantaged communities and universal access principles shows important progress
- **Housing-transportation integration**: Coordinating land use and transportation planning through the Sustainable Communities Strategy supports smart growth
- **Transit-oriented development**: Supporting development near transit helps create walkable, livable communities

However, **strong commitments on paper must translate into bold action**. As advocates who have seen many plans with excellent equity and climate goals fall short in implementation, we encourage SANDAG to demonstrate that this plan represents genuine transformation, not incremental change disguised as progress.

Areas for Improvement and Clarification

While we support the plan's overall direction, we have concerns about several key elements that could be strengthened:

Managed Lanes Strategy Needs Greater Transparency

The plan's emphasis on "Complete Corridors" and "managed lanes" requires more clarity about implementation. We understand the intention to improve traffic flow, but **adding new travel lanes increases overall vehicle capacity and induces additional traffic demand**—a well-documented phenomenon in transportation planning.

With **$24.8 billion allocated for Complete Corridors**, we encourage SANDAG to:

- Avoid highway widening and instead convert existing lanes for transit use
- Provide detailed analysis of how managed lanes will avoid induced demand if new capacity is added
- Ensure these investments truly support the plan's climate goals

Strengthening Cross-Border Rail Connectivity

We're concerned about the limited commitment to extending heavy rail service to the U.S.-Mexico border. While the plan mentions studying "the feasibility of extending the LOSSAN corridor to the U.S.-Mexico border," our binational region deserves a stronger commitment to rail-based cross-border mobility. This connection could significantly reduce vehicle emissions and improve access for cross-border workers and families.

Given the plan's stated focus on equity, extending reliable rail service throughout the region—including improving connections for areas that would benefit from faster, more direct transit access—would help demonstrate that commitment in action.

Technology Investments Need Concrete Details

The plan frequently references "Transportation Technology and Smart Intersection Systems" without specific implementation details. While we support innovation, we encourage SANDAG to ensure that technology investments complement—rather than substitute for—proven transportation infrastructure investments in transit, walking, and biking.

Transit Capacity Concerns

We're concerned about the apparent downgrading of the Purple Line from heavy rail to light rail. Heavy rail systems typically offer higher capacity and faster service, which would better serve the anticipated ridership along this corridor. This change appears to reduce the long-term transit capacity of a key regional connection, potentially limiting the system's ability to attract riders and reduce vehicle trips.

The Need for Real Bus Rapid Transit (BRT)

While we appreciate the plan's inclusion of "Next Generation Rapid Service," we strongly encourage SANDAG to commit to building **true Bus Rapid Transit according to international standards**, specifically the Institute for Transportation and Development Policy (ITDP) BRT Standard.

Real BRT requires:

- **Dedicated right-of-way** with physical separation from traffic
- **Off-board fare collection** to speed boarding
- **Platform-level boarding** for accessibility and efficiency
- **Intersection treatments** that prioritize transit
- **Multiple routes** and express services

The ITDP BRT Standard has been successfully implemented in cities worldwide, delivering faster, more reliable service that actually competes with driving. Half-measures and "BRT-lite" systems fail to achieve these benefits.

Our Recommendations for a Stronger Plan

1. **Avoid highway widening** and instead convert existing lanes for dedicated transit use
2. **Accelerate Heavy Rail extension** to the border with dedicated funding and clear timeline
3. **Reference proven BRT implementation practices** using resources like Circulate San Diego's research and international standards
4. **Clarify technology investments** with specific implementation plans and performance metrics
5. **Strengthen cross-border connectivity** through both rail and BRT investments

Moving Forward Together

San Diego County has tremendous potential to become a national model for sustainable, equitable transportation. The 2025 Regional Plan provides a strong foundation for this transformation. **With thoughtful refinements to address our concerns, this plan could position our region as a true leader in climate-conscious transportation planning.**

We appreciate SANDAG's commitment to community engagement and look forward to continuing this important dialogue. The choices we make today will shape our region's transportation future for generations to come, and we're optimistic that together we can create a plan that truly serves all San Diego County residents.

We stand ready to work collaboratively with SANDAG to strengthen these elements and ensure the 2025 Regional Plan delivers on its promise of a more sustainable, equitable transportation future for all.

Sincerely,

Leif Gensert
Vice President
RideSD

To: SANDAG Board of Directors and Planning Staff
Re: Public Comment on Draft 2025 Regional Plan
From: San Diego Vision Zero Coalition
Date: July 17, 2025

Dear SANDAG Board and Planning Staff,

On behalf of the San Diego Vision Zero Coalition, we appreciate the opportunity to comment on the Draft 2025 Regional Plan. As a coalition of community organizations, advocates, and residents committed to eliminating traffic deaths and serious injuries, we urge SANDAG to adopt a transportation strategy that centers **safety, climate action, equity, and regional connectivity.**

Below are our comments across the key modal areas outlined in the public comment form:

Transit

SANDAG must prioritize realigning the LOSSAN rail corridor and advancing the Purple Line. These investments are critical to achieving meaningful **mode shift** and meeting our region's **climate goals**. Just as important is ensuring that existing transit services are more frequent, reliable, and safe, particularly in **San Diego's densest urban neighborhoods**, where ridership potential and equity needs are highest. We strongly recommend that SANDAG **optimize and strengthen the core network** before expanding service into low-density suburban areas.

Scooter + Bikeshare

We encourage SANDAG to exert greater pressure on local jurisdictions—especially the **City of San Diego, Chula Vista, and coastal communities**—to implement **interoperable micromobility systems** for first- and last-mile connections. A regionally unified docked bikeshare and scooter system would allow users to ride between cities without dismounting or switching apps, boosting accessibility and ridership.

Bikeways and Walkways

SANDAG has led the delivery of high-quality bikeways across the region, most notably along 4th & 5th Avenues, Pershing Drive, Rose Creek, and freeway corridors such as I-5 and I-15. This type of **bold, regional active transportation leadership** we need more of. We urge SANDAG to continue to implement best practices in expanding well-designed **bike and walk networks that connect communities across city lines**, and to resist efforts to offload responsibility to individual cities. SANDAG is uniquely positioned to **strategize beyond municipal borders** to continue to develop a thoughtful and cohesive active transportation system that aligns its infrastructure investments with regional housing, employment, and transportation patterns.

We further urge SANDAG to **support cities committed to Vision Zero and climate goals and** hold accountable those that are not. Where local political barriers exist, SANDAG should work with state agencies to overcome them and ensure every community can access safe, sustainable, and connected transportation options.

Closing

The Draft 2025 Regional Plan is an opportunity to build a **safer, more equitable, and climate-resilient transportation system** for San Diego County. We urge you to be bold in your investments and unrelenting in your commitment to safety and sustainability.

Sincerely,

Anar Salayev Executive Director BikeSD	Ian Hembree Advocacy Manager San Diego County Bicycle Coalition	Leif Gensert Vice President RideSD
Colin Parent Chief Executive Officer and General Counsel	Christopher Roberts Transportation Team Lead San Diego 350	Kesav Gupta Executive Director People’s Platform San Diego

CirculateSD		

CITY OF OCEANSIDE

PUBLIC WORKS DEPARTMENT

July 17, 2025

SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Re: ***Regional Plan 2025 - City of Oceanside Comments***

Dear SANDAG Regional Plan 2025 Committee:

SANDAG's Regional Plan represents a 30-year vision for how our San Diego region will grow, where we will live, and how we will move around the region. The plan is updated every four years, which allows SANDAG the opportunity to reassess how to best enhance mobility and quality of life for everyone in the region for generations to come. The City of Oceanside understands that SANDAG leverages extensive, data-driven expertise to develop innovative solutions to create a world-class transportation system that is efficient, accessible, and sustainable. To ensure that regional goals align with the City's goals, this correspondence emphasizes important regional transportation projects that benefit Oceanside and the North County sub-region and encourages SANDAG to support in implementing these projects.

Below are the City of Oceanside's priority transportation projects that were initially brought to SANDAG's attention in September 2023. Below each item, there is an updated comment along with additional comments pertaining to other portions of the draft Regional Plan that are shown in bold and italic.

City of Oceanside Priority Projects

1. I-5 Managed Lanes - between I-5/SR-78 to Vandergrift/Harbor roughly 3.2 miles in the NB and SB directions
2. Coastal Rail Trail – gap closure and bridge over Loma Alta Creek
3. I-5/SR-78 Interchange
4. Coast Highway Corridor
5. Inland Rail Trail
6. SR-76 Grade Separation Improvements at two intersections

1. I-5 Managed Lanes (from SR-78 to Vandergrift Boulevard/Harbor Drive)

This segment of the I-5 corridor could benefit from construction of managed lanes in the north and south bound directions by improving efficiency in moving more people in fewer vehicles, reducing vehicle miles traveled (VMT) and VMT growth, meeting

Federal Performance Management targets, and managing congestion. The project would extend the managed lanes from SR-78 to just north of SR-76 at Vandergrift Boulevard/Harbor Drive. The projected design cost is approximately $10 million and has already been environmentally cleared as part of the North County Corridor (NCC) project. A federal earmark request for $4 million of the $10 million has been made by Caltrans and SANDAG for the fiscal year (FY) 2022/23, which is supported by the City. As SANDAG is aware, Federal earmark candidates were capped at $4 million this FY cycle. As a result, the request was designated for design of only the southbound I-5 managed lanes within the same proposed project footprint. Based on earlier discussions between the City and Caltrans staff, it was noted that the larger project is still being considered and is included in the Federal Budget Reconciliation. The determination will be known at the end of 2023. The design of the southbound I-5 managed lanes is estimated to take roughly 36 months to complete once the design project is funded. The total project cost for this project, managed lanes in both directions, is estimated at $100 million. This ultimate project was included in the 2015 Regional Plan and was slated to be completed by 2025 but was later delayed due to previous reprioritization of projects by SANDAG. This segment of I-5 Managed Lanes is the City's number one priority project!

The draft Regional Plan document does address the I-5 Managed Lanes through Oceanside, but only up to SR-76 and there are budget allocations totaling $10 million for this project in fiscal year 2025 to 2027. Please have the document reflect that the managed lanes will continue further north to Vandegrift/Harbor. (Appendix A – Table A.1 – CC007)

2. Coastal Rail Trail – Gap Closure and Bridge over Loma Alta Creek

Extension of the Coastal Rail Trail is an important regional project that would benefit all trail users including visitors and the citizens of Oceanside. This project is a high priority project for our local bicycle coalition and the trail's many active users. It also supports our Safe Routes to School goals. The City submitted an initial Active Transportation Program (ATP) grant application (Cycle 4) for this project 4 years ago in 2019. Unfortunately, the project was not awarded at that time. For the next cycle, the City hired a consultant to assist with the grant application to enhance the projects competitiveness. The City submitted for the ATP Cycle 5 in 2021 and the application received eighty-five points, seven points shy of the project recommendation scoring cut-off of ninety-two points for statewide eligibility. We further improved the application and re-submitted an grant application for the third time. In 2022, our application scored high again but fell short of the recommendation scoring cut-off for the statewide award.

In 2022, SANDAG received $69.1 million from Caltrans that it could allocate at its discretion to any project that had high score but fell short of the funding line. The Coastal Rail Trail project is estimated to cost $10.8 million for design and construction. After being notified by Caltrans of the discretionary amount, SANDAG

staff reached out to the City informing us that it would commit roughly $4.3 million contingent on the promise that the City would be responsible to fund the remaining shortfall from other funding sources. In order for the City to accept the funding and allocate the remaining funds, we would need approval from City Council to allocate the additional $6 million in funding required for the project. Due to timing requirements by SANDAG, the City was given a tight window of 48 hours to make a decision that required the City Council approval. Staff was unable to obtain concurrence from City Council within the timeframe provided and as a result, City staff had to reject SANDAG's offer. *This project supports one of Southern California's favorite coastal amenities, the ability to ride a bike along the coastline and enjoy the views!*

The City of Oceanside would like to emphasize how important the Coastal Rail Trail (CRT) is to the regional project. The CRT will benefit all trail users, including visitors and the citizens of Oceanside. This project is a high priority project for our local bicycle coalition and the trail's many active users. It also benefits the City's Safe Routes to School goals. With that stated, the Regional Plan documents needs to provide clarification when refencing the CRT. It is not clear if the "Coastal Rail Trail" is referring to the whole segment within Oceanside, or a specific portion. It states "Coastal Rail Trail – Oceanside Segment 1 ALT", but it is not clear what portion this is referring to. (Appendix A – Table A.1 – AT108). Also, the portion of the Coastal Rail Trail between Oceanside Boulevard and Morse (and includes the bridge) is closer to the $17.6 million mark. The table references a $7 million cost.

At this time, there is an existing Coastal Rail Trial gap between Oceanside Boulevard and Morse Street (which includes a bridge over Loma Alta Creek). This segment's estimated cost is approximately $17.6 million. There is another portion of Coastal Rail Trail between Morse Street and the southerly city limits that the City seeks to update to current standards, along with providing a bridge crossing over the railroad tracks. This segment's estimated cost is approximately $12 million.

Therefore, in Appendix A, Table A.1, please clarify the different segments of the Coastal Rail Trail within the City of Oceanside and their current estimated construction costs.

3. **I-5/SR-78 Interchange Improvements**

The I-5/SR-78 Environmental Impact Report/Environmental Impact Studies (EIR/EIS) is fully programed at $16.1 million. Approximately $2.5 million of which was expended during the feasibility phase (including the initial alternative discussions with the community/stakeholder committee and PSR development). The remaining dollars are available starting this year (23/24). Given the number of complex issues involved in this project, including potential coastal resources and noise/visual impacts and the need to provide the pedestrian and bicycle connections

as part of interchange improvements, Caltrans is optimistically anticipating five years for completion of the FEIR/FEIS with a start date of the preparation project in the next couple of months, by the end of 2023.

The five-year estimate for EIR/EIS completion will be largely driven by the alternative designs that will be analyzed through the formal study process. Caltrans will have a better understanding of the project schedule once it begins receiving community feedback as it starts engaging stakeholders, including Oceanside City staff and the communities around the interchange, to determine the ultimate range of alternatives. It's likely that completion of the EIR/EIS will take more than five years. The same is true with the project's design and construction. The cost for the "full connectivity" alternative was estimated over $400 million not including mitigation, and this cost estimate is already outdated by five years with inflation over the last few years.

With the EIR/EIS potentially starting at the end of this year, the project is likely ten years away from final completion. This project was initially promised for full delivery and completion by 2025 and was later delayed due to projects reprioritization by SANDAG. The City is asking that SANDAG consider completion of the environmental documents for this interchange improvement project as a high regional priority.

This item has been addressed and is included in the updated regional document. Thank you.

4. Coast Highway Corridor

The City Council adopted the Coast Highway Vision and Strategic Plan (CHVSP) based on a set of livable communities and smart growth principals intended to produce vibrant and economically successful communities. The plan provided an implementation strategy as well as a specific action items for short and long-term physical enhancements. The project includes implementation of a multimodal complete green streets, improvements for 3.5-miles along Coast Highway between Harbor Drive and Eaton Street, including lane reduction from four lanes to two lanes, roundabouts, and increased parking and bicycle facilities. A portion of the complete streets project has already been awarded for design. However, for the CHVSP to be fully achieved the project should be constructed in its entirety. We are requesting that SANDAG include Coast Highway's complete streets project in the Regional Plan and note that the project will cost $30 million for the completion of this project.

This item was not addressed in the Regional Plan document. The City still, respectfully, recommends that this project be included. There was an item in Appendix N – Table N2.1 that references "Highway 101 between I-5 to Eaton Street". Is this supposed to be "Coast Highway between SR-76 to southerly city limits"? There were other items in the Table N2.1 that reference "Highway

101", but the name of the highway when used in Oceanside should be changed. Please correct this and change "Highway 101" to "Coast Highway".

5. Inland Rail Trail

As part of the commitment to construct the SPRINTER, an MOU was executed over 30 years ago, between SANDAG, NCTD and the North County cities to build the Inland Rail Trail in exchange for support for the SPRINTER line. The Sprinter has been operational for years and the trail has been fully improved along the SPRINTER right-of-way in all the cites except for Oceanside. Our efforts to fund at least a preliminary engineering study of this project have been unsuccessful. However, our last ATP grants application submittal for $475,000 has been scored as the highest in its category by Caltrans District 11 (according to Caltrans staff) and is now under review for final approval at Caltrans HQ. We can use SANDAG support of this project now and in the coming years as we anticipate that the preliminary engineering study will be funded. We are asking SANDAG for continued support for this project and to complete the Inland Rail Trail that was promised as part of the SPRINTER construction. The City's Smart and Sustainable Corridors Specific Plan (SSCSP) currently under preparation, partially funded by grants from Caltrans and HCD, will establish a new zoning regime for the Oceanside Boulevard corridor that seeks to incentivize transit-oriented development. Completing the IRT will support the implementation of the SSCSP and further encourage the development community to invest in TOD in this corridor.

Upon completion of the preliminary engineering study, we are requesting that SANDAG provide the needed funding to design and build this important missing link in the North County trails system.

This item seems to be addressed, but it would be appreciated if there was more clarity. It does show the IRT on a map in Appendix K, but in Table A.1 of Appendix A, under AT036, it states "Inland Rail Trail: Vista to Oceanside". Please provide clarification that states "within Oceanside's City Limits EB/WB".

6. SR-76 Improvements

The City has been attempting, unsuccessfully, for years to gain support for improvements along SR-76 in the City of Oceanside. Finally, as part of our work with Caltrans and SANDAG in the Comprehensive Multimodal Corridor Plan (CMCP) project, certain improvements along SR-76 have been included in the final report, such as two grade-separation projects at SR-76/College Boulevard and SR-76/ Douglas Drive. Projects mentioned in the CMCP report will periodically go through review and evaluation for funding by the SANDAG staff with recommendations being made to the Board of Directors. The City requests a favorable review of our proposed projects along SR-76. Please consider funding improvements to SR-76 as this is becoming a more travelled highway in North County and the grade separation

projects are needed to reduce delay and improve operations on this facility. This is only one of two East-West Corridors in North County and SR-78 is already undergoing improvements based on the current work that Caltrans is doing as part of the Asset Management and HOV lanes addition projects. We are requesting the 2025 Regional Plan identifies improvements mentioned in the North County CMCP as high priority regional projects.

Requests to have SR-76 improvements within Oceanside's city limits was not addressed per Oceanside's September 2023 draft Regional Plan comments as mentioned above for item #6. The City respectfully requests that this be reconsidered and included in the regional plan.

Additional Comments:

- ***The draft Regional Plan mentions the g'Oside shuttle program, which is being indicated as a microtransit shuttle "flexible fleet" success story. However, Oceanside only has g'Oside funding to run the shuttle until the end of this year (2025). It is recommended that the partnership between SANDAG and the City continue, and as such we respectfully request funding assistance from SANDAG to continue what is being deemed as a "key strategy for improving mobility and access throughout the region."***

- ***Linkage with SANDAG Climate Action Documents & Local Efforts***

  It is recognized that future progress towards the State's ambitious climate goals will rely on local jurisdictions working in concert with SANDAG and transit agencies through their Climate Action Plans. We understand there are State-mandated elements and analyses required in the Draft Regional Plan, however the importance of collaboration with local municipal CAP implementation should be highlighted[1].

  In context of the Regional Plan's Greenhouse Gas (GHG) projections, SANDAG previously developed and adopted the Priority Climate Action Plan (PCAP – 2024) that identifies climate-focused transit planning measures to be implemented across the region by 2030. Additionally, SANDAG is currently developing the Regional Climate Roadmap to update GHG emissions inventories and identify longer-term measures to reduce emissions through 2050. These documents are supportive of the Draft Regional Plan's goals of Health & Equity yet there is little mention of these plans and their nexus to supporting the Key State Requirements

[1] *Draft Regional Plan – pages 7 & 12 – Regional Plan Goals*

of SB 375 and AB 805. We suggest the Regional Plan's narrative include references[2] to these plans where applicable.

- ***Greenhouse Gas Emissions Inventory & Projections[3]***

  Since U.S. Congress revoked California's U.S. EPA Clean Air Act waiver in June 2025 the future of California's regulatory environment around the Advance Clean Cars II and Advance Clean Fleets overseen by CARB is unclear. Given this uncertainty and the Regional Plan's reliance on State mandates for future GHG reductions, a contingency discussion should be included on potential impacts of the Federal action. For the sector-specific 2022 GHG emissions, page G.43 appears to contain erroneous text related to vehicle emissions and not Water Supply and Treatment.

- ***Habitat Conservation & Shoreline Preservation***

  The Draft Regional Plan[4] and Appendix Q discuss habitat conservation and shoreline preservation priorities. We recommend an expanded discussion on how SANDAG is collaborating and supporting local coastal cities and economies through the Shoreline Preservation Working Group, Shoreline Management & Monitoring and past Regional Beach Sand Projects (RBSP).

  Specifically, Near Term Actions should incorporate the June 2025 Shoreline Preservation Work Group decisions, which will 1) support the development of a cyclical RBSP program that looks to maintain beaches through cyclical beach nourishment projects (i.e., every 5-10 years); 2) support the development of a pilot sand retention project in the City of Oceanside as a representative pilot effort to responsibly retain sand; and 3) update associated sediment management and shoreline preservation policy documents that reflect these shoreline preservation recommendations.

  Appendix Q tells the story of the development, progress and challenges of regional habitat conservation programs including the

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[2] *Draft Regional Plan – page 17 – SCS Requirements et al.*
[3] *App. G – page G.10 – projected GHG emissions after Federal and State regulations*
[4] *Draft Regional Plan – page 25 – Habitat Conservation & Shoreline Preservation*

North County MHCP, with estimates of $300-$500M[5] in future mitigation due to planned transportation projects. If information on the potential timeline and location of mitigation needs are known, it would be beneficial to local agencies to support a collaborative preserve-planning dialogue supportive of the subregional conservation plans.

- ***North County Subregional Transportation Projects[6]***

  There are multiple microtransit and NEV (neighborhood electric vehicle) projects planned in the 2035 timeframe in the North County subregion, including Oceanside (for example, Project IDs TL077, TL085 and FF10). The Regional Plan provides a general discussion on these projects and locations through the 2035 and 2050 planning horizons, yet few details on the factors influencing feasibility of route expansions in context of transit authority operation such as North County Transit District (NCTD). We would appreciate an expanded discussion on how SANDAG will work with our local transit authorities to establish, fund and operate these projects with and emphasis on low/zero-emission modes.

Thank you for the opportunity to share the City of Oceanside's comments on the SANDAG Regional Plan 2025. We are looking forward to our continued partnership to improve quality of life, traffic safety and mobility in our community.

If you wish to further discuss this issue please call me at (760) 435-5114.

Sincerely,

Hamid Bahadori
Public Works Director

cc: Mayor and City Council
City Manager

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[5] *App. Q – page Q.10 – Regional Habitat Conservation Vision*

[6] *App. A – Transportation Projects, Programs, Policies & Phasing – North County Subregion*

Rancho Bernardo Community Planning Board

12463 Rancho Bernardo Road #523, San Diego, CA 92128
www.rbplanningboard.com

July 17, 2025

Draft 2025 Regional Plan Project Manager
SANDAG (regionalplan@sandag.org)
1011 Union Street, Suite 400
San Diego, CA 92101

SUBJECT: Comments on SANDAG's Draft 2025 Regional Plan

Attention: 2025 Regional Plan Project Manager

The Rancho Bernardo Community Planning Board (Planning Board) appreciates the opportunity to review and provide comments on the draft 2025 Regional Plan, which provides an update of SANDAG's proposals for the transportation, infrastructure, land use, housing, and environmental needs of the region. The Planning Board considered and approved the following comments, prepared by our Regional Issues Committee, on July 17, 2025. The primary focus of this comment letter is on the transportation needs of the I-15 corridor between SR-78 and SR-56, an area that receives minimal attention in the draft 2025 Regional Plan. Our specific comments are presented below.

Plan Overview: According to the SANDAG website, "The goal of the 2025 Regional Plan is to make transportation more convenient, equitable, healthy, and safe for everyone in the San Diego region." Although this is a statement that we all hope can be achieved, a review of the draft Regional Plan indicates a plan that emphasizes several specific parts of the region, while providing little discussion of other areas, including the I-15 corridor between I-8 and Escondido. Further, of those proposals that do address transportation needs for this portion of the I-15 corridor, most are proposed for implementation well into the future.

Protection of Environmental Lands: We support the draft regional plan's statements regarding climate change and the protection of the region's conserved lands in accordance with the Multiple Species Conservation Plan. To ensure a resilient future and to adapt to climate change, we agree that the San Diego region must work together to proactively conserve our native habitats and the species those habitats support.

Transportation Planning: The transportation aspects of the draft 2025 Regional Plan are of major importance to our community and we ask that our comments related to stepping up new transit opportunities at the Rancho Bernardo Transit Center be seriously considered.

Bicycle Lanes - A review of the projects proposed for the North County Subregion indicate that in Rancho Bernardo the majority of bike related facilities will be on-street, with only a short distance of off-street bikeway provided in the vicinity of the Rancho Bernardo Community Park. Item number AT073 2035 and AT150 2050 appear to support upgrading existing on-street bikeways to improve safety. We support improving bicycle safety to ensure safe bicycle access, particularly for elementary through high school students. However, due to frequent changes in the terrain and the distances between housing and major employment centers, regional access via bicycle in the Rancho Bernardo area is not realistic for many residents. Therefore, funding in this area would be better spent on local transit connectors between major transit stops and adjacent commercial, employment, and education centers.

Next Gen Mixed Rapid Bus Routes - Currently, the number of express bus routes that serve the Rancho Bernardo Transit Station are limited and do not provide easy access for Rancho Bernardo residents to travel to major employment centers, nor do they easily connect employees of Rancho Bernardo's major employment center to their homes in communities in the southern and northern portions of the County. One only needs to travel on the I-15 corridor during rush hour to see that where people live and where they work are separated by significant distances.

It is encouraging to read of new proposed routes, but disappointing to see that we have to wait at least ten more years before a number of "next gen mixed" rapid bus routes will be added to serve the Rancho Bernardo Transit Center and the northern portion of the City's I-15 corridor. Connections such as those proposed between Rancho Bernardo and UC San Diego via Sorrento Valley and Mira Mesa and Sorrento Valley and Carrol Canyon and the Route 484 Commuter Express providing access from Carlsbad to Kearny Mesa via I-15; Palomar Airport Road, SR 78, and Rancho Bernardo Transit Center would finally connect residents to major employment centers. Earlier introduction of select routes would be an effective way of reducing trips along with reducing greenhouse gas emissions.

Employee Serving Transit Routes - Waiting until 2035 to initiate the Transit: Circulator 675 Rancho Bernardo Business Park Loop is also disappointing, particularly because MTS is currently completing a significantly sized affordable housing project at the Rancho Bernardo Transit Center. This site is likely to provide housing for employees of nearby employment centers, including the Rancho Bernardo industrial park. Unfortunately, transit options for access to this area are limited. The same is true for access to the Palomar College Rancho Bernardo Education Center and nearby commercial areas. Without transit options, most will be forced to drive to their various destinations.

The employees at the industrial and business parks in Rancho Bernardo, Carmel Mountain, and Sabre Springs would benefit from the Flexible Fleet services proposed for the future. The sooner these services are in place, the sooner users will take advantage of existing bus routes, as quick access between transit centers and employment areas will make leaving your car at home much more feasible.

Environmental Justice: Appendix A, Page A-5, states: "California Assembly Bill 805 (Gonzalez Fletcher, 2017) (Chapter 658, Statutes of 2017) requires, among other things, that the Regional Plan identify disadvantaged communities and include transportation strategies to reduce pollution in these communities." Attachment A1 highlights the location of disadvantaged communities and details specific transportation strategies aimed at reducing their exposure to pollution.

As it appears this statute has been in effect since 2017, it is unclear how MTS was permitted to develop affordable housing immediately adjacent to 8+ lanes of I-15 in Rancho Bernardo. The future residents of this development will to subjected to excessive noise and toxic air quality the moment they move into their homes. The housing should have been sited at the western end of the MTS property, where noise and pollutant levels would have been reduced to some extent. Further, based on the information included in the City of San Diego's draft Environmental Justice document, the Rancho Bernardo affordable housing site would upon completion qualify as an Environmental Justice development due to high pollutant levels. The final version of the 2025 Regional Plan should be worded in a manner that would prohibit MTS or any other jurisdiction from developing new affordable housing projects in locations where residents would be exposed to toxic pollutants and excessive noise.

Public Outreach: Although SANDAG states in the draft plan that it conducted extensive public outreach prior to plan preparation, it does not appear that there was any substantive outreach to the various community planning groups in the City and County of San Diego. The plan would likely have benefited from such input.

Appendix F - Regional Growth Forecast: The growth forecasts in this section are based on historical averages from 1991-2020, and do not take into consideration the current population rates or current changes in the distribution of the population within San Diego County. Population distribution will necessarily be affected by where new ADUs and new apartment buildings have and will be constructed within the County. These changes will affect where and how people travel, as well as the total miles traveled between home and work, which will in turn likely require some revisions to the proposed transportation and infrastructure planning for the region.

Use of the 1991-2020 data also does not recognize the potential effects that AI and/or working from home or nearby business centers could have on future transportation needs. According to the Census Bureau, between July 2023 and July 2024, nearly 24,000 people left San Diego, while 24,226 people immigrated into San Diego (KPBS March 17, 2025). Therefore, immigration and emigration into and out of San Diego County currently has little effect on the overall population rate, but could have an effect on transportation needs depending upon the employment needs of those immigrating into the County. The Regional Growth Forecast should be updated to address what appear to be significant changes since 2020. The region would also benefit from an updated analysis of the future needs (e.g., housing, transportation, type of employment) of San Diego County residents based on current population trends and the change in distribution of housing opportunities being provided throughout the County.

Conclusion: The Planning Board generally supports the proposals in the draft Regional Plan, but as stated above, many of the proposals would not be implemented until well into the future. This is disappointing as new housing (most likely not anticipated in the 1991-2020 growth forecasts) is being constructed throughout the County; housing that could be better served if many of the transit proposals addressed in the plan were implemented many years sooner than currently proposed.

Thank you again for the opportunity to provide these comments.

Sincerely,

Robin Kaufman

Robin Kaufman, Chair
Rancho Bernardo Community Planning Board

cc: Councilmember Marni von Wilpert, City of San Diego, District 5

July 18, 2025

Mr. Mario Orso
Chief Executive Officer
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, CA 92101

Re: North County Transit – San Diego Railroad: Feedback on the 2025 Regional Plan

Dear Mr. Orso:

Thank you for the opportunity for North County Transit District, operating as North County Transit – San Diego Railroad (referred to herein as NCTD), to review and provide comments on the Draft 2025 Regional Plan (Plan). The Plan proposes to push the region forward by enhancing our transportation network through the integration of roads, transit, land use, and technology.

NCTD staff reviewed the Plan and held discussions with SANDAG staff during the public review period. NCTD's key areas of emphasis include:

- Investment in capital and operating funding for the SPRINTER corridor.
- Investment in increased bus frequencies on major North County corridors, including capital funding for road and technology improvements and operating funding for increased transit operations that are currently unfunded.
- Capital projects along the SPRINTER and the Los Angeles-San Diego-San Luis Obispo (LOSSAN) corridor that improve travel times, increase operational resiliency, and limit conflict with other modes of travel through grade separation.
- Strategic implementation of microtransit that requires additional operating and capital funding.
- Maintaining and improving connections to NCTD services at key transit centers and mobility hubs throughout NCTD's service area.

Accordingly, NCTD's priorities for the Regional Plan update focus on increased transit operations funding, increased capital funding for state of good repair and capacity-enhancing projects, and long-term funding sources for programs such as the Youth Opportunity Pass and other pilot programs.

Capital project phasing and funding assumptions are a key area of focus for NCTD in reviewing the Regional Plan. NCTD understands there are three key phases of the Regional Plan, including a 2035 plan, 2050 plan, and unconstrained plan. NCTD's 2035 priorities focus on state of good repair and capacity-enhancing projects that are shovel-ready along with investments for SPRINTER double tracking. Other priorities include grade separation projects on the coastal and

810 Mission Avenue
Oceanside, CA 92054
(760) 966-6500
(760) 967-2001 (fax)
GoNCTD.com

inland railroad, state of good repair and capacity enhancing projects, and NCTD's broader vehicle transition for its bus and rail fleets.

NCTD understands the importance of the Plan as it relates to the development and prioritization of projects. The region has significant funding needs to complete current *TransNet* projects that are shovel-ready but are unfunded, along with the need to support our region's future through continued investments in our transportation system that meets or exceeds statewide environmental, mobility, social equity, and economic goals.

We thank you and SANDAG staff for your willingness to provide this critical information to NCTD staff and its Board of Directors and commend SANDAG staff for their work in developing the Draft 2025 Regional Plan.

Sincerely,

Shawn M. Donaghy
Chief Executive Officer

cc: NCTD Board of Directors
Mary Dover, Chief of Staff, NCTD
Katie Persons, Director of Service Planning, NCTD

810 Mission Avenue
Oceanside, CA 92054
(760) 966-6500
(760) 967-2001 (fax)
GoNCTD.com

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PORT of SAN DIEGO

July 18, 2025

San Diego Association of Governments (SANDAG)
Antoinette Meier, Senior Director of Regional Planning
1011 Union Street, Suite 400
San Diego, CA 92101
Sent via email: regionalplan@sandag.org

Subject: Port of San Diego Comments on the Draft 2025 Regional Plan

Dear Ms. Meier:

Thank you for the opportunity to provide comments on the Draft 2025 Regional Plan (Draft Plan), which was released for public review on May 23, 2025. The San Diego Unified Port District (Port) is a public corporation and government agency with a mission to protect the Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to the maritime industry, tourism, water and land recreation, environmental stewardship and public safety. The San Diego Unified Port District Act ("Port Act"), which was adopted by the California State Legislature in 1962 and established the Port, recognizes the Public Trust Doctrine, and states that tidelands and submerged lands are only to be used for statewide purposes. To this end, the Port is charged with management of tidelands and diverse waterfront uses along San Diego Bay that promotes commerce, navigation, fisheries, and recreation on granted lands. Within the Port's jurisdiction are the waterfronts of five cities: San Diego, National City, Chula Vista, Imperial Beach, and Coronado.

Port staff is impressed with the comprehensive scope and content of the Draft Plan and looks forward to partnering with SANDAG on the planning and implementation of the Port-related projects and programs outlined in the Draft Plan. The following are the Port's specific comments regarding the Draft Plan:

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Appendix A: Transportation Projects, Programs, Policies and Phasing:

Transportation Projects by Subregion:

- Please consider revising the project descriptions for Goods Movement Projects GM05 – Harbor Drive Multimodal Corridor Improvements and GM06 – Harbor Drive 2.0, to include all elements that were described, analyzed and cleared by the Initial Study (IS) with Negative Declaration (ND)/Environmental Assessment (EA) with Finding of No Significant Impact (FONSI) in December 2023. Including all elements analyzed in the document will ensure that SANDAG and all partner agencies remain eligible for any and all funding opportunities which may become available.

Unconstrained Project List:

- For the NCMT Rail Improvements project, please consider revising the project description from 'Marina way' to 'Marina **W**ay'.
- For the TAMT Cargo Staging project, please consider revising the project description to include the words '…cargo handling infrastructure and equipment, **rail track improvements,** deployment of zero-emission infrastructure and equipment…".
- For the Truck Parking Information Management System project, please consider revising the project description to '…could be tied to the Port Freight Community Web Portal **and integrated with Regional ITS systems**'.
- Please consider carrying over Project ID GM44, Freight Signal Prioritization Pilot, from the 2021 Regional Plan to the 2025 Regional Plan Unconstrainted Project List, unless the project has been completed, moved towards implementation, or been absorbed into another project.
- Please consider carrying over Project ID NO07-GM58, Maritime Port Data, from the 2021 Regional Plan to the 2025 Regional Plan Unconstrained Project List unless the project has been completed, moved towards implementation, or been absorbed into another project.
- Request to add a new Goods Movement project to the Unconstrained Project List for Battery Electric Truck Charging Infrastructure, with a project description to locate and develop charging infrastructure for medium and heavy-duty trucks along local and regional transportation corridors to facilitate zero emission freight and goods movement.

PORT of SAN DIEGO

The Freight Network in 2025:

Please consider revising the language on page A.173 (PDF page 174) to the following: "…and ~~8th Street~~ **Civic Center Drive** and Bay Marina Drive in National City".

Appendix G: 2022 Greenhouse Gas Emissions Inventory and Projections for the San Diego Region.

Marine Vessels

- On page G.51 (PDF page 52), please consider revising the introduction of the "Marine Vessels" section to the following: "The GHG emissions from marine vessels in the San Diego region are largely attributed to **harbor craft** ~~the Port of San Diego~~ activities in San Diego Bay, Mission Bay, and other coastal waters."
- Additionally, please consider analyzing greenhouse gas emissions from commercial harbor craft and ocean-going vessels not included in the Port's 2022 Maritime Air Emissions Inventory, such as harbor craft operating in other harbors and inland lakes and reservoirs, military vessels, and other vessels operating in the San Diego Bay that were not included in the Port's maritime emissions inventory.
- For consistency with the previous 2021 Regional Plan, please consider including recreational vessel emissions in the Off-Road Transportation section instead of in the Marine Vessels section.
- Additionally, please consider analyzing greenhouse gas emissions from recreational vessel activity not included in the Port's 2022 Greenhouse Gas Emissions Inventory, such as activity associated with other harbors, inland lakes and reservoirs, residential slips (including those in San Diego Bay), and Navy MWR slips and moorings.

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The Port has been conducting a comprehensive, inclusive and multi-year “Integrated Planning” initiative, known as the Port Master Plan Update (PMPU). This effort supports the Port’s mission to develop San Diego Bay for multiple purposes and uses for the benefit of the people. The Final Draft PMPU, along with the Final Program Environmental Impact Report, were approved and certified, respectively, by the Board of Port Commissioners on February 28, 2024. Since then, the Port has been processing the certification of the Final Draft PMPU with the California Coastal Commission, which is anticipated to be completed within a year. Upon certification, the Port will have a new long-term planning document to guide Port development over the coming decades. Related to this, the Port anticipates requesting additional projects be added to the Regional Plan during its next update. In the meantime, the Port appreciates SANDAG’s cooperation and collaboration as we conclude the PMPU process.

Thank you again for the opportunity to comment on the Draft 2025 Regional Plan. The Port looks forward to working in close collaboration with SANDAG in an effort to provide a comprehensive vision for future growth and development of the San Diego region.

If you have any questions regarding these comments, please contact me at (619) 686-6469 or via email at lnishihi@portofsandiego.org.

Respectfully,

Lesley Nishihira, AICP
Vice President, Planning & Development

SAN DIEGO 350
CLIMATE ACTION

To: SANDAG Board of Directors and Planning Staff
Re: Public Comment on Draft 2025 Regional Plan
From: SanDiego350
Date: July 17, 2025

Dear SANDAG Board and Planning Staff,

SanDiego350 views the 2025 Regional Plan (RP) as a crucial opportunity to address the Climate Emergency and remedy the inequities in our current system of transportation. We appreciate all of the work that goes into preparing such a large plan.

We have specific requests, with more explanation below:

1. The 2025 RP achieves 19.3% Greenhouse Gas Emission (GHGe) reduction by 2035, which just barely exceeds the 19% reduction target set by SB375. This is insufficient to address the climate crisis that our region is already dealing with. We demand that Flexible Fleet projects (transit, microtransit, Neighborhood Electric Vehicles, safe streets for walking, and bicycle infrastructure) be given higher priority so that 25% GHGe reduction will be achieved by 2035.
2. Eliminate highway expansions from the 2025 RP. The 2025 RP includes nine Complete Corridors projects that add managed lanes (Appendix A, pages 18-19). Five of these are highway expansion projects, adding managed lanes, and four convert existing lanes to managed lanes. Four highway expansion projects actually add lanes to 6- or 8-lane highways. Expanding 6- or 8-lane highways will not achieve GHGe reduction. These projects should rather convert existing lanes to managed lanes.
3. Guarantee permanent funding for the Youth Opportunity Pass (YOP) program beyond 2026 as soon as possible. Transit agencies face a fiscal cliff, so it is crucial that SANDAG leads in ensuring the future of the YOP program.
4. The Purple Line must be completed by 2050, and so must be made a top priority. This project is critical for delivering vast numbers of County residents to key job centers.

More information:
We agree with the general goals of the 2025 RP but urge SANDAG to make the goals more bold, specific and measurable, and rearrange project priorities accordingly. We believe the plan's top priority should be to remedy inequities caused by decades of pouring transportation funds into road and highway expansions at the expense of

non-auto modes of travel. Given that 1) 30% of citizens cannot get around by car; 2) up to 50% of Millennials and GenZers would forego car ownership if good alternatives exist; 3) the high cost of car ownership in San Diego (>$12,000/year) is an extreme financial burden to low income residents, the expansion and improvement of transit needs to be our region's top priority.

The 2025 RP's first goal "to ensure convenient and reliable movement" via investment in a multimodal system should include targets to assess growth in alternative modes to driving and reduction in Vehicle Miles Traveled (VMTs). For example, the City of San Diego Mobility Master Plan includes mode shift goals for 2030 trips of 25% walking, 10% bicycling, and 15% transit. The 2022 CARB scoping plan called for planners to aim for a 25% reduction in VMT by 2030. SANDAG should seek a 25% VMT reduction in the 2025 RP and establish ambitious goals for modeshift.

The second goal promotes "equitable access to opportunities by expanding transit connections to major employment centers and higher education institutions. As a result, more adults can reach these destinations within 30 to 45 minutes by transit …" But reaching a destination in 45 minutes when a car trip takes 10 minutes is not equitable. SANDAG should aim for transit trips to major job centers and educational facilities to be competitive with driving. When transit trips require three and four times as much time as driving as is frequently the case now, the system is inequitable.

The third goal states that "to support healthy communities and a cleaner environment, the Plan reduces greenhouse gas emissions (GHGe) by providing options for people to shift to lower-emission travel modes. It meets the SB 375-mandated minimum of "19% per capita GHGe reduction target by 2035 and federal air quality standards." SanDiego350 feels that 19% reduction is insufficient, and we strongly urge SANDAG to make changes such that 25% GHGe reduction will be achieved by 2035. This will require that more transit-oriented projects are completed by 2035, and other projects will be completed by 2050.

The San Diego region has significant problems with ozone and small particulate matter pollution. Children living in Barrio Logan take twice as many trips to emergency rooms due to asthma as children in other parts of the County. Measurable health outcomes, such as trends in air pollution and incidence of children's asthma should be linked to this goal.

Finally, "the 2025 RP promotes safer transportation options by building more infrastructure for people who walk and bike. These improvements increase transportation-related physical activity, contributing to healthier communities." Progress on this important goal should be measured by yearly counts of deaths and injuries to cyclists, pedestrians, and drivers.

We look forward to future meetings with SANDAG staff to learn more about how the 2025 RP can be adjusted to meet the needs of all San Diegans, particularly those that live in communities of concern, where the negative impacts of our automobile-dominated transportation system are felt the strongest.

Thank you for your consideration.

Sincerely,

SanDiego350

DAHVIA LYNCH
DEPUTY CHIEF ADMINISTRATIVE OFFICER

LAND USE AND ENVIRONMENT GROUP OFFICE
1600 PACIFIC HIGHWAY, ROOM 212 SAN DIEGO, CALIFORNIA 92101-2422
858-514-4990

July 18, 2025

Mr. Mario Orso
Chief Executive Officer
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: regionalplan@sandag.org

RE: COUNTY OF SAN DIEGO COMMENTS ON SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG) DRAFT 2025 REGIONAL PLAN

Dear Mr. Mario Orso,

The County of San Diego (County) values our continued partnership and recognizes the importance of collaborative regional planning to ensure equitable, resilient, and sustainable growth for all communities, including the unincorporated areas. We appreciate the San Diego Association of Governments' (SANDAG's) dedication to developing a regional plan for one of the most expansive and diverse regions in the state, and acknowledge the complexity and care involved in this effort. We would like to continue to work together to ensure the 2025 Regional Plan (Plan) helps to further these goals in the unincorporated areas of the county. These areas may have different land use characteristics than more urbanized locations, but equal or greater needs in terms of community investment in infrastructure (including transportation and digital communication infrastructure), housing, and environmental resources. Broadly, the County requests SANDAG incorporate the following in the Plan:

- Equity and Rural Inclusion - Support investments in unincorporated, rural, and tribal communities. Ensure grant funding criteria allows for competitive participation for unincorporated areas. Consider separate metrics for urban and suburban/rural areas to advance equity across the region in terms of infrastructure, housing and environment.
- Climate Action and Resilience - Align with County and State climate goals for carbon neutrality by 2035–2050. Prioritize climate resiliency planning including wildfire preparedness.
- Funding Transparency and Prioritization - Increase budget transparency and share methods for determining project selection. Elaborate on how the Plan budget ($125–130 billion) will support historically underfunded communities. Increase transparency on project selection, phasing, funding status, and geographic distribution.

- Health and Environmental Protection - Recognize the Tijuana River Valley as a regional environmental priority and integrate funding and coordination support.

The county's unincorporated areas include a broad mix of rural, semi-rural, and village communities located outside the region's 18 incorporated cities. These diverse places are home to over 500,000 residents and encompass working lands, open space, tribal areas, and key recreational and environmental resources. The County serves as the land use authority for these areas, guiding development, infrastructure, and conservation through its General Plan, with a focus on sustainability, community character, and equitable access to services. This diverse area requires targeted goals and tailored, sustained investments to meet the needs of unincorporated residents. The County is committed to an equitable regional vision where all communities benefit from coordinated investments and thoughtful planning, as envisioned in the SANDAG 2025 Regional Plan (Plan).

County staff have reviewed the draft 2025 Plan, released on May 23, 2025. The following specific comments and recommendations are provided to support alignment between County priorities and the Final Regional Plan and its subsequent Environmental Impact Report (EIR). Our prior comments on the Notice of Preparation (Enclosure 1) and additional technical comments and recommendations (Enclosure 2) are provided for your consideration.

ALIGNMENT WITH LOCAL PLANNING

Given the breadth and diversity of the unincorporated area, the County requests, "rural towns and communities" be clearly defined to include unincorporated areas and support equitable representation in regional analyses. To support effective implementation, we would like to help ensure County-led plans and infrastructure programs can be fully integrated into the Plan. These efforts reflect adopted land use policies and investment priorities that are essential for serving unincorporated communities and advancing shared regional goals.

The County encourages SANDAG to recognize and incorporate key County initiatives into regional planning efforts, such as:

- Infrastructure & Transportation*:* County's Capital Improvement Plan, Active Transportation Plan, Small Airports, Sanitation Local Roadways Safety Plan, Wastewater Treatment - Advanced Water Purification Program;
- Environmental & Climate*:* Climate Action Plan, Watershed Protection Program, Flood Control Data, Recycling Program, Landfill Program, Multiple Species Conservation Plan, and;
- Digital Access & Equity*:* Comprehensive Broadband Plan.

Aligning these efforts would not only strengthen outcomes for unincorporated communities, but would also enhance regional coordination, funding competitiveness, grant readiness, and implementation efficiency across jurisdictions.

The County welcomes continued collaboration to establish a shared, user-friendly data standard that enables integration of local jurisdictional data into SANDAG's modeling. This shared localized data would streamline regional planning, enhance interagency coordination, and improve alignment with federal and state funding requirements.

FUNDING & PRIORITIZATION

Equitable infrastructure funding is essential to serving unincorporated communities, which plays a critical role in the region's housing, agriculture, recreation, open space, and economic sustainability. To support alignment between the Plan and County projects, we request that projects be clearly identified by subregion, especially those affecting unincorporated communities. This additional detail will enable the County to better align programs, such as the Capital Improvement Plan, with SANDAG's priorities and ensure coordinated investments in areas with the greatest need.

As part of ensuring equitable infrastructure funding, clarification is needed regarding how long-term investments in underserved and rural communities will be preserved with the reduction in the Plan's overall funding from $163 billion (2021 Plan) to $125–133 billion (2025 Plan). We request that SANDAG clarify how revised budgets will affect project timelines, phasing and prioritization across jurisdictions, and how projects in unincorporated areas will be identified and advanced. This clarification includes ensuring continued transparency through tools, such as SANDAG's interactive map.

The County also encourages SANDAG to strengthen the equity lens beyond regulatory compliance to ensure that funding decisions are guided by community-identified needs and priorities, including the needs of tribal communities. Additional transparency is needed around funding eligibility criteria, population modeling assumptions, and access to programs, such as Flexible Fleet opportunities.

ADVANCING EQUITY & SOCIAL RESILIENCE

Equity remains central to the County's planning framework. The Plan presents an opportunity to address long-standing disparities in infrastructure, access, and environmental burdens particularly for unincorporated, rural, tribal, and underserved communities that comprise over 20% of the region's population.

We believe it would be helpful in the Plan for SANDAG to expand its equity analysis to more directly reflect the distinct needs of the unincorporated area, including disparities in transit access, housing, and infrastructure. This expansion of the equity analysis includes identifying service and funding gaps in broadband, stormwater, sanitation, flood control, and inactive landfill monitoring. We recommend incorporating specific environmental justice metrics and adopting an investment approach that prioritizes historically under-resourced communities to ensure a more just and equitable regional future.

To advance shared goals, the County recommends co-developing tools, such as a Rural Mobility Action Plan, and establishing ongoing feedback loops to ensure community input is reflected through implementation, not just during the planning phase. Engagement practices should include listening sessions, multilingual outreach, culturally inclusive methods that recognize the diversity across unincorporated and tribal communities. We further recommend clarifying how input from the 2024 Tribal Summit has been incorporated into the Plan and whether engagement includes non-federally recognized tribes.

We also encourage SANDAG to explore how emerging technologies, including micro transit, electric vehicle infrastructure, and autonomous mobility, can be adapted to effectively serve unincorporated areas, including rural communities. The Plan should emphasize where investment can not only provide the greatest benefit to support overall mobility, but to also consider providing those investments in areas with the greatest need and highest potential return on investment.

TRANSPORTATION

Many unincorporated communities remain underserved by transit and require near-term, practical investments in road safety, first/last-mile solutions, and rural-serving transit options. The County continues to focus investing in village areas and communities adjacent to urbanized cities, where growth can support reduced Vehicle Miles Traveled (VMT) and greenhouse gas (GHG) emissions. The County welcomes collaboration with SANDAG to ensure the Plan adequately reflects unincorporated mobility needs, consistent with County-adopted land use plans.

Given that over 65% of unincorporated residents remain auto-dependent, scalable solutions are needed to reduce this reliance. The County supports prioritization of Next Gen Rapid Ride Routes 212, 256, 259, 292, and 483, and improving micro transit service areas, park-and-rides, and first/last mile infrastructure. Active transportation investments should reflect inclusive language, such as “walk, bike, and roll,” to address a wider range of mobility needs.

To support readiness and implementation, we recommend aligning County planning efforts with SANDAG programs including Flexible Fleets, Regional Bike Network Projects, and Smart Growth Incentive Program funding. Coordination should prioritize pilot and long-term investments in unincorporated areas, such as Fallbrook, Ramona, Spring Valley, Valle de Oro, Valley Center, Lakeside, Alpine, and Julian, especially around transit nodes, high-density zones, and County facilities. These investments must be paired with disaggregated data and locally informed engagement to ensure equitable distribution, particularly in rural and environmental justice communities.

The County requests early coordination on Plan projects intersecting County-owned properties, such as bikeways and transit alignments, to ensure safety, compatibility, and operational feasibility.

Regional Connectivity

The County recommends that the Plan more directly address cross-jurisdictional transportation challenges including increased congestion along Interstate 15 (I-15) and cross border routes and their impacts on local roads such as Old Highway 395 and Deer Springs Road. Mitigation strategies are essential to protect infrastructure and sustain regional mobility.

The County also recommends that the completion of State Route 11 (SR-11) and the Otay Mesa East Port of Entry be prioritized, with a definitive implementation timeline and that operational challenges related to SR-125 be addressed in parallel. A coordinated, interjurisdictional approach is needed to ensure benefits for both urban and unincorporated communities.

Safety and Emergency Preparedness

The County supports SANDAG’s Vision Zero planning and recommends including guidance on funding access for safety projects, such as shoulder widening, curve realignment, and Assembly Bill 43 (AB 43) speed reductions implementation. Regional safety planning should also integrate flood control resources, drainage studies, and early warning systems.

Emergency access and evacuation should guide prioritization of highway improvements especially in high-risk, fire-prone areas. The County recommends that the Plan clarify how project timing (e.g., before or after 2035) reflects these needs and encourages continued alignment with the County’s General Plan Safety Element and Hazard Mitigation Plan.

To strengthen long-term resilience, we recommend incorporating the County’s Vulnerability Assessment and Adaption report and expanding hazard considerations to include seismic and

hazardous materials risks. This incorporation and expansion should include mitigation strategies for vulnerable infrastructure and planning for potential environmental and public health impacts.

HOUSING & SUSTAINABLE LAND USE

Coordination between SANDAG's Sustainable Communities Strategy (SCS) and Regional Housing Needs Allocation (RHNA) is essential to aligning housing, transportation, and climate goals. The County encourages a more inclusive framework that reflects the development and re-development potential of unincorporated areas particularly, in previously developed areas, Villages, and Transit Opportunity Areas (TOAs), which can support sustainable growth when paired with appropriate transit and infrastructure investments.

The County recommends that the SCS recognize TOAs as eligible for targeted investments, alongside Mobility Hubs to broaden climate-aligned housing strategies. This recognition of TOAs would improve consistency with the County's Housing Element and Transportation Study Guidelines and support alignment between regional housing goals and unincorporated land use patterns. To ensure accuracy, we recommend additional analysis of development assumptions in rural and protected areas.

Regional housing affordability challenges are contributing to increased inter-county commuting, and growing congestion on County-maintained roads. We encourage SANDAG to acknowledge this dynamic and lead efforts to strengthen housing-employment connections, particularly in North County to reduce VMT and improve regional mobility and economic resilience.

Since the county is incredibly diverse in needs, the County recommends that SANDAG reconcile projected growth in housing and employment with population forecasts that suggest decline within unincorporated areas and clarify how local General Plan data and unincorporated land use patterns are incorporated into the Plan's modeling assumptions.

We encourage continued refinement of Series 15 growth modeling evaluate community-level needs within the unincorporated area. Tailoring programs and services at the service level would help ensure equitable infrastructure access and more accurately reflect the diversity of communities under the County's Jurisdiction. The County requests confirmation that the 19 intraregional Tribal Transportation Strategy (ITTS) projects are current and accurately reflected in the Plan to support coordinated implementation.

ENVIRONMENTAL PROTECTION AND CONSERVATION PLANNING

The County recommends that the Plan and EIR explicitly assess cumulative impacts on sensitive habitats, wildlife linkages, working lands, and conservation areas within the unincorporated area. These intersect with County-led efforts such as the Multiple Species Conservation Program (MSCP), which reflects decades of planning, coordination and investment.

To strengthen alignment, we recommend supporting mitigation through acquisitions in the MSCP designated areas and clarifying terminology used in Plan figures, particularly avoiding assumptions that all "Proposed Conserved Habitat Lands" are under active conservation or land use restrictions. The County encourages further coordination for wildlife crossings and to support connectivity and ecosystem health through infrastructure investments. We welcome continued collaboration through regional programs such as the Regional Habitat Conservation Assessment and Nature-Based Climate Solutions Program. The County also recommends coordination with the Vector Control Program when planning near waterbodies.

Tijuana River Valley: Environmental & Regional Priority

For decades, South County communities have faced disproportionate impacts from cross-border flows of sediment, trash, and untreated sewage in the Tijuana River Valley (TJRV) which continues to harm regional ecosystems, public health, and the local economy. In 2023, the County Board declared a Local Emergency which remains effective today.

The County leads collaborative efforts to restore habitat, rehabilitate floodplains, and enhance stormwater infrastructure in the TJRV, guided by the TJRV Needs and Opportunity Assessment, and Habitat Restoration Plan. These efforts are supported by real-time monitoring tools, multilingual outreach, and daily water quality testing to inform and protect the public.

The County respectfully requests that the Plan and EIR evaluate potential impacts to these efforts and ensure alignment with state and binational goals. In particular, we ask SANDAG to:

- Identify and support sustainable, long-term funding sources;
- Integrate TJRV projects into regional environmental planning and infrastructure investments, and planning tools; including alignment with the California/Baja California Border Resiliency Plan;
- Partner with the County on project delivery, technical coordination, and community engagement to address the ongoing sewage crisis.

The County emphasizes the importance of ongoing engagement to ensure that unincorporated residents and community partners see their priorities reflected in long-range regional investments.

Climate Action & GHG Reduction

The County supports the Plan's emphasis on reducing greenhouse gas (GHG) emissions, Vehicle Miles Traveled (VMT) reduction, mode shift, and transit investment. These strategies align with the County's Climate Action Plan and Regional Decarbonization Framework, which aim for carbon neutrality by 2035–2050.

To better reflect regional commitments, we recommend extending modeling beyond 2035 to capture long-term GHG reductions resulting from planned investments. We encourage investments in infrastructure resilience such as bus shelters that provide heat and storm protection, prioritizing climate-vulnerable areas and communities of concern.

The County requests more accessible, localized metrics to demonstrate how transportation investments within unincorporated communities may reduce VMT, increase active transportation, alleviate congestion, and improve safety at the community scale. Including dedicated section on how rural and unincorporated communities will contribute to and benefit from the Plan's GHG strategies would further demonstrate regional equity. Continued collaboration on mobility solutions such as Rapid Bus and Flexible Fleets will be essential to meeting climate goals across the region.

CONCLUSION

The County appreciates SANDAG's consideration of these recommendations, and we look forward to continued collaboration to ensure all communities' benefit. We recommend establishing a continuous feedback loop between SANDAG and the County to ensure that Regional Plan assumptions remain aligned with County General Plan updates and community priorities. We request that SANDAG consider the County comments included within this letter, along with comments from the 2025 Notice of Preparation comment letter (Enclosure 1) and County Department comments (Enclosure 2).

If you have any questions regarding these comments, please contact Ashley Rivero, Land Use/Environmental Planner III, at (619) 629-4438 or ashley.rivero@sdcounty.ca.gov. The County appreciates the opportunity to provide comments on the draft Plan and consideration of these comments and recommendations. We look forward to reviewing the associated Environmental Impact Report (EIR and Final 2025 Regional Plan.

Thank you for your attention to these matters.

Sincerely,

Dahvia Lynch
Deputy Chief Administrative Officer
Land Use and Environmental Group

ENCLOSURES
Enclosure 1: County Comment Letter on the SANDAG Regional Plan Notice of Preparation
Enclosure 2: County of San Diego Enterprise Technical Comments

cc: Sara Toma – Senior Planner – SANDAG
Ebony Shelton – Chief Administrative Officer – County of San Diego
Andrew Strong – Deputy Chief Administrative Officer – Public Safety Group
Kimberly Giardina – Deputy Chief Administrative Officer – Health and Human Services Agency
Brian Albright – Deputy Chief Administrative Officer – Finance and General Government Group
Joan Bracci – Chief Financial Officer – Finance and General Government Group
Vince Nicoletti – Director – Planning & Development Services
Marisa K. Barrie – Director – Department of Public Works
Amy Harbert – Director – Department of Environmental Health and Quality
Jason Hemmens – Director – Department of Parks and Recreation
Eden Brukman – Director – Office of Sustainability and Environmental Justice
Matthew Parr – Director – Economic Development and Government Affairs
Jeff Toney – Director – Office of Emergency Services
Marko Medved – Director – Department of General Services
David Estrella – Director – Housing and Community Development Services

County of San Diego

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General ▪ (858) 694-2705 Codes
(858) 565-5920 Building Services
www.SDCPDS.org

DAHVIA LYNCH
DIRECTOR

March 6, 2023

Kirsten Uchitel
Associate Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Sent via email to: Kirsten.Uchitel@sandag.org

REQUEST FOR COMMENTS ON THE NOTICE OF PREPARATION OF A PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR THE 2025 REGIONAL PLAN FOR THE SAN DIEGO ASSOCIATION OF GOVERNMENTS

Dear Ms. Uchitel,

The County of San Diego (County) staff reviewed the San Diego Association of Governments (SANDAG) Notice of Preparation (NOP) for the 2025 Regional Plan Environmental Impact Report (EIR) (Project), dated January 3, 2023. County staff appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as a County position on this Project.

The unincorporated area contains the second highest population of all municipalities in the region, behind only the City of San Diego, and includes unincorporated communities that are larger in population than several incorporated cities. These communities are reliant upon growth and transit investment occurring to grow and evolve in a healthy, resilient, and equitable way. Therefore, the County is encouraging SANDAG to take this into account when considering resource allocation, data collection, forecasting, and strategies for the 2025 Regional Plan. The 2021 Regional Plan 5 Big Moves are primarily focused within the incorporated communities that have access to existing transit with limited investment proposed in the unincorporated areas where there are fewer alternative options to driving. County staff is requesting that this iteration of the Regional Plan contain proportionate consideration of and equitable investment in unincorporated communities with large populations that warrant transit, as well as rural areas that need to connect to the greater region and have very little or no access to alternate modes of transportation.

To ensure that potential opportunities within the unincorporated area are not precluded in the future, County staff requests that SANDAG incorporate the comments below on the Draft PEIR

and that any necessary refinements be reflected in the appropriate chapters and analyzed in the appropriate sections of the Final PEIR.

GENERAL

1. The County's Land Use and Environment Group has developed Guidelines for Determining Significance that are used to determine the significance of environmental impacts and mitigation options for addressing potentially significant impacts in the unincorporated portions of the county. Project impacts that could have potentially significant adverse effects to the unincorporated county or County facilities should be evaluated using the County's Guidelines for Determining Significance. These guidelines are available online at: http://www.sandiegocounty.gov/pds/procguid.html.

TRANSPORTATION

1. Consideration should be given to County TOAs as part of Regional Plan development. The County Board of Supervisors (Board) adopted a Transportation Study Guide (TSG) technical guidance document to implement Senate Bill 743 (SB 743) and Vehicle Miles Traveled (VMT) in the unincorporated County. The intent of SB 743 was to streamline environmental review for land development projects located within infill areas close to transit. A key component to successful transit service is to provide a connection between infill or areas with high densities both in population and employment. Transit viability improves when services can efficiently connect one higher density area to another. As a result, the County's TSG established new screening criteria to allow and incentivize land development projects within defined infill areas to move forward without VMT analysis. The County requests SANDAG consider the County Board's adopted TSG "infill areas" as part of the RTP development when developing the future transit/mobility network. The TSG can be viewed on the County's website at: https://www.sandiegocounty.gov/content/sdc/pds/SB743.html

2. Consideration should be given to the County adopted TSG as part of Regional Plan development. In addition to the adoption of the TSG, the Board also directed County staff to explore the potential creation of "Transit Opportunity Areas (TOAs)" as part of the preparation of a Programmatic Environmental Impact Report (EIR) to further define, study, and evaluate the intersection between VMT, land use, mitigation, and potential transit opportunities. SANDAG's consideration of these efforts will be a critical component to better understand and identify the land uses, population density, and transportation network indicators for future transit and multi-modal services to these areas within the unincorporated County.

3. Additional Comments:.

    - Consideration should be given to the County Mobility Element and Active Transportation Plan (ATP) proposed facilities in the Regional Plan development.
    - Please share with the County assumed growth data for the Unincorporated Area and how it considers and is in alignment with or differs from the County's adopted land use policies (e.g General Plan).

- The SCS should consider the County's current General Plan land uses and provide strategies that would reduce GHG emissions and VMT. Significant deviations from the General Plan land uses should be identified and disclosed.
- The County continues to look for a partnership opportunity with SANDAG to develop a regional VMT mitigation fee plan to mitigate the cumulative VMT impacts of new growth and help to ensure that new development pay's their fair share to implement the RTP based on the benefits they will receive.

LAND USE

1. On December 9, 2022, the County of San Diego provided feedback on the ongoing Series 15 modeling, which will have implications for the predicted land use of all municipalities under the 2025 Regional Plan. The County requests that SANDAG continue to coordinate with County staff to understand how the Series 15 modeling assumptions will consider the unincorporated area and the County's General Plan, and any potential funding and resource allocation implications.

CONSERVATION PROGRAM

1. The Regional Plan covers areas that are critical to all three of the County's Multiple Species Conservation Program (MSCP) plans and Butterflies Habitat Conservation Plan (HCP). This includes the South County MSCP Subarea Plan (South County Plan), the draft North County MSCP (North County Plan), and future East County MSCP (East County Plan). The Regional Plan also covers areas that will be included in the County's in process Butterflies HCP. Please coordinate with County staff to ensure the Regional Plan's EIR evaluates and addresses potential direct and indirect impacts on the County's conservation plans. Please see additional comments pertaining to each of the plans below.

2. The South County Plan is a joint federal HCP and state Natural Communities Conservation Plan (NCCP) that covers the southwestern portion of the unincorporated county. The Regional Plan covers areas that are part of the Pre-Approved Mitigation Area, which encompasses the area with highest biological value in the South County Plan. The County's Biological Mitigation Ordinance (BMO) is the primary implementing ordinance for the South County Plan. The Regional Plan's EIR should evaluate and address impacts that could have potentially significant adverse effects to lands within the South County Plan using the BMO. This ordinance is available online at: COUNTY OF SAN DIEGO (sandiegocounty.gov).

3. The County is working in partnership with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to prepare the draft North County Plan. The draft North County Plan will be a joint federal HCP and state NCCP that will cover the northern part of the unincorporated county. The Regional Plan covers areas that are part of the draft North County Plan, including areas located within the draft Priority Conservation Area (PCA), the area within which the preserve will be assembled. The Regional Plan's EIR should evaluate and address potential impacts to the County's draft North County Plan. Additional information regarding the draft North County Plan is available at: https://www.sandiegocounty.gov/content/sdc/pds/mscp/nc.html.

4. The County's Butterflies HCP plan area has not yet been developed, but it will include the areas of the unincorporated county where the Covered Species or their habitat could occur. Given the Regional Plan covers areas that will be included in the County's Butterflies HCP, the Regional Plan's EIR should evaluate and address potential impacts to the County's in process plan. Additional information regarding the Butterflies HCP is available at: https://www.sandiegocounty.gov/content/sdc/pds/mscp/bhcp.html.

5. The County is currently focused on preparing the draft North County Plan and the Butterflies HCP, however, the County also entered into a Planning Agreement with USFWS and CDFW regarding the East County Plan, which will cover the eastern part of the unincorporated county. The Regional Plan covers areas that are part of the future East County Plan, including areas located within the draft Focused Conservation Areas (FCA), which are the preferred preserve areas. The Regional Plan's EIR should evaluate and address potential impacts to the County's future plan. Additional information regarding the East County Plan is available at: https://www.sandiegocounty.gov/content/sdc/pds/mscp/ec.html.

GREENHOUSE GAS EMISSIONS

1. The County is committed to supporting SANDAG in achieving its GHG reduction targets in the transportation sector. SANDAG's investments through the Regional Plan/SCS support GHG emissions reductions from transportation in the unincorporated County and throughout the region. County efforts, such as those developed through climate action planning, can enhance these GHG reductions by providing complimentary programming. This includes County-led investments in first/last mile services for unincorporated areas that receive SANDAG investment through transit frequency enhancements and route expansions, improved transit stations, and policies that encourage alternative transportation usage. The County recognizes, however, that many of our transportation investments and efforts can only achieve maximum benefits and GHG reductions when paired with similar and supportive SANDAG investments. The County encourages SANDAG to coordinate early and often with County Planning and Development Services to ensure the visions and strategies of the Regional Plan/SCS and County Climate Action Plan (CAP) Update are in alignment and complimentary. The County's CAP Update will include measures that address emissions from transportation in the unincorporated County to support meeting our aggressive net-zero GHG emissions goal between 2035 and 2045.

2. Investment in public transit and other transportation options will make it easier for people to drive less, which results in decreased GHG emissions. In the 2021 Regional Plan less than 1 % of the unincorporated area was proposed within the mobility hubs, which is where transit and on-demand travel infrastructure investment will be focused. The unincorporated north and east county communities represent a significant population with higher-than-average VMT in the region and therefore should be equitably considered in the Regional Plan.

ENVIRONMENTAL JUSTICE

1. "Environmental Justice" communities should be a consideration in the Regional Plan EIR This analysis should include discussion of disadvantaged communities designated under SB 535, tools for determining areas such as "CalEnviroScreen", and a discussion of how

environmental justice and/or disadvantaged communities within each municipality will be considered and how investment will be equitably distributed.

HAZARDS AND HAZARDOUS MATERIALS

1. The State of California's Fire Hazard Severity Zone Map updates should be analyzed and incorporated into the 2025 Regional Plan, Series 15 modeling, and transportation resource allocation for unincorporated areas, which are disproportionately affected by wildfires as compared to municipalities in more urban areas of San Diego County.

PARKS AND RECREATION

1. General

    a. Please consider how transit can be aligned with recreation access points to increase access to these important regional amenities.

    b. Please consider including analysis regarding mobility needs for wildlife (wildlife corridors) and for equestrians where appropriate.

2. Aesthetics

    a. Please consider evaluating direct and indirect impacts due to light and glare on open space lands and wildlife corridors/linkages.

    b. Please consider specifying that invasive or non-native species will not be used to replace impacted vegetation in cases where vegetation disruption causes potential aesthetic impacts.

3. Biological Resources

    a. Please consider coordinating with County staff and evaluate potential direct and indirect impacts on the Multiple Species Conservation Program (MSCP) (the approved South County Plan and the North and East County Plans in development).

    b. Please ensure that maps are using the latest GIS data available from SanGIS.

    c. Please consider including County parks and preserves and associated proposed project impacts to each specific park and preserve within the EIR; data on County parks and preserves can be found on SanGIS.

    d. Please consider requirements of the Public Park Preservation Act of 1971 (Public Resources Code Sections 5400-5409). In the event the Proposed Plan results in "take" of any County MSCP Preserve Lands, this would be considered "take" of designated park land and may require land or other compensation for loss of park land.

    e. Please use the latest available County of San Diego's SanBios data in preparation of the EIR.

f. Given the significance and regional importance of wildlife corridors and wildlife linkages, please consider updating the analysis to consider areas where linkages and corridors could be impacted by the Proposed Plan and any mitigation measures that could be implemented to improve wildlife linkages throughout the County.

g. Please consider inclusion of an integrated invasive plant control plan with enforceable protocols for maintenance, construction, and emergency activities to follow when working within and moving between important habitat areas.

h. Please work with the San Diego Monitoring and Management Program (SDMMP) and community partners to identify areas along regional transit corridors that would benefit from wildlife crossings and include these in future regional projects.

4. Cultural Resources

a. Please consider associated potential impacts on County parks and preserves related to cultural and historical resources. Please coordinate in advance with the County Department of Parks and Recreation (DPR) prior to implementation of projects that may have impacts to County parks and preserves and associated cultural and historical resources.

5. Public Services and Utilities (Recreational Facilities)

a. The County's Community Trails Master Plan identifies multiple regional trails that are regional resources, as they would benefit residents and visitors throughout the region. Please consider how the potential transportation and land use changes could impact the connectivity of these regional trails. The County also requests that SANDAG consider further coordination with the DPR during implementation of the Proposed Plan when potential regional and community trail impacts are anticipated. Additionally, please consider working with County staff to look for further opportunities to provide trail connections during implementation of transportation infrastructure projects where feasible.

b. For proposed projects that occur adjacent to DPR County-managed lands, please coordinate with DPR to ensure wildlife connectivity is maintained from adjacent lands to preserved County lands, including wildlife-only crossings.

c. For proposed projects that occur adjacent to or near existing or potential future trail connections, please coordinate with DPR on trail connectivity throughout the County and incorporate safe multi-use crossings for pedestrians, bicyclists, and equestrians such as bridges or overpasses for recreational use.

d. Please consider discussions of the County's Parkland Dedication Ordinance, Community Trails Master Plan, and County of San Diego Parks Master Plan in the EIR, as these are all resource documents that discuss regional trail and recreation facilities.

e. Please ensure that any impacted County Recreational Facilities (parks, trails, campgrounds, etc.) are clearly identified in the EIR.

f. Please consider including existing trails and pathways as part of the pedestrian facilities assessment in the EIR.

The County appreciates the opportunity to comment on the 2025 EIR NOP. We look forward to receiving future documents related to this Project and providing additional assistance in ensuring that all communities are considered in the Regional Plan. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 505-6677, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,

Lynnette Santos

Lynnette Santos
Chief, Long Range Planning Division
Planning & Development Services

cc: Rosa Olascoaga, Policy Advisor, Board of Supervisors, District 1
David Flores, Policy Advisor, Board of Supervisors, District 1
Gregory Kazmer, Land Use Director, Board of Supervisors, District 2
Rebecca Smith, Policy Advisor, Board of Supervisors, District 3
Jeffrey Yuen, Policy Advisor, Board of Supervisors, District 3
Cody Petterson, Policy Advisor, Board of Supervisors, District 3
Emily Wier, Policy Advisor, Board of Supervisors, District 4
Joon Suh, Policy Advisor, Board of Supervisors, District 4
Hunter McDonald, Policy Advisor, Board of Supervisors, District 5
Marvin Mayorga, CAO Group Program Manager, LUEG
Jacob Armstrong, Chief, Land Development, PDS
Tyler Farmer, Group Program Manager, PDS
Luis Duran, Planner, PDS
Autumn Viglione, Planner, PDS
Emmet Aquino, Park Project Manager, DPR

DRAFT 2025 REGIONAL PLAN COMMENTS FROM COUNTY OF SAN DIEGO DEPARTMENS AND DIVISIONS

The County of San Diego (County) submits these comments for your consideration on behalf of the County enterprise. Comments below originate from staff in Land Use & Environment Group (LUEG), Public Safety Group (PSG), Finance and General Government Group (FG3), and Health and Human Services Agency (HHSA) reviewed the San Diego Association of Governments' (SANDAG) Draft 2025 Regional Plan (Plan), for applicability to their respective work programs and County initiatives that are planned or currently underway. Given the size and breadth of services of this organization, the specific commenting party (i.e., department, division) is noted to facilitate follow up and collaboration with SANDAG moving forward.

CHAPTER 1: REGIONAL PLAN OVERVIEW

Alignment with Local Planning

1.1. The County of San Diego would like to recommend that SANDAG fully consider and incorporate the Department of Public Works (DPW) infrastructure plans and projects in all aspects of the Regional Plan (Plan), including data collection, modeling, forecasting, project prioritization, resource allocation, and funding support. These County-led efforts are essential to equitably serving unincorporated communities, accommodating projected growth, maintaining aging infrastructure, and ensuring eligibility for state and federal funding sources such as FHWA and TIF. The following County programs should be incorporated into the RP:

- The County's Capital Improvement Program (CIP) identifies priority infrastructure improvements over the next five years. Recommend that eligible CIP projects, particularly those aligned with FHWA safety and bridge funding, be included in the Plan to ensure federal funding eligibility.
- Developed by the County's Traffic Engineering Section, the Active Transportation Plan (ATP) identifies sidewalk and bike lane opportunities in unincorporated areas. Recommend that ATP projects be included in the Plan to maintain eligibility for ATP grant funding and to support multimodal mobility goals.
- The County's Climate Action Plan (CAP) includes goals to expand the sidewalk and bike lane network to reduce greenhouse gas emissions and promote sustainable transportation. Encourage SANDAG to provide funding support for these projects within the Plan to expand transportation mobility options in unincorporated areas.
- The CAP also emphasizes the need to improve access to Transit Priority Areas and provide first/last mile connections. Recommend targeted Plan investment in unincorporated and rural areas that lack transit service but would benefit from alternative and innovative mobility options.
- The County has identified stormwater quality projects to comply with the San Diego Basin Plan and Municipal Stormwater Permit. Encourage the inclusion of these projects in Plan

modeling and planning processes where applicable, given the relationship between transportation infrastructure and stormwater impacts.

- The County's long-range flood control plans address infrastructure resilience and aging systems. Recommend these projects be integrated into the Plan to support eligibility for the Federal Flood Insurance Program and ensure regional coordination on flood prevention.
- The DPW maintains several closed landfill and burn sites in unincorporated areas that require ongoing monitoring and maintenance. Recommend that these sites be acknowledged in the Plan to support funding opportunities for required upkeep and regulatory compliance.
- The County operates multiple general aviation airports that serve regional residents. Encourage consideration of these airport facilities and their associated improvement plans in Plan modeling, prioritization, and funding strategies.
- The County Sanitation District is implementing projects to address projected population growth and aging wastewater infrastructure. Recommend that these projects be reflected in the Plan to align regional infrastructure investments.
- The East County Advanced Water Purification Program is a regional initiative that aims to increase wastewater treatment efficiency. Recommend that SANDAG coordinate with the County on this program and reflect its infrastructure impacts in the Plan.
- The County's Recycling Program is expanding waste diversion strategies in unincorporated communities. Encourage SANDAG to consider the regional transportation implications of waste management and incorporate relevant projects and infrastructure needs into Plan planning efforts.

1.2 We recommend that SANDAG consider expanding the Flexible Fleet service areas in the following locations to improve access to County facilities:

- Expand coverage to include the County Operations Center (COC) and nearby HHSA facilities, bounded by SR-163, I-15, and Balboa Avenue.
- Extend coverage to the Lemon Grove Family Resource Center (7065 Broadway, Lemon Grove).
- Consider integration with existing fixed-route options (bus, Orange Line trolley) to support access to the County Assessor/Recorder Office (10144 Mission Gorge Road, Santee, CA).

1.3 County staff request that SANDAG coordinate directly with the County regarding potential impacts to County-owned properties identified in the 2025 Initial Concept (by 2035):

- On-Street & Off-Street Bikeways: A proposed bikeway segment along the San Diego River in Santee traverses County-owned. Any improvements on County land should be coordinated and approved by the County throughout all phases—planning, design, construction, and operations.

- Airport Transit Connection: Proposed improvements near the County Administration Center (CAC) may affect County property. Clarify the scope of improvements and confirm whether a stop at the CAC, previously referenced in the 2021 Plan as an optional automated people mover, is still under consideration. Any impacts should be coordinated with the County.

1.4 Due to the limited scale and general nature of the information currently available, additional projects may impact County-owned or operated properties. We request continued coordination and future review opportunities as the Plan is refined, and as more detailed project-level information becomes available.

1.5 We respectfully recommend adding cross-references throughout the chapters and appendices to relevant County programs, such as the Climate Action Plan, Local Roadway Safety Plan, and Multiple Species Conservation Program (MSCP), to emphasize integrated planning and support local coordination. We also encourage the inclusion of disaggregated data to ensure that investments are distributed equitably across urban and rural areas. Finally, we recommend that SANDAG develop or enhance a transparent project dashboard that clearly identifies project location, funding status, and implementation schedules by subregion. This informational request will help track progress, build trust, and ensure that projects align with the unique needs of urban, suburban, and rural communities alike.

1.6 The County recommends that the Sustainable Communities Strategy (SCS) recognize unincorporated Vehicle Miles Traveled (VMT) efficient and infill areas and Villages as key housing growth areas that contribute to regional climate goals. We also recommend that SANDAG incorporate both County-defined and SANDAG-defined Transit Opportunity Areas (TOAs) into the SCS to broaden the definition of climate-aligned housing. These SCS recommendations will foster consistency with the County's Housing Element and other regional housing goals.

1.7 To further support transparency and coordination, we recommend including a summary table that highlights all projects located by subregion or in unincorporated areas. This addition would help local agencies, stakeholders, and the public quickly identify projects and understand how they align with existing local priorities.

1.8 In addition, we recommend that the Plan highlight the County's Beach and Bay Water Quality Monitoring Program, which conducts daily beach water testing, public education, and real-time notifications of beach conditions – particularly in south county areas frequently impacted by transboundary sewage. This program protects the public health of millions of residents and visitors each year through beach signage. The program is administered by the County's Department of Environmental Health and Quality (DEHQ) and provides public notification of beach and bay water quality results online every day.

Regional Connectivity

1.10 We recommend that the Plan include a discussion of regional traffic impacts stemming from cross-county travel, particularly from Riverside and Orange counties. In recent years, increasing

traffic volumes on I-15 from Riverside County have resulted in significant congestion and have caused diversion of vehicles onto adjacent County arterials during peak morning and evening hours. Impacted roadways include Old Highway 395, Deer Springs Road, and Buena Creek Road. To address these ongoing challenges, we recommend that the Plan specifically evaluate the effects of interregional traffic on both I-15 and surrounding local arterials and clearly identify projects, programs, and strategies that are proposed to mitigate these impacts. Inclusion of these elements will ensure a more complete and regionally integrated approach to transportation planning and infrastructure investment.

1.11 The County recommends that the Plan address the interrelated nature of the SR-125 tollway and the SR-11 tollway/Otay Mesa East (OME) Port of Entry (POE) projects, which collectively comprise key components of the South San Diego regional roadway system. The successful operation of the border infrastructure depends in part on the efficient management and performance of the SR-125 corridor. We recommend that the Plan outline a coordinated strategy to ensure that issues associated with the management and operation of SR-125 are resolved concurrently with the completion of the SR-11 and OME POE projects. Addressing these projects in tandem will support regional goods movement, improve cross-border connectivity, and enhance system efficiency.

1.12 The SR-11 tollway and OME POE projects continue to be delayed by several years and there is no definitive date for completion. The delays have not only impacted the South San Diego region but the economy of the San Diego region. Completion of the SR-11 facility and the OME POE should be a top priority in the Plan due to the beneficial effect the improved border operations would have on the local economy. A more definitive schedule for completion would enable South Bay and Otay Mesa property owners and developers to more confidently move forward with their business which will rely on the new POE at OME.

CHAPTER 2: SUSTAINABLE COMMUNITIES STRATEGY

Housing and Sustainable land Use

2.1 Encourage the Regional Plan (Plan) to include a process for local jurisdictions to access funding for roadway safety enhancements, such as shoulder widening, curve realignment, and AB 43-related speed reductions, as part of implementing Vision Zero goals. The County has developed a Local Roadway Safety Plan aligned with these objectives and participated in SANDAG's Vision Zero efforts (Appendix L).

2.2 Recommend that the Plan ensure sufficient and sustained funding for the maintenance and operation of transportation infrastructure, with specific attention to the unique challenges associated with rural roadways and infrastructure networks.

2.3 Recommend that the Plan support the advancement of regional bike infrastructure by considering funding assistance for implementation of the County of San Diego's Active

Transportation Plan. This recommendation aligns with the County's Climate Action Plan goal to expand bicycle infrastructure in unincorporated communities.

2.4 Many climate action and relevant sustainability plans in the region, including the County's Regional Decarbonization Framework and Climate Action Plan, have goals and/or aspirational visions to achieve zero carbon emissions by 2035-2050 – a similar timeline to this Plan. It is unclear why the Plan and SCS do not consider similar or supportive goals for this midcentury timeline in alignment with other regional entities. Modeling does not appear to show a continued decline in regional transportation emissions after 2035. Recommend that the Plan model continued emissions reductions toward these longer-term goals because of anticipated changes intended to occur from these significant investments.

2.5 The County recommends that the SCS include a robust analysis of the jobs-housing balance in unincorporated areas. Recognizing local employment centers, such as Otay Mesa and Ramona Industrial Park, and supporting housing near these job centers will help reduce VMT and support regional climate goals.

2.6 Consider Julian for a Microtransit area in addition to those planned for Ramona, Borrego Springs, Alpine, Casa De Oro/Spring Valley/La Presa, Lakeside, Fallbrook.

2.7 Furthermore, we recommend reconsidering the phasing of bike infrastructure projects in unincorporated communities such as Ramona and Alpine. These projects are currently slated for post-2050 implementation, which does not align with the more immediate mobility needs of rural residents. We encourage advancing the timeline for these projects to 2035 where feasible, to better align with equity and accessibility goals in the Plan.

2.8 We recommend that SANDAG provide greater clarity on planned transit infrastructure investments in rural communities designated as "Microtransit areas," including Ramona, Alpine, Lakeside, Fallbrook, Pala/Pauma, and Borrego Springs. While these communities are identified as eligible for Microtransit or Flexible Fleet services, it is not clear whether additional investment is proposed to improve baseline transit frequency, infrastructure, or connectivity.

2.9 It is our understanding that Microtransit and Flexible Fleet programs are most effective when functioning as first/last mile connectors to frequent transit hubs. Without adequate transit infrastructure and service frequency, these programs may be limited in their ability to meaningfully reduce vehicle miles traveled (VMT) or meet rural mobility needs.

2.10 We recommend that SANDAG consider additional investment to improve transit service levels and regional connections in these areas so that Microtransit and Flexible Fleet programs are effective and equitable in rural contexts.

As a key example, the Flexible Fleet overlay for Borrego Springs appears in the Plan; however, Figure A.2: East County and Rural Area Projects shows no existing or planned complete corridors

or transit projects serving this area over the next 25 years. This disconnect should be addressed to ensure alignment between mobility designations and supporting infrastructure.

2.11 The County acknowledges SANDAG's Transportation Network Initial Concept can benefit residents and visitors regionally in their commutes to County owned and leased facilities. The County has identified several Microtransit expansion collaboration opportunities with other local jurisdictions in key service areas; including Kearny Mesa Convoy, Santee, and eastern San Diego (comment 1.3). Expansion of Microtransit services in these areas would greatly benefit residents by increasing access to critical services such as public health, family support, and social services. Ensuring last-mile solutions connect directly to County-owned facilities will help meet regional equity and access goals.

2.12 We recommend that the Plan explicitly recognize the importance of equitable access to essential County services, including Health and Human Services, Libraries, Public Safety, Law Enforcement, and Fire, through reliable and accessible alternative transportation options. Many County-owned and leased facilities are located throughout both incorporated and unincorporated areas, and proposed improvements to the regional transportation network should consider how best to serve these critical destinations.

2.13 The Draft Proposed 2025 Plan Transportation Network Initial Concept identifies improvements such as increased bus transit frequency, Bus Rapid Transit (BRT), regional and light rail expansion, and Flexible Fleets (including Neighborhood Electric Vehicles and Microtransit). These services can play a key role in helping residents and visitors reach County facilities, particularly for completing first/last mile segments of trips.

2.14 We request that the Plan include more detailed information on the Flexible Fleet proposals, including:

- Method of access (e.g., app-based, phone-in reservations)
- Hours of operation (weekday vs. weekend availability)
- Expected frequency and coverage zones
- Integration with existing transit hubs and County facility locations

2.15 We recommend that SANDAG provide additional review and scrutiny of documented land use patterns in rural areas to ensure alignment with on-the-ground conditions and land ownership constraints. In particular, we recommend a focused review of parcels located within or adjacent to State, federal, or Tribal lands, where development potential may be significantly limited or restricted. As a key example, the Land Use Pattern in the Sustainable Communities Strategy (SCS) identifies a single-family residential area adjacent to Palomar Mountain, specifically, Assessor's Parcel Number (APN) 112-230-21-00, that appears to be undeveloped and potentially protected. Clarification is needed to confirm whether this parcel is accurately represented and consistent with land use regulations and environmental protections.

Environmental Protection and Conservation Planning

2.16 The County recommends that the Plan and EIR explicitly assess cumulative impacts on sensitive habitats, wildlife linkages, working lands, and conservation areas within the unincorporated area. The Plan overlaps with key County conservation efforts, including the Multiple Species Conservation Program (MSCP) adopted South County Subarea Plan, the draft MSCP North County and East County Plans, and the draft Butterflies Habitat Conservation Plan. These plans are the result of years of interagency coordination and public investment

2.19 As projects are launched to enhance transportation infrastructure, the County requests that SANDAG engage and collaborate with the Vector Control Program (VCP) protect public health by monitoring and reducing the population of mosquitoes and other vectors, like ticks and rodents, which can carry diseases such as West Nile virus, dengue, and hantavirus. Using an integrated vector management strategy that incorporates surveillance, source reduction and treatment, quality control and research, partnerships and public education – and working in collaborating with other agencies and residents – the team identifies issues at the source, targeting vector problem areas in the most effective and environmentally sustainable ways possible. Development activities can increase the populations of vectors – like mosquitos in ponds and near rivers. Mitigation strategies should be incorporated into project plans to control vector populations and prevent the vector-borne illnesses.

Climate Action & GHG Reduction

2.20 We recommend that SANDAG clarify what information is publicly available to demonstrate the tangible and quantifiable benefits of Plan projects and programs at the local level, whether for individual cities or unincorporated communities. While the Plan highlights regionwide goals such as achieving a 19% reduction in greenhouse gas (GHG) emissions, it is equally important to communicate localized benefits that resonate with the public and local agencies. We encourage SANDAG to provide community-scale information, where feasible, showing outcomes such as:

- Reductions in vehicle miles traveled (VMT)
- Increases in carpooling, bicycling/rolling, and walking
- Improvements in travel time or reductions in congestion
- Enhancements to public safety, including fewer traffic collisions

This transparency will improve public understanding, build trust, and support local alignment with regional goals.

2.21 Limited information is available on future improvements or investments in existing bus shelter infrastructure. Recommend investment in existing facilities through improve bus shelters and infrastructure to support resilience actions by creating protection from extreme heat and precipitation events, prioritizing climate-vulnerable areas in communities of concern.

Safety and Emergency Preparedness

2.21 The County recommends that SANDAG integrate long-term water reuse and advanced water purification efforts, such as those planned in East County, into its regional environmental and climate resilience strategies.

2.22 We recommend that the Plan more explicitly identify and integrate existing local resources that support regional flood control and stormwater management efforts. The County recommends a range of technical tools and datasets that may be valuable to SANDAG's planning efforts, including floodplain maps, Special Drainage Area studies, hydrology and drainage design manuals, the ALERT Flood Warning Network, and flood forecast models.

2.23 We encourage SANDAG to coordinate with the County to determine which of these resources may be most appropriate to inform regional infrastructure planning, especially as it relates to climate adaptation, emergency preparedness, and environmental resilience. This coordination will help ensure that flood risks, particularly in vulnerable and rural areas, are adequately reflected in project prioritization and design.

2.24 The County recommends including additional hazard types that pose significant risks to the region's transportation systems. Specifically, earthquakes and hazardous materials incidents. Earthquakes have the potential to severely damage roads, bridges, and rail lines, with cascading effects for evacuation and emergency response. Additionally, include strategies to assess and mitigate seismic risks to critical transportation infrastructure. An accidental release of hazardous materials due to collision, derailment, or natural disaster could force road closures, require evacuation, and threaten environmental and public health. As well as include strategies to assess and mitigate risks associated with the transport of hazardous materials.

2.25 The County recommends explaining how emergency access and evacuation are factored in determining what highway improvements are included in the Plan. The Plan should explain how prioritization and timeframes (before or after Year 2035) are assessed for highway improvements in elevated risk, fire prone areas especially for rural communities.

2.26 To enable Smart Growth and infill in unincorporated communities, we recommend that SANDAG consider expanding funding eligibility to include critical enabling infrastructure such as pump stations, sewer upgrades, and recycled water systems that support housing and mobility goals. These additions help reinforce the connection between land use, mobility, and essential wastewater infrastructure.

2.27 The County requests that the Plan acknowledge the critical role of wastewater infrastructure, particularly aging or capacity-constrained systems in the unincorporated area, in supporting sustainable growth, smart land use, and environmental protection. Coordination between SANDAG and the County on future growth areas should include review of downstream impacts on sewer capacity and treatment facilities.

CHAPTER 3: IMPLEMENTATION ACTIONS

3.1 Include planning activities in the Flexible Fleets pilot program grant opportunity. The County also requests clarification of how flexible fleet projects that serve the unincorporated area will be prioritized, including for grant funding, as the 2022 Flexible Fleets Implementation Strategic Plan does not include Microtransit Areas of Casa De Oro/Spring Valley (TL069), Lakeside (TL070), Ramona (TL079), Fallbrook-Pala (TL080), Alpine (TL082) or Borrego Springs (TL086), therefore do not fall in the Tier 1 or Tier 2 Opportunity Areas.

3.2 Encourage SANDAG to establish measurable performance metrics for all projects and programs, with regular public reporting and a mechanism for periodic review and adjustment of priorities to ensure accountability and responsiveness.

3.3 We also encourage SANDAG to explore how emerging transportation technologies such as Microtransit, electric vehicle (EV) infrastructure, and autonomous vehicles can serve rural and unincorporated residents effectively. Complete communities begin with strategic infrastructure investments that connect residents to jobs, education, and essential services. The Regional Plan (Plan) should emphasize where investment can produce strong network effects and lasting mobility benefits especially in areas with the greatest need and highest return on investment.

3.4 The County recommends that Chapter 3 expand on the role of investments in unincorporated areas, including additional detail on major corridors and how planned projects will support flexible fleets and on-demand transit services. This recommendation will enhance regional connectivity and reduce vehicle miles traveled (VMT) in currently underserved areas.

3.5 The County emphasizes the Next Gen Rapid Ride routes identified in the Plan, specifically Rapid Routes 212, 256, 259, 292, and 483. These routes are of critical importance to connect unincorporated area residents and visitors to opportunities, employment, and education centers like SDSU and Cuyamaca College.

3.6 We request that SANDAG clarify how local General Plan data, including the unique land use patterns in unincorporated areas, have been incorporated into the forecast. This alignment is critical to supporting the County's Housing Element implementation and local planning efforts. Greater clarity in how VMT-efficient areas and unincorporated Villages are accounted for would also help ensure these communities receive appropriate consideration in transportation and housing funding allocations.

3.7 We also recommend increasing transparency around the forecasting and modeling assumptions that inform regional planning decisions, particularly those presented in Tables 1-3 of the April 2024 InfoBits report. To improve coordination, the County recommends sharing disaggregated data for unincorporated areas and establishing a feedback loop to align Plan assumptions with County General Plan updates.

3.8 Recommend that the Plan clarify the criteria used to determine which projects and programs are included in the FY 2025–2035 timeframe and which are deferred to FY 2036–2050. Notably, a greater share of projects in the 2025 Plan (67%) are deferred to the 2036–2050 phase compared to the 2021 Plan (56%). The Plan should address how this increase in deferred projects may impact implementation certainty, especially given the reduced overall cost estimate in the 2025 Plan.

3.9 Recommend that the Plan clearly identify which portions of proposed projects and programs within the unincorporated area are scheduled for implementation during the 2025–2035 and 2036–2050 timeframes. This information is critical to help the County align local infrastructure planning and ensure equitable phasing of transportation improvements across the region.

Funding and Prioritization

3.10 The Plan should identify what grant opportunities would help fund projects and programs that are consistent with SANDAG's and the local jurisdictions' near-term and long-range plans. Grants that would help fund multi-modal, bicycle, and pedestrian improvements include safety enhancements within rural unincorporated communities should be available for near-term and long-range planning efforts.

3.11 The reduction in the Plan's investment target, from $163 billion in the 2021 Plan to $125–130 billion, raises questions about long-term feasibility, particularly for historically underserved and under-resourced communities. We recommend that SANDAG clarify how equity priorities will be maintained under this reduced funding framework. Many areas, such as Ramona, currently lack adequate transit options. While proposals such as Microtransit are identified, their effectiveness in rural areas remains unclear. We recommend further assessment and investment in scalable, context-sensitive solutions that can reliably meet rural mobility needs.

Tijuana River Valley: Environmental & Regional Priority

3.12 For decades, South County communities have been disproportionally impacted by transboundary pollutants, such as sediment, trash and raw sewage, that flow across the border into the Tijuana River Valley (TJRV) and into the ocean. Inadequate and failing infrastructure has resulted in detrimental impacts to the environment, economy, and property within the region caused by the persistent cross-border sewage pollution and sewage-impacted ocean waters. The County Board of Supervisors (Board) has taken a variety of actions to address this issue on a federal, state, local, and international level. On June 27, 2023, the County Board issued a Proclamation of Local Emergency as a result of the continued conditions for detrimental impacts to the environment, economy, and property within San Diego County, caused by persistent impacts from cross-border sewage pollution and sewage impacted ocean waters. As the date of the letter, the County Board has continued to approve the continuation of the local emergency every 60 days in accordance with Government Code section 8630.

3.13 Within the County owned land in the TJRV, the County has focused on habitat restoration, environmental remediation, and floodplain rehabilitation. As outlined in the TJRV Habitat

Restoration Plan, Enhancement Project, and Rehabilitation Project, the County is implementing long-term, sustainable solutions informed by the TJRV Needs and Opportunity Assessment, which provides a framework for project prioritization, interagency coordination, and funding strategy development. The County has taken a leadership role in collaborating on solutions to address ongoing public health and quality of life concerns raised by the pollution and sewage affecting the TJRV residents, economics, and environment. The County has led collaborative efforts with state, federal, and binational partners to address sedimentation, pollution, and cross-border trash and sewage in the TJRV. Additionally, the County has prioritized advocating for legislative and policy solutions to the TJRV pollution crisis, as authorized by the County's Legislative Program. The County's legislative priorities include support for more resources for sewage treatment and air quality monitoring, as well as support for legislation that addresses needed rehabilitation of the TJRV watershed.

3.14 In 2020, the County completed the TJRV Needs and Opportunity Assessment to provide a comprehensive review and assessment of potential management strategies to address cross-border flows coming into the TJRV. Since completion of the assessment, the County has been actively working with local, state, and federal agencies to implement sediment management, habitat restoration, and stormwater improvement projects across the 1,800-acre Regional Park owned and managed by the County's Parks and Recreation Department.

3.15 The County has taken a lead role in prevention, response, and coordination and communication, including ensuring the public is kept informed about the public health effects associated with sewage and pollution in the Tijuana River Valley and surrounding communities through creation of a website, social media, and digital campaigns. The County actively monitors community health metrics, has contributed to the development a Community Odor Advisory System, including various campaigns to communicate steps those effected can take to respond to the odors, creation of a real-time interactive dashboard (Environmental Dashboard) that displays current hydrogen sulfide and beach water conditions clearly on mobile devices, in partnership with the CDC and Agency for Toxic Substances and Disease Registry, led health survey assessments (CASPER & ACE surveys), holds recurring meetings with regional, state and federal agencies engaged in responding to this crisis, supports regular distribution of materials at community events staffed by County outreach workers, and developed a robust web presence cataloging the work being done (South Region Health Concerns).

Advancing Equity and Social Resilience

3.16 The County values SANDAG's commitment to meaningful community engagement throughout the regional planning process. To maintain this momentum, we respectfully recommend that SANDAG develop a plan for ongoing engagement with unincorporated communities during the implementation phases. This plan could outline strategies to ensure these communities remain involved in decision-making, allowing their unique needs, priorities, and feedback to be consistently incorporated into regional projects and programs.

3.17 We recommend that the Plan incorporate the following equity-focused enhancements to better reflect the diversity, needs, and experiences of the San Diego region's residents and workers:

- Address the regional commuter population living outside San Diego County who travel into the region for work due to the lack of affordable housing. Regional mobility strategies should account for this dynamic and explore coordinated solutions with neighboring counties.
- Recognize tourism as a major economic driver in the region and integrate tourism stakeholders and agencies into the regional transportation planning process.
- Acknowledge and plan for binational residents and workers who regularly cross the U.S. - Mexico border, ensuring their mobility needs are fully integrated into regional travel demand models and infrastructure planning.
- Include LGBTQIA+ populations in planning for mobility hubs and other public spaces by considering gender-neutral restrooms and safety measures that support inclusivity and comfort.
- Expand accessibility planning efforts to include neurodivergent individuals by considering sensory-friendly design elements, inclusive signage, and other neuro-accessible infrastructure approaches.
- Clarify the current status of the Equity Guidance Document referenced in prior planning efforts and indicate how its principles have been adapted or integrated into the Plan.
- Prioritize equity in transportation-related contracting by encouraging the engagement of local, small, and community-based subcontractors, particularly those representing historically underserved populations.
- Disaggregate and include data on access for LGBTQIA+ individuals, tribal communities, and individuals with disabilities, including neurodivergent individuals, to better understand and respond to equity gaps across populations.
- Update terminology throughout the Plan by replacing "minorities" with more appropriate language such as "persons of color" or "people of color" to align with inclusive and current terminology.
- Ensure more focused community engagement in unincorporated areas by co-creating outreach strategies with trusted messengers who reflect the lived experiences and cultural backgrounds of these communities.
- Incorporate disaggregated data specific to unincorporated areas into the equity analysis and infrastructure planning process to identify gaps more effectively and guide equitable investment decisions.

3.18 Emphasize co-creation alongside technical planning, recognizing communities as partners, not just stakeholders, in developing transportation solutions. Build trust through mechanisms of shared accountability and transparent responsiveness to public input.

3.19 Ensure the Plan explicitly considers how race, age, income, geography (especially unincorporated areas), and ability intersect to shape access and mobility outcomes. Prioritize solutions that address the needs of individuals and communities most impacted by transportation inequities, starting from the margins.

3.20 Incorporate mechanisms for continuous community input after Plan adoption. This request for ongoing post-Plan community input includes regular check-ins, participatory evaluation processes, and updates to reflect evolving community needs. Clearly communicate how community ideas, particularly from rural and unincorporated areas, are reflected in project implementation, performance tracking, and Plan updates.

3.21 Balance quantitative metrics with qualitative narratives to reflect the lived experiences of transit-dependent populations. Highlight stories that show how residents interact with transportation systems on a daily basis to inform investment priorities. Unincorporated and rural communities remain underrepresented in regional planning discussions despite comprising over 20% of the region's population. We recommend stronger representation of these areas in regional modeling, project prioritization, and equity analyses.

3.22 We recommend applying a more targeted equity lens, as meeting federal and state minimums does not guarantee that planning efforts reflect lived realities. Equity efforts should be grounded in community-identified priorities and focused on eliminating disparities. We recommend that the RP incorporate participatory design processes such as localized listening sessions, multilingual surveys, and culturally inclusive outreach strategies. We further recommend that outreach efforts emphasize engagement with rural and unincorporated communities to ensure these areas have equitable influence on planning outcomes.

3.23 The RP should include specific environmental justice metrics to ensure equitable treatment of unincorporated communities and address historical infrastructure disparities.

3.24 Recommend clarifying how input from the 2024 Tribal Summit been integrated into the 25-year plan and if SANDAG works with non-federally recognized tribes or only federally recognized tribes. Tribal Areas and many rural areas of the County still have very limited access to public transportation in 2050 scenarios. Recommend exploring further bus lines and broad micro-transit to link residents with future Complete Corridors. Tribes only exist in the RP as part of the Public Involvement Program where coordination is demonstrated. Unincorporated rural and tribal communities face similar issues with access to transportation for basic health and welfare needs (food, medical appointments, school etc.). Recommend providing more details as to how the Intraregional Tribal Transportation Strategy (ITTS) plan support overlapping goals in the RP. Clarify how tribal priorities overlap with rural unincorporated.

3.25 Recommend explaining how ITTS Plans are built into funding processes for the larger funding pools. Is the scale for funding that tribes are advocating for being met. Recommend explaining how the modeling shows population decline and how that impacts Tribal funding priorities.

3.26 We also recommend that the RP include a dedicated section that specifically addresses rural unincorporated communities, clearly identifying proposed projects and programs that support the County in meeting State and regional VMT and GHG targets.

3.27 Unincorporated areas face unique mobility challenges that may not be addressed through traditional urban transit models. We encourage SANDAG and the County to continue collaborating on rural-focused mobility measures, such as expanded Rapid Bus Service and Flexible Fleet programs, that align with RP concepts and provide meaningful transportation alternatives for residents in low-density communities.

3.28 Including these strategies in a defined section of the RP will help ensure rural areas are not left behind in regional sustainability and equity efforts.

CHAPTER 4: FINANCE PLAN

Funding & Prioritization

4.1 Recommend that SANDAG clearly explain the factors that contributed to the significant reduction in the estimated cost of the proposed 2025 Regional Plan (RP) compared to the 2021 RP. For reference, the 2050 RP cost estimate is nearly $126 billion in 2024 dollars, while the 2021 RP estimated $163 billion in 2020 dollars. Notably, even with the removal of the Road Usage Charge (RUC), the amended 2021 RP maintained the $163 billion estimate by identifying alternative funding sources. Greater transparency around the assumptions, methodologies, and funding strategies that informed the reduced 2025 estimate would help stakeholders better understand the implications of this change.

4.2 Recommend that the RP include a side-by-side assessment comparing the 2021 and 2025 cost estimates. This recommendation should include a clear explanation of the methodology used to achieve the substantial reduction in costs, and describe the key priorities, criteria, and decision-making framework used to determine which projects and programs from the 2021 RP were retained, modified, or removed in the 2025 RP.

4.3 Encourage SANDAG to clarify the cost estimate of the 2025 RP. Table 4.1 identifies a cost of $125,496 million ($125.5 billion), while the Financial Plan Overview (Pg. 38) references an estimate of approximately $130 billion, and Appendix I (Table I.6) lists a total of $128.85 billion in 2024 dollars. The RP should explain these discrepancies and clarify whether they reflect rounding, differing assumptions, or updates to project scope, phasing, or inflation factors.

4.4 Additionally, SANDAG should clarify whether the reduced cost estimate in the 2025 RP reflects a more limited scope of regional transportation improvements compared to the 2021 Plan, and what implications the reduced cost estimates may have for long-term infrastructure planning and regional mobility outcomes.

4.5 Encourage SANDAG to clarify what portion of the $45.5 billion FY 2025–2035 cost estimate is associated with the Regional Transportation Improvement Program (RTIP). Understanding

which projects are included in the RTIP will help assess near-term funding certainty, as projects outside the RTIP may face greater challenges in securing timely and reliable funding.

4.6 The County encourages SANDAG to expand Chapter 4's equity analysis to more explicitly address the unique challenges faced by unincorporated and rural communities. This request could include analyzing different sub-regions (i.e., rural, sub-urban, and urban) and the distinct impacts they experience. The analysis should also consider transit access, affordable housing, and infrastructure investments, including communications infrastructure, to ensure equitable outcomes. We also request that SANDAG continue to integrate strategies that align with the County of San Diego Comprehensive Broadband Plan.

APPENDICES

A.1 The County appreciates the efforts SANDAG has made to identify transportation projects across the region. We request that Appendix A of the Regional Plan (RP) provide additional clarity regarding which projects in unincorporated areas are fully funded, partially funded, or unfunded, along with their anticipated timing. This increased transparency will help the County plan effectively, prioritize investments, and coordinate seamlessly with SANDAG and other regional partners.

A.2 Recommend that the RP include a cost estimate for the unconstrained project list found in Appendix A.

A.3 The County recommends that Appendix B explicitly consider the impact of growth and transportation strategies on agricultural lands, and include pilot programs in rural areas (e.g., on-demand transit) to support VMT reduction and rural economic vitality.

A.4 The County recommends that Appendix B's off-model GHG reduction strategies explicitly include pilot programs in rural and unincorporated communities, such as on-demand transit and micro transit, to expand options and reduce reliance on single-occupancy vehicles.

A.5 The County recommends that Appendix J include a summary of outreach meetings held specifically in unincorporated areas and a clear presentation of community input from those meetings and survey responses which informed the RP and models. This recommendation will ensure that local voices are documented and considered in the final RP.

A.6 On page 10 of Appendix J: Government to Government Framework, it states tribes have independent constitutions. Not all tribes, both federally recognized and non-federally recognized in the region have formal constitutions. Recommend that the RP accurately represents that tribes have varying governing structures.

A.7 We recommend that SANDAG revise the Regional Bike Network phasing and project prioritization to ensure greater inclusion of unincorporated communities. Appendix K, Figure K-3, illustrates that much of the proposed Regional Bike Network is concentrated in incorporated areas, leaving significant gaps in unincorporated regions. We encourage the addition of bike

network projects in unincorporated areas, even those not directly connecting to the Regional Bike Network, where they can integrate with planned Microtransit and other emerging alternative transportation services.

A.8 We recommend that the RP include the Monument Road Realignment Project and the California Coastal Trail project in Appendix A of the RP. These projects support multimodal connectivity, public access, coastal resource protection, and regional mobility goals. State and federal funding programs for transportation projects frequently require consistency with the regional transportation plan as a condition of eligibility. Including these projects in Appendix A, even within the unconstrained project list, would position the County and its partners to pursue competitive grant opportunities and leverage future funding sources.

A.9 Appendix B: It is important to note that the MSCP was adopted in 1998; however, it is incorrectly stated as 1988 on page Q.3 and should be corrected.

A.10 Appendix B: RP Figures B.2 and Q.1 include a subfigure that identifies the four regional habitat conservation programs. These subfigures should be updated to reflect the current North County and East County MSCP Plan Area boundaries, which were revised when the draft North County Plan Area was expanded in 2021.

A.11 Appendix B: RP Figures B.2 and Q.1 illustrate the region's conserved habitat lands. The South County MSCP Pre-Approved Mitigation Area (PAMA), draft North County MSCP Priority Conservation Area (PCA), and future East County MSCP Focused Conservation Area (FCA) are indicated on these figures in dark green. The County encourages SANDAG to satisfy its project mitigation requirements by acquiring lands within these areas to optimize the assembly of the regional preserve system. However, while land acquisitions will occur within this dark green area to form the MSCP Preserves, labeling this area as "Proposed Conserved Habitat Lands" may lead to misunderstandings among readers. It could be misinterpreted that all these lands are being actively pursued for conservation or that they are limited solely to conservation land uses.

CITY OF CORONADO

July 18, 2025

SANDAG Board of Directors
1011 Union Street, Suite 400
San Diego, CA 92101

Subject: Comments on the SANDAG Draft 2025 Regional Plan

Dear SANDAG Board of Directors,

Thank you for the opportunity to review the SANDAG Draft 2025 Regional Plan. The City of Coronado (City) appreciates SANDAG's efforts to improve the region's mobility options, address traffic congestion, advance transportation services technology, reduce greenhouse gas emissions, and improve regional transportation infrastructure.

While the City is generally supportive of the 2025 Regional Plan, the City has concerns about introducing High Occupancy Vehicle (HOV) and High Occupancy Toll (HOT) managed lanes on the Coronado Bridge and identifying almost all of the City as a High Quality Transit Corridor. These concerns are outlined below.

The introduction of HOV managed lanes in 2035 and HOT managed lanes in 2050 on the Coronado bridge as outlined in Appendix A of the Regional Plan is of significant concern for the City. A toll was collected on the bridge from its opening in 1969 through June 2002, and it has since operated without a toll. In that time traffic has increased, with a majority of trips attributed to the large Naval job force traveling to/from Coronado over the bridge. Many residents, workers, and service members would be negatively impacted by the reintroduction of an HOV lane and future toll as most travel via single occupancy vehicles and those within the lower/median income levels would be unlikely to pay the toll to travel two miles. The reversible middle lane on the bridge installed in 1993 has helped the flow of traffic into Coronado during the morning commute and outbound during afternoon commutes by dedicating a third lane of travel during each commute period. Removing the ability for this lane to handle increased traffic and dedicating it to a HOV/HOT lane would likely increase traffic congestion on the two remaining lanes. The anticipated increase in congestion would undoubtedly extend out from the San Diego-Coronado Bridge in both directions, delaying not only single-occupancy vehicles but high occupancy vehicles trying to reach the proposed HOV/HOT lane, likely negating any time savings and/or emission reductions afforded by the HOV/HOT lane.

Design of a successful HOV lane is a difficult task that requires careful analysis prior to implementation. Because the bridge spans just approximately two miles, the effectiveness of removing one mixed-flow lane in favor of a HOV/HOT lane is questionable, especially considering it terminates on its west end into a three-lane, one-way local street in a residential area. On the east end drivers in the HOV/HOT lane wishing to head south on I-5 would need to exit the HOV/HOT lane early to reach the ramp to southbound I-5 reducing any potential time savings gained. The potential result of the remaining two mixed-flow lanes seeing increased traffic volumes leading to slower travel speed, greater congestion, and higher emissions would have an overall negative impact.

Further, there are unique challenges with the bridge's frequent public safety closures of one or both travel directions when a suicidal jump from the bridge is attempted. These are extremely traumatic events for the individual and first responders, and also highly disruptive to transportation to and from Coronado. After years of work, Caltrans is in the nascent stages of a design build project to install a suicide prevention barrier on the bridge. The City of Coronado eagerly anticipates the installation of this important infrastructure which will greatly reduce the risk and loss of life. However, even when the barrier is in place, given the limited egress and ingress to Coronado and future public safety interactions on the bridge, the City cautions against any added complexity and limitations to this vital transportation corridor.

For these cumulative reasons, the City of Coronado requests that the designation of the San Diego-Coronado Bridge as a future HOV/HOT lane be removed from the Regional Plan.

Additionally, SR-75 is part of the nationwide Strategic Highway Corridor Network (STRAHNET) which is a key part of defense mobility and the deployment of military equipment and personnel. Introducing HOV/HOT lanes could potentially hamper the transportation objectives of the STRAHNET and would require further analysis and input from the Department of Defense and Federal Highway Administration.

The second area of concern is related to the identification of almost the entire City as being a High Quality Transit Corridor in 2035 and 2050, as outlined in Appendix B of the Regional Plan. It is unclear what criteria are met to consider the majority of Coronado as a High Quality Transit Corridor as there is currently only one bus line that has headways over 20 minutes. The proposed increased 15-minute headways of the local 904 bus line would entail an increase in the number of buses fourfold to meet the Plan's proposed 15-minute headways. The local 904 line currently provides 60-minute headways with buses that only traverse within Coronado and has experienced a marked decrease in ridership over recent years. The City has significant concerns about the cost, feasibility and effectiveness of adding up to four times the number of local bus trips to City streets without the ridership demand necessary to effectively support the service. In addition, the majority of bus stops along the route do not include pullouts nor is there sufficient right of way to

add one; the increased 15-minute headways will therefore increase congestion caused by buses during each stop.

The City is very concerned with being assigned a High Quality Transit Corridor designation when the concept is purely aspirational, without tangible plans, service agreements, demonstrated demand or funding to activate such a network. Inclusion in the Regional Plan as a High Quality Transit Corridor can have reaching consequences for Coronado's local land use authority. Many current legislative proposals mandate high density development simply due to proximity to "high quality transit" as included in a Regional Plan, and without any conditions for the project to address impacts related to traffic, parking, or community character. Thus, the aspiration for high quality transit in the Plan becomes a false premise upon which development could be based, with no actual high quality transit available to support the residents. For these reasons, we request the removal of this designation from the City of Coronado until a future time where such a network is certain to extend to the city.

Again, thank you for the opportunity to comment on the 2025 Regional Plan. We look forward to future collaboration on this important regional document.

Sincerely,

John Duncan
Mayor

Tina Friend
City Manager

cc: City Council

July 18, 2025

Honorable Members of the SANDAG Board,
San Diego Association of Governments (SANDAG)
1011 Union Street, Suite 400
San Diego, CA 92101

RE: Support for Equity-Focused Elements in the Draft 2025 Regional Transportation Plan

Dear Chair Heebner and Members of the Board,

On behalf of the Coalition for Equitable Development (CED), which represents historically marginalized communities across the San Diego region, we are writing to express our support for key equity-forward components within the Draft 2025 Regional Transportation Plan (RTP) and to urge continued and expanded commitments that advance mobility justice, environmental health, and housing stability.

While we remain concerned that the overall plan backslides from the visionary framework laid out in the 2021 RTP, we are encouraged by the following components and strongly support their preservation and acceleration:

- **Transit and Active Transportation First**: The 2021 RTP envisioned a future where San Diegans could quickly and affordably move between home, school, work, and recreational activities by pairing robust public transit with safe walking and biking access. We urge SANDAG to reaffirm this commitment by fully integrating the 10 Transit Lifelines into the 2025 RTP and prioritizing the buildout of active transit—not extending outdated patterns of segregation through car-centric expansion.

- **Preservation and Expansion of Active Transportation Infrastructure:**
  • Preserve SANDAG's Active Transportation Program.
  • Support blue/green infrastructure and traffic safety projects in the historically redlined Chollas Creek watershed, as proposed by the Chollas Creek Coalition.
  • Create parking-protected bike lanes along University Ave. between 54th and 58th Streets, and enhance walkability and safety in the area.
  • Accelerate the Chollas Creek Bikeway North Fork phase for completion by 2030.

- **Equity in Transit Access and Affordability:**
  • Make the Youth Opportunity Pass (YOP) program permanent and expand it to include older adults and low-income households with free or deeply discounted multimodal transit options.
  • Expand access to flexible fleets and microtransit in communities historically excluded from infrastructure investments, paired with affordable pricing and inclusive mobility incentives.

- Accelerated Project Timelines and Community Trust:

• We call on SANDAG to meaningfully accelerate planning and implementation timelines for transit and active transportation projects. Delays erode trust, particularly among older residents who have long invested time in community planning processes. SANDAG should lead efforts to streamline internal processes and advocate for state-level reforms to remove unnecessary barriers to prioritizing investment in projects that benefit disadvantaged communities.

- Equitable Housing Development Near Transit:

• We strongly support strategies that tie transit investments to affordable housing preservation, land value capture, and anti-displacement policies. In particular:

– Prioritize land value capture specifically to fund affordable housing.

– Incentivize tenant and community opportunity to purchase, right to return policies, and the preservation or replacement of affordable housing when new infrastructure is built in low- and moderate-resource communities.

- Managed Lanes over Highway Expansion:

• Instead of expanding highways, we urge SANDAG to focus on converting existing roadways to managed lanes that support transit, light rail, and vanpooling. These strategies reflect the changing needs of our population and travel patterns and avoid the negative health, climate, and traffic impacts associated with additional car infrastructure.

We appreciate the opportunity to offer our support and feedback. The 2025 RTP must move our region toward an inclusive, climate-resilient, and community-rooted future. We urge you to advance the above priorities to ensure transportation planning centers the needs of those most affected by past inequities.

Sincerely,

Coalition for Equitable Development

July 2025

SANDAG
Regional Plan
San Diego, CA 92101

Re: Chollas Creek Watershed Bikeway Input for Regional Plan Update

Dear Regional Plan Update Manager,

We are submitting the attached "Chollas Creek Watershed Bikeway Network - Community Survey Report" for inclusion in the community input for the Regional Plan update. This report presents findings from our survey of 163 community members, showing 93-96% support for six proposed bikeway segments in our historically underrepresented neighborhoods.

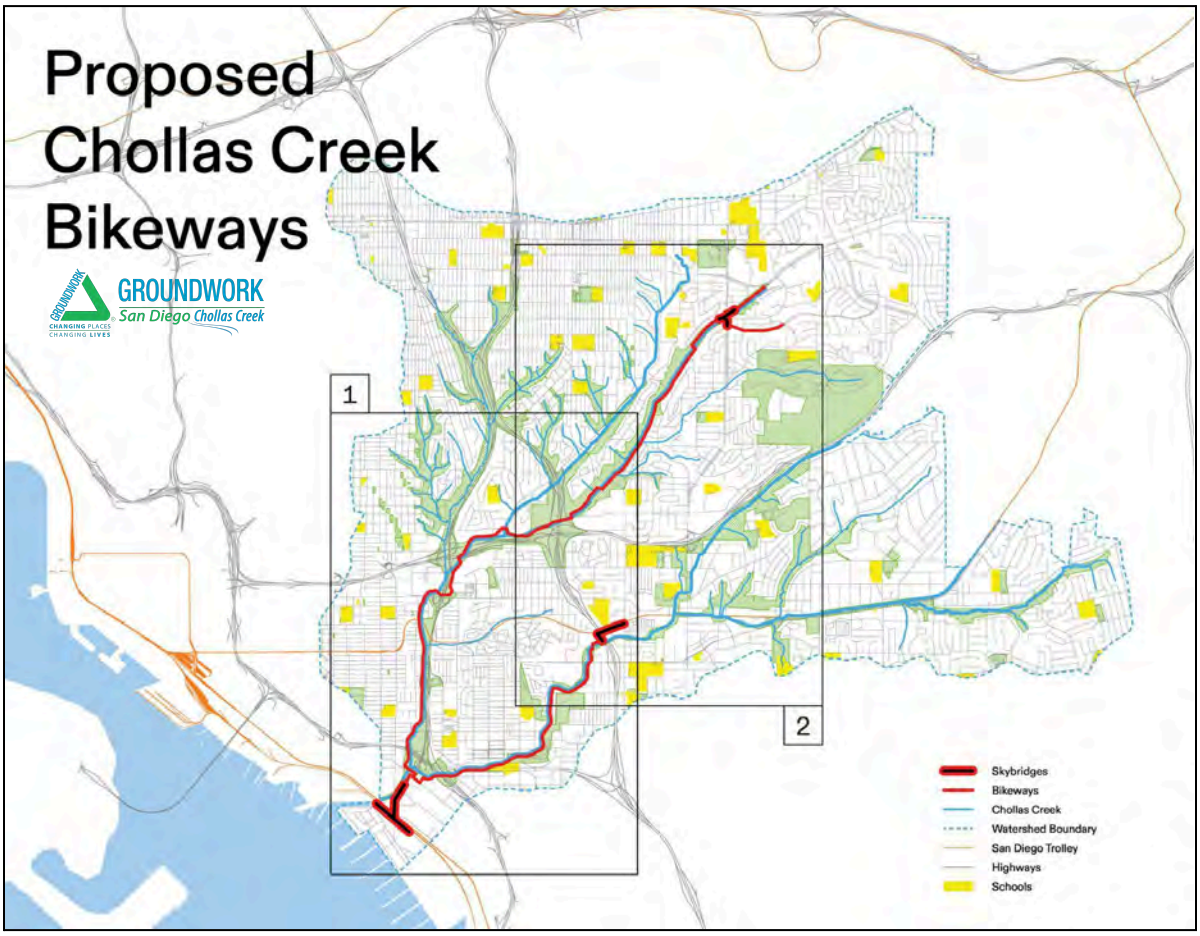
Our communities contain some of the most dangerous streets in San Diego and need immediate safety improvements. Specific community input is detailed in the appendix of the attached report, and we ask that, as a whole, you prioritize the six interconnected bikeway routes detailed in our report. Most are currently represented as 2050 projects. We ask that 1) these be reprioritized to 2030 projects and 2) SANDAG allocate funding for a feasibility study of this Chollas Creek Corridor.

The attached report provides comprehensive details on community priorities. We look forward to working with you to implement these needed improvements.

Sincerely,

Center on Global Justice at University of California, San Diego
Chollas Creek Coalition
Circulate San Diego
Groundwork San Diego-Chollas Creek
Major Taylor Cycling Club SD
Mundo Gardens
Partnership for the Advancement of New Americans (PANA)
San Diego County Bike Coalition
San Diego Canyonlands
The Urban Collaborative Project

CHOLLAS CREEK WATERSHED BIKEWAY NETWORK



COMMUNITY SURVEY REPORT

July 2025

Prepared by Community Members and

GROUNDWORK
San Diego Chollas Creek
CHANGING PLACES CHANGING LIVES

Introduction

The City of San Diego is updating its Bike Master Plan, an important framework that will shape the future of cycling infrastructure throughout our city. However, we noticed a significant gap: our **Chollas Creek Watershed communities have been underrepresented** in the feedback.

In response, Groundwork San Diego and community partners launched an initiative to gather and amplify the voices of our neighbors. With the city's support, we developed and distributed a community survey focused on six proposed bikeway segments. These routes would collectively form an interconnected network using Chollas Creek as a throughline, connecting Eastern and Southeastern communities to each other and extending all the way to San Diego Bay.

This report presents the findings from **our survey of 163 community members** who provided valuable input on these proposed bikeways, plus direct input from others. The overwhelming support for all routes demonstrates a clear community desire for safe, accessible cycling infrastructure that connects our neighborhoods to each other and to the broader San Diego region. **This report includes suggestions for a large vision for cycling that we hope can be incorporated into SANDAG's Regional Plan Update and the City's Bike Master Plan Update as well as small improvements that can be implemented immediately.**

Survey Overview

Our survey collected input on six key bikeway segments designed to create an interconnected network throughout the Chollas Creek Watershed. Respondents were asked to indicate their support for each route with "Yes," "No," or "No opinion" and were given the opportunity to provide additional comments.

Key Findings at a Glance

- **163 community members** participated in the survey
- **Strong support across all routes** with approval ratings ranging from 93.6% to 96.3%
- **93 respondents** provided specific address information, representing at least 26 ZIP codes
- Highest concentration of respondents from ZIP codes 92102, 92105, 92113, 92114, and 92115
- **103 detailed comments** were submitted across all routes, highlighting community priorities and concerns

Support by Route

Route	Yes	No	No Opinion	Total Responses
Route 1: SR-15 Corridor	96.3%	2.5%	1.3%	160
Route 2: Southcrest Park	93.6%	2.5%	3.8%	157
Route 3: Skybridge/Barrio Logan	94.3%	5.0%	0.6%	159
Route 4: Oak Park Trail	95.0%	2.5%	2.5%	159
Route 5: Federal Avenue Park	94.3%	2.5%	3.2%	158
Route 6: Jackie Robinson YMCA	94.4%	5.0%	0.6%	161

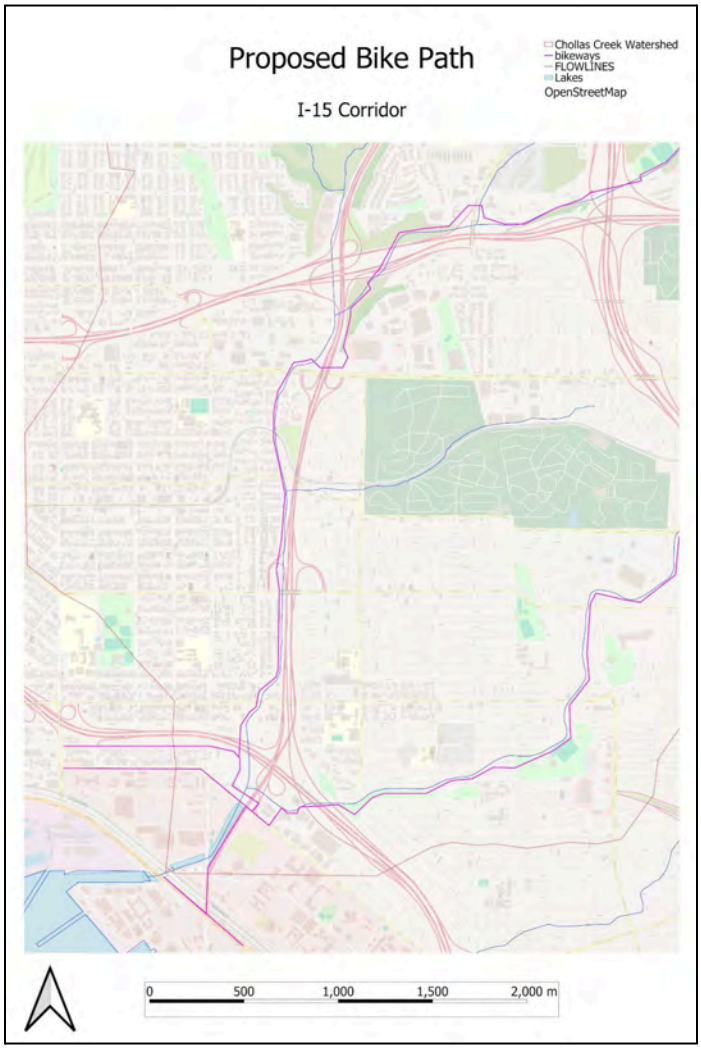
Route 1: SR-15 Corridor

Description: A path along and within Chollas Creek from SR-94 to 32nd & Main, connecting Mid-City communities through Logan Heights to the bay.

Project Status: Initial feasibility planning has been completed by Groundwork San Diego and the National Parks Service, confirming the segment's feasibility.

Survey Results

- **96.3% Support** (154 of 160 respondents)
- **26 detailed comments** provided



Community Feedback Highlights

- "This area has less green space and recreational spots/parks than it should. We need a north-south pathway for cycling this far east because it doesn't exist and current roads like Fairmount and Home Ave are dangerous."
- "Yes, I love this idea. I commute by bike, so any opportunity to move around on a separate path from auto traffic is extremely attractive to me."
- "We need a safe and accessible bikeway from our neighborhood that connects us to neighborhoods west of the 805/15."
- "Make sure it is well connected to surrounding neighborhoods so it is both a recreation and transportation asset."

Key Themes

- Strong desire for **safe alternatives to dangerous roads** like Fairmount and Home Ave.
- Need for **north-south cycling connectivity** in eastern areas
- Importance of **connections to surrounding neighborhoods**
- Interest in **dual recreation and transportation benefits**
- Desire for **integration with natural restoration** of Chollas Creek

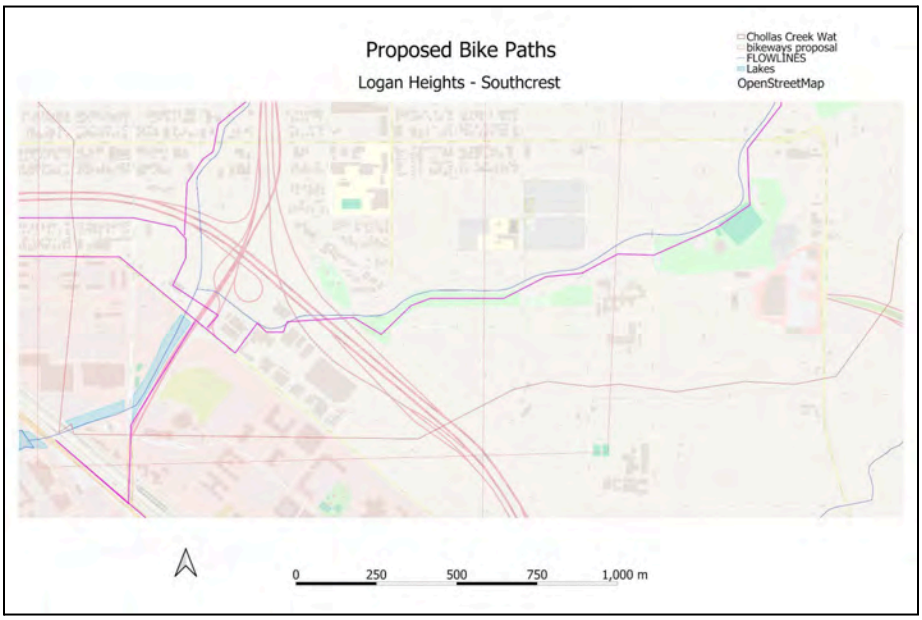
Route 2: Southcrest Park

Description: A path connecting Southcrest Park with Southcrest Trails Park plus an I-5 underpass, following Chollas Creek.

Project Status: The City's Stormwater and Parks & Recreation Departments are planning major community improvements to mitigate flooding. Bikeways could be incorporated.

Survey Results

- **93.6% Support** (147 of 157 respondents)
- **19 detailed comments** provided



Community Feedback Highlights

- "I avoid riding in this area because of a lack of safe infrastructure."
- "This is great, we need an entire network of connected green spaces that provide car-free, high-speed connectivity for active transportation users."
- "This would be super valuable and encourage the community to get out more. In this area, the streets have lots of potholes which make biking safely hard."
- "I think connecting the communities and connecting to other bikeways is great, even more important than making it just to the bay or 32nd St or the Bayshore Bikeway."

Key Themes

- **Current avoidance of the area** due to safety concerns
- Desire for **integration with green spaces** and ecological benefits
- Need for alternatives to **poorly maintained streets**
- Emphasis on **community connections**, not just destination access

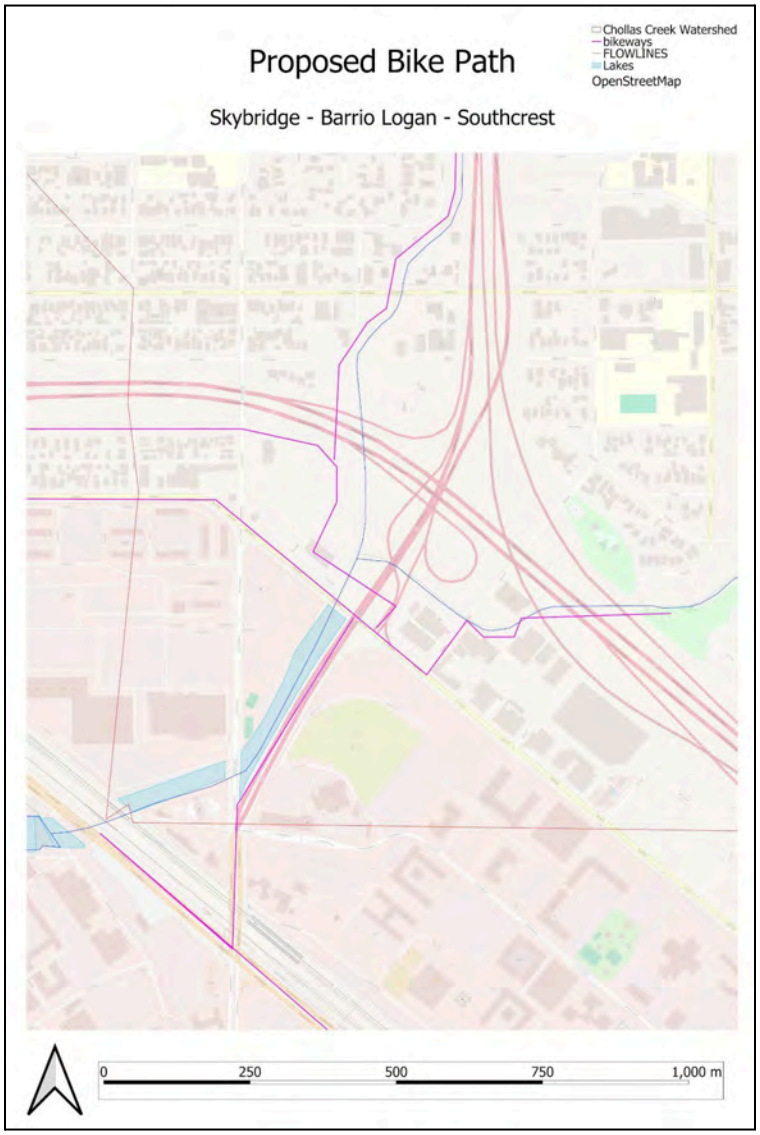
Route 3: Skybridge/Barrio Logan

Description: An elevated bike bridge connecting Chollas Creek Watershed residents to the Bayshore Bikeway and San Diego Bay, linking inland communities to coastal resources.

Project Status: Design completed by Groundwork San Diego and ready for final permitting and construction.

Survey Results

- **94.3% Support** (150 of 159 respondents)
- **15 detailed comments** provided



Community Feedback Highlights

- "I live in Grant Hill. Currently to get to the bay shore bikeway I have to take 25th to Harbor Drive. Harbor drive is dangerous, sketchy from lots of cars and the quality of roads. I feel unsafe doing that."
- "This project would be a dream come true. Can't wait until we grow up to be THIS kind of city that can do this kind of thing."
- "Many youths have to walk because it is the safest way to travel, access to this pathway will give them a time saver and will make daily travel so much safer giving them a sense of autonomy."

Key Themes

- **Current dangerous routes** to the Bayshore Bikeway
- **Excitement about innovative infrastructure** that transforms city image
- **Youth mobility and independence** concerns
- Some concerns about **project complexity** and implementation challenges

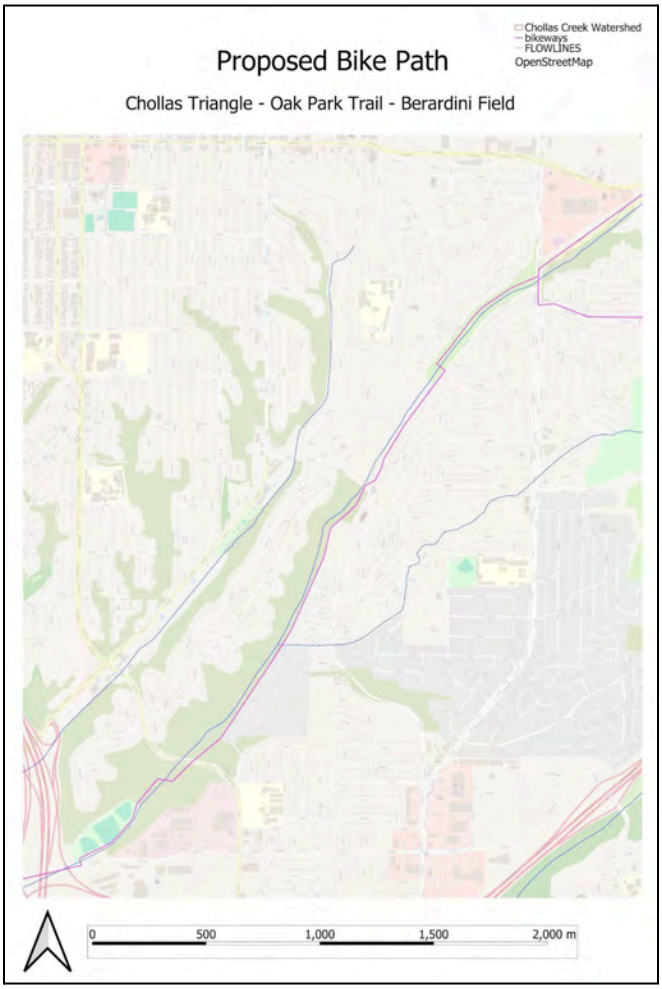
Route 4: Oak Park Trail

Description: A protected natural trail and separate bikeway through and along Oak Park Canyon, designed to preserve sensitive habitats.

Project Status: City of San Diego Planning Department is planning a multi-use trail here. Residents are calling on them to distinguish between a protected nature trail and a separated bikeway to ensure the benefits of both while protecting sensitive canyon habitats.

Survey Results

- **95.0% Support** (151 of 159 respondents)
- **17 detailed comments** provided



Community Feedback Highlights

- "So many children in this community who would benefit!"
- "We need more intercity nature trails."
- "This is an underutilized corridor that would connect the eastern areas to the Golden Hill, South Park and downtown neighborhoods."
- "It should include connections to Chollas Lake Park as well."

Key Themes

- **Benefits for children and families**
- Desire for more **nature access within the city**
- Potential to **connect eastern neighborhoods to central areas**
- Need to **balance ecological preservation** with human access
- Recommendations for **additional connections** to existing park assets

Route 5: Federal Avenue Park

Description: A creekside path from Sunshine-Berardini Field to Home Avenue, featuring creek restoration, a new pocket park, and extensive tree planting. Design ready for construction.

Project Status: Fully planned, permitted, and construction-ready by Groundwork San Diego. Project will break ground once final construction funding is secured.

Survey Results

- **94.3% Support** (149 of 158 respondents)
- **16 detailed comments** provided

Community Feedback Highlights

- "I support this more than every other project. This is a critical link in allowing bicycle access south to north that is otherwise impossible there and you have to go way east or way west to go north."
- "Yes, I live in City Heights. It's easier to get to downtown across mid-city than it is to take the southern (shorter as the crow flies) route. This fact annoys the hell out of me."
- "This is a critical connection for the Webster neighborhood."
- "Federal Blvd is unsafe. If adding a bikeway would make it slower and safer, this would be my priority."

Key Themes

- **Critical north-south connection** that fills a significant gap
- Current **inefficient routing** for residents trying to access downtown
- **Safety improvements** for Federal Blvd corridor
- **Strong priority** for several respondents

Route 6: Jackie Robinson YMCA & I-805 Reconnection

Description: A path connecting Chollas Valley/Encanto to Southeastern San Diego via an I-805 crossing at 47th Street Trolley, with creek restoration around the YMCA.

Project Status: Segment around Jackie Robinson YMCA is in planning led by Groundwork San Diego.

Survey Results

- **94.4% Support** (152 of 161 respondents)
- **10 detailed comments** provided

Community Feedback Highlights

- "Yes, the 47th street station suffers from limited connections to its surrounding neighborhoods. This would be a way to increase the catchment area of the trolley stop."
- "This would be so nice. We live in Chollas View and have gym memberships at the Jackie Robinson Y but we walk there instead of biking because the overpass at Imperial is so dangerous."
- "The overpass on Imperial is way too dangerous. This would be very useful for novice bike riders."
- "I support safer bike paths crossing major freeways."

Key Themes

- **Improved transit connections** to the 47th Street trolley station
- **Current dangerous conditions** on Imperial Avenue overpass
- Benefits for **novice cyclists** and community members accessing the YMCA
- **Safety improvements** for crossing major barriers (I-805)

Conclusion and Next Steps

The overwhelming support for all six bikeway segments demonstrates a clear community mandate for developing this interconnected Chollas Creek Watershed bikeway network. Key survey themes include:

1. **Safety First:** Respondents consistently highlighted dangerous current conditions and the need for protected infrastructure.
2. **Connectivity Matters:** The ability to connect neighborhoods to each other and to regional destinations is highly valued.
3. **Multiple Benefits Desired:** Respondents appreciate bikeways that offer transportation utility while providing green space, ecological restoration, and recreational opportunities.
4. **Removing Barriers:** The proposed network addresses barriers (freeways, dangerous roads) that currently divide communities.
5. **Supporting Transit:** Connections to trolley stations and improved mobility options were highlighted as important benefits.

<u>Based on this community support, we recommend:</u>

- **Moving forward with all six segments** as part of a Chollas Creek bikeway network
- **Prioritizing Routes 1 and 5** based on the frequency and intensity of comments
- **Incorporating community feedback** into detailed design processes, especially regarding connections to neighborhoods and existing assets
- **Balancing human access with ecological restoration** throughout the network
- **Developing clear implementation phasing** that allows for early wins while working toward more complex segments

Acknowledgements

We thank all community members who participated in this survey and those who offered leadership, contributions, and outreach efforts to this project: Bikes del Pueblo, Center on Global Justice at UCSD, Circulate SD, Major Taylor Cycling Club SD, Partnership for the Advancement of New Americas (PANA), Chollas Creek Coalition, Groundwork Resident Fellows, and Logan Heights CDC.

Report prepared by Groundwork San Diego and Community Partners, April 2025

Appendix A: Additional Bikeway Input & Suggestions

Beyond the six proposed routes, survey respondents and partner organizations provided suggestions for additional bikeways and infrastructure improvements they would like to see in the Chollas Creek Watershed. These suggestions demonstrate the community's engagement with bicycle infrastructure planning and provide valuable insight for network expansions.

Detailed Route Proposals

Below are additional route suggestions provided by community members:

- **Oak Park Canyon & 54th St. Crossing**
  - Location: Intersection of Oak Park Canyon, Chollas Parkway, and 54th Street
  - Key connections: Would connect the proposed Oak Park Trail (Route 4 above) to areas east of 54th Street, including the future Chollas Triangle Park and the planned Refugee and Immigrant Cultural Hub
  - Community rationale: Current conditions make crossing 54th Street unsafe for cyclists and pedestrians. Community members suggested several solutions including a flyover bridge, a raised street crossing with signals to slow traffic, or lowering the Chollas Creek channel to create an underpass beneath 54th Street.
- **Valencia Business Park Trail**
  - Location: Valencia Park neighborhood, from Stevens Way to Euclid Avenue
  - Key connections: Would extend the existing trail that currently ends at 54th Street, creating a continuous path along Chollas Creek toward Euclid Avenue
  - Community rationale: This would upgrade and improve an existing but underutilized trail, making it suitable for cyclists. Community members emphasized the need for safety improvements and regular maintenance to create both a viable transportation route and a quality public space for the neighborhood.
- **SR-15/I-805 East-West Crossings**
  - Location: Between South Park and City Heights/Azalea Park/Gateway neighborhoods
  - Key connections: Would provide direct east-west connections across major freeway barriers between Market Street and Wightman/Landis Street
  - Community rationale: Eastern neighborhoods are currently cut off from western areas, creating transportation inequity. The lack of crossings forces significantly longer, indirect routes through congested bottlenecks, isolating communities, hurting local businesses, and creating substantial barriers to non-motorized transportation.

Additional Infrastructure Recommendations

North-South Connections

- Note: 30th Street and Fairmount Avenue are the two main North-South corridors, approximately 15 blocks (2 miles) apart. There should be more options between these.
- Protected Bikeways (Class IV)
    - 30th Street (El Cajon Blvd. to Imperial Ave.)
    - 32nd Street (El Cajon Blvd. to Imperial Ave.)
    - Home Avenue (from Euclid Ave., across I-94, to Market St.)
    - 43rd Street (Meade Ave. to Fairmount Ave. merge; with reverse angle parking in a floating parking lane)
    - Fairmount/47th Street Corridor (El Cajon Blvd. to the Southeast & National City Green Corridor Project (near Beta St.))
    - Euclid Avenue (El Cajon Blvd. to Imperial Ave.)
    - 54th Street (El Cajon Blvd. to Euclid Ave.)
- Bicycle Boulevard on Chamoune Avenue (Thorn St. to El Cajon Blvd.)
- Bicycle Boulevard on 42nd Street (Thorn Street to Adams Ave.)
- Bicycle Boulevard on Manzanita Drive (Violet St. to Manzanita Gathering Place/43rd St.)
- College Avenue (El Cajon Blvd. to SDSU)

East-West Connections

- Bicycle/Pedestrian Bridge over SR-15 freeway from Juniper Street (City Heights) to Haller Street (Greater Golden Hill)
- Protected Bikeways (Class IV)
    - Imperial Avenue (47th St. to Lemon Grove)
    - Market Street (I-5 to Merlin Dr.)
    - Euclid Avenue (Monroe Ave. to 54th St.)
    - University Avenue (I-805 to Estrella Ave.)
    - Poplar/Pepper/Tulip/Midvale/Gateway (with roundabouts) in Azalea Park (Fairmount Ave. to Home Ave.)
- Bicycle Boulevard on Hilltop Drive (Euclid Ave. to Boundary St.)

Other Bikeway Improvements

- After SANDAG's University Ave. Bikeway installation, convert outside travel lanes on University Ave. into parking lanes to provide parking-protected bikeway elements (consistent with Mid-City Communities Plan)
- Upgrade all Class II Bike Lanes to Class IV Protected Bikeways

Additional Bicycle/Pedestrian Bridges

- Over SR-8 freeway to connect Snapdragon Stadium to the SR-15 Commuter Bikeway
- Connect Home Ave/Federal Blvd South to Broadway

Transit, Multimodal Integration, and Street Design

- Create a mobility hub at Euclid & Market
- Euclid Transit Center Rail/Grade Separation
- Orange Line and bus frequency improvements with 3-bike capacity racks on all buses
- Rapid 625: National City to Southeast SD to Mid-City to SDSU
- Install more charging infrastructure for electric vehicles, shuttles, micro-transit, e-bikes
- When repurposing the public right of way for traffic safety improvements, remove travel lanes instead of parking lanes when feasible, shifting parking lanes towards the centerline to preserve parking and create parking-protected bike lanes. Examples can be seen on Home Avenue between Fairmount and Euclid, 47th Street in front of Gompers, 30th Street in North Park, and 5th Avenue Bikeway in Uptown.

Pedestrian and Safety Improvements

- Implement a Safe Routes to School Strategy
- Install Leading Pedestrian Intervals and pedestrian count-down timers at intersections
- Provide pedestrian-scale street lighting on mixed-use streets and at transit hubs
- Increase street-lighting throughout community
- Create dignified pedestrian and transit experiences: Litter and weed abatement, cleanliness, and sanitation access
- Improve pedestrian accessibility at key transit hubs

Community Development Integration

- Implement beautification and artistic improvements throughout community
- Implement SESD Community Plan recommendations to convert 43rd St ramp at I-805 (former SR-252 freeway corridor) into "Alpha Street Realignment" with community benefits, housing, health-supportive infrastructure, gardens, murals, and land trust

Existing Plan Alignment

- Implement mobility recommendations in existing plans:
    - Encanto Neighborhoods Community Plan
    - Mid-City Communities Plan
    - Southeastern San Diego Community Plan
    - SESD Community Mobility Roadmap
    - MTS Social Equity Listening Tour
    - City Heights Urban Greening Plan

These community suggestions should be considered as potential expansions to the Chollas Creek Watershed bikeway network featured above. They reflect local knowledge of travel patterns, barriers, and desired connections that may not be immediately apparent in citywide planning processes.

Friends of Rose Canyon
PO Box 221051, San Diego, CA 92192-1051
858-525-1489 ✷ rosecanyon@iCloud.com

To: SANDAG – Regionalplan@sandag.org
Re: Comments on the Draft 2025 Regional Plan
From: Deborah Knight, Executive Director, Friends of Rose Canyon
rosecanyon@iCloud.com

Friends of Rose Canyon appreciates the opportunity to provide comments on the Draft 2025 Regional Plan. We have a great deal of first-hand knowledge about the area we are commenting on. We participated extensively in the lengthy process that produced the 2024 University Community Plan Update. We have worked for many years to conserve and restore the MSCP lands in this area. We hope SANDAG will consider our comments carefully.

We submit the following comments on the Draft 2025 Regional Plan:

1. **SANDAG should study a connection to and from the I-805 at La Jolla Village Drive for the proposed Rapid 880, 688, and for any other proposed Rapid or arterial bus routes that would serve the larger UTC area.**

   One rationale for the Rapid 880 and Rapid 680 is to provide people from areas further south and east in the county access to the jobs-rich UTC area. A Rapid route along LJ Village Drive between I-805 and UTC is by far the best way to do that. Both sides of La Jolla Village Drive between I-805 and Genesee Avenue already have high-density employment within walking distance: high tech, biotech, business, commercial, medical, hospitality, etc.

   Furthermore, the City of San Diego rezoned the areas immediately north and south of this stretch of La Jolla Village Drive for major increases in density in the University Community Plan Update, approved in July, 2024. Rapid buses could make one or more stops on La Jolla Village Drive and provide access within walking distance to this increasingly dense employment area.

   In contrast, the Draft 2025 Regional Plan's proposed Nobel Drive route from I-805 to UTC for Rapid 880 and 688 would provide almost no access to jobs either now or in the future. The entire stretch along Nobel Drive between I-805 and UTC has <u>one</u> existing commercial development (on Judicial Drive). No future commercial development within walking distance of this entire stretch of Nobel Drive is planned in the 2024 University Community Plan Update. The other land adjacent to or in walking distance to this stretch of Nobel Drive consists of: existing residential development, 100% conserved MSCP land, and a community park. People on the Rapid buses using Nobel Drive will have to stay on the Rapid all the way to UTC. There, many of them will likely have to either transfer to a local bus or have a potentially lengthy walk to get to jobs.

Existing Rapid 237 and local bus 921 already use the La Jolla Drive/I-805 connection.

The proposed Rapid Route 238 (UCSD to Rancho Bernardo via Sorrento Valley and Carroll Canyon) will use the La Jolla Village Drive/I-805 connection.

This letter may not include all the proposed bus routes between I-805 and the UTC area that are in the Draft 2025 Regional Plan. However, our comments apply to all that are proposed.

Thank you.

Deborah Knight
Executive Director
Friends of Rose Canyon
858-525-1489ß

July 18, 2025

SANDAG Draft 2025 Regional Plan
Attn: Sara Toma Ischep
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego CA 92101
Via: regionalplan@sandag.org

RE: CITY OF CARLSBAD COMMENTS ON DRAFT 2025 REGIONAL PLAN

Dear Ms. Ischep:

The City of Carlsbad appreciates the opportunity to comment on the draft 2025 Regional Plan (Plan), which plays a key role in guiding the next phase of regional growth and transportation investment across San Diego County. A well-executed plan that carefully considers local agency feedback can help improve transportation choices, reduce greenhouse gas emissions, and enhance quality of life for all residents. As a local agency responsible for delivering key components of the transportation network, such as pedestrian, bike, and local transit connections, the city emphasizes the importance of transparency and public input throughout the planning process, especially when considering environmental, cumulative, and off-site impacts tied to implementation.

Carlsbad staff reviewed the draft 2025 Regional Plan with a focus on how it aligns with our local policies, priorities, and community feedback. We appreciate the conversations we've had with SANDAG staff during development of the Plan and the regional model. We also want to thank SANDAG for presenting the Plan to our Traffic Safety and Mobility Commission on June 2, 2025. Comments from that meeting, including public feedback, are included as Attachment 1.

Additionally, we've re-submitted comments from our March 2023 review of the North County Comprehensive Multimodal Corridor Plan (Attachment 2), since many of those concerns were not addressed in the final document. These comments remain directly relevant to the Draft Regional Plan, as the NC-CMCP serves as a foundational document for shaping transportation priorities and recommendations in North County. Since the Regional Plan builds on the NC-CMCP, it's important that unresolved issues such as local project priorities, transit recommendations, and corridor-specific concerns are revisited and considered.

We've outlined our key comments below, organized into land use and growth, air quality, and transportation.

General Feedback

- For digital versions of the Plan, please provide PDF bookmarks
- Please provide a list of Figures and Tables

Transportation & Community Development Departments
1635 Faraday Avenue | Carlsbad, CA 92008 | 442-339-2600 t

Housing and Growth

- Chapter 2: The city acknowledges the Plan statement in Chapter 2 that the "Series 15 Forecast is in alignment with each jurisdiction's adopted General Plan." However, the existing growth projection maps in the Plan and its appendices are not granular enough for Carlsbad to confirm that the modeled growth areas align with the land use restrictions and growth potential input provided by the city.
- Appendix F: Please provide a summary of land use inputs provided by member agencies to the land use model and the action taken in response to each.
- Appendix F: Throughout the review process, member agency staff were told that detailed modeling/Plan information would be made available for review, comment, and verification. This occurred during the land use model baseline stage in Summer 2023 using the land use web app tool provided by SANDAG; however, information regarding modeling outputs was only provided at the jurisdiction level thereafter. More localized/granular detail is needed for jurisdictions to verify modeling assumptions and outputs. In particular:
    - At the December 18, 2023 and February 26, 2024 Series 15 Taskforce meetings and again at the April 18, 2024 Sustainable Communities Working Group meeting SANDAG staff indicated they would provide jurisdictions with detailed housing/population and jobs information (including data tables at the MGRA scale) to review. Those materials were not provided and do not appear to be part of the Plan materials made available for public review. Carlsbad staff remain interested in receiving this information in order to validate the underlying data and assumptions in the Plan.
- Appendix F: On page F.8, the report states that "During the process of developing the SCS Land Use Pattern, it became clear that adjustments were needed for the cities of Coronado and Solana Beach, where initial housing build-out estimates were below the cities' proposed or adopted Housing Elements. For both cities, the build-out estimate for each city's adopted Housing Element was used to accommodate their 6th Cycle RHNA allocations." What were these adjustments and how did the post-adjustment land use model parameters remain consistent with these cities' General Plans?
- Appendix F: The city seeks clarity on the Plan's underlying assumptions made for future growth projections. What exactly are the "detailed assumptions" made in the Cohort Component Model (CCM) in Appendix F related to fertility, mortality and migration? What evidence was used to reach these conclusions (other than communications with economists and demographers through Peer Review Panels (PRPs))? The city does not have adequate information to fully comment on the accuracy of these assumptions.
- Appendix F: The text states, "Vacancy rates are assumed to stabilize at healthy levels, with 5% for renters and 2% for homeowners." Were these rates applied consistently across the county through the plan's forecast horizon or is this a summary statement generalizing the vacancy rate data that is available on SANDAG's Open Date Portal (https://adlsdasadsprodpublicwest.z22.web.core.windows.net/datasurfer/sandag_forecast_15_jurisdiction_carlsbad.pdf), which provides data by city and dwelling unit type (single family, multiple family, and mobile home) through time (2022 – 2050)? If it is referring to the same data, how did the plan categorize the dwelling unit types in terms of renters and homeowners?
    - Appendix F did not provide a link or citation between the above referenced percentages and the Regional Growth Forecast/Open Data Portal webpage, so staff were only aware of this additional source of information from prior experience. Staff recommend that the Plan include supporting details as requested above or at least provide directions to

the location of the requested information in supplemental documents and/or data sources.

Air Quality

- Chapter 2: The Environment section does not include any information on SANDAG's regional climate planning efforts. SANDAG's role in reducing greenhouse gas emissions in the region directly correlates to the implementation of local agencies' Climate Action Plans, particularly with measures and actions related to on-road transportation, as is highlighted in Chapter 4. Please include reference to this work.
- Appendix G: Please provide more discussion as to why EMFAC2017 was used to develop the on-road transportation emissions projections in the regional inventory. As written, it is difficult to understand why the best available data of a more current model year (e.g., EMFAC2021, EMFAC2025) was not utilized, especially when the off-model calculators use EMFAC2021.
- Please include a graphic version of the 2022 greenhouse gas inventory. For example, the 2022 information included in Table G.3 could also be presented as a pie chart. This would make it easier to read.

Fire:

- Appendix D: Includes a brief discussion on risks due to wildfire. With the recent release of the state's new Fire Hazard Severity Zone Maps, it would seem appropriate for the appendix to acknowledge the maps in its analysis and the expansion of areas prone to wildfire risk. Additionally, would the new maps impact any Plan objectives?
- The paragraph on page R.4 describing the County Consolidated Fire Code could be clarified. Not all jurisdictions within San Diego County adopt the County's Consolidated Fire Code. However, all jurisdictions across California are required to adhere to the California Fire Code (CFC) and the California Building Code (CBC). Additionally, beginning January 1, 2026, the new California Wildland-Urban Interface Code (CWUIC) will also be in effect statewide. This new code should be acknowledged as part of the regulatory framework guiding fire-safe planning and infrastructure design moving forward.

Transportation

- Chapters 2 & 3: Data Transparency and Modeling Assumptions: The plan indicates that the activity-based model (ABM-3) demonstrates compliance with greenhouse gas (GHG) targets set by CARB under SB 375, achieving a 19.3% reduction by 2035 (Chapter 2, pg. 17; Chapter 3, pg. 30). However, the specific modeling outputs and assumptions used in ABM-3 are not included or summarized in the plan or appendices. Without access to these underlying data, local jurisdictions cannot adequately evaluate how the model's outputs support project prioritization, travel mode shifts, or VMT reductions.
- Lack of Transparency in Public Input Integration: While Chapter 2 (pg. 20) and Appendix J describe the outreach efforts conducted during plan development, the plan does not clearly document how comments from cities like Carlsbad were considered or incorporated. There is no visible response matrix or tracking of public input that allows jurisdictions to evaluate whether their concerns meaningfully shaped the plan recommendations.
- We also anticipate providing follow-up comments related to fire planning and resilience at a later date.

Freeways:

- Chapter 2 & Appendix A: Prioritize the I-5/SR-78 Interchange Improvement Project to Address Regional and Local Congestion: The I-5/SR-78 interchange in Oceanside remains a significant regional bottleneck, relying on a signalized intersection that causes frequent delays and backups. This congestion leads to increased cut-through traffic on Carlsbad's local arterial streets as drivers seek alternative routes. As a result, streets providing access to Carlsbad schools experience higher volumes of unnecessary regional traffic, creating avoidable safety risks for students and families walking or biking. Prioritizing this project would improve traffic operations along both I-5 and SR-78, while also reducing pressure on local streets and enhancing safety near schools and in residential areas. We strongly recommend SANDAG elevate this project's importance in the Regional Plan and prioritize implementation in collaboration with Caltrans.

Transit:

- Chapter 1 & 2: One-Size-Fits-All Transit Strategy Ignores North County Context: The plan envisions significant expansion of regional transit services, including 35 new Rapid bus routes and major rail upgrades (Chapter 1, pg. 6; Chapter 2, pg. 24). While this may be appropriate in dense urban areas, it does not reflect the development pattern of Carlsbad and much of North County, which has been shaped by suburban, auto-oriented land use over the past 60 years. A more context sensitive approach is needed, one that includes greater investment in flexible mobility services, roadway safety projects, and key freeway interchanges like I-5/SR-78.
- Chapter 2 pages 22-24 and Appendix A- Rapid Routes in Carlsbad, Request for Clarification and Concern Over Roadway Impacts: The City of Carlsbad does not support the implementation of new Rapid bus routes in Carlsbad as outlined in the Regional Plan. While these services may be suitable in denser urban environments, they may not be appropriate given Carlsbad's suburban land use patterns, travel behavior, and existing roadway design. In reviewing the Plan, it is unclear what local changes would be needed to accommodate these services.

  We request clarification on the following:

  - What physical changes to the roadway would be required? For example, will the implementation involve the removal of travel lanes, medians, or on-street parking?
  - How would the Rapid routes affect local traffic circulation and the city's Complete Streets objectives?
  - Are bus-only lanes, flexible-use lanes, or signal pre-emption required to operate these routes effectively? If so, what analysis has been done to assess the impact on traffic operations, emergency vehicle access, and public safety?

  The Plan briefly references transit priority features such as "bus guideways" and "Smart Intersection Systems" (Chapter 2, pp. 22–24), but does not provide sufficient detail about whether these include transit signal pre-emption or bus-only lanes, nor where they would be located. These types of treatments could significantly impact local control over roadway operations. The City requests that any such features be clearly identified, justified, and coordinated with local agencies prior to implementation.
- Microtransit and Flexible Fleets Underemphasized: Flexible Fleets, such as microtransit and neighborhood electric vehicle services, are briefly mentioned (Chapter 2, pg. 24), and the plan notes SANDAG's partnerships on programs like the Carlsbad Connector. However, there is no clear funding commitment or regional implementation strategy. This is a missed opportunity. Flexible Fleets can improve equity, reduce per-rider subsidies, and serve areas where fixed-route

transit is infeasible. Given the growing cost of traditional transit services (e.g., COASTER subsidies rising from $8 to $53 per rider from 2012–2022 based on NCTD data), we urge SANDAG to prioritize these alternatives in the funding and implementation framework (Chapter 4, pg. 41).

- Regional Transit Performance and Travel Time Competitiveness: Long travel times and lack of last-mile connectivity remain barriers to transit use in North County. While the plan references regional rail upgrades (Chapter 2, pg. 24), it does not provide benchmarks for how service changes will improve speed, reliability, or competitiveness with other modes that would results in actual mode shift throughout the region. More analysis is needed to demonstrate that proposed investments will attract meaningful ridership in lower-density areas.
- Chapter 3 Transit Improvements: The City recommends that future transit investments prioritize grade separation projects before pursuing additional double tracking. Grade separation enhances safety, reduces delays, and improves traffic flow at crossings. These benefits should align with regional goals and OCTA's Bridges Railroad Grade Separation Program.

Active Transportation

- Chapter 2 and Appendices A and K – Freeway Interchanges and Active Transportation Gaps: The Draft Plan highlights the importance of expanding the region's active transportation network, but it does not directly address one of the most common and critical barriers to walking and biking throughout the region being freeway interchanges. These locations often lack safe crossings, have high-speed vehicle movements, and create uncomfortable or disconnected links in otherwise continuous active transportation routes. In Carlsbad the I-5 freeway is a major barrier to east – west active transportation connections.

  We recommend the Plan includes a specific strategy and dedicated funding for retrofitting freeway interchanges to improve safety and comfort for people walking and biking.

  To better understand the intent of the Plan, we request clarification on the following:

  - Does the Plan identify freeway interchanges as active transportation barriers in any of the performance evaluations or project development criteria?
  - Are there any funded projects within Appendix A or Appendix K that include interchange retrofits or overcrossing enhancements for active modes?
  - How does SANDAG intend to prioritize safety improvements at these locations, especially in areas identified as part of the Regional Bikeway Network?
- Appendix K Active Transportation: The draft Plan requires that all SANDAG-funded regional bikeways use the facility types recommended in the *NACTO Designing for All Ages & Abilities* guide, as referenced in Appendix K, Figure K.4. While NACTO provides a good overview of bikeway types and design considerations, it is inherently broad and primarily geared toward dense, urban settings, which may not align with the suburban, mixed-use, and corridor-specific conditions found throughout North County and Carlsbad.

  The NACTO guide itself emphasizes that local context matters, including factors like street width, traffic volumes, driveway patterns, parking needs, intersection safety, and community input. For instance, a Class IV separated bikeway may satisfy default selection criteria, but it could create new safety challenges, such as poor visibility at intersections or driveways, disruption to parking and curb access, or conflicts with residential and commercial frontages.

  Recommendation:

- The NACTO guide should be used as a reference or consideration only, not as a blanket requirement. The ultimate selection and design of bikeway facilities should be determined by local agencies based on site-specific conditions and community input, including recommendations from recent active transportation or mobility master plans developed through robust public engagement. This approach will help ensure that regional investments result in facilities that are both safe and context-sensitive for the communities they serve.

Transportation Funding and Prioritization

- Funding Allocation and Prioritization: The plan estimates total expenditures of $125.5 billion (Chapter 4, Table 4.2), yet it lacks detail on how funding is geographically distributed, particularly among subregions. North County stakeholders are concerned that the proposed project list and phasing schedules do not reflect equitable prioritization, despite growing population, congestion, and infrastructure needs. More transparency is needed on how funding will be allocated and what criteria were used to sequence investments.

If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov or, if you need additional information related to comments on the land use assumptions, please contact Eric Lardy, City Planner, at Eric.Lardy@carlsbadca.gov.

Sincerely,

TOM FRANK
Transportation Director/City Engineer

Attachments:

1. June 2, 2025, City of Carlsbad Traffic Safety and Mobility Commission meeting minutes (includes comments provided on the Draft 2025 Regional Plan)
2. March 12, 2023, City of Carlsbad comments on the North County Comprehensive Multimodal Corridor Plan

cc: Geoff Patnoe, City Manager
Cindie McMahon, City Attorney
Sheila Cobian, Assistant City Manager
Tim Lyons, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Community Development Director
Eric Lardy, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Robert Efird, Principal Planner
Scott Donnell, Senior Planner
Katie Hentrich, Senior Program Manager
Alex Patterson, Assistant Planner

TRAFFIC SAFETY & MOBILITY COMMISSION

Minutes

Council Chamber
1200 Carlsbad Village Drive
Carlsbad, CA 92008

June 2, 2025, 4 p.m.

CALL TO ORDER: 4:03p.m.

ROLL CALL: Coelho, Penseyres, Newlands, Kohl, Nicholes, Schuck.
Absent: Proulx.

INVOCATION: None.

PLEDGE OF ALLEGIANCE: Chair Coelho led the Pledge of Allegiance.

APPROVAL OF MINUTES:
Minutes of Regular Meeting held on May 5, 2025.

Motion by Commissioner Nicholes, seconded by Commissioner Newlands, to approve the minutes of the Regular Meeting held on May 5, 2025, as presented. Motion carried, 6/0/1(Proulx – Absent).

PRESENTATIONS: None.

PUBLIC COMMENT:

Bret Schanzenbach spoke about parking tickets for commercial vehicles. He requested that an item be agendized to address the current parking policies and how they can be expanded to accommodate commercial vehicles.

Christina McGoldrick thanked the Commission for their work to improve traffic safety throughout the city.

CONSENT CALENDAR:

1. EL CAMINO REAL ROADWAY IMPROVEMENTS FROM ARENAL ROAD TO LA COSTA AVENUE, CAPITAL IMPROVEMENT PROGRAM PROJECT NO. 6051: Support staff's recommendation to the City Council to approve the plans and specifications of the El Camino Real Widening from Arenal Road to La Costa Avenue Project, Capital Improvement Program Project No. 6051. (Staff contact: Brandon Miles, Public Works Department)

   Associate Engineer Brandon Miles reviewed a PowerPoint presentation (on file in the Office of the City Clerk).

   The Commission received the PowerPoint presentation by Associate Engineer Miles.

Christina McGoldrick expressed her concerns regarding the potential safety impacts to students traveling to/from Sage Creek High School that may be created during construction.

In response to Commissioner Kohl's inquiry regarding the removal of the safe route to school, City Traffic Engineer John Kim confirmed that staff would look into options to accommodate a bicycle path during construction.

In response to Vice-Chair Penseyres' inquiry regarding whether the "Keep Clear" signs near the intersection of El Camino Real and Arenal Road will be removed, City Traffic Engineer Kim confirmed that the "Keep Clear" signs will remain and explained that the traffic signals for that intersection are connected to the fire trucks exiting from the fire station.

In response to Vice-Chair Penseyres' concerns regarding the lack of space for a bike lane during construction, Associate Engineer Miles responded that he anticipates there to be more space available for bike lanes during construction.

Motion by Commissioner Kohl, seconded by Commissioner Schuck, to approve Consent Calendar Item No. 1. Motion carried, 6/0/1 (Proulx – Absent).

2. AVENIDA ENCINAS COASTAL RAIL TRAIL AND PEDESTRIAN IMPROVEMENTS – SEGMENT 3: Support staff's recommendation to the City Council to approve the plans and specifications of the Avenida Encinas Coastal Rail Trail and Pedestrian Improvements – Segment 3, Capital Improvement Program Project No. 6004. (Staff Contact: Brandon Miles, Public Works Department)

   Associate Engineer Brandon Miles reviewed a PowerPoint presentation (on file in the Office of the City Clerk).

   The Commission received the PowerPoint presentation by Associate Engineer Miles.

   In response to Vice-Chair Penseyres' inquiry regarding the green painted bike lanes, City Traffic Engineer Kim responded that staff would take another look at the right-turn from Avenida Encinas into Embarcadero Lane.

   Motion by Vice-Chair Penseyres, seconded by Commissioner Newlands, to approve Consent Calendar Item No. 2 with the alteration that staff evaluate the feasibility of a right-turn only lane into the Carlsbad Poinsettia Station. Motion carried, 6/0/1 (Proulx – Absent).

PUBLIC HEARING: None.

DEPARTMENTAL REPORTS:

3. SANDAG 2025 REGIONAL PLAN UPDATE: Receive a presentation from SANDAG staff on the 2025 Regional Plan Update. (Staff Contact: Nathan Schmidt, Public Works Department)

Recommended Action: Receive the presentation.

SANDAG's Deputy Director of Mobility Planning Jennifer Williamson reviewed a PowerPoint presentation (on file in the Office of the City Clerk).

The Commission received a PowerPoint presentation by SANDAG's Deputy Director of Mobility Planning Williamson.

Christina McGoldrick spoke in support of the North County Highway Project.

In response to Commissioner Schuck's inquiry regarding how rapid routes were selected, SANDAG's Deputy Director of Mobility Planning Williamson responded that various factors were taken into consideration including SANDAG's travel model, commuter surveys, streetlight data, and high-performing bus routes.

In response to Commissioner Nicholes' inquiry regarding whether microtransit is the only method to get to the rapid routes, SANDAG's Deputy Director of Mobility Planning Williamson responded that the Active Transportation Plan will provide improvements that will enable enhanced bicycle and pedestrian connections, in addition to the microtransit, to get to the rapid routes.

In response to Commissioner Kohl's inquiry regarding funding, SANDAG's Deputy Director of Mobility Planning Williamson explained that Regional Plan is based on a funding scenario that incorporates various sources, including federal, state, and local funding, sales tax, and outside revenue.

In response to Commissioner Newlands' comment that he would like SANDAG to provide more attention to railway improvements, SANDAG's Deputy Director of Mobility Planning Williamson confirmed that there are multiple plans and projects to improve the railway.

In response to Vice-Chair Penseyres' inquiry regarding SANDAG's plan to assist in lowering the train tracks, SANDAG's Deputy Director of Mobility Planning Williamson explained that SANDAG is currently working on grade separation criteria to help prioritize the grade separation requests across the region.

Vice-Chair Penseyres commented that "protected bike lanes" is not an appropriate term and should be referred to as "separated bikeways" or "cycle tracks."

Vice-Chair Penseyres commented that Class IV bikeways are optional for cyclists to use and are not considered part of the roadway. As a result, when a collision occurs between a vehicle and a bicycle within a Class IV bikeway, it is often not included in official crash reports, since the incident is technically not considered to have occurred in the roadway.

In response to Chair Coelho's inquiry regarding whether SANDAG has any influence on city bikeway projects, SANDAG's Deputy Director of Mobility Planning Williamson responded that SANDAG can only make recommendations unless it is a regional bikeway project. She recommended that SANDAG receive these comments in writing on the Regional Plan.

In response to Chair Coelho's inquiry regarding whether there is an efficiency evaluation to determine the most effective way to reduce vehicle miles traveled, SANDAG's Deputy Director of Mobility Planning Williamson responded that public transit is the most efficient way to reduce vehicle miles traveled.

In response to Chair Coelho's inquiry regarding whether SANDAG has looked into funding school buses as a way to reduce vehicle miles traveled, SANDAG's Deputy Director of Mobility Planning Williamson explained that any funding received from the Federal Transit Administration prohibits direct school transportation.

In response to Chair Coelho's inquiry regarding transit ridership, SANDAG's Deputy Director of Mobility Planning Williamson responded that San Diego Metropolitan Transit System currently has the best recovery in the nation.

In response to Commissioner Kohl's inquiry regarding whether the Coaster ridership has returned to pre-COVID levels, SANDAG's Deputy Director of Mobility Planning Williamson responded that it has not.

4. 2025 STREETS RESURFACING PROJECT, CAPITAL IMPROVEMENT PROGRAM PROJECT NO. 6001-25: Support staff's recommendation to the City Council to approve the plans for the 2025 Streets Resurfacing Project, Capital Improvement Program Project No. 6001-25, as a part of the Pavement Management Program. (Staff Contact: Eddie Wills and Hossein Ajideh, Public Works Department)

Recommended Action: Support staff's recommendation.

Associate Engineer Eddie Wills and Engineering Manager Hossein Ajideh reviewed a PowerPoint presentation (on file in the Office of the City Clerk).

The Commission received the PowerPoint presentation by Associate Engineer Wills and Engineering Manager Ajideh.

In response to Commissioner Schuck's inquiry regarding the first bullet point on Slide 5, Engineering Manager Ajideh explained that it should list Highway 78 instead of Interstate 5.

In response to Commissioner Kohl's inquiry regarding additional miles of roadway that will need to be repaired outside of this project's scope and how it will be funded, Engineering Manager Ajideh explained that the pavement management program is a

system used to maintain the city's street infrastructure, consisting of 350 center miles, in a cost-effective manner based on an annual budget. He further explained that slurry seals last around seven to ten years, dependent on various factors, and overlays last around 20 to 25 years.

In response to Vice-Chair Penseyres' inquiry regarding whether intersections are included in the slurry seal and restriping, Associate Engineer Wills confirmed that most of the intersections along Palomar Airport Road and the intersections at the northern and southern limits of El Camino Real will be overlayed and restriped.

Motion by Vice-Chair Penseyres, seconded by Commissioner Schuck, to support staff's recommendation to the City Council to approve the plans for the 2025 Streets Resurfacing Project, Capital Improvement Program Project No. 6001-25, as a part of the Pavement Management Program. Motion carried, 6/0/1 (Proulx – Absent).

COMMISSION COMMENTARY AND REQUESTS FOR CONSIDERATION OF MATTERS: In response to Commissioner Kohl's inquiry regarding whether 3-4 seconds could be added to the green segment of the traffic signal cycle at the intersection of El Camino Real and Arenal Road, City Traffic Engineer Kim responded that he would take a look and follow up.

ANNOUNCEMENTS: This section of the Agenda is designated for announcements to advise the community regarding events that Members of the Commission have been invited to, and may participate in. No announcements were made.

STAFF COMMENTS: Transportation Planning & Mobility Manager Schmidt spoke about the public comment received earlier in the meeting regarding parking for commercial vehicles. He confirmed that the Chamber of Commerce and business owners have been in contact with staff and are working with the Economic Development Department and Police Department to address their concerns. An item will be brought to the Commission in the future.

ADJOURNMENT: 5:56 p.m.

LMagalued

Lovelynne Magalued
Secretary

From:	Steve Linke
To:	Traffic; Nathan Schmidt
Subject:	6/2/2025 Item #3: SANDAG Draft 2025 Regional Plan (protected bike lanes)
Date:	Monday, June 2, 2025 2:22:52 AM
Attachments:	rc000lADWdyqSjTI.png

Carlsbad traffic commission:

The SANDAG Draft 2025 Regional Plan, Appendix K (Active Transportation), includes the following statement: "**To support safer streets for all users, the updated Regional Active Transportation Network in the 2025 Regional Plan will be built for All Ages & Abilities, consistent with the National Association of City Transportation Officials (NACTO) Contextual Guidance for Selecting All Ages & Abilities Bikeways.**"

The NACTO guidance is then presented in Figure K.4 (appended below), which places an enormous emphasis on "Protected Bicycle Lanes" (PBLs) to the exclusion of most other approaches on streets other than local neighborhood streets. PBLs typically include plastic flexible posts and, often, asphalt wheel stops in the buffer areas with which cyclists can collide.

With the above-cited language and Figure K.4, SANDAG appears to be promoting an inappropriate mandate for local jurisdictions to follow NACTO's guidance to build extensive PBLSs, which Carlsbad has thus far rejected and instead opted for buffered Class II bike lanes. **Local jurisdictions should be able to make their own decisions on how to create safe bikeways, so the language and figure should be removed, or at least changed to make it clear that the NACTO guidance is not mandatory.**

In announcing its latest 2025 bikeway guidance, NACTO made the following claim: "Protected bike lanes are appropriate for all streets, in all contexts." This type of unsupported, absolutist claim is pure marketing and not consistent with data-driven decision-making or critical thinking. Multiple bike fatalities and serious injuries in PBLs in Encinitas and Del Mar over the past few years have almost certainly arisen due to the presence of PBL infrastructure, so it is a dangerous myth that they are always safer, particularly in areas with high concentrations of driveways and/or intersections.

Despite these types of safety marketing claims by organizations such as NACTO and the Federal Highway Administration (FHWA), the research behind the safety of PBLs is actually quite weak and inconclusive. For example, there is an often-cited FHWA statistic that PBLs reduce bicycle crashes by "up to 53%." However, the 2023 study behind that claim has several fatal flaws, such as:

- The safety findings failed when the entire PBL "corridors" were studied. It only worked when **intersection crashes were excluded** and only crashes within the street segments between them were considered.
- Of the three cities modeled, **only one (San Francisco, CA) showed a statistically significant crash reduction**, while the other two (Cambridge, MA and Seattle, WA) did not. In fact, for Seattle (by far the largest dataset of the three), the PBLs trended to **reduce safety in many cases**.
- Even the San Francisco data is suspect, because the most common bike crashes (solo ones) tend not to be reported in PBLs in California. So, the **alleged safety improvement may be largely or entirely due to reduced reporting--not reduced crashes**.

I conducted an analysis of the PBLs that replaced buffered Class II bike lanes on South Coast Highway in Encinitas in 2020. When crash data was collected from both police reports and emergency vehicle dispatch logs (57 months of data both before and after), bike crashes were **50% higher after the PBLs were installed**--including both a fatality and several serious injuries. In addition, there were around 20 additional unreported bike crashes in those PBLs, which directly involved the PBL infrastructure. In contrast, for a control corridor of equal length on South Coast Highway just to the north, which retained its Class II bike lanes, the crash frequency remained unchanged between the "before" and "after" study periods.

Official-sounding organizations like NACTO and FHWA publish or cite many transportation studies to

support their safety marketing claims. But when many of the underlying studies are actually scrutinized, the credibility of the claims is severely compromised. Unfortunately, it is easy for local jurisdictions and regional planning organizations to fall into the trap of citing these claims.

Figure K.4: NACTO's Contextual Guidance for Selecting All Ages & Abilities Bikeways

Roadway Context				All Ages & Abilities Bicycle Facility
Target Motor Vehicle Speed*	Target Motor Vehicle Volume (ADT)	Motor Vehicle Lanes	Key Operational Considerations	
Any		*Any*	*Any of the following:* high curbside activity, frequent buses, motor vehicle congestion, or turning conflicts‡	**Protected Bicycle Lane**
< 10 mph	Less relevant	No centerline, or single lane one-way	Pedestrians share the roadway	**Shared Street**
≤ 20 mph	≤ 1,000 – 2,000		< 50 motor vehicles per hour in the peak direction at peak hour	**Bicycle Boulevard**
≤ 25 mph	≤ 500 – 1,500			
	≤ 1,500 – 3,000	Single lane each direction, or single lane one-way	Low curbside activity, or low congestion pressure	**Conventional or Buffered Bicycle Lane, or Protected Bicycle Lane**
	≤ 3,000 – 6,000			**Buffered or Protected Bicycle Lane**
	Greater than 6,000			**Protected Bicycle Lane**
	Any	Multiple lanes per direction		
Greater than 26 mph†	≤ 6,000	Single lane each direction	Low curbside activity, or low congestion pressure	**Protected Bicycle Lane, or Reduce Speed**
		Multiple lanes per direction		**Protected Bicycle Lane, or Reduce to Single Lane & Reduce Speed**
	Greater than 6,000	*Any*	*Any*	**Protected Bicycle Lane**
High-speed limited access roadways, natural corridors, or geographic edge conditions with limited conflicts		*Any*	High pedestrian volume	**Bike Path with Separate Walkway or Protected Bicycle Lane**
			Low pedestrian volume	**Shared-Use Path or Protected Bicycle Lane**

Source: NACTO

Best regards,
Steve Linke
Carlsbad, CA

CAUTION: *Do not open attachments or click on links unless you recognize the sender and know the content is safe.*

ATTACHMENT 2

March 12, 2023

California Department of Transportation, District XI
Attn. Kareem Scarlett, PE
4050 Taylor St.
San Diego CA, 92110

North County Comprehensive Multimodal Corridor Plan

Dear Mr. Scarlett:

The City of Carlsbad appreciates the opportunity to provide comments on the draft North County Comprehensive Multimodal Corridor Plan (CMCP) and would like to make the following comments:

General Comments:
These corridor studies stem from Senate Bill 1 and will assist SANDAG and the Department of Transportation (Caltrans) to nominate projects, with preference to be given to projects that demonstrate collaboration between the regional agencies and Caltrans. The City has provided comments to SANDAG during the development of the current Regional Plan which were shared with the North County CMCP Technical Working Group and are still relevant for suggested revisions to the proposed plans programs and projects of this plan. Please refer to our previous comments to SANDAG regarding the Regional Plan included in a City Council Memorandum dated Oct 21, 2021 Re: SANDAG 2021 Regional Transportation Plan Draft EIR Comment Letter- referenced at following web address - https://records.carlsbadca.gov/WebLink/DocView.aspx?id=5493674&dbid=0&repo=CityofCarlsbad. Below are specific comments regarding the draft plan:

Mobility Hubs:

- Recommend changing the On-demand shuttle connecting transit center to employment centers to a "On-demand flexible fleet" to facilitate the option of rideshare programs.

Mobility Boulevards:

- Request inclusion of the **Coast Highway / Carlsbad Boulevard as a Mobility Boulevard**. Throughout the Technical Working Group meetings, the City of Carlsbad and Oceanside requested that Coast Highway and Carlsbad Boulevard be included as a "Mobility Boulevard" in the North County CMCP. This primary north-south corridor is the most highly utilized corridor in North County from a multimodal users perspective and most consistent with the definition of a Mobility Boulevard as an alternative path to the state highway system (I-5), has a high potential for higher quality investments for pedestrians, bicyclists, and transit, and connects the subregions primary activity centers in Oceanside, Carlsbad and neighboring cities to the south.

- College Boulevard: The recommended active transportation improvements include a Class-IV protected bikeway to Palomar Airport Road. The City of Carlsbad recommends that this be revised to a Class-I facility within the city limits. The city is developing a plan for the extension of College Blvd. between Bobcat Lane and El Camino Real which includes a plan to provide both Class-II bike lanes and a separate Class-I multi-use path along this new alignment.

- Palomar Airport Road/San Marcos Boulevard: Recommend a Class-I multi-use path be provided along El Camino Real within the City of Carlsbad instead of the proposed Class-IV protected

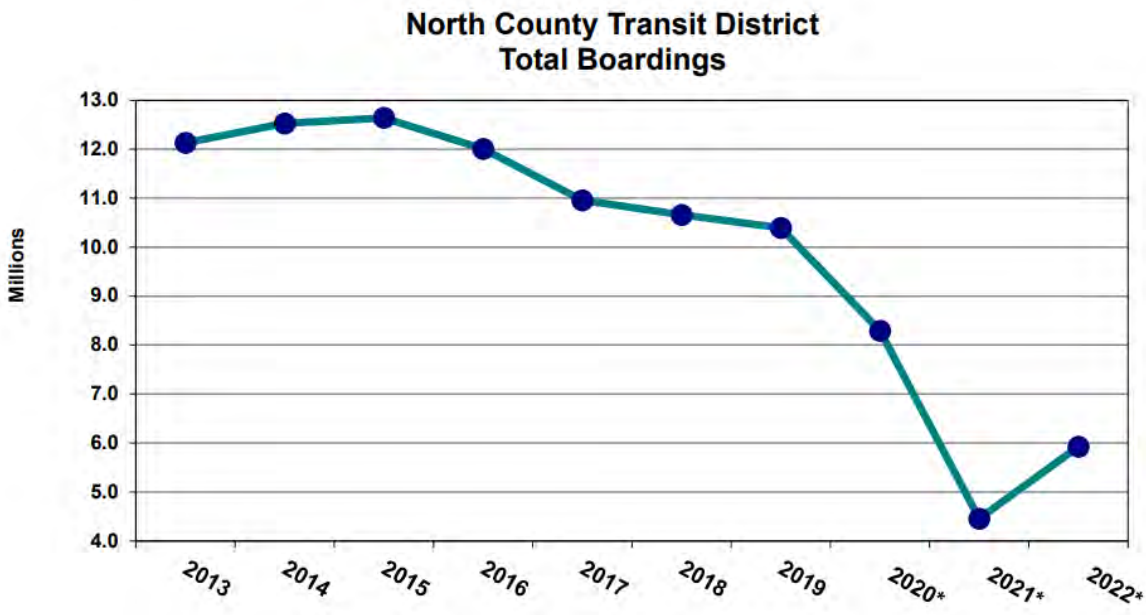
bikeway due to the high vehicle speeds, wide roadways, and potentially limited visibility of bicyclists at the primary intersections. It is also recommended to provided flexible fleets/on-demand transit along this corridor as a primary connection from the Poinsettia Coaster Station to the Business Parks along Palomar Airport Road and eventually Cal State San Marcos. Recommend upgrading all intersections through interchange to smart intersections with recommended revisions as explained below. Requesting a proposed multimodal bridge over NCTD rail road right of way and tracks to facilitate adequate space for vehicle lanes, a Class I pathway, sidewalks, and class IV or buffered class II for the highspeed bicyclist including electric bicycles.

- El Camino Real: Recommend a Class-I multi-use path be provided along El Camino Real within the City of Carlsbad instead of the proposed Class-IV protected bikeway due to the high vehicle speeds, wide roadways, and potentially limited visibility of bicyclists at the primary intersections.

Regional Spines:

- In the area serviced by North County Transit District (NCTD), fixed route transit ridership declined from 2015 to 2021 and has not returned to the pre-pandemic ridership levels as shown in the below graph included in NCTD's Annual Comprehensive Financial Report For the Fiscal Years Ended June 30, 2022 and 2021

Source: *NCTD Internal Financial Information*



Interstate 5 (I5) and State Route 78 (SR78) – Recommend prioritizing the NCC improvements and managed lanes on both I5 and SR 78. The new managed lanes would facilitate next gen Rapid (BRT) and Flexible Fleet public transit programs which support Senate Bill 1 Chapter 8.5 Congested Corridors, section 2391. The NCC EIR includes an additional Managed Lane to provide 8 free lanes and 4 managed lanes. To implement the flexible fleet programs with

minimum delays on the I5 and SR 78 routes, we recommend revising the projects scopes included in this plan and subsequently the Regional Plan to include 8 free lanes and 4 managed lanes on I5, and adding the previously scheduled proposed lanes on SR78 included in the current Transnet Extension Ordinance. We recommend moving up the projects priorities to be completed by 2035 which could support the Next Gen Rapid projects and flexible fleet public rideshare transit programs. Recommended priority projects for this corridor include:

1. Completing the I5 and SR 78 multimodal interchange
2. Completing the Village Trench Project
3. Completing additional managed lanes on I5 and SR78 in the Transnet Extension Ordinance.
4. To address the community barrier created by I5 and the current auto-centric on and off-ramp intersections designed in the 1960s, include in the plan all new multimodal interchanges throughout I5 NCC and North County CMCP with the similar approach used in the Birmingham Drive interchange in the NCC.

A overview of the current trends in our region and many of the recommendations included in this letter are explained in our short presentation to SANDAG Independent Taxpayer Oversight Committee (ITOC) on May 11, 2022 at the following web address - https://www.youtube.com/watch?v=3Cj_qAtqg2M&t=1332s . Please include the related recommendations in the presentation as recommendations in this letter.

- Recommend using program language consistent with SANDAG including the following flexible fleet programs.
    - Rideshare: Drivers and passengers headed in a similar direction can share the ride in a vehicle. This includes carpool, vanpool, and pooled ridehailing services such as uberPOOL and Lyft Shared.
    - Microtransit: Multi-passenger shuttles can carry up to 15 passengers and provide rides within a defined service area. This technology-enabled transit service allows users to reserve a ride ahead of time or on-demand. Smaller, all-electric shuttles, also known as neighborhood electric vehicles (NEV), are a form of microtransit that provides a sustainable and convenient solution for short trips around communities.
    - Ridehailing: On-demand ridehailing services allow someone to request a ride in real time. Services link the passenger with available drivers based on their trip length, number of passengers, origin, and destination. This includes services such as Uber, Lyft, and taxis.

Projects and Programs:

- Delete all reference to flexible lanes on Palomar Airport Road and other arterials in Carlsbad
- Revise Carlsbad Mobility Hubs• NEV Areawide Shuttles to • “Rideshare/Rideshailing and Microtransit”
- Recommend all Rapid (BRTs) be revised to routes on I5 and SR 78 as explained in the first comment under Regional Spines
- For all identified - • Upgrade signalized intersections to smart intersections, recommend revise to:
    - Upgrade signalized intersections to smart intersections including Intersection Control Evaluation (ICE).

  - ICE guidelines shall conform with the California Manual on Uniform Traffic Control Devices (CA MUTCD), Section 4C.01b and 01c regarding intersection control**.** An engineering study shall include consideration of a roundabout (yield control). If a roundabout is determined to provide a viable and practical solution, it shall be studied in lieu of, or in addition to a traffic control signal. Refer to the California Department of Transportation (Caltrans) website for more information on the Traffic Operations Policy Directive 13-02, Intersection Control Evaluation (ICE), and other resources for the evaluation of intersection traffic control strategies: http://www.dot.ca.gov/hq/traffops/liaisons/ice.html

- Palomar Airport Road/San Marcos Boulevard Corridor Wide Mobility Boulevard Improvements & Enhancements- Recommend
  - Upgrading all intersections through interchange to smart intersections with recommended ICE analysis and proposed intersection improvements. Recommend increasing cost estimate $10 million or per an engineer's estimate of probably cost and revise cost accordingly.
  - Requesting a proposed multimodal bridge over NCTD rail road right of way and tracks to facilitate adequate space for vehicle lanes, a Class I pathway, sidewalks, and class IV or buffered class II for the highspeed bicyclist including electric bicycles. Recommend increasing budget estimate $30 million or complete engineer's estimate of probably cost and revise cost accordingly.

Other General Comments:

- Transit Demand Analysis: The expansion of transit throughout the subregion is a key element of the North County CMCP however the analysis provided in Appendix C does not provide any information to support the significant expansion of traditional fixed route transit. To understand how transit can be utilized to improve the ways people travel throughout North County a full demand analysis and supporting market research data should be provided in the document. Appendix R, Travel Patterns, should be similarly structured to understand how the recommended transit services can address the current travel patterns in the subregion.

- Barriers for Active Transportation: Freeways interchanges are among the most significant barriers for active transportation users in the subregion due to the high-speed design features and number of conflict points. In the City of Carlsbad, the I-5 freeway divides the city and disconnects active transportation users between the highly attractive coastal destinations in the west and the residential and business park areas in the eastern portions of the city. The "Gaps and Barriers" section of the CMCP fails to highlight these critical gaps at freeway interchanges. Improvements at the freeway interchanges are under the jurisdiction of Caltrans so the draft CMCP should provide guidance on how these freeway barriers will be overcome with specific project recommendations for active transportation improvements at all freeway interchanges in the city.

- The final North County CMCP should prioritize all remaining and un-finished projects that were identified during the North Corridor Public Works Plan (NC PWP) and seek ways to streamline implementation.

- The draft North County CMCP inventories and assesses existing and future conditions in each city. However, despite previously providing information to SANDAG staff, the assumptions used for "existing" and "planned" land use and transportation in the City of Carlsbad are not consistent with our adopted land use and transportation plans or policies (e.g., forecasted housing and roadway capacities). Predicting the effect of transportation plans or projects on land uses and land use planning is critical to developing context sensitive solutions for transportation projects. Therefore, utilization of the most recent planning assumptions is not only necessary but is required as specifically stated therein Government Code Section 65080. Furthermore, the land use assumptions for "uses, residential densities, and building intensities within the region" (as required by Government Code Section 65080 (b)(2)(B)(i)) should also be the same, as that provided to the State Air Resources Board (as required per Government Code Sections 65080 (b)(2)(H and J) in estimating and analyzing GHG from the RTP and the effect on growth and whether the effects of that growth would be significant in the context of the region's plans, natural setting, and growth patterns.

- The draft North County CMCP identifies new policies, programs, and projects that were not included in the RTP or the NC PWP. The North County CMCP seems to create a funding requirement for some future activity that is reasonably foreseeable and/or an irrecoverable commitment to specific program or construction project. As of this writing, it is unclear what procedures related to CEQA apply to the adoption of the North County CMCP. If the scope of the North County CMCP is a "project" as defined by CEQA (and NEPA), then the City of Carlsbad will need to be consulted as a Responsible Agency per CEQA Guidelines Section 15096. As such, the Lead Agency (i.e., SANDAG) should consider whether the project is covered by a previous environmental review. To determine whether a project can tier from a certified program EIR, the Lead Agency should consider whether the later project (Public Resources Code Section 21068.5) is consistent with the program for which the original EIR was prepared and certified; is consistent with applicable land use plans and zoning in which the later project would be located; and would not trigger the need for a subsequent or supplemental EIR. In this instant, there would need to be an evaluation of impacts to existing Land Use Plans, and the lack of a reasonable range of alternatives that show what would occur if funding or land use assumptions for the new projects have not been prepared.

- The draft North County CMCP only lists potential projects; it does not show potential alignments, right of way needed or coordination with specific agencies. More information needs to be provided on project implementation phasing (both short-range and long-range improvements), unfunded projects and various funding mechanisms that can bridge the unfunded gaps.

- Carlsbad respectfully requests that SANDAG support the city's service bureau requests as efficiently as possible. Further delays in completion of the regional travel demand model could adversely impact our rezone schedule and jeopardize our ability to timely meet our Housing Element program requirements, thereby potentially placing our HCD housing element certification at risk. Additionally, the city requests that future decisions to update the 2021 Regional Transportation Plan respect the fact that Carlsbad and other local jurisdictions have been waiting on the availability of the regional model for local projects for some time and that further delays could result in additional liability, time, and costs for member agencies.

If you have any questions or need additional information, please contact Jeff Murphy, Community Development Director at Jeff.Murphy@carlsbadca.gov for land use related items or Tom Frank, Transportation Director/City Engineer, at tom.frank@carlsbadca.gov for mobility related items.

Sincerely,

Tom Frank
Transportation Director/City Engineer

c: Paz Gomez, Deputy City Manager, Public Works
Gary Barberio, Deputy City Manager, Community Services
Ron Kemp, Assistant City Attorney
Jeff Murphy, Community Development Director
Eric Lardy, City Planner
Scott Donnell, Senior Planner
Jason Geldert, Engineering Manager
Nathan Schmidt, Transportation Planning and Mobility Manager

City of Oceanside Bicycle and Pedestrian Committee
BikeWalk Oceanside
Phone: 619-200-6133 • E-Mail: lichtermanti@gmail.com

July 18, 2025

Board of Directors
Regional Planning Staff
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, CA 92101

Subject: Comments on Draft 2025 SANDAG Regional Plan

Dear SANDAG Board and Staff,

The Oceanside Bicycle and Pedestrian Committee is a citizen's advisory committee whose role is to advise the City on programs, projects, and policies which improve bicycling and walking in the community. The Committee's membership includes over 90 Oceanside residents who are concerned about bicycling and walking infrastructure and opportunities. Our goals are to promote bicycling and walking in the community for health, recreation, and transportation, to promote bicycle and pedestrian safety, and to improve and increase bicycling and pedestrian facilities.

The Committee has reviewed the Draft Regional Plan's Appendix A, Table A.1, North County Subregion Projects, with regard to Active Transportation. The Committee strongly supports the Oceanside- and Oceanside-area projects from the Plan listed in the table on the next page. All of these projects support Committee goals of improvements to major bikeways and improving cycling and walking infrastructure and inter-community connections.

The Committee would like to make the following comments on each of these projects:

AT019, Coastal Rail Trail Oceanside (Oceanside Blvd. to Cassidy)
The Coastal Rail Trail, along with the Inland Rail Trail, are our Committee's highest priority projects for improvement and completion. Please note that the City has recently completed a specific alignment study for this segment of the Coastal Rail Trail, and requests that SANDAG work with City staff to ensure the Community's preferred alignment is developed for this project.

AT036, Inland Rail Trail (Melrose to the coast)

The Inland Rail Trail, along with the Coastal Rail Trail, are our Committee's highest priority projects for improvement and completion. In particular, the Inland Rail Trail project has been on the books since 1995, when the five communities along the corridor agreed by Memorandum of Understanding . . .

> *. . . to create a multi-modal transportation facility which will help these communities achieve a higher quality of life by promoting alternative transportation opportunities, reducing automobile trips, improving air quality, reducing congestion, providing recreational opportunities, and increasing access to desired North County destinations.*[1]

It should be noted that completion of the Inland Rail Trail will have been on the books for **40 years** if SANDAG's current projected Phase Year of 2035 is met. This is a long time for the communities on the corridor to wait for a bike trail project to be completed. We respectfully request that SANDAG work to expedite this project. The City is just now completing studies for the preferred alignment for the IRT in Oceanside and we trust that SANDAG will use that preferred alignment in advancing this important project.

Project ID	Phase Yr	Project Category	Project Name	Project Descript.	Project Limits	Cost ($2024) Millions
AT019	2035	Active Transport. Off-Street Bikeway	Coastal Rail Trail Oceanside	Early Action Program (Tier 2), Local Bike Plan	O'side Blvd. to Cassidy	$6
AT036	2035	Active Transport. Off-Street Bikeway	Inland Rail Trail: Vista to Oceanside	Early Action Program (Tier 2), Regional Bike Plan, Safety Focus Network	Melrose to the Coast	$98
AT082	2050	Active Transp. On-Street and Off-Street Bikeway	San Luis Rey River Trail	Regional Bike Plan, Upgrade Existing Bikeway	Santa Fe to I-15	$95
AT091	2050	Active Transp. On-Street and Off-Street Bikeway	Camp Pendleton Trail	Regional Bike Plan, Safety Focus Network, Upgrade Existing Bikeway	Oceanside to San Clemente	$135
AT108	2050	Active Transp. On-Street Bikeway	Coastal Rail Trail Segment 1 ALT	Local Bike Plan, Safety Focus Network, Upgrade Existing Bikeway	North end of current trail to Tyson	$7
AT153	2050	Active Transp. On-Street Bikeway	San Luis Rey River to Coast	Safety Focus Network, Systemic Safety Network, Upgrade Existing Bikeway	Douglas to the Coast	$35

[1] Memorandum of Understanding between the North San Diego County Transit Development Board and the City of San Marcos, City of Escondido, City of Oceanside, City of Vista, and San Diego County, February 16, 1995.

AT082, San Luis Rey River Trail (N. Santa Fe to I-15)
This project would extend the current, heavily used San Luis Rey River Trail from its terminus near N. Santa Fe and Highway 76, out to I-15. This long-term project would provide a needed safe alternative for cyclists and pedestrians to use vs. the current bike lanes on Highway 76, where highway traffic speeds reach 65 mph or more.

AT091, Camp Pendleton Trail (Oceanside to San Clemente)
This project would provide a viable alternative for cyclists and pedestrians on the west side of Interstate 5. Currently, cyclists must use either the shoulder of I-5 between Oceanside and Las Pulgas, or internal base roads for this segment, if they have a valid Base Pass. The Base has also been known to stop issuing Base Passes on occasion. Providing this project would create a permanent safe and stress-free link between Oceanside and San Clemente for cyclists.

AT108, Coastal Rail Trail Segment 1 ALT (approx. north end of current trail to Tyson)
This project would improve a portion of the Coastal Rail Trail which currently operates partly on local streets where traffic conflicts can occur.

AT153, San Luis Rey River to Coast (Douglas to the Coast)
This project would provide improvements to the heavily-used San Luis Rey River Trail between Douglas and the coast. The current trail has had some erosion issues along the edges and is in need of repaving. City crews try to keep up with the holes that develop between the trail edge and the concrete/rip-rap embankment.

Additional Project Request
In addition to the above projects which our Committee strongly supports, we request that SANDAG work with Caltrans on an additional project which will connect two parts of our community that were separated by I-5. Currently, cyclists in south Oceanside who wish to travel to the Pacific Coast Plaza (Walmart and other major stores) east of I-5 and north of Highway 78 have an extremely difficult and steep route to get there. We have discussed this issue with David Calkins, Caltrans District 11's Complete Streets Program Manager. We proposed that Caltrans study the possibility of using some Caltrans right-of-way between Soto Street and the Highway 78-to-I-5 merge to create a far easier connection to Pacific Coast Plaza. This could be a relatively inexpensive way to re-link two important parts our our Community. We request that SANDAG include this as a future project.

Thank you for your consideration of our comments on the Draft SANDAG Regional Plan.

Sincerely,

Tom Lichterman
Chairman, Oceanside Bicycle and Pedestrian Committee

cc: Oceanside City Council
Oceanside City Manager
Oceanside Bicycle and Pedestrian Committee Members
Teala Cotter, City Traffic Engineer
Kris Martinez, City Active Transportation Coordinator

Veronica Morones
City Planner
Development Services
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4548 Fax: 760-839-4313

July 18, 2025

Via email: regionalplan@sandag.org

Subject: Draft 2025 Regional Plan – Public Comments

Dear Madam/Sir:

The City of Escondido ("City") appreciates the opportunity to provide feedback on the Draft 2025 Regional Plan ("Plan"). The City previously submitted comments during the Initial Concept phase of the Plan in early 2024. While many of the comments and concerns appear to have been addressed in the most recent version of the Plan, representatives from the City would like to respectfully submit the following comments and questions on Escondido-specific projects and on the Plan more generally.

Comments on SANDAG's Escondido Proposed Projects

Appendix A of the Plan identifies 52 projects and programs associated with the City of Escondido. Of the 52 projects, 24 are existing or under construction; 13 are assumed to be implemented by 2035; and 15 are assumed to be implemented by 2050, contingent on continued need and available funding. After review of the Plan, staff have the following comments and concerns.

1. **Mixed Rapid Route 483 (Project ID: TL046)**

On October 2023, the SANDAG Board of Directors approved $26.6 million for the development of new rapid routes, including Rapid 483 which will create a connection from Temecula to San Marcos and Carlsbad (Pg. D.3, Appendix D of the Draft 2025 Regional Plan). Since its project launch, the City has consistently expressed the desire to have Rapid 483 service the Escondido Transit Center ("ETC"). Staff are deeply concerned that there is funding allocated for the design of a cross-regional bus line that passes by--but does not stop--in Escondido. Page A.10 of Appendix A introduces the bus line by saying that the line will "connect San Marcos to Riverside County." The appendix further cements the idea by having stops at Palomar College via I-15, SR 78, and CSU San Marcos. While creating connections to colleges and universities is important, it is critical to remember that the San Diego region is an employment and tourist hub that attracts Riverside, Orange, and LA County residents and SANDAG specifically identifies Escondido as the Gateway for the San Diego Region (Page 22, Appendix T of the 2021 Regional Plan).

Escondido is the 4th largest City in the region, by population, with the 3rd largest RHNA allocation (Pg. 4, SANDAG RHNA Plan), surpassing RHNA allocation of the unincorporated San Diego County. Creating a line from Riverside County to the coast, as expressed in Appendix D, and not including Escondido is concerning and an enormous missed opportunity, as well as an equity concern given the socio-economic makeup of Escondido. The City is working with NCTD on the redevelopment of the ETC, in an effort to facilitate multi-modal inter- and intra-regional travel. Several blocks around ETC are in the permitting process for redevelopment for over 300 housing units.

A connection from Riverside County to Escondido via the Rapid 483 will support ridership within the City and regionally since Rapid 235 to Downtown San Diego begins in Escondido, and promote economic development by providing a transit line connecting the two counties. Furthermore, Rapid 483 has the potential to reduce bottlenecks experienced along the I-15 and SR-78 during traffic peak hours. The City of Escondido respectfully asks that the Draft 2025 Regional Plan be revised to include Rapid 483 service to ETC.

2. **Proposed Bikeways**

Table A.1 of Appendix A of the Plan lists a collection of 8 active transportation projects to take place at the City of Escondido. The list appears to be a mix of projects from the City's 2012 Bikeway Plan plus additional projects unknown to City staff. Table A.1 and Table A1.2 identify all bikeway projects (Project ID: AT064, AT088, AT097, AT114, AT121, AT137, AT151, AT177) to take place during the latter implementation phase of the Plan (2050) and not as a near-term action within the 2035 build. Per the Plan, projects in the 2050 phase are uncertain since they are highly dependent on available funding. The Plan's proposed project list ***did not*** fully come from the City nor does it align with the timing of the locally adopted Mobility and Infrastructure Element or its Capital Improvement Projects program. Given that local jurisdictions maintain land use control and manage design standards for bikeways within their jurisdiction, Staff request closer coordination so SANDAG can ascertain the City's preferred network. Staff also request that bikeway projects within the jurisdiction be moved to the near-term implementation of the Plan.

The City's Mobility Element update is anticipated by the end of 2025. As part of the project, the City will identify opportunities for road reconfigurations and diets to prioritize active transportation. The City is also considered to be in the top 50% of the California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0 and has the 3rd largest RHNA

allocation in the Region, making bike lanes critical for the reduction of VMT and greenhouse gas emissions.

Additionally, staff would like to note that project AT03-97 includes a section of roadway slated for rapid bus. Staff do not believe a rapid bus and bike lane should coexist on the same route since it can present a hazard and discourage bikers from using the lane.

3. **Network Performance**

Appendix N of the Plan provides performance results if the Plan were to be fully executed and implemented. Table N4.1 of the plan provides performance measure results by jurisdiction and only by AM peak period and not PM. For the Escondido to Downtown corridor, almost all performance outcomes in 2050 are ***higher*** than the base year (2022). In other words, it appears Escondido residents would experience higher transit and auto commute times to downtown if the Plan were to be implemented, while carpool would only experience a 2-minute decrease. For all other routes, Escondido experiences little to no benefits while other cities experience significant reductions to their resident commutes. Staff request clarification and additional information in regards to the expected network performance and details on how Escondido would anticipate to benefit from the Plan. Further, staff would like to see performance measures for the PM peak hour and not just AM since the I-15 and SR-78 traffic greatly impact the City in the evenings.

4. **SPRINTER Light Rail (Project ID: TL006)**

Historically staff have been informed that the terminus of the SPRINTER line extension would take place after 2050. As the Plan is written, SPRINTER improvements are set during the 2035-2050 timeframe. Staff requests SANDAG continue to work with City staff on the presumed expansion, as feasibility appears unknown. Any details as to how this can be implemented should be made in collaboration with the City.

Additionally, the City encourages SANDAG to explore interim transit solutions along the Centre City Parkway corridor including high-frequency bus services from the NCTD transit center to the North County Mall.

5. **Flexible Fleets (Micro transit and NEV)**

City staff appreciate the Plan's expansion in Escondido's micro transit boundaries and encourage a larger area to be incorporated in the final version of the Plan. Additionally, the City of Escondido requests to be included in the NEV operations category on Appendix A, page A.24, given the recent sidewalk expansion and improvements along its downtown corridor.

In 2023, the City conducted a Community Transportation Needs Assessment ("CTNA") which was funded by the California Air Resources Board and the California Energy Commission's Clean Mobility Options Program. The CTNA identified opportunities to incorporate flexible fleets into the City's transportation network. City staff recommends SANDAG review the CTNA (Attachment A) and align any future micro transit efforts with the CTNA. As part of the Mobility Element update, the City will identify opportunities for road reconfigurations and diets to prioritize active transportation. We invite SANDAG to review the updated Mobility Element once finished (anticipated late 2025) and work with the City to ensure future micro transit efforts align at the local level.

6. **Managed Lanes Connector I-15 and SR-78 (Project ID: CC071)**

The City requests SANDAG work with and involve staff in the reconfiguration and implementation of the I-15 and SR-78 Managed Lanes Connector project. If possible, please provide additional details on current efforts and on-going status.

7. **Rapid 491 (TL042)**

In the Plan, Arterial Rapid Route 491 travels between Nordahl Marketplace to East Escondido via Downtown Escondido. Staff would like to highlight that while the City supports rapid bus routes, innovative mobility, and technologies, the City would prefer such technologies be used in lieu of bus only lanes as there is limited capacity within the arterial and minor roadways. The City encourages SANDAG to work with staff during the development and implementation of the project.

8. **Dedicated Lanes**

The Plan should seek to avoid repurposing vehicle lanes for bus-only lanes along congested corridors. The City is open to exploring transportation system management strategies and technologies such as priority traffic signal timing for bike and bus and other innovative strategies that result in safer roadways and reduce overall travel times. The City continues to strongly recommend that designating lanes as Transit-only on Second and Valley is not the preferred solution. Isolating lanes for "transit use only" is an undesirable use of valuable right-of-way. The City prefers technology to give Transit priority rather than designated a transit-only lane.

9. **Regional Growth Forecast**

The City would like clarification as to how the Series 15 Forecast squared with California Department of Finance forecast; SANDAG's projection shows regional population peaking around 2040 (decreasing thereafter) while DOF forecasts peak population in 2050 (decreasing thereafter). The Plan shows Escondido's population increases by only 398 or 0.25% by 2050 and it is unclear how projected acceleration in jobs and housing growth will be supported by a declining population.

General Comments Not Directly Related to Escondido.

a. Figure A.11 of Appendix A (Active Transportation Network 2022 map, Page A.91) only shows off-street class for bike routes and does not include any existing Class 2 bike routes. Please revise map to include Class 2. Same comment for the 2035 Map (Figure A.12).
b. Please consider including San Diego's ports of entry to pg. 8 of the Plan. The section introduces the region and discusses sharing the border with Mexico, but does not show the point-of-entry. Page 24 of the Plan speaks to Otay Mesa East 2, but there is no mention of Otay Mesa East or where ports are located.
c. Page 9 of the Plan includes repeat language in the bottom 2 paragraphs. Consider compilation or revision.
d. Appendix I presents costs and revenues "in billions of $2024", whereas the Plan depicts cost in "millions of 2024$". Costs are confusing as presented and consistency across documents would be helpful and facilitate transparency.
e. Table A.1 of Appendix A of the Plan does not delineate between existing and proposed projects. Please consider including information to indicate whether a project is existing or new. Please also consider creating a geospatial map of projects by subregion or city.
f. Appendix N, Page N.43 of the Plan only shows performance during AM Peak periods. SANDAG should be fully transparent with the Plans performance by providing information on PM Peak periods also.

The City of Escondido appreciates the opportunity to provide feedback on the 2025 Draft Regional Plan and thanks SANDAG for its continuous efforts to improve mobility across the region. The City encourages SANDAG to work with staff now and during the development and implementation of the Plan.

Sincerely,

Veronica Morones
City Planner

Attachment A: City of Escondido Community Transportation Needs Assessment (2023)

CLEAN MOBILITY OPTIONS
VOUCHER PILOT PROGRAM (CMO)

CITY OF ESCONDIDO COMMUNITY TRANSPORTATION NEEDS ASSESSMENT

SEPTEMBER 2024

Table of Contents

Acknowledgments **1**

Executive Summary **2**

Project Overview 2

Transportation Access Data Analysis 3

Community Engagement 3

Recommended Solutions 3

Introduction **5**

Project Background 5

Project Team 5

Fehr & Peers 5

Alta 5

Vista Community Clinic 6

Escondido Education COMPACT 6

Project Study Area 6

Community Transportation Needs Assessment 8

Project Timeline 8

Purpose of this Report 8

Transportation Access Data Analysis **9**

Median Household Income and Poverty Rates 11

Number of Jobs and Commute Rates 13

EPA Walkability Index 15

AllTransit™ 17

Housing and Transportation Index (H+T Index) 20

Transportation Injury Mapping System (TIMS) 23

People for Bikes Bicycle Network Analysis (BNA) 25

Community Engagement **27**

Community Survey Development and Administration 27

Survey Development 27

Survey Distribution and Collection 28

Community Survey Findings 29

Demographics 29

Active Transportation Barriers and Opportunities....29
Transit Priorities....30
Destinations of Interest....30
Current Transportation Behavior....30
Possible Future Transportation Behavior....31
Community Engagement Activities....32
Community Pop-Up Event....32
Community Presentations....34
Public Workshop....35
School-Focused Outreach....36
Interactive Feedback Map....37
Limitations and Lessons Learned....39
Discussion and Solutions....40
Transportation Access Data Analysis....40
Community Engagement....40
Recommended Solutions....41
Next Steps....42

Appendices

Appendix A: Outreach Materials

Appendix B: Community Survey

Appendix C: Community Survey Results

List of Figures

Figure 1: Community Transportation Needs Assessment (CTNA) Study Area 7
Figure 2: Median Household Income by Census Tract (5-Year estimate 2017-2021) 12
Figure 3: Number of Jobs by Census Tract (Year 2020) 14
Figure 4: National Walkability Index (Smart Location Map Version 3.0, 2021) 16
Figure 5: AllTransit™ Performance Score by Block Group (City of Escondido) 18
Figure 6: AllTransit™ Performance Score Comparison 19
Figure 7: Housing + Transportation Index (Job Score) 21
Figure 8: Housing + Transportation Index (Compact Neighborhood Score) 22
Figure 9: Collision Heatmap (TIMS 2018 - 2022) 24
Figure 10: People for Bikes Bicycle Network Analysis (BNA) 26
Figure 11: Public Schools in Escondido 38

List of Tables

Table 1: Transportation Access Data Requirements 10
Table 2: Median Household Income Distribution (1-Year ACS 2022) 11
Table 3: Inflow/Outflow Job Counts (1-Year ACS 2022) 13
Table 4: Commute Characteristics (1-Year ACS 2022) 13
Table 5: AllTransit™ Performance Score Insights 18
Table 6: Housing and Transportation Index (H+T®) Insights 20
Table 7: City of Escondido Collision Profile (TIMS 2018-2022) 23
Table 8: BNA Score Summary 25

Acknowledgments

The City of Escondido would like to thank the residents, business owners, and interested stakeholders who took the time to shape and participate in the Transportation Needs Assessment process. The City would also like to thank the following organizations for their contributions to this process:

- Escondido Education COMPACT
- Vista Community Clinic
- Park Avenue Community Center
- Escondido Union School District
- Escondido Union High School District

Thank you to the California Air Resources Board (CARB) and California Energy Commission (CEC) for providing essential funding toward clean transportation investments in disadvantaged communities through California Climate Investments (CCI) and the Clean Transportation Program. Clean Mobility Options is part of CCI, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in under-served communities, and CEC's Clean Transportation Program, which is investing more than $1 billion to accelerate the deployment of zero-emission transportation infrastructure and support in-state manufacturing and workforce training and development.

Executive Summary

Project Overview

The Clean Mobility Options Voucher Pilot Program (CMO) is a statewide initiative funded by the California Air Resource Board (CARB) through California Climate Investments (CCI) that provides funding for zero-emission shared mobility options to under-resourced communities in California. CMO is available throughout California to all eligible disadvantaged and low-income communities and tribal governments to increase access to safe, reliable, convenient and affordable transportation options.

The City of Escondido was awarded a $100,000 grant to conduct a Community Transportation Needs Assessment (CTNA) through the CMO. The CTNA, hereinafter referred to as "project," seeks to identify the unmet community mobility needs of disadvantaged and low-income communities in Escondido and develop sustainable solutions in partnership with community members. Specifically, the project has six primary objectives:

1. Understand how community members currently travel
2. Identify unmet community transportation needs as well as existing mobility barriers
3. Determine what new or expanded mobility services would be preferred and utilized by community members
4. Improve access to economic opportunity, medical facilities, schools, parks, grocery stores, transit stops, and other critical destinations
5. Actively engage historically marginalized communities in the transportation planning process
6. Reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions

The project study area consists of all AB 1550-designated low-income communities within the City of Escondido. According to 2022 American Community Survey (ACS) Five-Year Estimates, the 22-square mile study area is home to approximately 116,000 residents. The study area is primarily located in central Escondido, stretching west across Interstate 15 (I-15) to Hidden Trails Road in the east (see **Figure 1)**. The community is made up of a large variety of land use types, ranging from industrial and commercial in the western portion and a mix of residential uses in the north, south, and eastern portions, including medium-density multifamily, single-family residential, mobile home, and residential agriculture. The topography is flat to hilly with roads that cater to efficient, speedy transport of motor vehicles. Pedestrian and bicycle facilities are discontinuous and in need of enhancements.

The goal of the project was to identify clean mobility options that help community members overcome transportation challenges, while also providing environmental benefits. The project was conducted in accordance with the CMO program-provided methodology for preparing a CTNA. The required elements for implementation of this project are described in the following sections and include a transportation access data analysis, community engagement, and preparation of this summary report.

Transportation Access Data Analysis

Analysis of Escondido's transportation and mobility reveals significant disparities, particularly affecting lower-income neighborhoods where median household incomes are 30% below the City average. These areas experience reduced car ownership and a greater dependence on public transportation. The City's All-Transit Performance Score of 5.2 out of 10 indicates a need for enhanced transit accessibility and connectivity. In fact, nearly 72% of residents commute to work alone using their personal vehicles. Additionally, many jobs and services are concentrated in downtown Escondido, where many low-income residents live.

Walkability varies widely, with some downtown areas rated as "Most Walkable," while most Census tracts in the CTNA Study Area are only average, indicating a need for alternative transportation options (see **Figure 4)**. The Housing and Transportation Index shows few neighborhoods as "Location Efficient," leading to longer travel times, higher transportation costs, and limited access to opportunities (see **Figure 7)**. Additionally, the high incidence of traffic collisions in downtown areas highlights the urgent need for improved safety and mobility options in these neighborhoods (see **Figure 9)**.

For detailed information on the data utilized in the Transportation Access Data Analysis, please refer to **Table 1** located in the corresponding chapter of this report.

Community Engagement

Community feedback from public workshops and surveys highlighted residents' key transportation concerns and preferences. The predominant transportation mode among survey respondents was driving alone; however, residents showed significant interest in public transit options, assuming these options become more accessible and affordable. Residents demonstrated a particular preference for light rail, bus, and microtransit/shuttle as potential options. Notably, over 70% of respondents support City investment in on-demand microtransit or traditional fixed-route transit. The survey also identified gaps in familiarity with certain transportation options, including carshare, vanpooling, and shuttle/microtransit - indicating a need for further education and outreach.

The survey also revealed the greatest barriers felt by community members while walking and biking in Escondido. Barriers to walking include poor (or lack of) pedestrian infrastructure, personal safety concerns, lengthy distance between origin and destination, and fear of traffic collision or reckless driving behavior. Similarly, barriers to biking include fear of traffic collision or reckless driving behavior, poor (or lack of) bicycle infrastructure, and personal safety concerns. When asked what is most important when it comes to taking transit, respondents emphasized safety as the top priority, followed by reliability and convenience.

Recommended Solutions

Reviewing available data and community inputs reveals significant transportation disparities in Escondido, particularly affecting low-income residents. These disadvantaged areas face limited alternative transportation modes, with low public transit utilization and a high reliance on personal vehicles.

Data analysis, community outreach, and successful examples in San Diego area - such as Go'Side shuttle service in Oceanside, Beach Bug neighborhood shuttle in Pacific Beach, and FRED shuttle service in downtown San Diego - suggest that clean mobility options such as electric shuttles could address these challenges. Microtransit systems, such as circulators and shuttles, offer flexible, on-demand transportation that bridges the gap between traditional public transit and private car usage. These systems reduce traffic congestion and parking demand, enhance accessibility, and connect residents and visitors to key destinations - supporting local economies and promoting environmental sustainability through reduced emissions.

By expanding transportation choices, improving connectivity, and reducing reliance on personal vehicles, these initiatives can significantly enhance the quality of life for residents, particularly in underserved communities.

Introduction

Project Background

As part of its commitment to implementing clean transportation strategies and increasing transportation equity in Escondido, the City of Escondido (City) applied for and received a $100,000 Community Transportation Needs Assessment (CTNA) Voucher for the Clean Mobility Options Voucher Pilot Program (CMO). The purpose of this assessment (CTNA or Project) is to identify the unmet mobility needs of disadvantaged and low-income communities in Escondido and develop sustainable solutions in direct partnership with community members. The CTNA goals and objectives include:

1. Understand how community members currently travel
2. Identify unmet community transportation needs as well as existing mobility barriers
3. Determine what new or expanded mobility services would be preferred and utilized by community members
4. Improve access to economic opportunity, medical facilities, schools, parks, grocery stores, transit stops, and other critical destinations
5. Actively engage historically marginalized communities in the transportation planning process
6. Reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions

Project Team

The Project Team consists of the City of Escondido as the lead agency, with support from Fehr & Peers, Alta, Vista Community Clinic, and Escondido Education COMPACT.

Fehr & Peers

Fehr & Peers is a transportation consulting firm that is known for being passionate about transforming transportation through innovation and creativity. The firm derives inspiration by partnering with communities to understand and shape local transportation futures objectively, and tailored to diverse needs. Fehr & Peers combines its advanced expertise with curiosity, humility, and initiative to deliver implementable, data-driven solutions that reinforce community values.

Fehr & Peers is the primary consultant and led a team comprised of industry specialists for the successful completion of this CTNA.

Alta

Alta is an active transportation consulting firm dedicated to creating active, healthy communities through planning, landscape architecture, engineering, and education/encouragement programs. Their work is known for bringing about positive change by creating places that are geared towards moving people rather than cars, connecting community members to daily needs, and empowering every person to live an

active, healthy life. As a global leader in mobility innovation, Alta is dedicated to working across disciplines to address social justice, safety, and environmental resilience.

Alta led the school-based outreach that was incorporated into the public engagement effort for the CTNA.

Vista Community Clinic

Vista Community Clinic (VCC) is a nonprofit 501(c)(3) community-based organization (CBO) in the Escondido community that conducts outreach, education, capacity building and advocacy both to the general low-income population, and to specific sub-populations - including migrant and seasonal workers, youth, persons at risk for or living with HIV, young parents (particularly those with justice and/or foster system involvement), and youth interested in addressing youth substance and tobacco use.

VCC assisted with public engagement activities for the CTNA.

Escondido Education COMPACT

Escondido Education COMPACT, or COMPACT, is a CBO with an active, long-standing partnership with the Escondido Union School District (EUSD) and the Escondido Union High School District (EUHSD). COMPACT's mission is to create and implement high quality programs and services for individuals to reach their fullest potential.

COMPACT assisted with public and school engagement activities for the CTNA.

Project Study Area

The study area for this project consists of all AB 1550-designated low-income communities within the City of Escondido, indicated by Census tracts: 201.05, 201.07, 201.08, 201.09, 202.02, 202.06, 202.07, 202.08, 202.09, 202.10, 202.11, 202.13, 202.14, 203.05, 203.08, 203.09, 203.12, 203.13, 204.04, 205.00, 206.01, 206.02, and 207.07. According to 2022 American Community Survey (ACS) Five-Year Estimates, the 22-square mile study area is home to approximately 116,000 residents. **Figure 1** shows a map of the CTNA Study Area.

While a comprehensive network of roads connects the various areas, car ownership and car availability may be a financial burden for many residents in low-income areas, limiting access to job opportunities, education, and essential services. Expanding access to clean mobility options can offer greater independence and mobility for those who may not have reliable personal transportation. Reduced reliance on gas-powered vehicles translates to lower transportation costs, freeing up resources for other needs.

Additionally, efforts to implement clean mobility options in the project study area can improve connectivity to the City of Escondido Transit Center, which serves as a hub for public transportation, with access to the NCTD SPRINTER light rail line and BREEZE rapid bus routes, as well as several MTS Rapid buses (230 + 280/290) is an important matter.

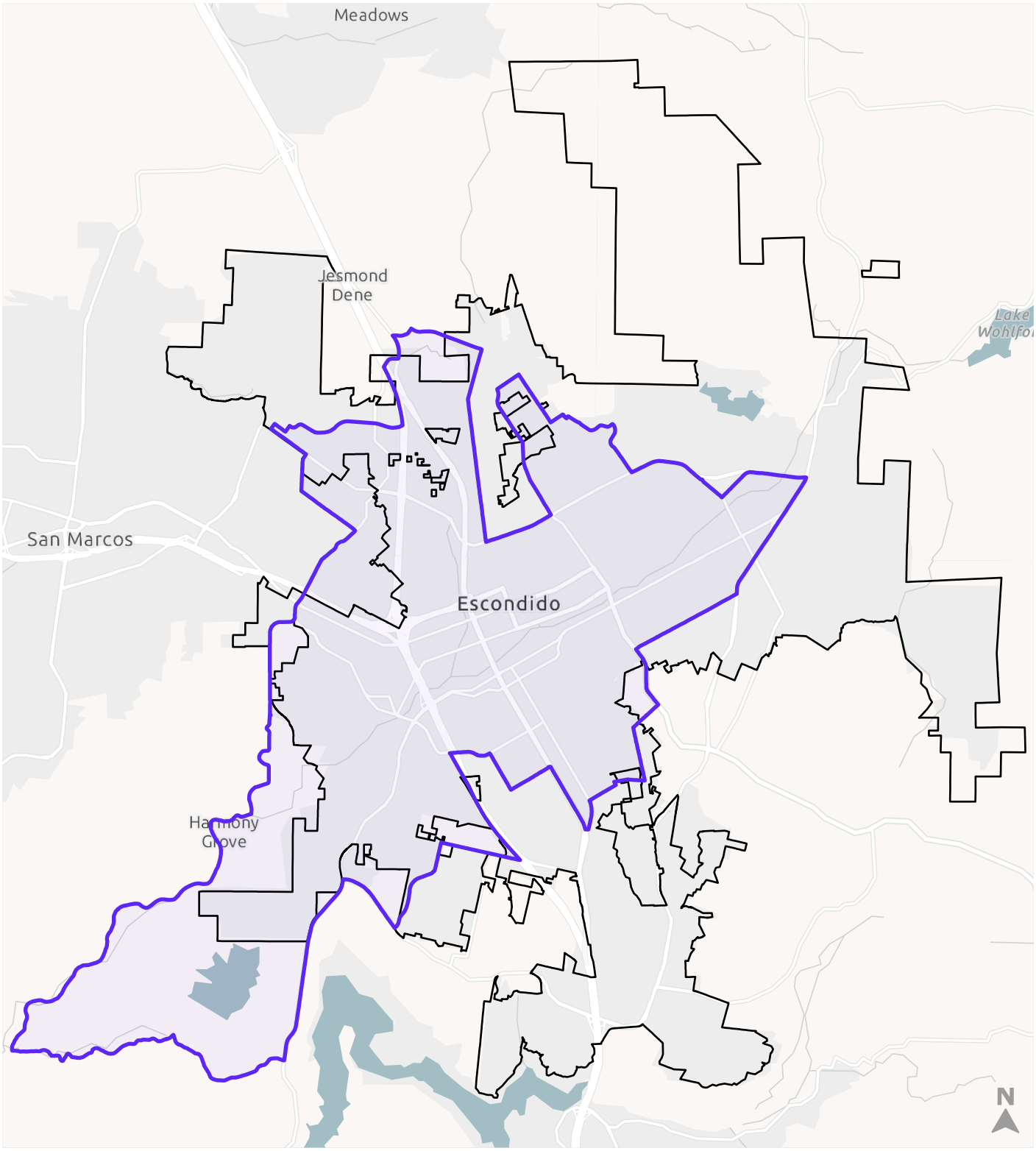


Figure 1

Community Transportation Needs Assessment (CTNA) Study Area

Community Transportation Needs Assessment

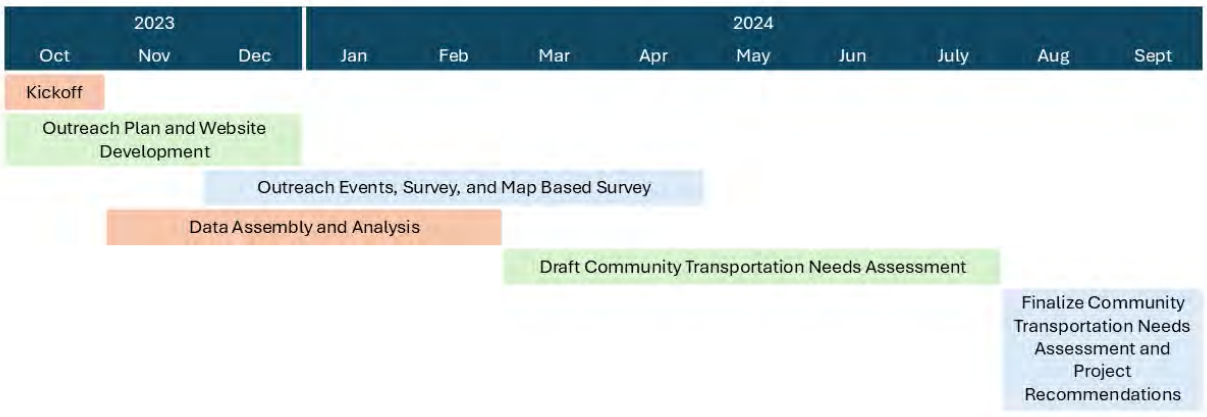
The California Air Resources Board (CARB) and the California Energy Commission (CEC) have dedicated funding to assist eligible applicants in conducting CTNAs under the Clean Mobility Options Voucher Pilot Program (CMO). CMO is a statewide initiative that provides funding for zero-emission shared mobility options to under-resourced communities in California. CMO is available throughout California to all eligible disadvantaged and low-income communities and tribal governments, to increase access to safe, reliable, convenient and affordable transportation options. There are three (3) key requirements of a CTNA:

1) Transportation Access Data Analysis
2) Community Engagement
3) Summary Report

CTNAs allow government entities to better understand how people currently travel, as well as mobility obstacles faced by community members, particularly those who do not have access to a vehicle. CTNAs include a review of existing demographic and socioeconomic data, extensive community outreach, and a community survey to help identify existing mobility needs and preferences for future transportation projects.

Project Timeline

The City was awarded the CTNA Voucher in October 2023 for a 12-month project period ending in September 2024. A general timeline of activities conducted for the Project is shown in the timeline below.



Purpose of this Report

This report was prepared to outline the steps taken by the Project Team to complete the CTNA, conduct community outreach, summarize key findings, and share lessons learned. This report is intended to provide background information to help inform the future expansion of mobility options in the CTNA Study Area.

Transportation Access Data Analysis

The following chapter provides the data collection and analysis necessary for Transportation Access Data Analysis to identify and assess the existing transportation access conditions in the City of Escondido - by measuring accessibility, affordability, and reliability. The following describes each measure as described in the CMO Program Data Collection Guide.[1]

Accessibility - measures access to opportunities and vital services in a given area. For instance, an area where transportation options connect more seamlessly to jobs, education hubs and vital services like healthcare and food is deemed more accessible than an area that requires vehicles to access vital services.

Reliability - measures how much people can depend on different transportation options to safely and conveniently move around their community. For instance, an area can have plenty of transit nearby, but if it is constantly dirty, broken, or residents do not know about it, then it may not be reliable.

Affordability - measures the cost of mobility in comparison to people's income and other needs (healthcare, school, food, etc.) in the household.

This process aligns with the guidelines proposed in the Data Collection Guide for Community Transportation Needs Assessment, as outlined in the Clean Mobility Options Voucher Pilot Program. **Table 1** summarizes the resources used for this analysis.

[1] Clean Mobility Options Voucher Pilot Program Data Collection Guide for the Community Transportation Needs Assessment

Table 1: Transportation Access Data Requirements

Data	Measure	Source	Description	Year
Median Household Income	Affordability	US Census Bureau: Median Household Income by Census Tract, 5-Year Estimate (2017-2021) in 2021 Inflation-Adjusted Dollars,	Median household income and poverty rates within the community through Census data.	5-year data from 2017 to 2021, and 1-year data for year 2022
Number of Jobs, Inflow/Outflow of jobs	Accessibility	Census OnTheMap	Information on how many jobs are in a specific area. It also shows how many people commute in and out of a specified area for employment. This information can be useful to show how much people may rely on transportation when commuting to work.	Year 2020
EPA Walkability Index	Accessibility	EPA Smart Location Mapping Tool, Version 3.0	The EPA National Walkability Index is a nationwide geographic data resource that ranks block groups according to their relative walkability.	Year 2021
AllTransit™	Accessibility	Center for Neighborhood Technology	This resource provides an overall transit access score and detailed data on job accessibility, transit access, and equity	2013 National Transit Database
Housing and Transportation index	Accessibility Affordability	Center for Neighborhood Technology	This tool provides an accessibility and affordability index taking into account variations in transportation costs based on neighborhood characteristics.	
Collisions	Accessibility	Transportation Injury Mapping System	This tool maps collisions in an area over a period of time	Year 2018 to Year 2021
People for Bikes	Accessibility	People for Bikes Bicycle Network Analysis (BNA)	This tool measures how well bike networks connect people with the places they want to go	Year 2023

Median Household Income and Poverty Rates

Measure: Affordability

This indicator shows the median household income and poverty rates within the City of Escondido, as shown through Census data. Based on the most recent data available from American Community Survey (ACS), the City of Escondido has a Median Household Income of $87,664 (ACS 2022). Approximately 11.8% of the population is considered to fall under the poverty line as defined using the federal poverty thresholds or guidelines set by the US government. **Table 2** shows the Median Household Income distribution and compares it to the San Diego region and the state of California.

Table 2: Median Household Income Distribution (1-Year ACS 2022)

Income	City of Escondido	San Diego Region	California
Under $50K	28.1%	24.9%	27.9%
$50K to $100K	27.2%	25.5%	25.8%
$100K to $200K	31.5%	31.5%	28.2%
Over $200K	13.2%	18.1%	18.1%

Figure 2 illustrates the median household income distribution across Escondido's Census tracts. As the map reveals, income levels tend to be lower in low-income community areas. Specifically, the median household income in these neighborhoods ranges from approximately $29,292 to $94,078. The weighted average of the median household income by population is calculated at approximately $62k. This number is nearly 30% below the average median household income in the city of Escondido.

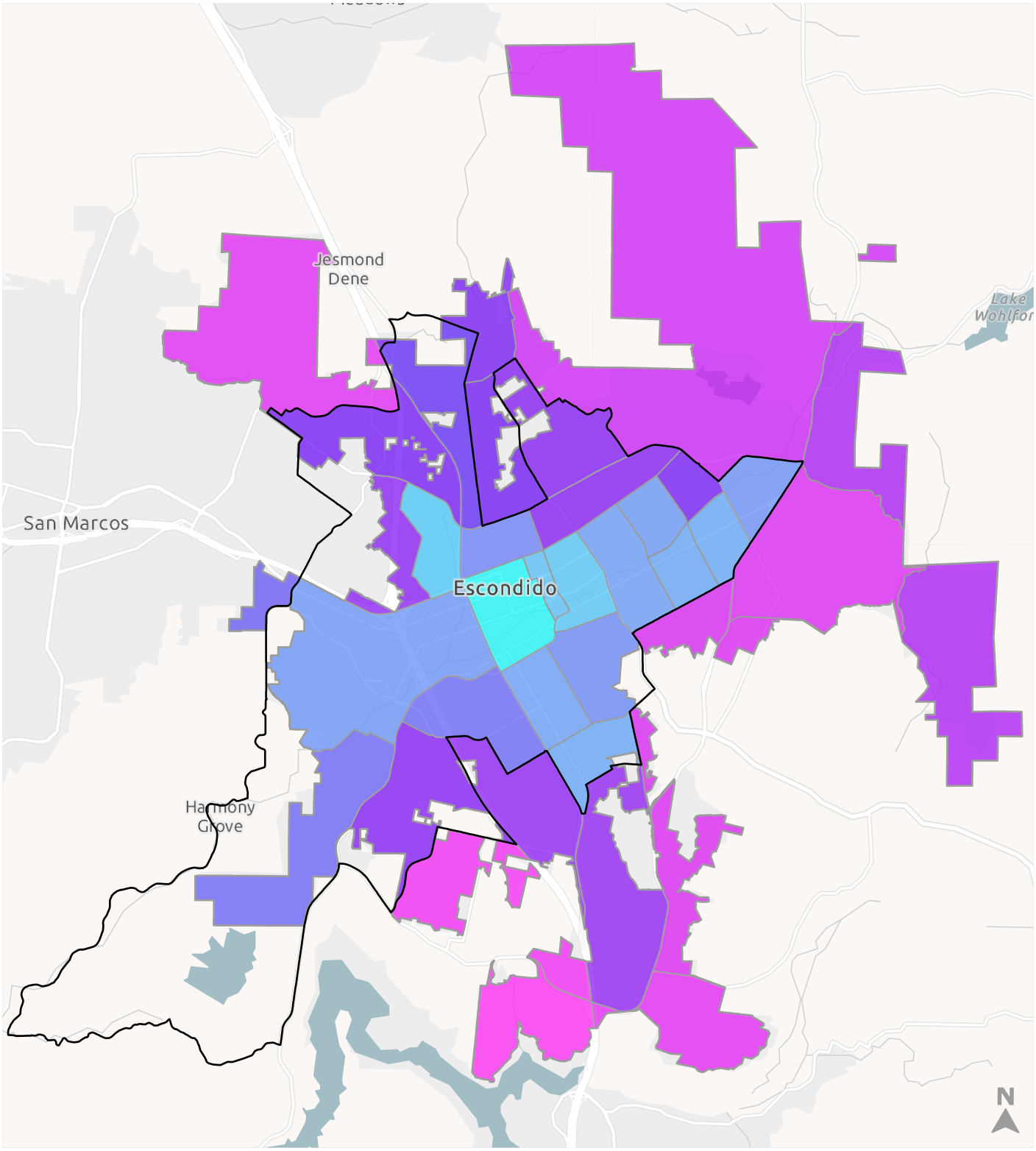


Figure 2

Median Household Income by Census Tract (Census Bureau)
5-Year Estimate (2017-2021) in 2021 Inflation-Adjusted Dollars

Number of Jobs and Commute Rates

Measure: Accessibility

This indicator shows the total number of jobs within the City of Escondido through Census data. **Table 3** shows the inflow/outflow job counts profile for the City of Escondido. Since people may work second jobs at or during their primary place of employment (like a plumber working deliveries or a babysitter answering phone calls), data is analyzed based on only 'Primary Jobs'.

Table 3: Inflow/Outflow Job Counts (1-Year ACS 2022)

Inflow/Outflow	Income	Count	Share
Inflow	Total Jobs in the City of Escondido	45,449	-
	Employed in the City of Escondido but living outside	34,272	75.4%
	Employed and living in the City of Escondido	11,177	24.6
Outflow	Total Employees in the City of Escondido	60,222	-
	Living in the City of Escondido but employed outside	49,045	81.4%
	Living and employed in the City of Escondido	11,177	18.6%

depicts the distribution of jobs across Escondido based on 2020 Census data. The map reveals a concentration of employment opportunities in the downtown area, located in close proximity to a low-income neighborhood.

Table 4 shows the commute characteristics in the City of Escondido based on the ACS 2022 (1-year) Census data. Based on this data, nearly 72% of the commuters drive alone (6% higher than rates in the San Diego-Chula Vista-Carlsbad, CA Metro Area). Less than 4% of commuters use Public Transportation, Walk, or Bike combined. Each of the three transportation modes will be reviewed in more detail in the next sections.

Table 4: Commute Characteristics (1-Year ACS 2022)

Inflow/Outflow	Count	Margin of Error
Car, Truck, or Van	81.8%	±1.9%
Drive Alone	71.6%	±3.1%
Carpooled	10.2%	±2.2%
2-person	7.1%	±1.6%
3-person	2.2%	±1.2%
4 or more person	0.9%	±0.8%
Public Transportation	1.2%	±0.7%
Walk	0.8%	±0.5%
Taxicab, Motorcycle, or Bicycle	1.7%	±0.9%
Work from Home	14.5%	±2.1%

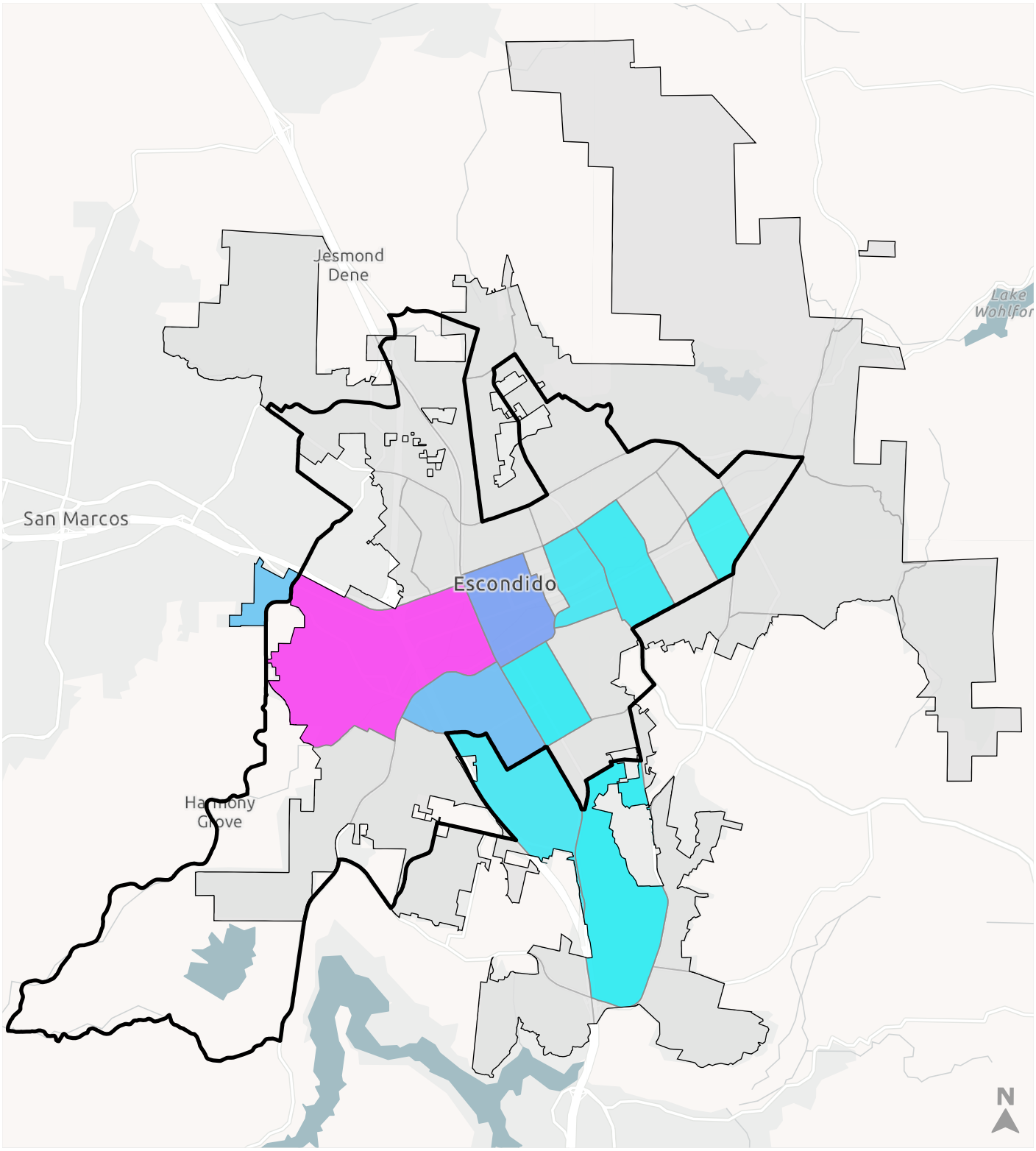


Figure 3

Number of Jobs by Census Tract
Source: Census OnTheMap Data, Year 2020

EPA Walkability Tools

Measure: Accessibility

The Smart Location Database developed by the US Environmental Protection Agency (EPA) summarizes more than 90 different indicators associated with the built environment and location efficiency, including density of development, diversity of land use, street network design, and accessibility to destinations, as well as various demographic and employment statistics.

EPA National Walkability Index provides walkability scores based on a simple formula that ranks selected indicators, from the Smart Location Database, that have been demonstrated to affect the propensity of walk trips. This Index dataset ranks each block group relative to all other block groups in the United States. The block groups were then assigned a rank from 1 to 20. A ranked score of 1 was assigned to the block groups with the lowest relative values influencing walking, and a ranked score of 20 was assigned to the block groups with the highest relative values influencing walking, with intermediate scores in between.

Figure 4 shows the national walkability index for the City of Escondido. Based on this data, block groups in the City rank between 3.3 to 18 with an average of 11.1 and a standard deviation of 3.2. While some areas might score well (between 15 to 20), many Census tracts in low-income communities score lower suggesting potential challenges for pedestrian accessibility.

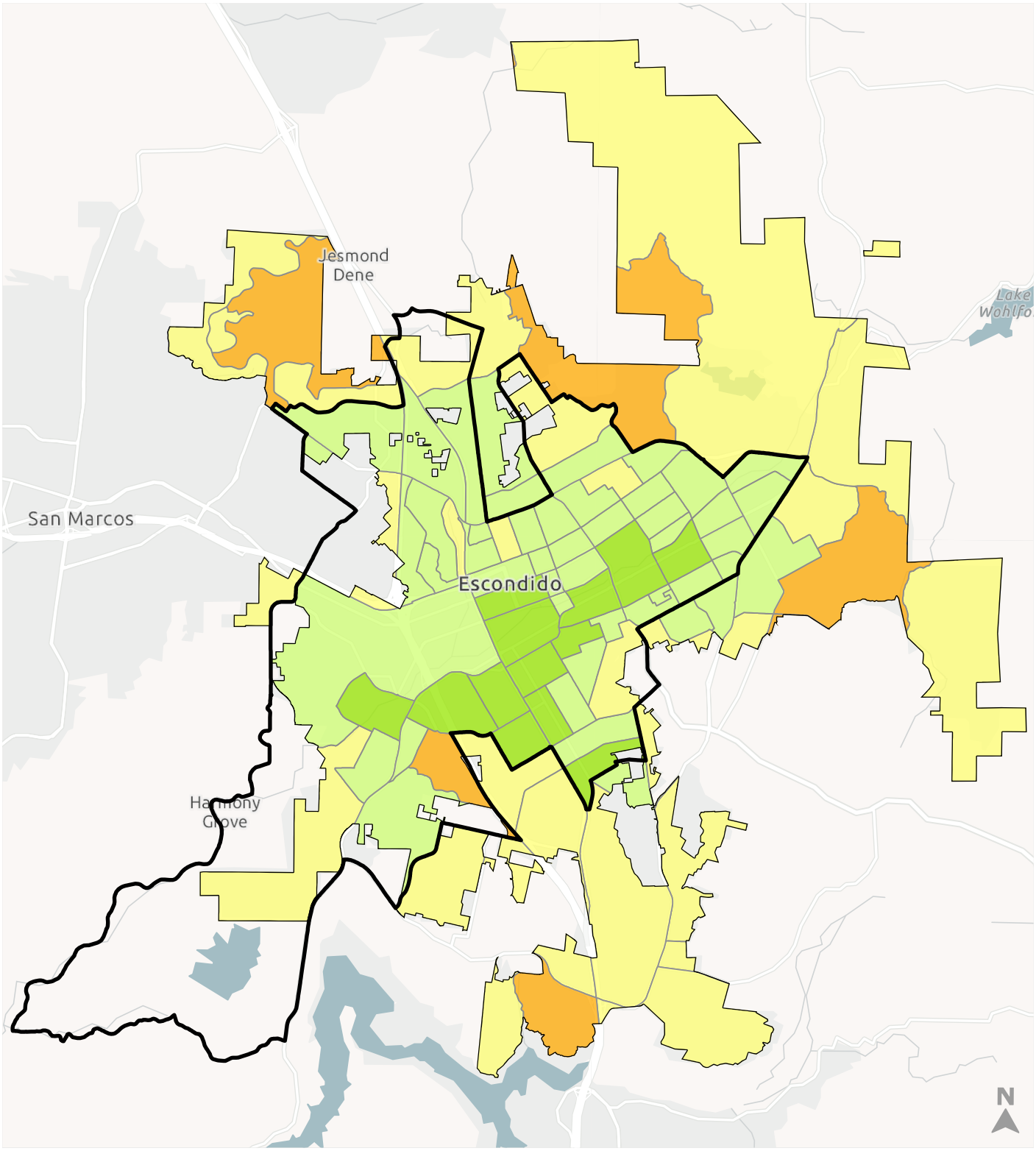


Figure 4

National Walkability Index
Source: EPA Smart Location Database, Version 3.0 (2021)

AllTransit™

Measure: Accessibility

Center for Neighborhood Technology (CNT) has created a database consisting of stop, route, and frequency information for transit agencies in regions with populations greater than 100,000, as well as a large number of smaller regions and agencies. Data associated with transit agencies serving these areas were compiled from the 2013 National Transit Database, as well as the American Public Transportation Agency (APTA).

The AllTransit™ Performance Score measures the performance of the transit system based on a combination of metrics including transit accessibility, connections to other routes, jobs accessible in a 30-minute transit ride, and the number of workers using transit to travel. The estimated performance score ranges from 0 to 10, with 10 being the best score. The City of Escondido has a performance score of 5.2. The City is described as a "*Moderate combination of trips per week and the number of jobs accessible, enabling a moderate number of people to take transit to work*". **Table 5** provides a summary of the findings based on AllTransit™ Performance Score insights.

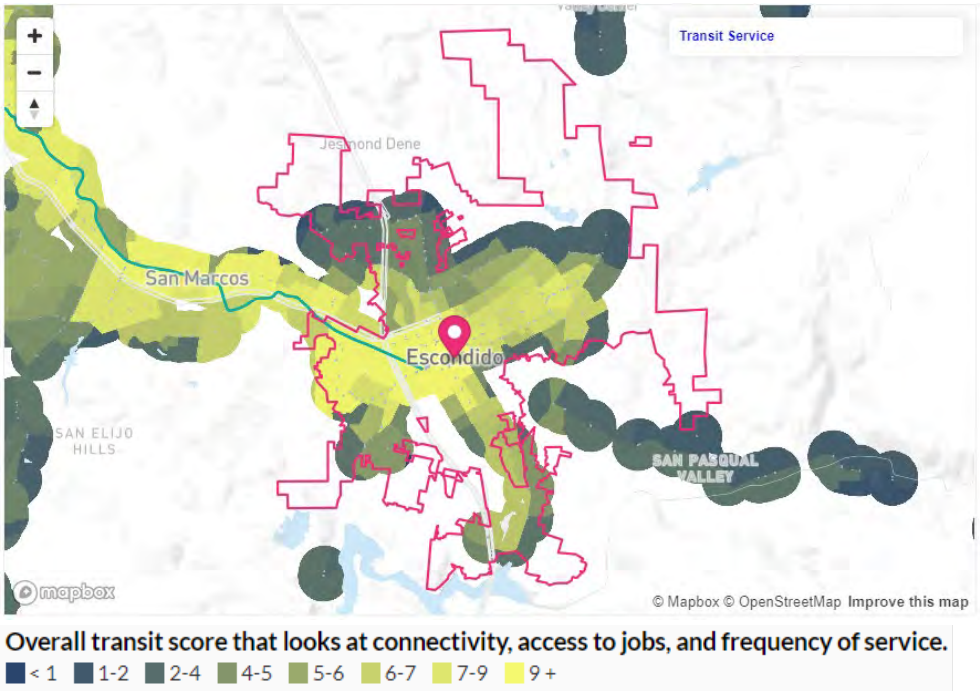
Figure 5 provides a snapshot of the performance scores within the City of Escondido. Based on this map, transit accessibility in the City of Escondido is mainly focused in downtown areas where most of the low-income Census tracts are located.

Figure 6 compares the AllTransit™ Performance Score across cities around the San Deigo Region. Compared to the regions, the City of Escondido ranks a near average score with a moderate AllTransit™ Performance Score throughout the county.

Table 5: AllTransit™ Performance Score Insights

Metric	Description	Findings
Jobs	Percent of jobs near high-frequency transit	28.8%
	Percent of jobs that are located within ½ mile of transit	89.0%
	Jobs accessible by transit (within 30 minutes)	43,336
Economy	Percent of income for transportation costs	21.7%
	Customer households accessible to a business within a 30-minute transit commute	31,613
Health	Workers who commute by walking or biking and live within ½ mile of transit	2.06% walk 0.82% bike
Equity	Percent of low-income households near transit	91.2%
Transit Quality	Percent of households within ½ mile of transit	84.7%
	Percent of households within ½ mile of high-frequency transit	14.5%
Mobility	Transit routes available within ½ mile of a block group on average	6 transit routes
	Percent of households within ½ mile of transit that own no vehicles	7%
	Percent of households within ½ mile of transit that own one vehicle	32%
	Percent of households within ½ mile of transit that own a minimum of 2 vehicles	61%

Figure 5: AllTransit™ Performance Score by Block Group (City of Escondido)



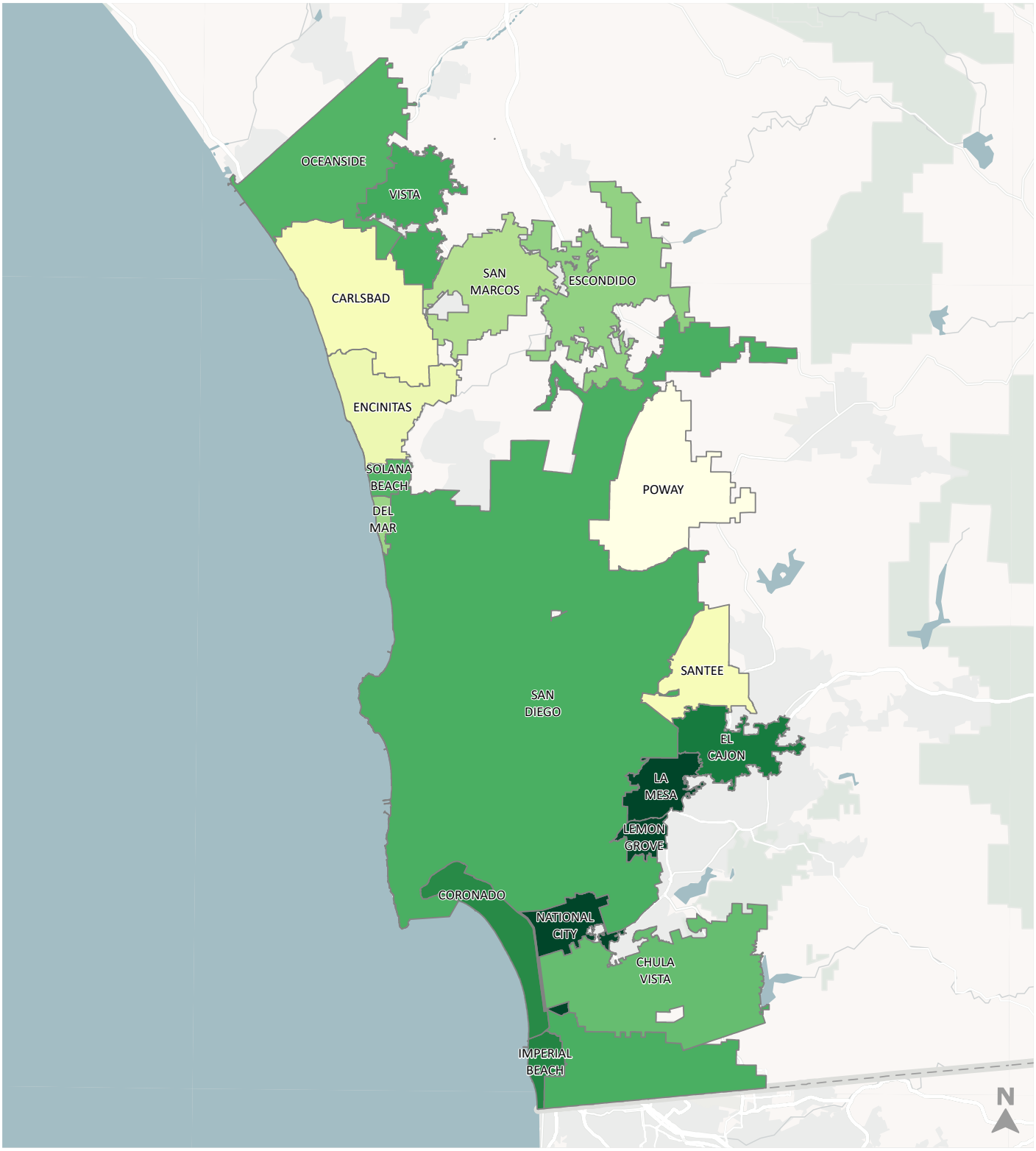


Figure 6

AllTransit (TM) Performance Score
Based on Connectivity, Access to Jobs, and Frequency

Housing and Transportation Index (H+T Index)

Measure: Accessibility and Affordability

Transportation costs are typically the second-largest spending category for a household. Conventional measures of housing affordability do not take into account transportation expenses. Transportation Expenses are significantly influenced by the neighborhood's attributes where a household decides to reside.

The Center for Neighborhood Technology (CNT) provides a tool that provides a Housing and Transportation (H+T®) index, taking into account variations in transportation costs based on neighborhood characteristics. The tool also provides a Neighborhood Characteristic Score (ranging from 1 to 10 with 10 as the best score) as compared to other neighborhoods around the States.

Figure 7 shows the jobs score by Census tract. **Figure 8** shows the Compact Neighborhood Score by Census tract. Based on the H+T Index, the City of Escondido maintains a Job Access score of 6.3, described as 'High access to a variety of jobs', and a Compact Neighborhood Score of 3.9, described as 'Low density and limited walkability'.

Additionally, the tool provides a 'Location Efficiency Metric' that provides the percentage of a select area that is compact, close to jobs and services, with a variety of transportation choices, allowing people to spend less time, energy, and money on transportation. According to this data, approximately 5% of neighborhoods in the City of Escondido are identified as Location Efficient Areas.

Table 6 provides a summary of findings from the Housing and Transportation Index outputs.

Table 6: Housing and Transportation Index (H+T®) Insights

Metric	Description	Estimate
Transportation Costs	Average annual transportation costs	$15,616
	Annual auto ownership costs	$11,628
	Average autos per household	1.85
	Average household VMT	16,940
Transit Ridership	Transit ridership among workers	4%
Affordability	Housing + Transportation Costs as a percentage of income	48%
	Housing Costs as a percentage of income	28%
	Transportation Costs as a percentage of income	20%

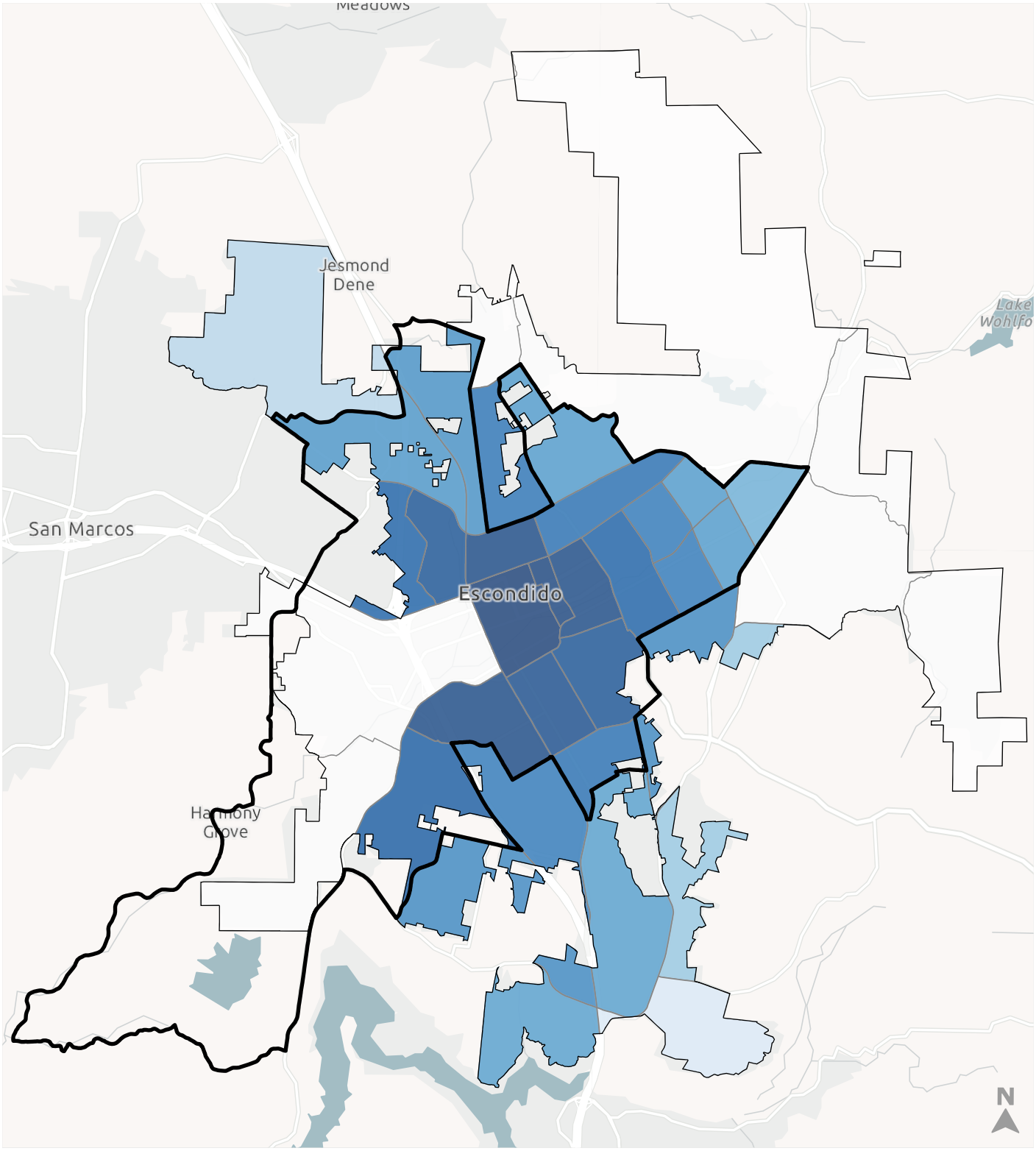


Figure 7

Housing+Transportation Index (Job Score)
Based on 2022 Update

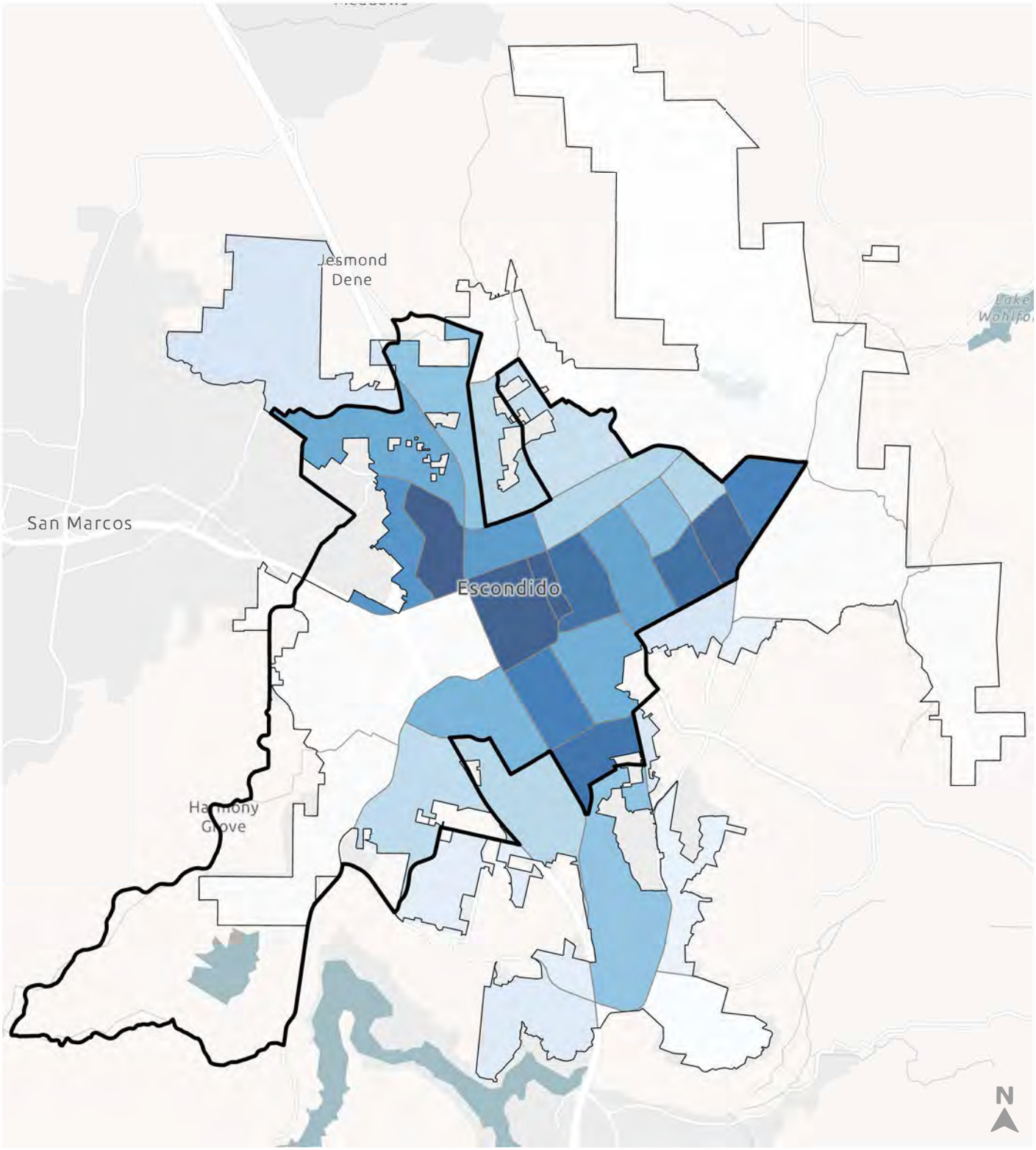


Figure 8

Housing+Transportation Index (Compact Neighborhood Score)
Based on 2022 Update

Transportation Injury Mapping System (TIMS)

Measure: Accessibility

TIMS provides a web-based tool that is used to map collisions in an area over a period of time. The tool is used to identify dangerous streets or intersections for people biking and walking. **Table 7** provides a summary of the collision data profile in the City of Escondido.

Table 7: City of Escondido Collision Profile (TIMS 2018-2022)

Metric	Description	Findings
Crash Profile	Total Crashes	3,732
	Total Victims	52 Killed, 5,404 Injured
	State Highway	969 (26%)
	Ped Involved	228 (6%)
	Bike Involved	200 (5%)
	Motorcycle Involved	278 (7%)
Crash Severity	Fatal	45 (1%)
	Injury (Severe)	186 (5%)
	Injury (Other Visible)	1301 (35%)
	Injury (Complaint of Pain)	2,200 (59%)

Figure 9 illustrates that the majority of collisions recorded in the City of Escondido area are focused in the downtown area, near where the low-income Census tracts are located.

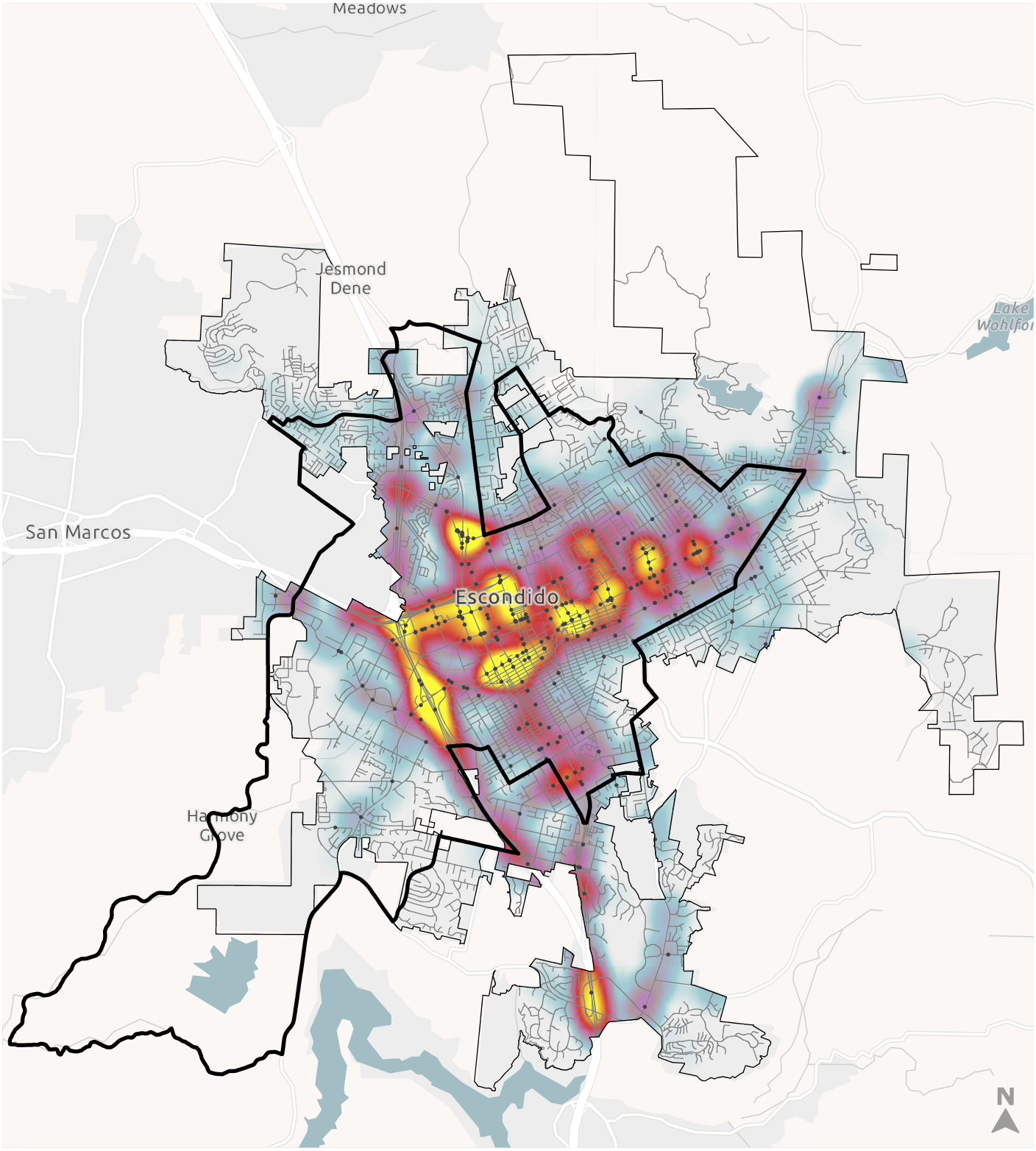


Figure 9

Pedestrian & Bike Involved Collisions and Severity
Transportation Injury Mapping System (TIMS) 2018 - 2022

People for Bikes Bicycle Network Analysis (BNA)

Measure: Accessibility

The Bike Network Analysis (BNA) is a data analysis tool that measures how well bike networks connect people with the places they want to go. Because most people are interested in biking only when it's a comfortable experience, the data includes only 'low-stress' biking connections.

The BNA score was estimated in four steps: data collection, traffic stress analysis, destination access analysis, and score aggregation. This data helps to visualize bicycle infrastructure (or lack thereof) in the study area, and see how they connect to destinations like hospitals, dentists, major transit hubs, and more. **Table 8** shows the average BNA Score to reach various services and opportunities. **Figure 10** shows the Average BNA score by Census block for the City of Escondido. The BNA score on "low-stress biking connections" suggests that the current bicycle infrastructure in Escondido might be limited (20 out of 100), particularly in low-income Census tracts.

Table 8: BNA Score Summary

Metric	Description	Score
People	How well people can reach other people	**22**
Opportunity Total	How well can people reach Employment and Educational Opportunities	**19**
• Employment		17
• K12 Education		35
• Tech/Vocational College		6
• Higher education		0
Core Services	How well people can reach core services	**19**
• Doctors		14
• Dentists		17
• Hospitals		3
• Pharmacies		16
• Grocery		32
• Social Services		27
Retail	How well people can reach retail services	**35**
Recreation	How well people can reach recreation opportunities	**25**
• Parks		43
• Trails		14
• Community Centers		10
Transit		**1**
Overall Score		***20***

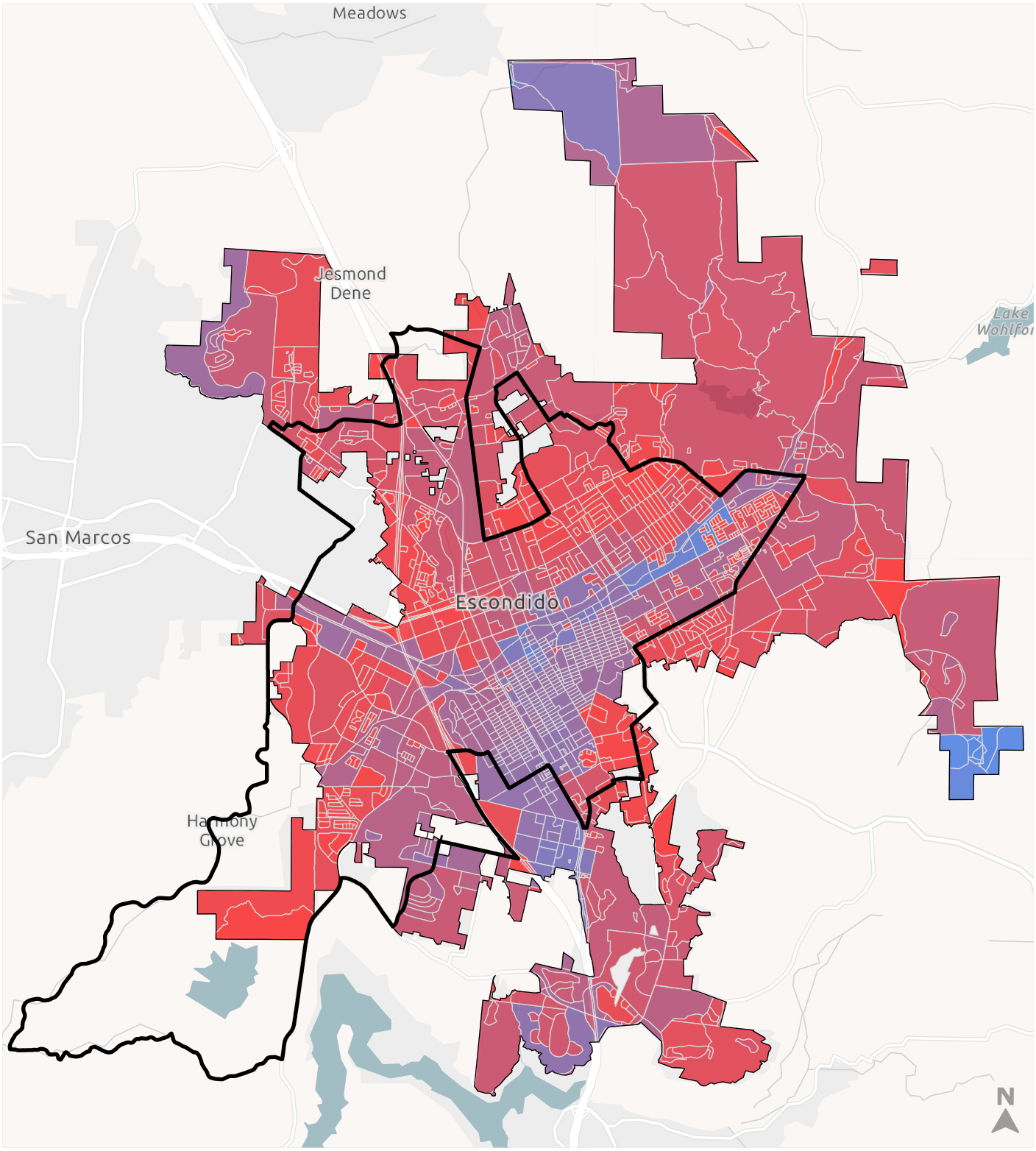


Figure 10

People for Bikes Bicycle Network Analysis (BNA) Based on 2023 Update

Community Engagement

The Project Team developed an outreach framework document to guide project implementation and ensure that diverse voices were heard. This document outlined objectives and strategies that the Project Team would employ to engage community members, learn about their unmet mobility needs, and co-create sustainable solutions. The outreach goals set in this document include:

- Develop a community engagement approach that meets people where they are and provides a mix of virtual and in-person channels.
- Engage and solicit feedback from historically underrepresented, marginalized, and excluded communities using the proper tools, means, and knowledge.
- Establish region-wide and multi-jurisdictional partnerships aimed at increasing eligibility for regional clean mobility funding opportunities.
- Take an intersectional approach to the engagement process, ensuring that the unique economic, health, environmental, and educational challenges of each community are carefully considered and addressed.
- Foster meaningful relationships between the Project Team and community stakeholders, building capacity for future collaboration and project implementation.

Recognizing that community engagement should provide several avenues for people to meaningfully participate in the planning process, the Project Team used a variety of outreach materials and methods to invite community members to share their transportation experiences and ideas. Outreach materials included printed and online flyers to advertise outreach events and the availability of the online survey, printed surveys, development of a project website[2], interactive map, and visual glossary, and social media posts promoting the survey and outreach events on the City's platforms, as well as VCC's and COMPACT's. **Appendi**.

Accessibility and reaching demographically diverse communities were core components of our community engagement process. All outreach materials, printed and online, were available in English and Spanish, and Spanish interpretation services were provided at all community meetings.

Community Survey Development and Administration

Survey Development

The community survey was developed using a combination of the Project Team's past experience conducting mobility surveys as well as the resources provided in the Needs Assessment Implementation Toolkit. All sample survey questions provided by CMO were carefully reviewed to determine applicability to the project study area. In an effort to keep the survey length manageable and maximize participation, only the most critical questions necessary to understand community members' existing travel behavior,

[2] City of Escondido Mobility website: www.escondido.org/mobility

perceived barriers, and desired mobility options were maintained. A handful of demographic questions were also included to evaluate the Project Team's success in reaching a diverse cross-section of the community. The survey was then translated into Spanish and reviewed by native Spanish speakers on the Project Team to ensure accuracy and accessibility for community members with limited English proficiency. An English and a Spanish copy of the survey are provided in **Appendix B**.

Survey Distribution and Collection

The survey was administered online through Social Pinpoint, an online community engagement platform. Through Social Pinpoint's Translate feature, community members were able to take the survey in over ten languages. The survey was launched on December 4th, 2023 and closed on April 19th, 2024. Hard copy versions of the survey, in English and Spanish, were distributed at in-person outreach events, including the Swap Meet on February 25th, 2024, the Senior Educational Forum on March 5th, 2024, and the Community Conversation on April 4th, 2024. Large-print versions of the survey were provided at the Senior Educational Forum. Hard copy surveys could either be mailed in or scanned and emailed.

To compensate community members for their time and to encourage participation, all survey respondents were automatically entered into a raffle to win one of six $50 Visa gift cards.

Data Entry

All survey responses were entered and stored in the Social Pinpoint database. Any hard copy surveys collected at in-person outreach events were manually entered into Social Pinpoint by Project Team staff to help streamline the analysis.

Data Cleaning

The Project Team reviewed each survey response individually to ensure all responses were appropriate and legitimate. Any duplicate survey responses were removed. The survey contained one (1) optional open-ended question asking if respondents had anything they wanted to share about their walking, biking, or transit experiences. Any Spanish responses were translated into English prior to analysis.

Data Analysis

Analysis of survey results was performed using the Social Pinpoint platform. Social Pinpoint automatically aggregates and analyzes responses to quantitative survey questions, then illustrates the results through summary tables and dynamic visualizations. "Other" responses, as well as responses to the one (1) optional open-ended question, were reviewed individually by Project Team staff for common themes. The survey included one question (Question 11) asking respondents to identify whether they live in the CTNA Study Area (referred to in the survey as the 'CMO Grant Coverage Area'). This question was used to determine which survey responses represented the needs and interests of study area residents.

Community Survey Findings

The Project Team received 188 survey responses from community members. The majority of surveys (176) were completed via our project website. Of all online survey responses, 40% were completed via Desktop computer, 59% were completed via mobile device, and 1% were completed via tablet. Key takeaways from the survey are summarized in the following sections. Note that the survey was open to all, although most responses came from Escondido residents. Two-thirds of respondents noted that they live in the CTNA Study Area. The results presented herein represent all survey responses received. Full survey results can be found in **Appendix C**.

Demographics

Among the 188 survey respondents, a significant majority (79%) reside in Escondido and approximately two-thirds live in the CTNA Study Area (i.e., a low-income Census tract). Nearly half of all respondents (47%) work within the City. Interestingly, 63% of respondents were parents. The survey encompassed a diverse age range, spanning from under 18 to over 65 years old, with the highest representation from the 36-45 age group at 34%, followed closely by the 26-35 age group at 25%.

English was the primary language used by 89% of respondents followed by Spanish (10%). 53% of respondents identified as Caucasian or White and 33% of respondents identified as Hispanic or Latinx. Almost half (48%) of respondents said their household has access to two (2) cars while 31% said their household has access to three (3) or more cars. 18% said they have access to one (1) car and only 2% of respondents said their household does not have access to a car.

Active Transportation Barriers and Opportunities

To develop a more nuanced picture of the transportation challenges faced by study area residents, while using alternative modes, respondents were asked what prevents them from walking or biking to places they would like to go. The most significant barrier respondents face while walking is a lack of sidewalks or poor crosswalk conditions (59%), followed closely by concerns for personal safety (55%). The distance between origin and destination, and fear of traffic collisions or reckless behavior, were equally cited as concerns (47%). Additionally, 25% of respondents mentioned that walking takes too long, 14% pointed out that their route includes hilly terrain, and 10% indicated that pregnancy or having children/dependents affected their ability to walk. Only 6% of respondents reported that nothing prevents them from walking safely to their destinations. Other concerns, raised by 10% of respondents, included issues such as cars running red lights. Furthermore, 3% of respondents stated they are disabled, have difficulty walking, or use an assistive device such as a walker or wheelchair.

The biggest barrier respondents face while biking is a fear of traffic collisions or reckless driving (58%), followed by a lack of bike lanes or poor bike lane conditions (52%) and concerns for personal safety (52%). Lack of secure bike parking was noted by 32% of respondents, and 23% mentioned the distance between origin and destination as a barrier. Additional concerns raised by respondents included collisions due to cars running red lights and poor road conditions.

When asked what makes them feel unsafe while walking or biking, the majority of respondents pointed to high traffic speeds or volume (68%), followed by the lack of sidewalks or poor bike lane conditions (65%) and drivers not showing courtesy to pedestrians and bicyclists (62%). Lack of adequate lighting was a concern for 42% of respondents, and 37% cited the potential for crime. Only 5% of respondents felt nothing made them feel unsafe. Among the 10% who selected "Other," additional concerns included battery-powered skateboards and bikes traveling on sidewalks at high speeds, dark and unpopulated areas, unhoused people and poor lighting conditions along Escondido Creek Trail, and insufficient stop lights on busy roads.

As far as opportunities for improvement, the survey also sought to understand what roadway enhancements would make participants more willing to walk or bike. The top three enhancements identified by respondents were sidewalks or bike lanes separated from traffic (68%), designated safe routes for walking or biking to school (57%), and increased numbers of protected or marked crossings (56%). Respondents also highlighted the importance of greater connectivity between regional walking and biking paths and neighboring communities (53%), improved street lighting (44%), and measures to reduce vehicle speeds (41%).

Transit Priorities

Participants were also asked to prioritize their preferences when considering transit options. A significant majority, 36% of respondents, highlighted safety as their foremost concern. Reliability and convenience followed closely behind, with 20% and 12% of respondents citing these factors as critical, respectively. Accessibility (10%), frequency (9%), speed (8%), affordability (5%), and comfort (0.5%) were less frequently identified as top transit priorities among participants.

The survey also explored interest in a circulator bus service in downtown Escondido. Roughly two-thirds of respondents expressed a willingness to use such a service if it were made available. This indicates a potential demand for convenient and accessible public transportation options within the downtown area, which could contribute to reduced reliance on personal vehicles and enhanced mobility for residents and visitors alike.

Destinations of Interest

To identify key destinations and determine specific travel patterns, participants were asked where they would like to walk, bike, or take transit to that they do not currently. More than half (60%) expressed a desire to walk or bike for exercise or leisure. The three most popular destinations were parks (47%), grocery stores (46%), and schools (39%). Homes of friends and family (39%), restaurants (37%), and workplaces (35%) were also frequently mentioned. 30% of respondents said they would like to walk, bike, or take transit to run errands.

Current Transportation Behavior

The survey aimed to understand participants' current transportation habits and their interest in alternative modes of transport if readily available and affordable. The three most commonly used transportation

modes among respondents are driving alone (86%), driving with others (66%), and walking or rolling (46%). Rideshare services like Uber and Lyft are also popular, with 32% of respondents using them, followed by biking (22%), light rail/metro train (13%), and bus services (7%). Less frequently used options include taxis (2%), shuttle/microtransit (2%), bikeshare (1%), scootershare (1%), and vanpooling (1%). Only one respondent (0.5%) reported using carshare services.

The survey also revealed gaps in familiarity with certain transportation options. The three travel modes that respondents were least familiar with were: carshare (20%), vanpooling (19%), and shuttle/microtransit (19%). Additionally, a notable percentage of respondents were unfamiliar with bikeshare (15%), scootershare (13%), and light rail/metro train (11%).

Possible Future Transportation Behavior

When asked which options they would consider using if readily available and affordable, respondents showed significant interest in public transit options. 61% of respondents said they would use light rail/metro train if readily available and affordable. Roughly half of all respondents said they would use the bus, shuttle/microtransit, or bike if readily available and affordable, while just under a quarter of all respondents said they would use bikeshare, scootershare, or rideshare services (e.g., Uber, Lyft).

Conversely, the survey also identified the transportation modes respondents are least likely to use. 71% and 65% of respondents indicated that they would not use taxis or carshare services, respectively, even if readily available and affordable. Roughly 60% of respondents said they would not use vanpooling, scootershare, or bikeshare services, and approximately 40% said they would not use rideshare services.

Survey respondents were also asked which shared mobility options they would most like to see the City invest in. The majority of respondents indicated that they would most like to see the City invest in on-demand microtransit (74%) or traditional fixed-route transit (72%). 41% of respondents expressed interest in bikeshare, and 38% expressed interest in electric vehicle carshare. Just over one-third of respondents would like to see the City invest in scootershare.

Community Engagement Activities

Community Pop-Up Event

In an effort to meet people where they are, the Project Team held a community pop-up event at the Escondido Swap Meet on February 25th, 2024. The Escondido Swap Meet is a weekly outdoor market filled with vendors selling both used and new merchandise. The event is well-attended by Escondido's Hispanic population and was selected for its location within the CTNA Study Area. During the event, Project Team staff handed out flyers and tchotchkes promoting the project and encouraged passersby to fill out the community survey at our designated booth. Hard copy versions of the survey were available in English and Spanish for community members to complete. A banner stand displaying key project information and a QR code to the project website was positioned at our booth, and Project Team staff were available to answer any questions from community members. The Project Team engaged with approximately 80 people over the course of the seven-hour event.

ESCONDIDO CATS
We Need to Hear From You!
Effort #1
Effort #2
Effort #3
Before we can get started on these plans, we first need to understand how Escondido residents currently travel and how they would like to travel.
That's where you come in!
Scan here to get started
sta Community Clinic
Funded by Prop 99
ESCONDIDO
City of Choice

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Community Presentations

Neighborhood Leadership Forum (NLF) Meeting

On October 26th, 2023, the Project Team delivered a presentation to the Neighborhood Leadership Forum (NLF) to raise awareness about the project. The NLF is a quarterly meeting during which Escondido's neighborhood group leaders come together to discuss accomplishments, challenges, group events, and other City happenings. The meeting took place within the CTNA Study Area at Escondido City Hall and was attended by approximately 20 neighborhood group leaders. During the presentation, City of Escondido staff, with support from Fehr & Peers, provided an overview of the CMO and project website, followed by a brief Q&A session. Meeting attendees were then asked to take this information back to their respective neighborhoods to help spread the word and encourage community participation.

Community Alliance for Escondido (CAFE) Meeting

In an effort to gain traction on the project, COMPACT staff gave a brief presentation at the virtual Community Alliance for Escondido (CAFE) meeting on February 9th, 2024. CAFE is a group of stakeholders, community members, and service providers that meet biweekly to discuss new programs and available resources, and share news regarding the needs of the Escondido community. 23 people attended the presentation. During the presentation, COMPACT staff provided an overview of the CMO and project website, including the interactive feedback map and community survey. COMPACT staff also highlighted upcoming outreach events and gave meeting attendees a chance to ask questions at the end.

Senior Educational Forum

On March 5th, 2024, the Project Team held a one-hour Senior Educational Forum at the Park Avenue Community Center, located within the CTNA Study Area. The event was held to inform and get input from Escondido's senior population. The event was promoted internally and through the Park Avenue Post (a

newsletter run by the Park Avenue Community Center). 15 people participated in the forum. Led by the City of Escondido, with support from VCC, the forum began with a brief presentation, similar to the one given to CAFE on February 9th, 2024. The presentation was then followed by an open discussion where participants had a chance to provide input on locations of concern and/or present their ideas for making it safer and easier to get around Escondido. Many of the participants expressed how hard it can be to get around the city or get rides at an affordable price. The Project Team also handed out large-print surveys for participants to fill out in English or Spanish.

Public Workshop

On April 4th, 2024, the Project Team held an evening public workshop, or 'Community Conversation,' at the Escondido Public Library located within the CTNA Study Area. The Community Conversation was advertised heavily on social media (e.g., Instagram, Facebook, etc.) in the weeks leading up to the event. Additionally, the Project Team coordinated with Councilmember Consuelo Martinez to hold an interview with her that would air on Univision, a Spanish-language television network, two days prior to the event. During the interview, Martinez discussed the importance of the project and encouraged community members to voice their transportation concerns at our upcoming Community Conversation. The Project Team also distributed flyers and posters advertising the event at various locations throughout the city, including local markets and businesses, laundry mats, City Hall, the Escondido Public Library, and the East Valley Community Center (EVCC).

The Project Team utilized a station-based setup to facilitate the Community Conversation. Attendees were asked to sign in upon arrival to help us track attendance. They were also given instructions on how to navigate the stations. The first station was the info board station, where attendees could familiarize themselves with the City's three distinct, but overlapping mobility planning efforts, one of which is the CTNA. The CTNA info board provided an overview of the CMO, the goals of the CTNA, and a map of the CTNA Study Area. The station was supported by Project Team staff, who were there to provide key project takeaways and help answer any questions. The second station was the map activity station, where attendees had a chance to provide location-specific feedback by placing Post-it notes on large, 24x36 inch maps of the city. Attendees were prompted by Project Team staff with the following question: "Where would you like to see improvements made to the City's pedestrian, bicycle, or transit network?" The activity was intended to be an analog alternative to the interactive feedback map hosted on our project website. Once the event was over, all comments received on the paper maps were manually added to the online feedback map by Project Team staff. The third and final station was the survey support station, where attendees could fill out our community survey (via pen and paper or tablet) with the support of Project Team staff. All event attendees were asked to fill out the survey. Copies of our visual glossary, which was designed to help participants recognize and understand unfamiliar terms and ease any language barriers, were available at the station for participants to reference as they filled out the survey.

A total of 15 community members attended the Community Conversation. The event was a true team effort, organized and facilitated by all members of the Project Team. All materials for the event were

provided in both English and Spanish, and bilingual Project Team staff were present to provide translation support if needed.

School-Focused Outreach

Virtual School Listening Sessions

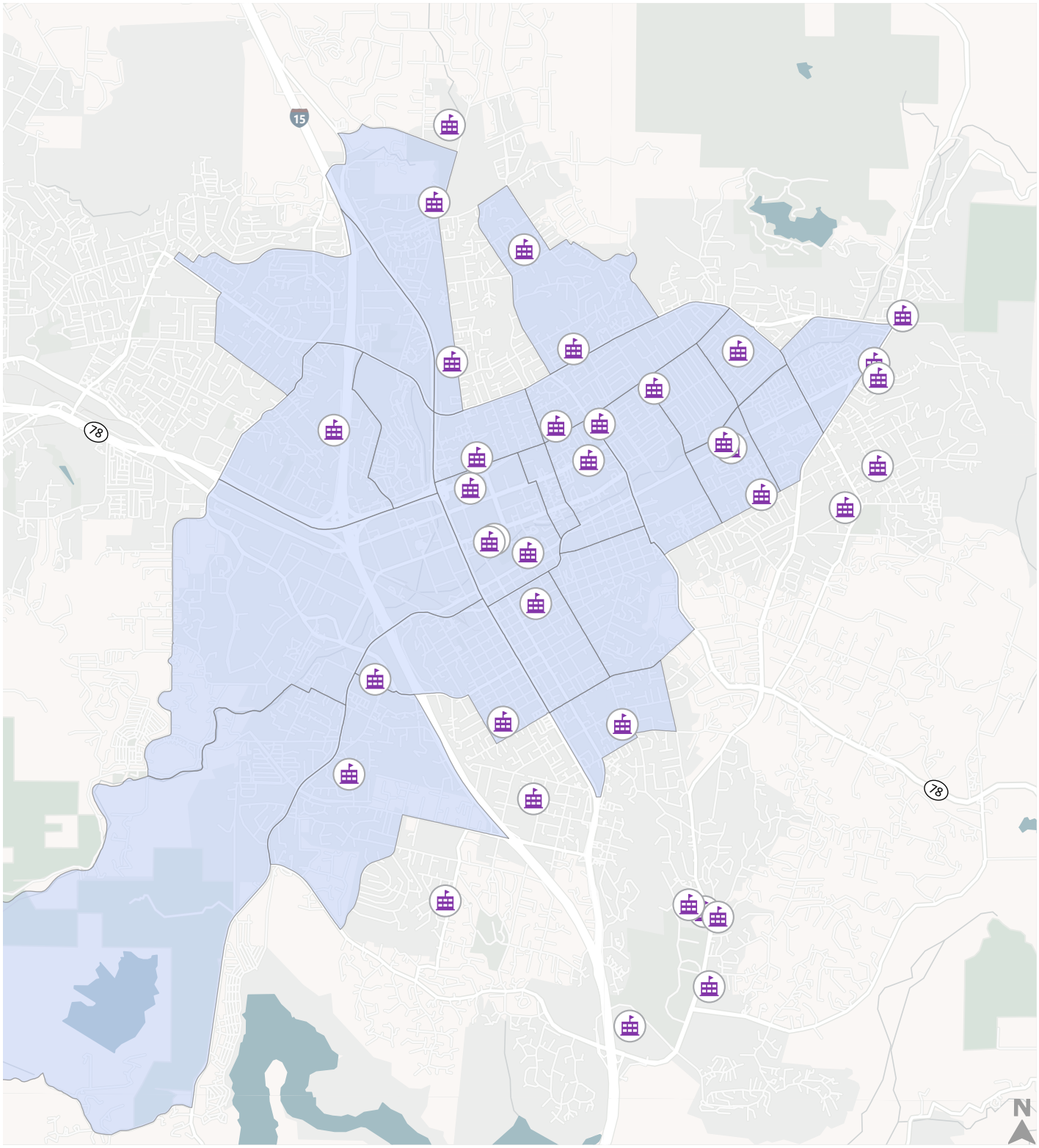
The Project Team conducted five virtual listening sessions with representatives from over 30 public schools in Escondido on the following dates: March 13th, March 14th, March 18th, April 8th, and April 11th. All 36 Escondido public schools were invited to participate in the listening sessions, including 23 schools (64%) located within the CTNA Study Area, as shown in **Figure 11**. These sessions were promoted through social media and were led by Alta staff, with translation support from COMPACT. Over 75 people participated in the listening sessions in total. Alta staff started each session with a brief explanation of the CMO, the Safe Routes to School (SRTS) program, the purpose of the listening sessions, and some examples of what suggested improvements could look like. Education stakeholders, including parents, students, teachers, and school staff, then shared their insights regarding the existing mobility challenges at their respective schools. Participants highlighted locations within the City that present dangers to cyclists and pedestrians, and offered potential solutions for promoting safety and active modes in the school environment. Each listening session lasted no more than two hours.

In-Person School Walk Audits

Following completion of the virtual school listening sessions, the Project Team conducted walk audits with 11 of the schools over the course of three (3) days: June 12th, June 13th, and June 14th. The selection of the 11 schools was based on insights gathered from listening sessions and overall safety needs, with 7 of these schools located within the CTNA Study area. The walk audits were led by Alta staff, with support from COMPACT. During the audits, Escondido Union School District (EUSD) staff and school administrators, including principals, office managers, and heads of security, were able to voice their school-specific concerns regarding traffic flow, sign visibility, congestion, pedestrian safety, and any other transportation-related issues, which were observed and documented by the Project Team. Alta staff then talked through potential solutions with the school and District representatives, informing them that final recommendations would be provided through a formal Safe Routes to School Plan.

Interactive Feedback Map

To ensure that community members unable to attend in-person events could still share their input and experiences, the City hosted an interactive feedback map on the project website. The interactive feedback map allowed community members to provide location-specific feedback on the City's transportation network using designated markers. Marker categories consisted of the following: Walking Barrier, Walking Opportunity, Biking Barrier, Biking Opportunity, Transit Barrier, Transit Opportunity, and Other Comment. The "barrier" markers were intended to represent locations where barriers, such as inadequate bike facilities or uneven sidewalks, impede users' ability to travel. The "opportunity" markers were intended to represent locations where users would like to walk, bike, or ride transit, but there are no existing facilities to allow them to do so safely. Users could use the "Other Comment" marker to leave general comments on the City's active transportation network. Users could also upload supplementary pictures, and view and vote on other community members' comments. The interactive feedback map was open from December 4th, 2023 to April 19th, 2024, receiving over 220 comments, with 163 of those specifically focused on the CTNA Study Area.



Public Schools

CMO Grant Coverage Area

Figure 11

Public Schools in Escondido

Limitations and Lessons Learned

While the project successfully gathered valuable information from community members, there were limitations that could be addressed in future efforts.

- Virtual outreach tools, such as our interactive feedback map, may have excluded some residents from the community engagement process due to technological barriers or accessibility issues.
- Map-based surveys can allow one person's voice to overshadow others' if there is no limit on the number of comments a person can leave, potentially leading to an unrepresentative sample.
- Use of technical jargon in project materials may have different meanings for community members compared to planners and technical experts. While staff made efforts to simplify the language, earlier use of technical terms may have limited initial engagement.
- Language accessibility also presented a challenge. For example, some mobility terms were difficult to translate accurately across languages.
- The significant length of the community survey may have discouraged some community members from fully completing it, potentially leading to incomplete responses/data.
- Lack of fun, eye-catching outreach activities may have limited our success in attracting passersby to engage at in-person outreach events.
- While the available data provided valuable insights, it lacked the desired level of detail for some parts of the analysis. Often, the data was aggregated at the city level, preventing us from identifying specific trends or patterns at a more granular geographic scale.

By acknowledging these limitations, the City of Escondido can refine its outreach and analysis approach for future planning efforts, ensuring broader participation and a more comprehensive understanding of community needs.

Discussion and Solutions

Through the CTNA process, the Project Team gained valuable insight into the transportation needs, challenges, and preferences of the Escondido community. The following key findings were gleaned from the needs assessment process:

Transportation Access Data Analysis

Analysis reveals a disparity in transportation access and mobility within Escondido. Residents in lower-income neighborhoods face greater challenges due to lower median household incomes (30% below the Escondido Median household income average), which often correlates with reduced car ownership and increased reliance on public transportation.

The All-Transit Performance Score of 5.2 out of 10 further underscores the need for improvements in transit accessibility and connectivity. The majority of residents commute alone (nearly 72% of the commuters), highlighting a reliance on personal vehicles. Additionally, the distribution of jobs and services is concentrated in downtown areas where a high proportion of the low-income population resides.

To compound these issues, the city's walkability, as measured by the National Walkability Index, varies significantly across neighborhoods. While some areas in the downtown district are rated as “Most Walkable”, most of the Census tracts within the CTNA Study Area are rated near average, highlighting a significant need for alternative transportation options (refer to **Figure 4)**.

Furthermore, the Housing and Transportation Index reveals that a small percentage of Escondido neighborhoods are considered "Location Efficient," highlighting a lack of compact, mixed-use development with accessible transportation choices. This factor contributes to increased travel times, higher transportation costs, and reduced accessibility to opportunities.

The prevalence of traffic collisions in downtown areas, where many low-income residents live, also underscores the need for improved safety and mobility options in these neighborhoods.

Community Engagement

Consistent with the results of the data analysis, community input received through workshops and surveys indicates that the most popular transportation mode among community members is driving alone. However, approximately 74% of respondents indicated that they would be supportive of an on-demand microtransit solution if the CMO Mobility Project Voucher or other grant funding is pursued. Another 72% indicated support for traditional fixed-route transit.

When considering possible future travel patterns, survey respondents showed significant interest in public transit options, particularly light rail, bus, and microtransit/shuttle, assuming these options are made more accessible and affordable. Survey results also revealed gaps in familiarity with certain transportation

options (e.g., carshare, vanpooling, etc.), indicating a need for additional outreach to increase awareness around new transportation options and ultimately ease implementation.

When asked about the challenges and barriers faced while walking in Escondido, survey respondents listed low-quality (or lack of) pedestrian infrastructure (e.g., sidewalks, crosswalks, etc.), concern for personal safety, excessive distance between origin and destination, and fear of traffic collision or reckless driving behavior as the most significant barriers. Similarly, fear of traffic collisions or reckless driving behavior, low-quality (or lack of) bicycle infrastructure, and concern for personal safety prove to be the biggest barriers respondents face while biking. When respondents were asked to rank their transit priorities, a significant majority highlighted safety as their foremost concern, followed by reliability and convenience.

Recommended Solutions

Based on our review of available data and input from the community, Escondido's low-income communities face significant transportation disparities. Low public transit utilization and an overwhelming reliance on personal vehicles reveal limitations in access to alternative modes of travel. Implementation of a clean mobility option, such as on-demand microtransit, could be a promising solution to help alleviate some of these challenges, and one that residents indicated they would be supportive of.

On-demand microtransit offers numerous benefits in downtown areas. This flexible transportation option helps bridge the gap between traditional public transit and private car usage, making it easier for people to navigate urban environments without relying on personal vehicles. By providing frequent, reliable, and convenient services, microtransit reduces traffic congestion and parking demand, contributing to a more sustainable and efficient urban infrastructure. Additionally, microtransit solutions enhance accessibility for residents and visitors, connecting them to key destinations such as business districts, entertainment venues, and public services. This improved connectivity supports local economies, promotes environmental sustainability, and fosters a more vibrant, pedestrian-friendly urban landscape. By expanding mobility options, improving connectivity, and reducing reliance on personal vehicles, clean mobility initiatives can enhance the overall quality of life for Escondido residents and visitors alike, especially those in underserved communities.

Next Steps

Following the completion of the CTNA process, the City of Escondido will use the results of this report to apply for a CMO Mobility Project Voucher. The City will coordinate internally to prepare this application and outline a program to implement an on-demand microtransit solution. The City will then select the appropriate partners to operate the microtransit service and negotiate a service contract. The City will continuously monitor the service and modify service locations, hours, and operations where needed, based on feedback from the service users.

Lessons from the CTNA process will be shared internally with other City departments. The information shared will help guide future outreach efforts in the City and ensure that diverse populations are included in every step of the planning process.

Appendix A: Outreach Materials

VISUAL GLOSSARY

BIKESHARE

Shared mobility service in which people can rent bicycles for short periods of time, often by the minute.

SCOOTERSHARE

Shared mobility service in which people can rent electric motorized scooters for short periods of time, often by the minute.

RIDESHARE

App-based shared mobility service in which people can request a ride on short notice from drivers using their personal vehicles for hire.

CARSHARE

Shared mobility service in which people can rent cars for short periods of time, often by the hour.

CIRCULATOR BUS

Short-distance, circular, fixed-route transit service that takes riders around a specific area with major destinations, typically downtown.

MICROTRANSIT / SHUTTLE

Shuttle service that users can request, commonly through an app, to transport them to nearby locations such as transit stops, grocery stores, or doctors appointments.

LIGHT RAIL/ METRO TRAIN

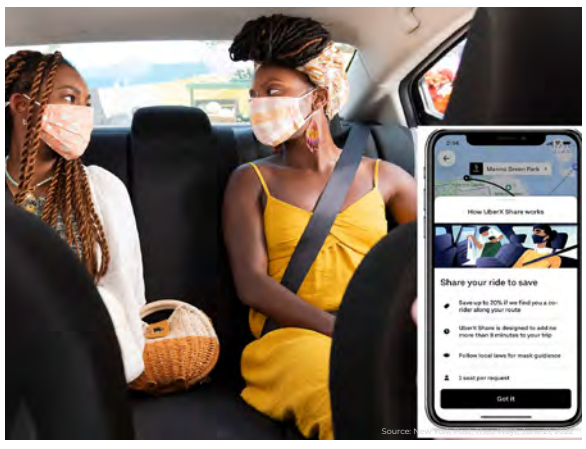
A rail-based public transportation system with trains that carry fewer people and travel at slower speeds compared to heavy rail.

TRADITIONAL FIXED-ROUTE TRANSIT

Traditional bus service that follows a fixed route.

UBERX SHARE

Discounted service offered by Uber that allows users to share a ride with other passengers heading in the same direction.



VANPOOL

A group of people (typically 7-15) commuting together on a regular basis using a van or similarly-sized vehicle. Think carpooling but on a larger scale.

Movilidad de Escondido

GLOSARIO VISUAL

BICICLETA COMPARTIDA

Un servicio de movilidad compartida en el que las personas pueden alquilar bicicletas por períodos cortos de tiempo, a menudo por minutos.

SCOOTER COMPARTIDO

Un servicio de movilidad compartida en el que las personas pueden alquilar scooters eléctricos con motor por períodos cortos de tiempo, a menudo por minutos.

VIAJE COMPARTIDO

Un servicio de movilidad compartida basado en una aplicación en el que las personas pueden solicitar un viaje con poca antelación a los conductores que utilizan sus vehículos personales de alquiler.

COCHE COMPARTIDO

Un servicio de movilidad compartida en el que las personas pueden alquilar coches por períodos cortos de tiempo, a menudo por horas.

AUTOBÚS CIRCULADOR

Un modo de tránsito de ruta fija, circular y de corta distancia que lleva a los pasajeros por un área específica con destinos principales, generalmente el centro de la ciudad.

MICROTRANSITO / LANZADERA

Un servicio de transporte que los usuarios pueden solicitar, comúnmente a través de una aplicación, para transportarlos a lugares cercanos, como paradas de transporte público, tiendas de comestibles o citas médicas.

TREN LIGERO / METRO

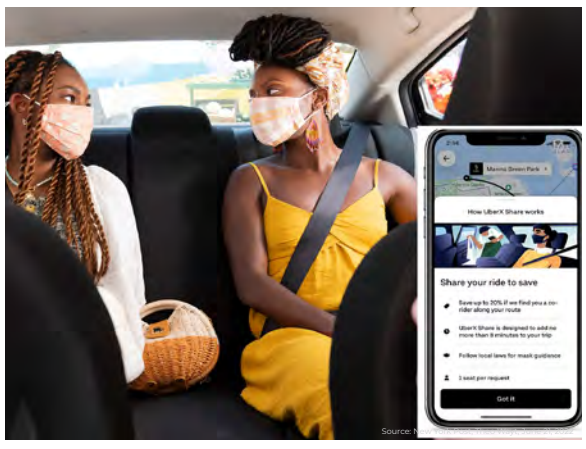
Un sistema de transporte público basado en ferrocarril con trenes que transportan menos personas y viajan a velocidades más lentas en comparación con el tren pesado.

TRÁNSITO TRADICIONAL DE RUTA FIJA

Un servicio de autobús tradicional que sigue un recorrido fijo.

UBERX SHARE

Un servicio con descuento ofrecido por Uber que permite a los usuarios compartir viaje con otros pasajeros que van en la misma dirección.



FURGONETA COMPARTIDA

Un grupo de personas (normalmente entre 7 y 15) que viajan juntas de forma regular utilizando una furgoneta o un vehículo de tamaño similar. Piense en compartir el coche, pero a mayor escala.

ESCONDIDO CATS

COMPREHENSIVE ACTIVE TRANSPORTATION STRATEGY

We need to hear from you!

The City of Escondido is leading several major efforts to bolster mobility options in Escondido.

1. **Developing a Comprehensive Active Transportation Strategy (CATS)** which will look for opportunities to enhance bikeways and sidewalks and provide safer facilities for all people "8-80" to walk, bike, and roll!

2. **Refreshing the Mobility and Infrastructure Element of the General Plan** to evaluate mobility needs, congestion relief, and safety, while also further incorporating "Complete Streets" concepts, as introduced in the 2012 edition of the General Plan. Complete Streets are "streets designed and operated to enable safe use and support mobility for all users" (U.S. Department of Transportation).

3. **Conducting a Community Transportation Needs Assessment (CTNA)** through the state's Clean Mobility Options Voucher Pilot Program (CMO).[1] The CTNA will identify the unmet mobility needs of disadvantaged and low-income communities in Escondido and develop sustainable solutions in partnership with community members.

Before we can get started on these plans, we first need to understand how Escondido residents currently travel and how they would like to travel. *That's where you come in!*

Scan here to get started

www.escondido.org/mobility

Questions? Connect with us!

Craig Williams, Associate Engineer
Traffic & Transportation
(760) 839-4812
cwilliams@escondido.org

[1] *CMO is part of California Climate Investments, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment – particularly in under-served communities, and California Energy Commission's Clean Transportation Program, which is investing more than $1 billion to accelerate the deployment of zero-emission transportation infrastructure and support in-state manufacturing and workforce training and development.*

ESCONDIDO CATS

ESTRATEGIA INTEGRAL PARA EL TRANSPORTE ACTIVO

¡Necesitamos su opinión!

La ciudad de Escondido está dirigiendo varios esfuerzos importantes para mejorar las opciones de movilidad en Escondido.

1. **Desarrollar una estrategia integral para el transporte activo (CATS)** que identifique oportunidades para mejorar las ciclovías y las banquetas y que proporcione una movilidad más segura para que todas las personas "entre los 8 y 80 años" puedan caminar y andar en bicicleta u otro aparato con ruedas.

2. **Actualizar el elemento de movilidad e infraestructura del Plan General de la ciudad** para evaluar las necesidades de movilidad, el descongestionamiento y la seguridad, incorporando además el concepto de "calles completas", tal como se presentaron en el Plan General de 2012. Las calles completas son "calles diseñadas y operadas para permitir un uso seguro y apoyar la movilidad de todos los usuarios" de acuerdo al departamento de transporte de los Estados Unidos.

3. **Realizar una evaluación de las necesidades para el transporte comunitario (CTNA, por siglas en inglés)** a través del programa piloto estatal de vales para opciones de movilidad libres de emisiones (CMO, por sus siglas en inglés)[1]. El CTNA identificará las necesidades de movilidad no atendidas de las comunidades en desventaja y de bajos ingresos en Escondido y desarrollará soluciones sostenibles en colaboración con la comunidad.

Antes de que podamos comenzar con estos planes, necesitamos entender cómo los residentes de Escondido utilizan el transporte en la actualidad y cómo les gustaría seguir utilizándolo. *¡Y en eso es que necesitamos su ayuda!*

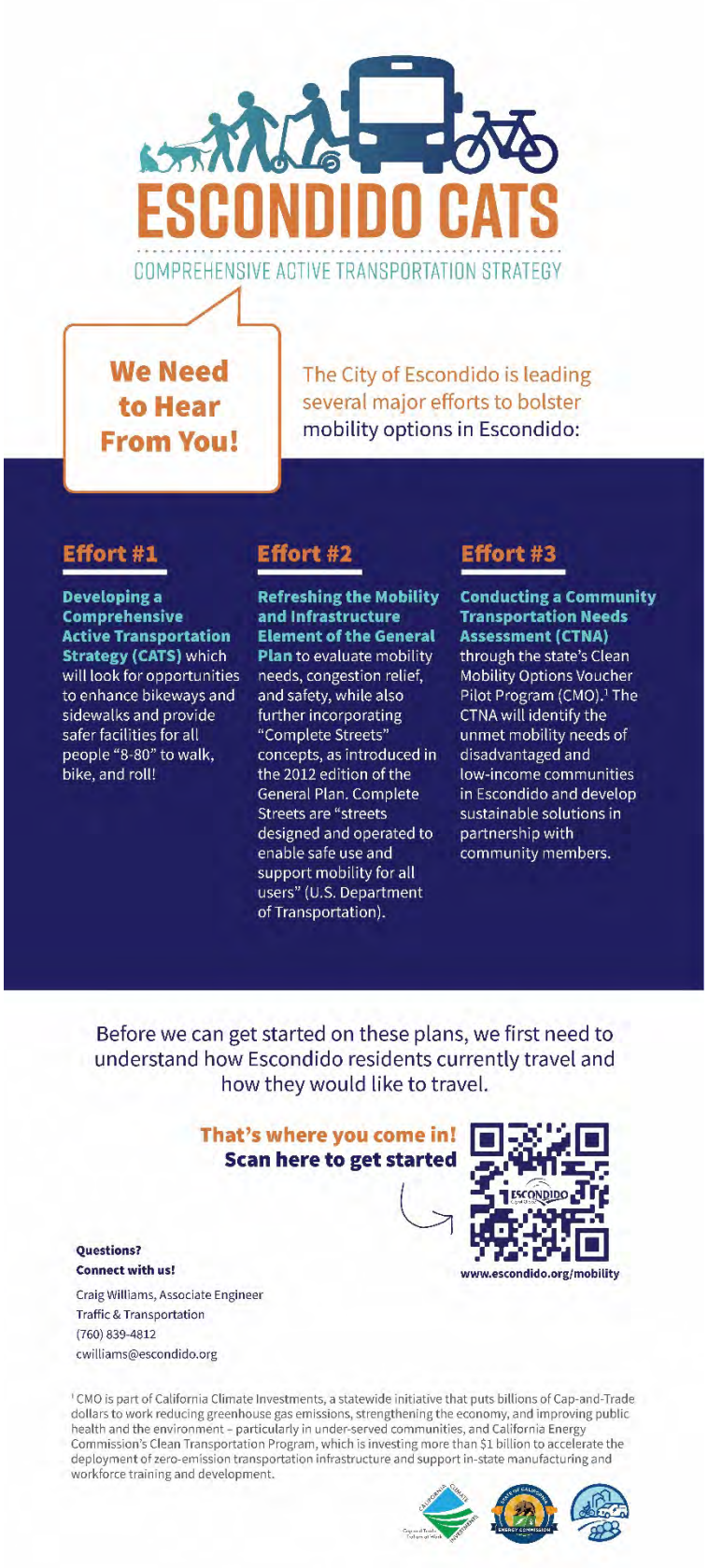
Escanear este código QR

www.escondido.org/mobility

Si tiene preguntas, comuníquese con nosotros

Craig Williams, Ingeniero Asociado
Departamento de tráfico y transporte
(760) 839-4812
cwilliams@escondido.org

[1] *El Programa Piloto de Clean Mobility Options (CMO) es una iniciativa estatal que proporciona fondos para opciones de movilidad compartida de cero emisiones a comunidades de bajos recursos en California. CMO está disponible en todo California para las comunidades de bajos recursos elegibles, así como para las comunidades tribales de bajos ingresos y de viviendas económicas elegibles, para aumentar el acceso a opciones de transporte seguras, confiables, convenientes y económicas.*


ESCONDIDO CATS
COMPREHENSIVE ACTIVE TRANSPORTATION STRATEGY
We Need to Hear From You!
The City of Escondido is leading several major efforts to bolster mobility options in Escondido:
Effort #1
Developing a Comprehensive Active Transportation Strategy (CATS) which will look for opportunities to enhance bikeways and sidewalks and provide safer facilities for all people "8-80" to walk, bike, and roll!
Effort #2
Refreshing the Mobility and Infrastructure Element of the General Plan to evaluate mobility needs, congestion relief, and safety, while also further incorporating "Complete Streets" concepts, as introduced in the 2012 edition of the General Plan. Complete Streets are "streets designed and operated to enable safe use and support mobility for all users" (U.S. Department of Transportation).
Effort #3
Conducting a Community Transportation Needs Assessment (CTNA) through the state's Clean Mobility Options Voucher Pilot Program (CMO).[1] The CTNA will identify the unmet mobility needs of disadvantaged and low-income communities in Escondido and develop sustainable solutions in partnership with community members.
Before we can get started on these plans, we first need to understand how Escondido residents currently travel and how they would like to travel.
That's where you come in!
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ESCONDIDO CATS

ESTRATEGIA INTEGRAL PARA EL TRANSPORTE ACTIVO

¡Necesitamos su opinión!

La ciudad de Escondido está dirigiendo varios esfuerzos importantes para mejorar las opciones de movilidad en Escondido.

Misión #1

Desarrollar una estrategia integral para el transporte activo (CATS) que identifique oportunidades para mejorar las ciclovías y las banquetas y que proporcione una movilidad más segura para que todas las personas "entre los 8 y 80 años" puedan caminar y andar en bicicleta u otro aparato con ruedas.

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Misión #3

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HOW DO YOU GET AROUND ESCONDIDO?

YOU ARE INVITED TO JOIN A COMMUNITY CONVERSATION

WHEN

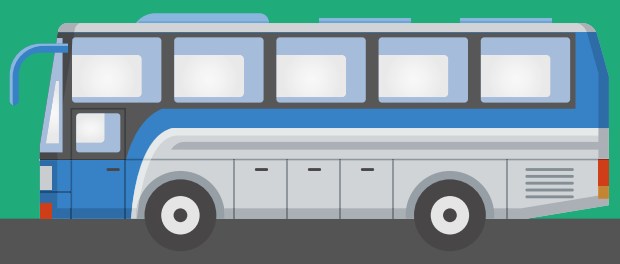
April 4, 2024
4:30-7:00pm

WHERE

Escondido Library
239 S Kalmia St,
Escondido, CA 92025

WHY

Your input matters!



What challenges do you face while walking, biking, or taking transit?

What would make it safer and easier for you to get around?

What kinds of improvements would you like to see?

LIGHT SNACKS AND DRINKS WILL BE PROVIDED

www.escondido.org/mobility

Questions? Contact us:

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¿CÓMO MOVERSE POR ESCONDIDO?

ESTÁ INVITADO A UNIRSE A UNA CONVERSACIÓN COMUNITARIA

CUANDO

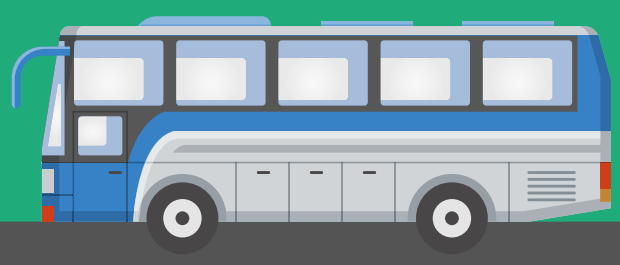
Abril 4, 2024
4:30-7:00pm

DÓNDE

Escondido Library
239 S Kalmia St,
Escondido, CA 92025

POR QUÉ

Tu opinión importa



¿Qué desafíos enfrenta al caminar, andar en bicicleta o tomar el transporte público?

¿Qué haría que fuera más seguro y fácil moverse por la ciudad?

¿Qué tipo de mejoramiento le gustaría ver?

SE PROPORCIONARÁN REFRESCOS

www.escondido.org/mobility

¿Preguntas? Comuníquese con nosotros:

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El Programa Fondo del Clean Mobility Options (CMO) es una iniciativa estatal que proporciona fondos para opciones de movilidad compartida de cero emisiones a comunidades de bajos recursos en California. CMO está disponible en todo California para las comunidades de bajos recursos elegibles, así como para las comunidades tribales de bajos ingresos y de viviendas económicas elegibles, para aumentar el acceso a opciones de transporte seguras, confiables, convenientes y económicas.

SANDAG | 2025 RAddition PIO
Photo del Clean Mobility Options
1954

What is a Community Transportation Needs Assessment?

¿Qué es una Evaluación de las Necesidades de Transporte Comunitario?

The City of Escondido was awarded a grant to conduct a Community Transportation Needs Assessment (CTNA) through the state's Clean Mobility Options Voucher Pilot Program (CMO).[1] CMO is a statewide initiative that provides funding for zero-emission, shared mobility options to under-resourced communities in California. The map on the right shows the CMO Grant Coverage Area for Escondido. Through the CTNA, the City hopes to:

Identify and Understand Unmet Mobility Needs of Escondido's Most Vulnerable Residents

Co-Create Sustainable Solutions In Collaboration With Community Members

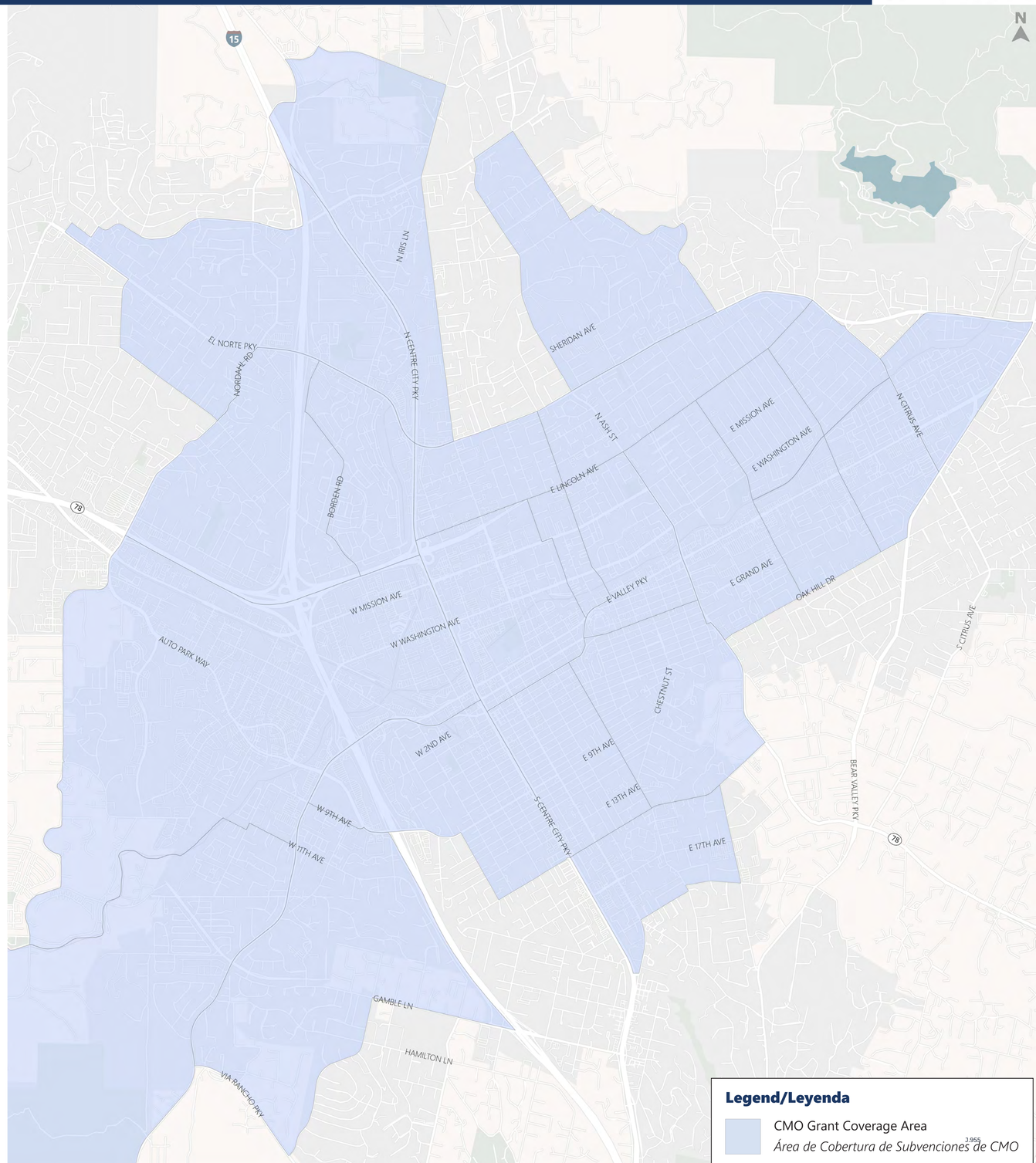
1 CMO is part of California Climate Investments (CCI), a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in under-served communities, and California Energy Commission's (CEC) Clean Transportation Program, which is investing more than $1 billion to accelerate the deployment of zero-emission transportation infrastructure and support in-state manufacturing and workforce training and development.

La ciudad de Escondido recibió una subvención para realizar una Evaluación de las Necesidades de Transporte Comunitario (CTNA, por sus siglas en inglés)) a través del Programa Piloto de Vales de Opciones de Movilidad Limpia (CMO, por sus siglas en inglés)) del estado.[1] La CMO es una iniciativa estatal que proporciona fondos para opciones de movilidad compartida sin emisiones a comunidades con limitados recursos en California. El mapa de la derecha muestra el área de cobertura de subvenciones de CMO para Escondido. A través de la CTNA, la Ciudad espera:

Identificar y comprender las necesidades de movilidad insatisfechas de los residentes más vulnerables de Escondido

Co-crear soluciones sostenibles en colaboración con miembros de la comunidad

1 El Programa Piloto de Clean Mobility Options (CMO) es una iniciativa estatal que proporciona fondos para opciones de movilidad compartida de cero emisiones a comunidades de bajos recursos en California. CMO está disponible en todo California para las comunidades de bajos recursos elegibles, así como para las comunidades tribales de bajos ingresos y de viviendas económicas elegibles, para aumentar el acceso a opciones de transporte seguras, confiables, convenientes y económicas.



March 2024 www.escondido.org/city-newsletters

Park Avenue Post

Park Avenue Community Center (PACC) new, events, activities, resources, & a whole lot of fun!

Office Hours	Contact Us	Find Us Here!
Monday - Friday	760-839-4688	210 E. Park Avenue
8 a.m. - 3 p.m.	recreation@escondido.org	Escondido, CA 92025

We need to hear from you!

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Park Avenue Post

Do you have ideas for making it safer and easier to get around Escondido by foot, bike, or transit? We want to hear from you!

ESCONDIDO CATS
COMPREHENSIVE ACTIVE TRANSPORTATION STRATEGY

- How do you currently travel and how would you like to travel?
- Where and what kind of improvements to the City's pedestrian, bike, and transit networks are needed to help you safely get where you want to go?
- What new or expanded mobility services would you like to see in Escondido?

To provide feedback, visit our project website at www.escondido.org/mobility. Here you can take our brief survey to share your experience getting around Escondido, and provide location-specific comments on the City's pedestrian, bike, and transit networks using our interactive feedback map.

Questions? Connect with us!

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ESCONDIDO TIMES-ADVOCATE
The hometown newspaper of Escondido, California

Friday, February 23, 2024

Community News

City survey asks 'how do people travel?'

Times-Advocate | on February 08, 2024

Escondido City traffic engineer Craig Williams is soliciting residents who travel (we're guessing that's nearly everyone) to fill out a survey on their mobility habits.

Williams recently sent a letter to the Downtown Business Association, asking it to "help with spreading the word on a few exciting mobility planning efforts that are underway in Escondido. The purpose is to update and refresh the General Plan Mobility Element

An overview of this project can be found at www.escondido.org/mobility.

The city has begun outreach for this project and has developed some tools to help them understand:

How people currently travel and how they would like to travel

Where and what kinds of improvements to the City's pedestrian, bicycle, and transit networks are needed to help people safely get where they want to go

What new or expanded mobility services people would like to see in Escondido

The first of these tools is an interactive web map where community members can provide location-specific comments on the City's active transportation network. The second is a mobility survey where community members can share their experience using clean mobility options in Escondido. Both tools can be found on the project website under "Get Involved!".

Questions? Email Williams at cwilliams@escondido.org.

Trending Stories

1 Thrift store clothing room reopening

2 Supers remove homeless shelter site from Escondido

3 Stephen Houlahan looks to unseat Darrell Issa in 48th District

4 Founders of Our Faith: Kathryn Kuhlman

5 A Grand time at the Chocolate Festival

Weekly Activity Report

February 1, 2024

Futsal Court Grand Opening

Join us for a ribbon cutting and dedication of the new Futsal Courts at Washington Park. The event is this Saturday, February 3, at 1 p.m.

There will be lots of fun happening at Washington Park on Saturday:
The second stop on the San Diego FC's Ball Tour
We Love Esco Day! Day (8-10 a.m.)
Street Soccer Cup & Finals (11 a.m.-5 p.m.)
Skateboard Trick Competition (1-2 p.m.)

More information can be found here.

Escondido Comprehensive Active Transportation Strategy

Do you have ideas for making it safer and easier to get around Escondido by foot, bike, or transit? We want to hear from you!

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To provide feedback, visit our project website at www.escondido.org/mobility. Here you can take our *brief survey* to share your experience getting around Escondido, and provide location-specific comments on the City's pedestrian, bike, and transit networks using our *interactive feedback map*.

Weekly Activity Report

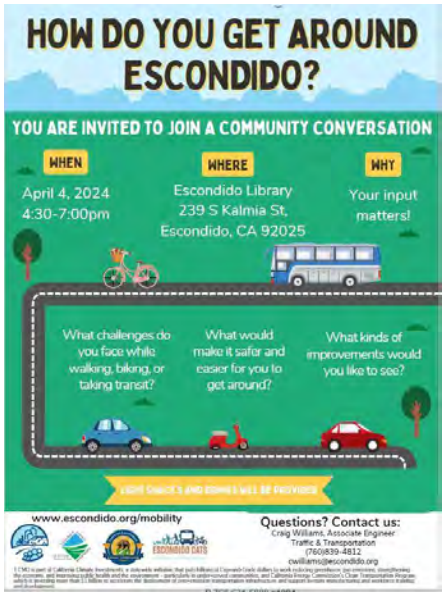
March 28, 2024

Dixon Lake Stocked

Yesterday, March 27 Dixon Lake was stocked with over 1,000 lbs. of Rainbow Trout.Hours are 6:30 a.m. to 7 p.m. and a daily fishing permit is required. We hope to see you there.

Community Feedback

We'd like to hear from you! How do you get around Escondido? Join us for a community conversation on April 4 from 4:30 - 7 p.m. at the Escondido Library and share your thoughts.



Open Gym

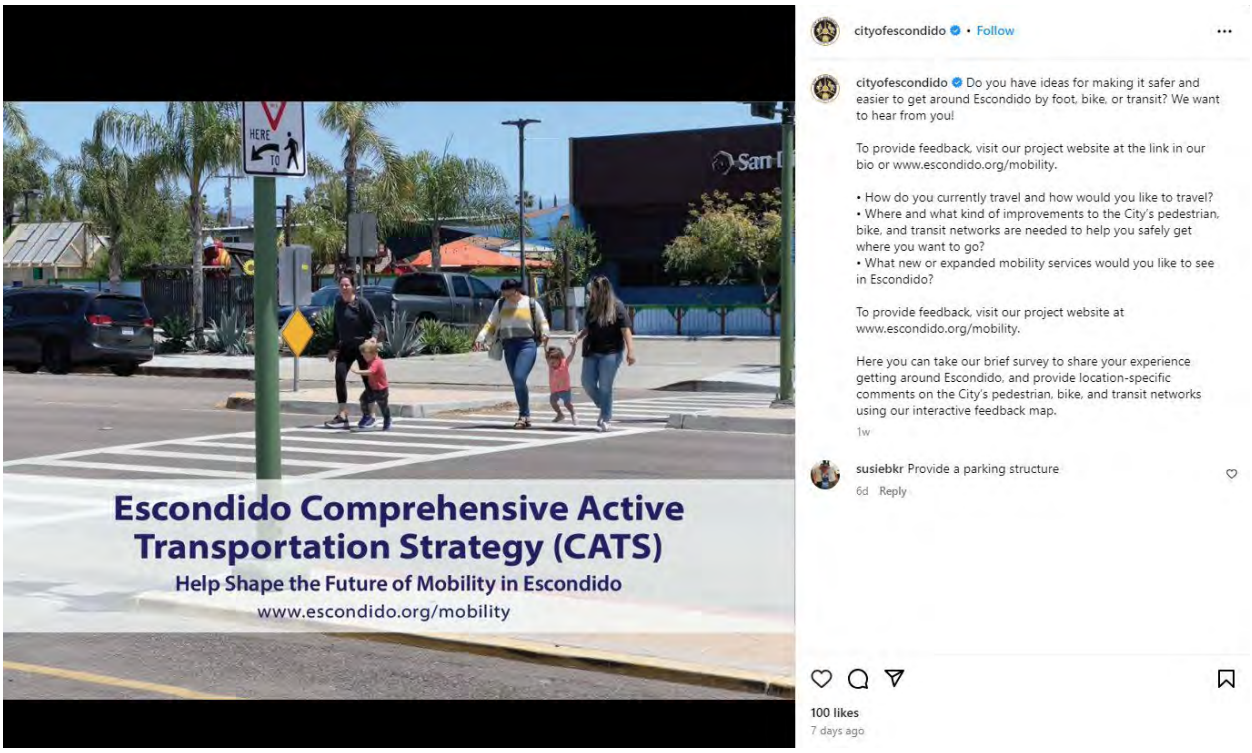
Looking for ways to stay active, or play a game with friends? Open Gym at the East Valley Community Center is for all ages and just $5 to drop in.

You can enjoy a game of pickleball or basketball (volleyball & badminton are occasionally available; ask at the front desk.)

Check out the schedule here:
https://recreation.escondido.org/open-gym

Interacting with the City, and Staying Informed:

- See something that needs to be fixed? To report potholes, graffiti, and discarded debris, use Report It!
- You can pay your utility bill and apply for a business license or permit utilizing our Online Services
- Curious about what is being built around town? To see up-to-date major project updates, visit the Major Projects Dashboard
- Never miss a class…register for recreation classes and leagues using our Online Registration


HERE
TO
Escondido Comprehensive Active Transportation Strategy (CATS)
Help Shape the Future of Mobility in Escondido
www.escondido.org/mobility
cityofescondido • Follow
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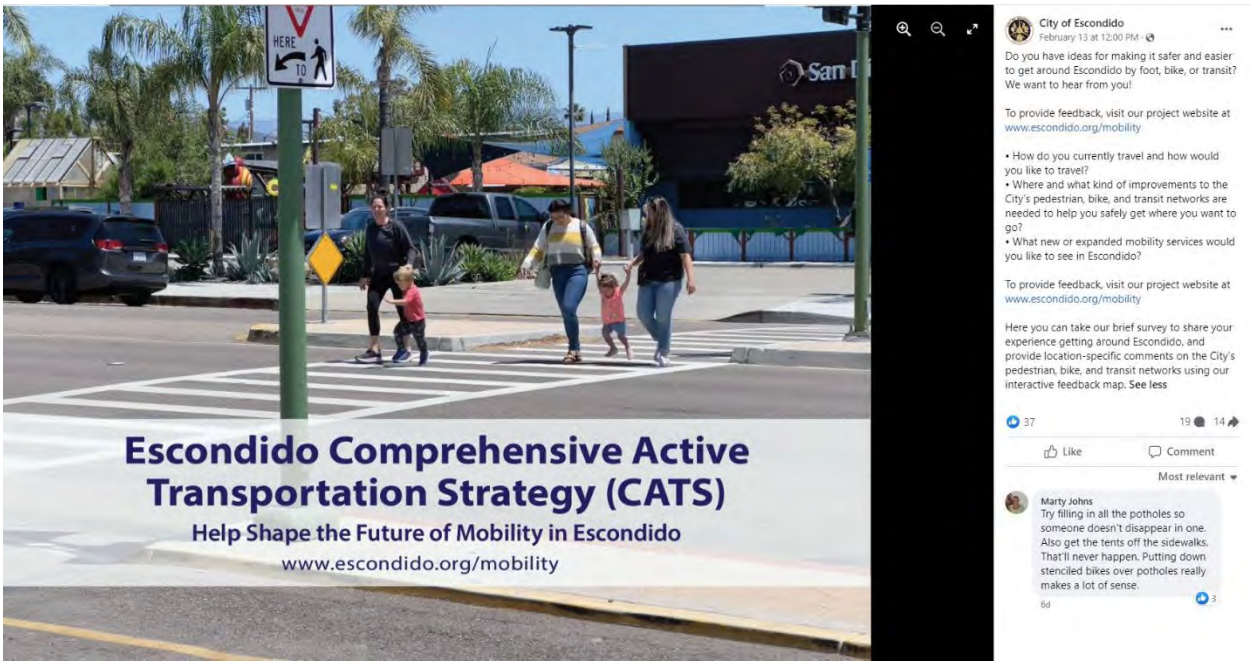
1w
susiebkr Provide a parking structure
6d Reply
100 likes
7 days ago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City of Escondido
February 13 at 12:00 PM
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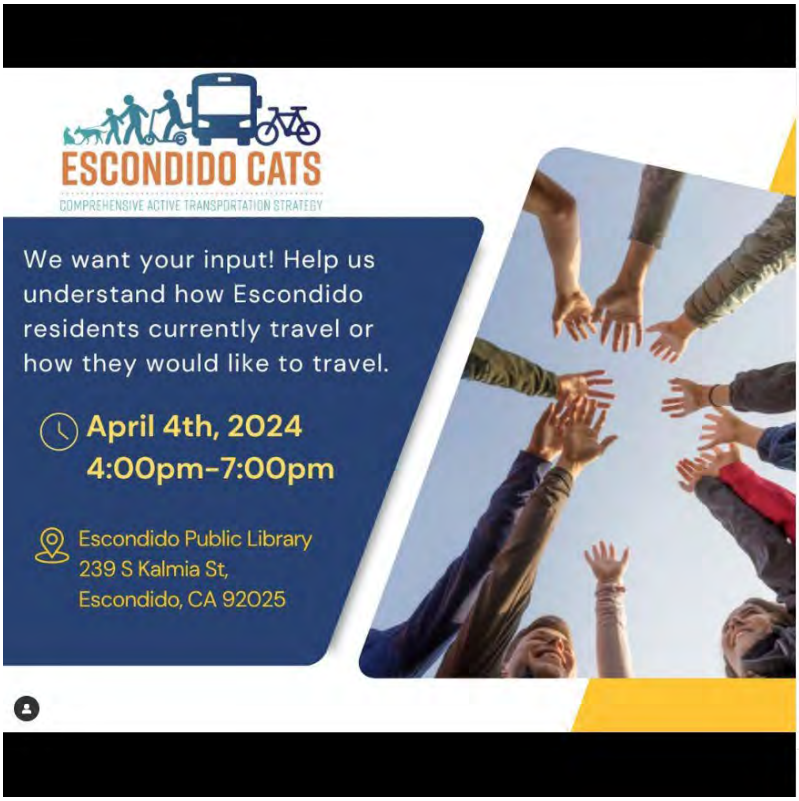
37
19 14
Like
Comment
Most relevant
Marty Johns
Try filling in all the potholes so someone doesn't disappear in one. Also get the tents off the sidewalks. That'll never happen. Putting down stenciled bikes over potholes really makes a lot of sense.
6d
3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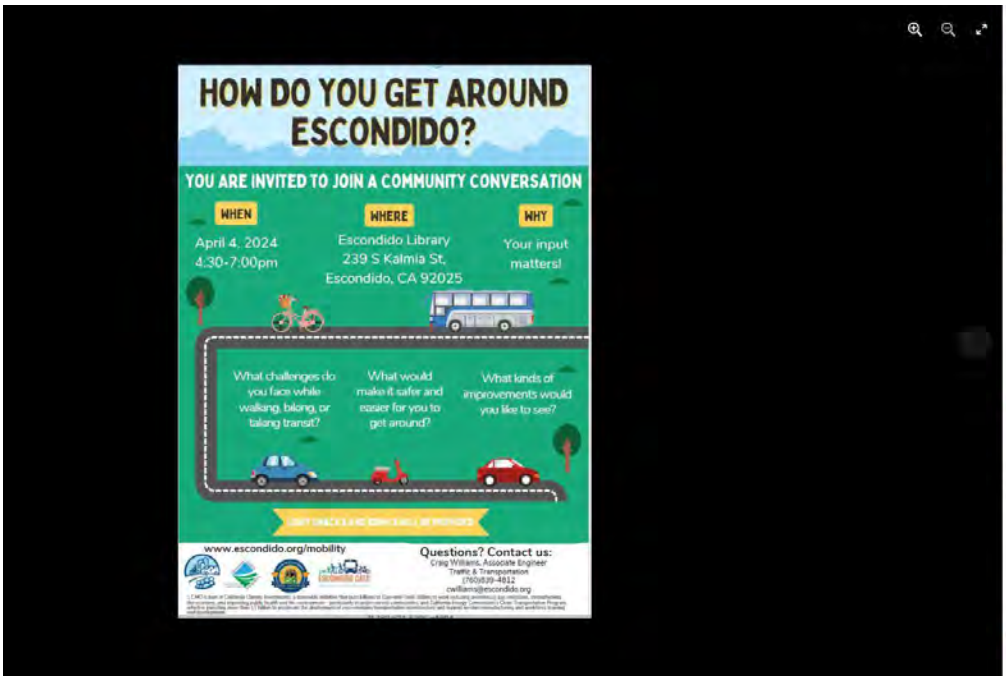
April 4th, 2024
4:00pm-7:00pm
Escondido Public Library
239 S Kalmia St,
Escondido, CA 92025

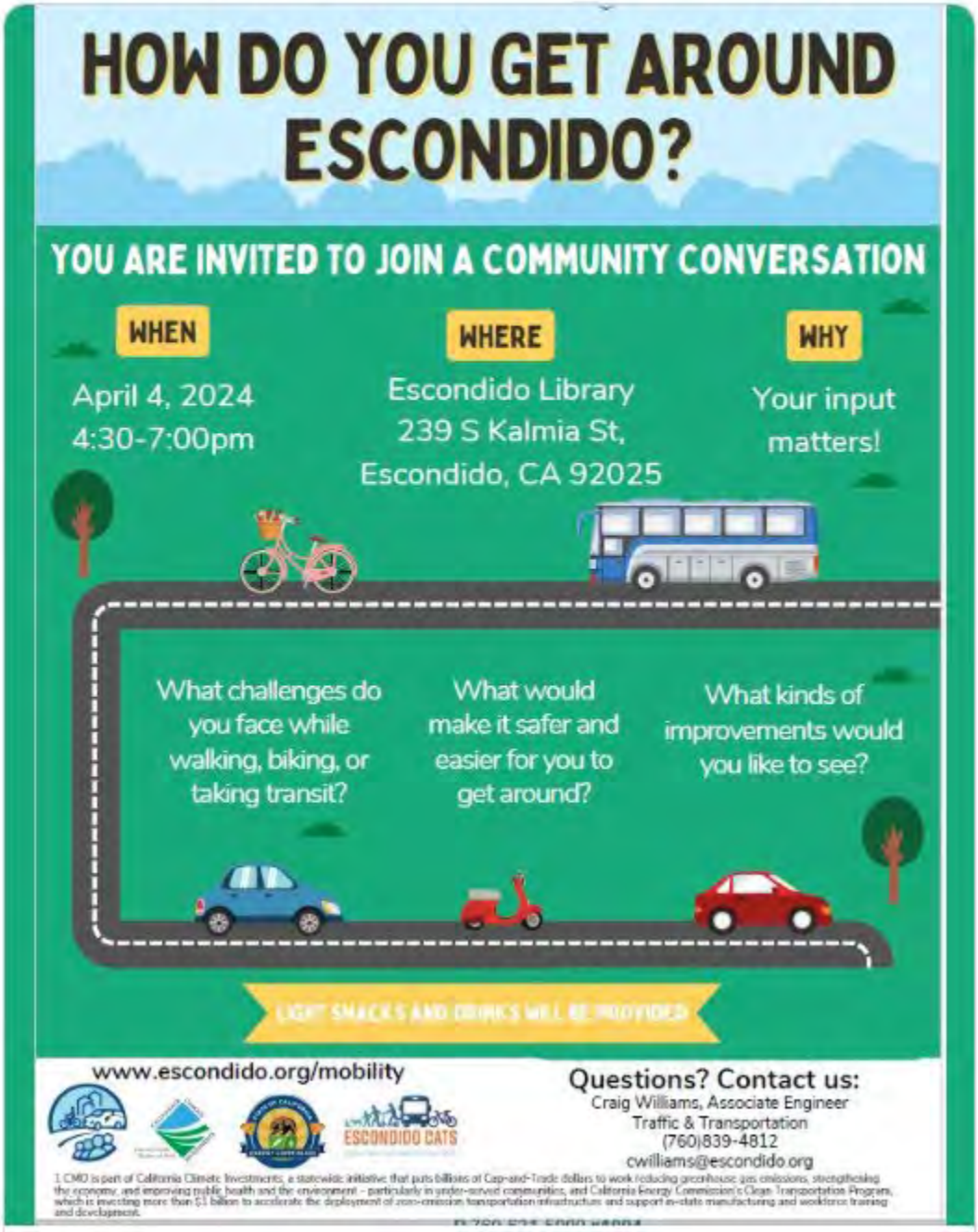
healthyescondidocoalition • Follow
healthyescondidocoalition Join us for a Community Conversation on Escondido's Community Transportation Needs Assessment (CTNA), Comprehensive Active Transportation Strategy (CATS), and Mobility Element Refresh. These three efforts will guide the development of the City's transportation network for years to come. You will have the opportunity to meet with local staff, consultants, and advocates advancing these planning efforts and share your feedback on existing challenges that you face, as well as your preferences for future transportation improvements in Escondido.
When: Thursday, April 4th from 4:30-7pm
Where: Escondido Public Library (239 S Kalmia St)
Light refreshments will be provided.
Can't make the event? Don't worry - you can still provide feedback by visiting our project website (see link in bio).
#Escondido #Mobility #CleanMobility #SharedMobility #InnovativeMobility #CleanMobilityForAll #Transportation #ActiveTransportation #CAClimateAction #CAClimateInvestments #CapandTrade
1w
6 likes
7 days ago
Add a comment...

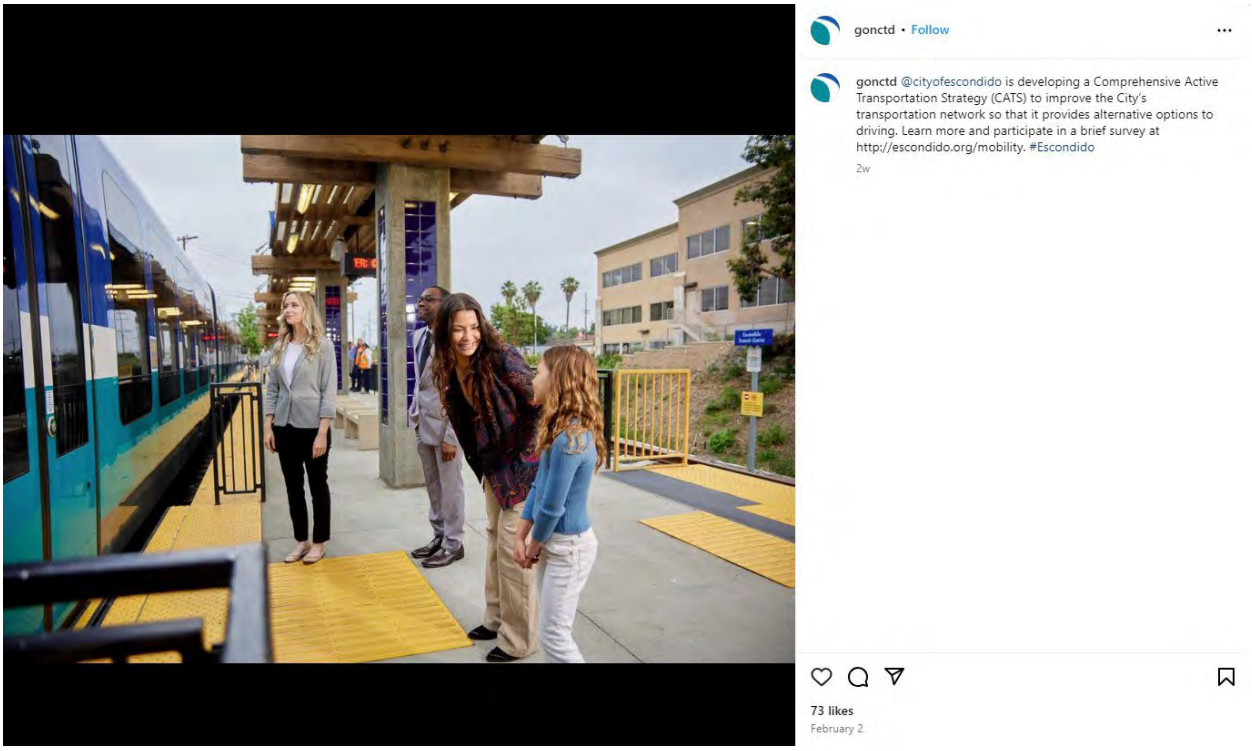

HOW DO YOU GET AROUND ESCONDIDO?
YOU ARE INVITED TO JOIN A COMMUNITY CONVERSATION
WHEN
April 4, 2024
4:30-7:00pm
WHERE
Escondido Library
239 S Kalmia St,
Escondido, CA 92025
WHY
Your input matters!
What challenges do you face while walking, biking, or taking transit?
What would make it safer and easier for you to get around?
What kinds of improvements would you like to see?
www.escondido.org/mobility
Questions? Contact us:

City of Escondido
March 26 at 11:00 AM
We'd like to hear from you! How do you get around Escondido?
Join us for a community conversation on April 4 from 4:30 - 7 p.m. at the Escondido Library and share your thoughts.
Like
Comment
Share
Most relevant
Timothy Garcia
Mayor Dane M. White - City of Escondido - Mayor is a failure. He is failing Escondido with his secret meetings with hand-picked guests and hand-picked questions...with his little homeless subcommittee with only him and another councilman on it.
Dane W... See more
Allene Bailey
Fix the pot holes first !
Timothy Garcia replied · 1 Reply
Dávid Náll'n
These streets are dangerous. No one follows the rules of the road. So don't trying pushing a biking agenda...And if you magically made it to your destination without incident. You'll probably come out to see a homeless person has claimed your bike as the... See more
Write a comment...

City of Escondido
5d

Reminder: In addition to the Public Art meeting this evening, there is also a community conversation about transportation in Escondido at the Escondido Public Library. See you there!




gonctd • Follow
gonctd @cityofescondido is developing a Comprehensive Active Transportation Strategy (CATS) to improve the City's transportation network so that it provides alternative options to driving. Learn more and participate in a brief survey at http://escondido.org/mobility. #Escondido
2w
73 likes
February 2

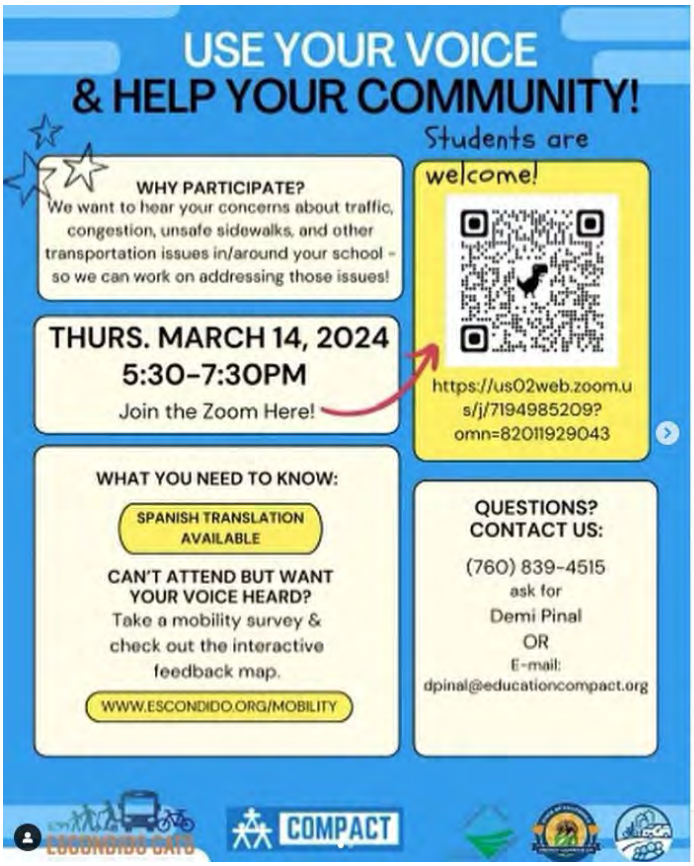
North County Transit District (NCTD)
February 2 at 5:00 PM
The City of Escondido is developing a Comprehensive Active Transportation Strategy (CATS) to improve the city's transportation network so that it provides alternative options to driving. Learn more and participate in a brief survey at http://escondido.org/mobility.
#Escondido
21
3
1
Like
Comment
Most relevant
Top fan
Oscar G Soto Valle
Ciry should set up benches at all bus stops
2w
Scott Nicholls replied · 2 Replies

SD Stay Informed is at **Escondido Public Library**.
April 2 at 1:42 PM · Escondido, CA ·

#Repost @healthyescondidocoalition with @use.repost
. . .
Join us for a Community Conversation on Escondido's Community Transportation Needs Assessment (CTNA), Comprehensive Active Transportation Strategy (CATS), and Mobility Element Refresh. These three efforts will guide the development of the City's transportation network for years to come. You will have the opportunity to meet with local staff, consultants, and advocates advancing these planning efforts and share your feedb... See more

2

Like Comment Share


USE YOUR VOICE
& HELP YOUR COMMUNITY!
Students are welcome!
WHY PARTICIPATE?
We want to hear your concerns about traffic, congestion, unsafe sidewalks, and other transportation issues in/around your school - so we can work on addressing those issues!
THURS. MARCH 14, 2024
5:30-7:30PM
Join the Zoom Here!
https://us02web.zoom.us/j/7194985209?omn=82011929043
WHAT YOU NEED TO KNOW:
SPANISH TRANSLATION AVAILABLE
CAN'T ATTEND BUT WANT YOUR VOICE HEARD?
Take a mobility survey & check out the interactive feedback map.
WWW.ESCONDIDO.ORG/MOBILITY
QUESTIONS? CONTACT US:
(760) 839-4515
ask for
Demi Pinal
OR
E-mail:
dpinal@educationcompact.org
COMPACT

eecompact • Follow
eecompact Tonight on Zoom! Don't miss out on the conversation. We want to hear your voice, concerns, & feedback about traffic, congestion, and unsafe sidewalks in Escondido.
Reidy Creek Elem.
Rincon Middle School
Escondido High School
North Broadway Elem.
Rock Springs Elem.
Lincoln Elem.
Tonight is your night, see you there! Spanish Translation available. #escondido #eusd #euhsd #school #EscondidoCATS
3w
15 likes
March 14
Add a comment...

USE YOUR VOICE
USA TU VOZ
ESCONDIDO CATS
COMPACT
March 18th, 2024
GLEN VIEW
ROSE ELEMENTARY
PIONEER ELEMENTARY
FARR ELEMENTARY
MISSION MIDDLE
CONWAY ACADEMY
JCCS
5:30pm-7:30pm
TRADUCCIÓN SERA DISPONIBLE
https://us02web.zoom.us/j/83971388930
Meeting ID: 839 7138 8930
HELP YOUR COMMUNITY
AYUDA TU COMMUNIDAD

eecompact • Follow
eecompact TONIGHT ON ZOOM! Don't miss out on the conversation. We want to hear your concerns/feedback about transportation issues in/around your school. Parents, students, staff & community members are all welcome.
Tonight is your night, see you there!
¡ESTA NOCHE EN ZOOM! No te pierdas la conversación. ¡Queremos escuchar tus opiniones sobre problemas de transporte alrededor de su escuela. Padres, alumnos, facultad son bienvenidos!
#escondidocats #educationcompact #escondido #eusd
3w See translation
11 likes
March 18
Add a comment...

Escondido Education COMPACT
March 14 at 5:53 PM ·

Tonight on Zoom! Don't miss out on the conversation. We want to hear your voice, concerns, & feedback about traffic, congestion, and unsafe sidewalks in Escondido.
Reidy Creek Elem.
Rincon Middle School
Escondido High School
North Broadway Elem.
Rock Springs Elem.
Lincoln Elem.
Tonight is your night, see you there! Spanish Translation available. #escondido #eusd #euhsd #school #EscondidoCATS

4 2 shares

Like Comment Share

eecompact • Follow
Escondido Public Library

eecompact Join us for a Community Conversation on Escondido's Community Transportation Needs Assessment (CTNA), Comprehensive Active Transportation Strategy (CATS), and Mobility Element Refresh. These three efforts will guide the development of the City's transportation network for years to come. You will have the opportunity to meet with local staff, consultants, and advocates advancing these planning efforts and share your feedback on existing challenges that you face, as well as your preferences for future transportation improvements in Escondido.

Can't make the event? Don't worry - you can still provide feedback by visiting our project website (see link in bio).

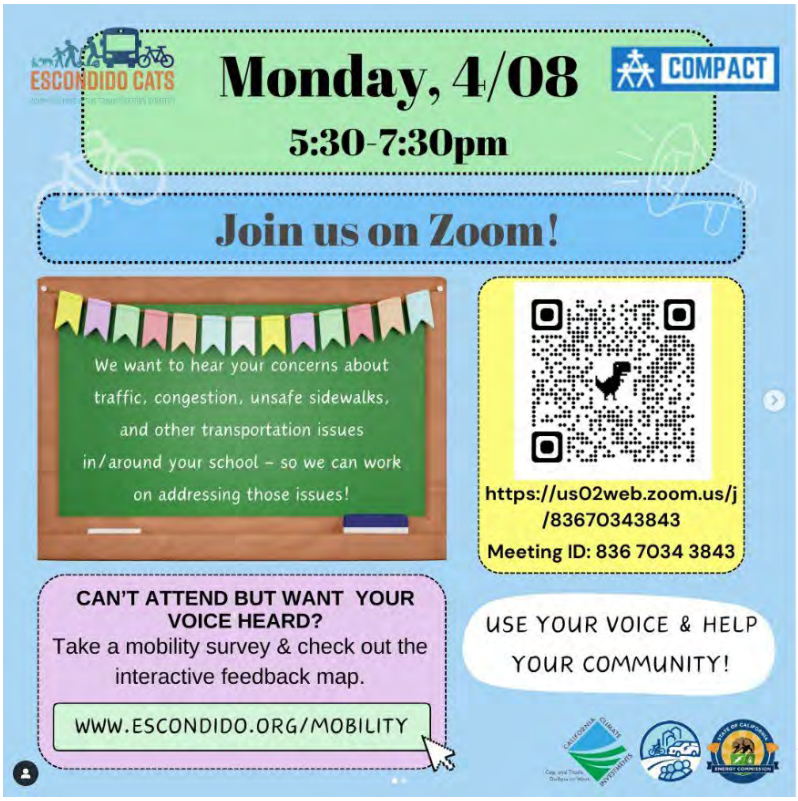
Únase a nosotros para una conversación comunitaria sobre la evaluación de las necesidades de transporte comunitario de Escondido (CTNA), Estrategia Integral de Transporte Activo (CATS) y Actualización de Elementos de Movilidad. Estos tres esfuerzos guiarán el desarrollo de la red de transporte de la ciudad en los años venideros. Usted tendrá la oportunidad de reunirse con personal local, consultores y defensores que promueven estos esfuerzos de planificación y compartir sus comentarios sobre los desafíos existentes que enfrenta, así como sus preferencias para el futuro mejoras en el transporte en Escondido

¿No puedes ir al evento? No se preocupe: aún puede enviar comentarios visitando el sitio web de nuestro proyecto (ver enlace en biografía)

#Escondido #Mobility #CleanMobility #SharedMobility #InnovativeMobility #CleanMobilityForAll

18 likes
April 1

Add a comment...



eecompact • Follow

eecompact 💻 VALLEY H.S, OG ELEM., OGHS, HIDDEN VALLEY M.S, QUANTUM ACADEMY, ESCONDIDO CHARTER H.S ⭐

TONIGHT ON ZOOM! Don't miss out on the conversation. We want to hear your concerns/feedback about transportation issues in/around your school. Parents, students, staff & community members are all welcome.
Tonight is your night, see you there!

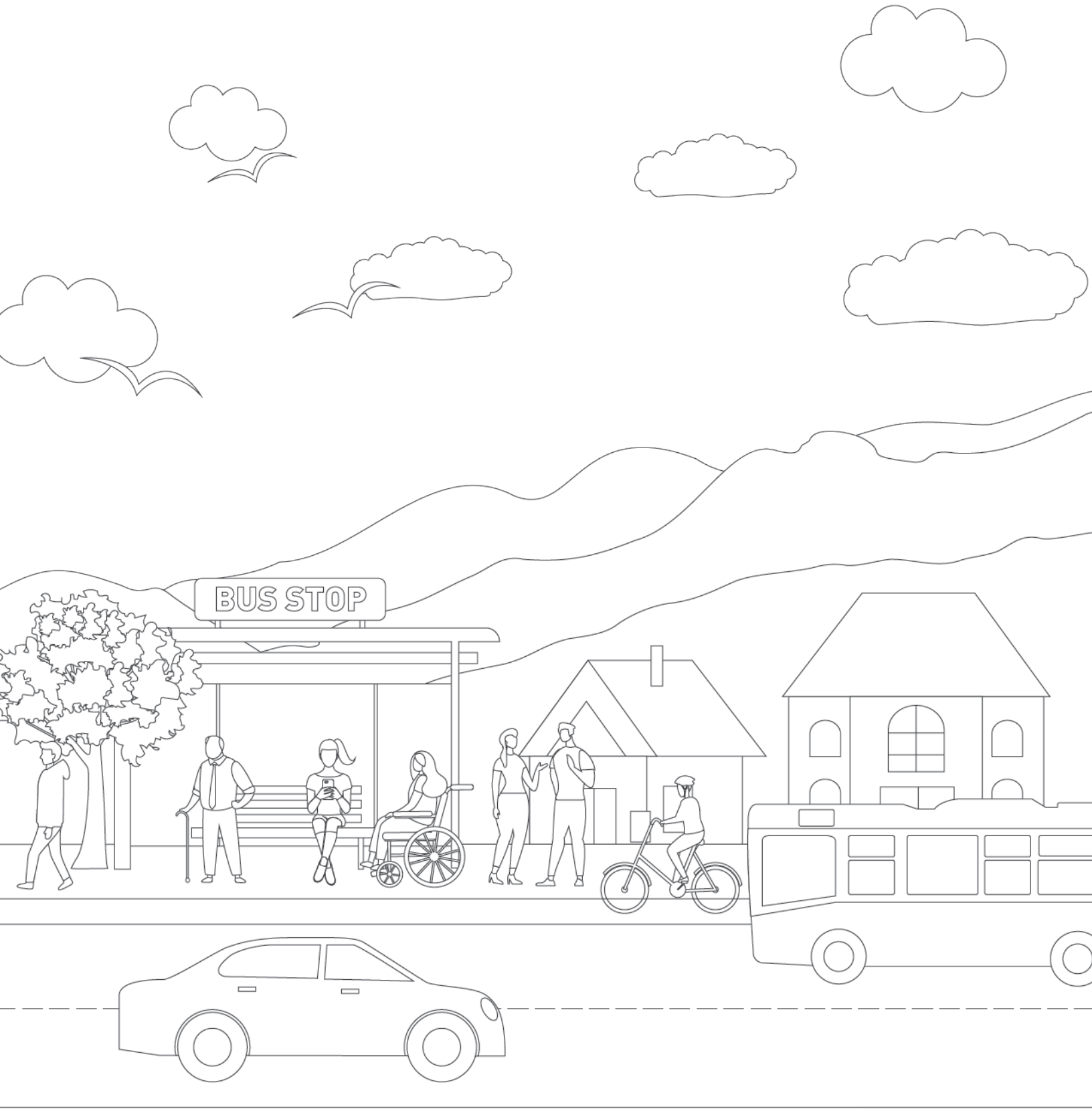
¡ESTA NOCHE EN ZOOM! No te pierdas la conversación. ¡Queremos escuchar tus opiniones sobre problemas de transporte alrededor de su escuela. Padres, alumnos, facultad son bienvenidos!

#escondidocats #educationcompact #escondido #eusd

Edited · 1d See translation

9 likes
1 day ago

Add a comment...



Color Your World.

Colorea tu mundo.

Appendix B: Community Survey

Mobility Survey

Welcome to the Escondido Community Mobility Survey!

The City of Escondido received a Clean Mobility Options (CMO) grant to conduct a Community Transportation Needs Assessment (CTNA). Clean mobility includes modes such as walking, biking, scootering, skateboarding, transit, electric vehicles, shared mobility services, and more. Please share your experience using clean mobility options in Escondido by filling out this brief survey. Your answers will be used to help the City determine what new or expanded mobility services would be preferred and utilized by community members to meet transportation needs.

Don't forget to enter your name and email address at the end of the survey for a chance to win a $50 Visa gift card!

---

01. Where would you like to walk, bike, or ride transit to that you do not currently? (Select all that apply)

- ☐ Work
- ☐ School (for yourself or your children)
- ☐ Grocery store
- ☐ Transit stop
- ☐ Restaurant
- ☐ Park
- ☐ Homes of friends/family
- ☐ For exercise/leisure
- ☐ For running errands
- ☐ N/A – I can walk, bike, or ride transit to everywhere I'd like to go
- ☐ Other:

  _____

  _____

02. What currently prevents you from walking to places you would like to go? (Select all that apply)

- ☐ Distance between origin/destination is too far
- ☐ Takes too long to walk
- ☐ Lack of sidewalks/crosswalks or poor sidewalk/crosswalk conditions
- ☐ I am pregnant or have children/dependents
- ☐ I am disabled, have difficulty walking, or use an assistive device (walker, wheelchair, etc.)
- ☐ Concern for personal safety
- ☐ Fear of traffic collision or reckless driving behavior
- ☐ My route includes hilly terrain
- ☐ Nothing – I can safely walk everywhere I'd like to go
- ☐ Other:

  _____

  _____

03. What currently prevents you from biking to places you would like to go? (Select all that apply)

- ☐ Distance between origin/destination is too far
- ☐ Takes too long to bike
- ☐ Lack of bike lanes or poor bike lane conditions
- ☐ I am pregnant or have children/dependents
- ☐ I am disabled/unable to bike
- ☐ Concern for personal safety
- ☐ Fear of traffic collision or reckless driving behavior
- ☐ Lack of secure bike parking
- ☐ My route includes hilly terrain
- ☐ I don't own/have access to a bike
- ☐ I don't know how to ride a bike
- ☐ Nothing – I can safely bike everywhere I'd like to go
- ☐ Other:

_____

_____

04. What makes you feel unsafe while walking or biking? (Select all that apply)

- ☐ High traffic speeds/volume
- ☐ Drivers not showing courtesy to pedestrians/bicyclists
- ☐ Lack of sidewalks/crosswalks/bike lanes or poor sidewalk/crosswalk/ bike lane conditions
- ☐ Lack of adequate lighting
- ☐ Potential for crime
- ☐ Nothing – I feel safe while walking and biking
- ☐ Other:

_____

_____

05. Which of the following would make you more likely to walk or bike? (Select all that apply)

- ☐ More/better bike parking infrastructure
- ☐ More protected or marked crossings
- ☐ Better street lighting
- ☐ Reduced vehicle speeds
- ☐ Designated safe routes for walking/biking to school
- ☐ On-street parking that serves as a buffer between people and cars
- ☐ Sidewalks/bike lanes that are separated from traffic
- ☐ Greater connectivity between regional walking/biking paths and neighboring communities
- ☐ Other:

_____

_____

06. What are your priorities when it comes to taking transit? Rank the following options in order of priority, with 1 being your highest priority and 8 being your lowest priority.

_____ Reliability	_____ Frequency	_____ Convenience	_____ Safety
_____ Speed	_____ Comfort	_____ Affordability	_____ Accessibility

07. If there was a circulator bus in downtown Escondido, would you ride it?

Note: A circulator bus is a short-distance, circular, fixed-route transit mode that takes riders around a specific area with major destinations, typically downtown.

- ☐ Yes
- ☐ No

08. Which transportation options do you use now, and which transportation options would you use if they were readily available and affordable? (Select all that apply)

	Use now	Would use	Would not use	Not familiar with this
Drive alone	☐	☐	☐	☐
Drive with others (e.g., coworkers, family, friends, etc.)	☐	☐	☐	☐
Bus	☐	☐	☐	☐
Light rail/metro train	☐	☐	☐	☐
Bicycle	☐	☐	☐	☐
Walk/roll	☐	☐	☐	☐
Uber/Lyft	☐	☐	☐	☐
Taxi	☐	☐	☐	☐
Carshare[1] (e.g., Zipcar)	☐	☐	☐	☐
Bikeshare[2] (e.g., Lime, Lyft)	☐	☐	☐	☐
Scootershare[3] (e.g., Bird, Lime)	☐	☐	☐	☐
Shuttle/Microtransit[4]	☐	☐	☐	☐
Vanpooling[5]	☐	☐	☐	☐

[1] Carshare is defined as a shared mobility service in which people can rent cars for short periods of time, often by the hour.

[2] Bikeshare is defined as a shared mobility service in which people can rent bicycles for short periods of time, often by the minute.

[3] Scootershare is defined as a shared mobility service in which people can rent electric motorized scooters for short periods of time, often by the minute.

[4] Microtransit is defined as a privately or publicly operated, technology-enabled transit service that typically uses multi-passenger/pooled shuttles or vans to provide on-demand or fixed-schedule services with either dynamic or fixed routing.

[5] Vanpooling is defined as a group of people (typically 7-15) commuting together on a regular basis using a van or similarly-sized vehicle. Think carpooling but on a larger scale.

09. Shared mobility is defined as transportation services and resources that are shared among users, either concurrently or one after another. Which three (3) shared mobility options would you MOST like to see the City invest in? See definitions on previous page.

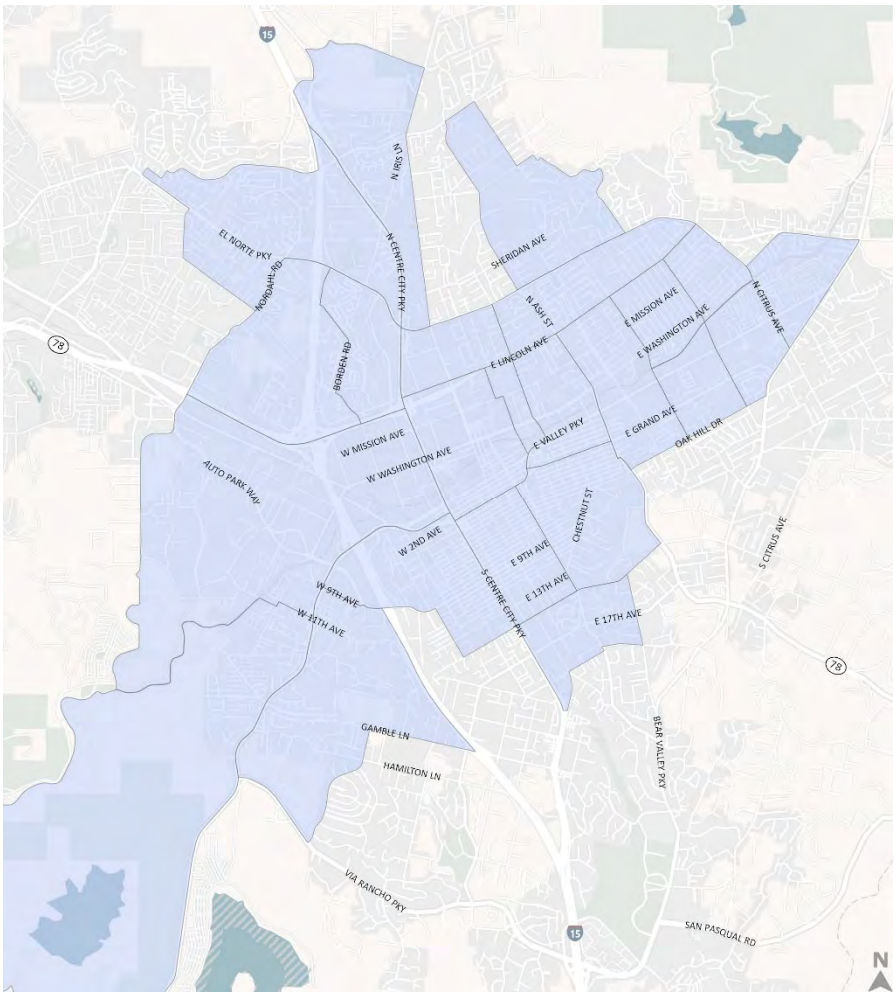
- ☐ Electric vehicle carshare
- ☐ Bikeshare
- ☐ Scootershare
- ☐ On-demand microtransit
- ☐ Vanpooling
- ☐ Traditional fixed-route transit
- ☐ UberX Share (previously Uber Pool)

10. Please tell us a bit about yourself. (Select all that apply)

- ☐ I am a student
- ☐ I am a parent
- ☐ I live in Escondido
- ☐ I work in Escondido
- ☐ I am retired
- ☐ Other: _____

11. To the right is a map of the CMO Grant Coverage Area. Do you live in one of the census tracts highlighted in blue?

- ☐ Yes
- ☐ No



13. What is your primary language (i.e., the language you speak most of the time)?

- ☐ Arabic
- ☐ Cantonese
- ☐ English
- ☐ Mandarin
- ☐ Portuguese
- ☐ Spanish
- ☐ Tagalog
- ☐ Prefer not to respond
- ☐ Other: _____

14. How would you describe your race/ethnicity? (Select all that apply)

- ☐ American Indian or Alaskan Native
- ☐ Asian
- ☐ Black or African American
- ☐ Caucasian or White
- ☐ Hispanic or Latinx
- ☐ Middle Eastern
- ☐ Native Hawaiian or Pacific Islander
- ☐ South Asian (e.g., Indian, Pakistani, etc.)
- ☐ Prefer not to respond
- ☐ Other: _____ _____

15. How many cars does your household (including family members and roommates) have access to?

☐ 0 ☐ 1 ☐ 2 ☐ 3 or more

16. Is there anything else you would like to share about your walking, biking, or transit experiences in Escondido?

Provide your name and email address below for a chance to win a $50 Visa gift card.

First Name: _____ **Last Name:** _____

Email: _____

Would you like to receive project updates and invites to upcoming outreach events via email? Please indicate here if so.

☐ Yes ☐ No

Please return your completed survey to Craig Williams by mail (201 N Broadway, Escondido, CA 92025) or by email (cwilliams@escondido.org) no later than April 19, 2024.

Encuesta de Movilidad

¡Bienvenido a la Encuesta de Movilidad Comunitaria de Escondido!

La ciudad de Escondido recibió una subvención de Opciones de Movilidad Limpia (CMO) para realizar una Evaluación de las Necesidades de Transporte Comunitario (CTNA). La movilidad limpia incluye modos como caminar, andar en bicicleta, patineta, patineta, transporte público, vehículos eléctricos, servicios de movilidad compartida y más. Comparta su experiencia utilizando opciones de movilidad limpia en Escondido completando esta breve encuesta. Sus respuestas se utilizarán para ayudar a la Ciudad a determinar qué servicios de movilidad nuevos o ampliados serían preferidos y utilizados por los miembros de la comunidad para satisfacer las necesidades de transporte.

¡No olvide ingresar su nombre y dirección de correo electrónico al final de la encuesta para tener la oportunidad de ganar una tarjeta de regalo Visa de $50!

---

01. ¿A dónde le gustaría ir caminando, en bicicleta o en transporte público y que actualmente no utiliza? (Seleccione todas las que correspondan)

- ☐ Trabajar
- ☐ Escuela (para usted o sus hijos)
- ☐ Tienda de comestibles
- ☐ Parada de tránsito
- ☐ Restaurante
- ☐ Parque
- ☐ Casas de amigos/familiares
- ☐ Para ejercicio/ocio
- ☐ Para hacer recados
- ☐ N/A – Puedo caminar, andar en bicicleta o usar el transporte público a cualquier lugar al que me gustaría ir
- ☐ Otros:

  _____

  _____

02. ¿Qué le impide actualmente caminar a los lugares a los que le gustaría ir? (Seleccione todas las que correspondan)

- ☐ La distancia entre origen/destino es demasiado grande
- ☐ Tarda demasiado en caminar
- ☐ Aceras/pasos de peatones faltantes o en mal estado
- ☐ Estoy embarazada o tengo hijos/dependientes
- ☐ Estoy discapacitado, tengo dificultad para caminar o uso un dispositivo de asistencia (andador, silla de ruedas, etc.)
- ☐ Preocupación por la seguridad personal
- ☐ Miedo a una colisión de tráfico o comportamiento de conducción imprudente
- ☐ Mi ruta incluye terreno montañoso
- ☐ Nada – Puedo caminar con seguridad a cualquier lugar al que me gustaría ir
- ☐ Otros:

  _____

  _____

03. ¿Qué le impide actualmente ir en bicicleta a los lugares a los que le gustaría ir? (Seleccione todas las que correspondan)

- ☐ La distancia entre origen/destino es demasiado grande
- ☐ Tarda demasiado en andar en bicicleta
- ☐ Ciclovías faltantes o en mal estado
- ☐ Estoy embarazada o tengo hijos/dependientes
- ☐ Estoy discapacitado/no puedo andar en bicicleta
- ☐ Preocupación por la seguridad personal
- ☐ Miedo a una colisión de tráfico o comportamiento de conducción imprudente
- ☐ Falta de estacionamiento seguro para bicicletas
- ☐ Mi ruta incluye terreno montañoso
- ☐ No tengo/tengo acceso a una bicicleta
- ☐ No se andar en bicicleta
- ☐ Nada – Puedo andar en bicicleta con seguridad a donde quiera ir
- ☐ Otros: _____ _____

04. ¿Qué te hace sentir inseguro mientras caminas o andas en bicicleta? (Seleccione todas las que correspondan)

- ☐ Altas velocidades/volumen de tráfico
- ☐ Los conductores que no muestran cortesía hacia los peatones/ciclistas
- ☐ Aceras/pasos de peatones/ciclovías faltantes o en mal estado
- ☐ Falta de iluminación adecuada
- ☐ Potencial de delincuencia
- ☐ Nada – Me siento seguro mientras camino y ando en bicicleta
- ☐ Otros: _____ _____

05. ¿Cuál de las siguientes opciones te haría más propenso a caminar o andar en bicicleta? (Seleccione todas las que correspondan)

- ☐ Más/mejor infraestructura de aparcamiento para bicicletas
- ☐ Cruces más protegidos o señalizados
- ☐ Mejor alumbrado público
- ☐ Velocidades reducidas de los vehículos
- ☐ Rutas seguras designadas para caminar o andar en bicicleta a la escuela
- ☐ Estacionamiento en la calle que sirve como zona de amortiguamiento entre personas y automóviles
- ☐ Aceras/ciclovías separados del tráfico
- ☐ Mayor conectividad entre los senderos regionales para caminar y andar en bicicleta y las comunidades vecinas
- ☐ Otros: _____ _____

06. ¿Cuáles son sus prioridades a la hora de utilizar el transporte público? Clasifique las siguientes opciones en orden de prioridad, siendo 1 la prioridad más alta y 8 la más baja.

_____ Fiabilidad	_____ Frecuencia	_____ Conveniencia	_____ Seguridad
_____ Velocidad	_____ Comodidad	_____ Asequibilidad	_____ Accesibilidad

07. Si hubiera un autobús circulador en el centro de Escondido, ¿lo usarías?
Nota: Un autobús circulador es un modo de tránsito de ruta fija, circular y de corta distancia que lleva a los pasajeros por un área específica con destinos principales, generalmente el centro de la ciudad.

- ☐ Sí
- ☐ No

08. ¿Qué opciones de transporte utiliza ahora y qué opciones de transporte utilizaría si estuvieran disponibles y fueran asequibles? (Seleccione todas las que correspondan)

	Usar ahora	Usaría	No usaría	No estoy familiarizado con esto
Conducir solo	☐	☐	☐	☐
Conducir con otras personas (p. ej., compañeros de trabajo, familiares, amigos, etc.)	☐	☐	☐	☐
Autobús	☐	☐	☐	☐
Tren ligero/metro	☐	☐	☐	☐
Bicicleta	☐	☐	☐	☐
Caminar/rodar	☐	☐	☐	☐
Uber/Lyft	☐	☐	☐	☐
Taxi	☐	☐	☐	☐
Coche compartido[1] (p. ej., Zipcar)	☐	☐	☐	☐
Bicicleta compartida[2] (p. ej., Lime, Lyft)	☐	☐	☐	☐
Scooter compartido[3] (p. ej., Bird, Lime)	☐	☐	☐	☐
Lanzadera/microtransito[4]	☐	☐	☐	☐
Furgoneta compartida[5]	☐	☐	☐	☐

[1] Coche compartido se define como un servicio de movilidad compartida en el que las personas pueden alquilar coches por períodos cortos de tiempo, a menudo por horas.
[2] Bicicleta compartida se define como un servicio de movilidad compartida en el que las personas pueden alquilar bicicletas por períodos cortos de tiempo, a menudo por minutos.
[3] Scooter compartido se define como un servicio de movilidad compartida en el que las personas pueden alquilar scooters eléctricos con motor por períodos cortos de tiempo, a menudo por minutos.
[4] El microtransito se define como un servicio de tránsito basado en tecnología, operado de manera privada o pública, que generalmente utiliza lanzaderas o camionetas para varios pasajeros/agrupados para brindar servicios a pedido o con horarios fijos con rutas dinámicas o fijas.
[5] Furgoneta compartida se define como un grupo de personas (normalmente entre 7 y 15) que viajan juntas de forma regular utilizando una furgoneta o un vehículo de tamaño similar. Piense en compartir el coche, pero a mayor escala.

09. La movilidad compartida se define como servicios y recursos de transporte que se comparten entre usuarios, ya sea de forma simultánea o consecutiva. ¿En cuáles tres (3) opciones de movilidad compartida le gustaría MÁS que invirtiera la ciudad? Consulte las definiciones en la página anterior.

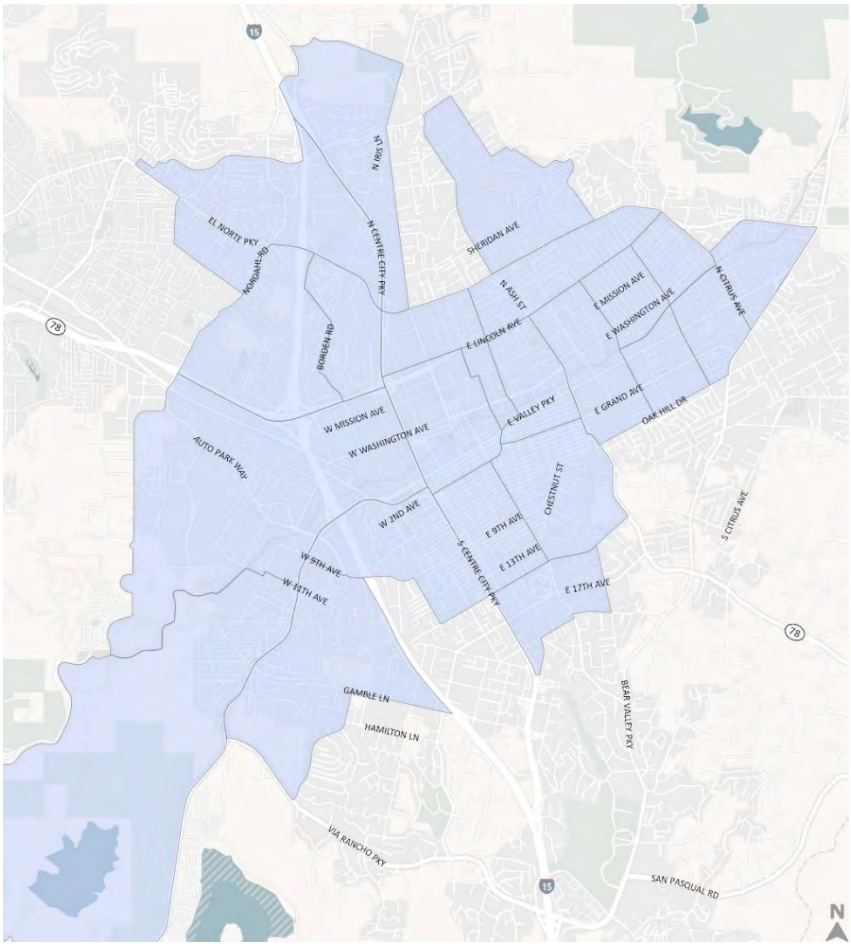
- ☐ Coche compartido de vehículos eléctricos
- ☐ Bicicleta compartida
- ☐ Scooter compartido
- ☐ Microtransito bajo demanda
- ☐ Furgoneta compartida
- ☐ Tránsito tradicional de ruta fija
- ☐ UberX Share (anteriormente Uber Pool)

10. Por favor cuentenos un poco de usted. (Seleccione todas las que correspondan)

- ☐ Soy un estudiante
- ☐ Soy padre
- ☐ Vivo en Escondido
- ☐ Trabajo en Escondido
- ☐ Soy jubilado
- ☐ Otros: _____

11. A la derecha hay un mapa del área de cobertura de subvenciones de CMO. ¿Vive en uno de los sectores censales identificados en azul?

- ☐ Sí
- ☐ No



12. ¿Cuál es tu edad?

- ☐ Menores de 18 años
- ☐ 18-25
- ☐ 26-35
- ☐ 36-45
- ☐ 46-55
- ☐ 56-65
- ☐ Mayores de 65

13. ¿Cuál es su idioma principal (es decir, el idioma que habla la mayor parte del tiempo)?

- ☐ Arábica
- ☐ Cantonés
- ☐ Inglés
- ☐ Mandarín
- ☐ Portugués
- ☐ Español
- ☐ Tagalo
- ☐ Prefiero no responder
- ☐ Otros: _____

14. ¿Cómo describirías tu raza/etnia? (Seleccione todas las que correspondan)

- ☐ Indio americano o nativo de Alaska
- ☐ Asiático
- ☐ Raza negra o afroamericano
- ☐ Caucásico o blanco
- ☐ Hispano or latino
- ☐ De Oriente Medio
- ☐ Nativo de Hawái o de las islas del Pacífico
- ☐ Del sur de Asia (p. ej., indio, paquistaní, etc.)
- ☐ Prefiero no responder
- ☐ Otros: _____ _____

15. ¿A cuántos automóviles tiene acceso su hogar (incluidos los miembros de la familia y los compañeros de cuarto)?

☐ 0 ☐ 1 ☐ 2 ☐ 3 o más

16. ¿Hay algo más que le gustaría compartir sobre sus experiencias a pie, en bicicleta o en transporte público en Escondido?

Proporcione su nombre y dirección de correo electrónico a continuación para tener la oportunidad de ganar una tarjeta de regalo Visa de $50.

Nombre de pila: _____ **Apellido:** _____

Email: _____

¿Le gustaría recibir actualizaciones del proyecto e invitaciones a próximos eventos de divulgación por correo electrónico? Por favor indique aquí si es así.

☐ Sí ☐ No

Devuelva su encuesta completa a Craig Williams por correo (201 N Broadway, Escondido, CA 92025) o por email (cwilliams@escondido.org) a más tardar el 19 de abril de 2024.

Appendix C: Community Survey Results

F&P Social Pinpoint

Report Type: Form Results Summary
Date Range: 08-12-2023 - 13-05-2024
Exported: 06-08-2024 16:59:46

Closed

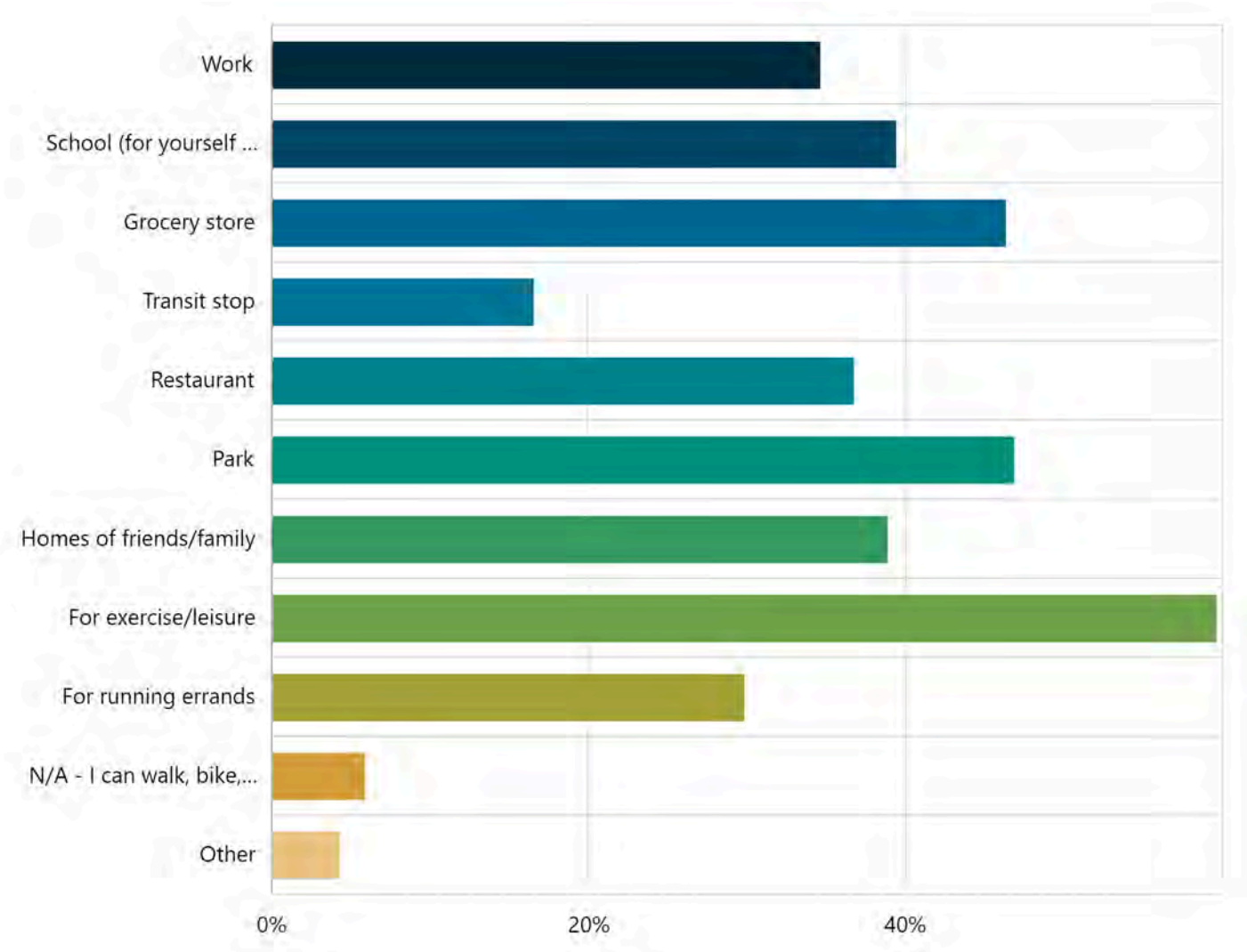
Community Survey
Escondido Mobility

145 Contributors	188 Contributions

Contribution Summary

1. Where would you like to walk, bike, or ride transit to that you do not currently? (Select all that apply)

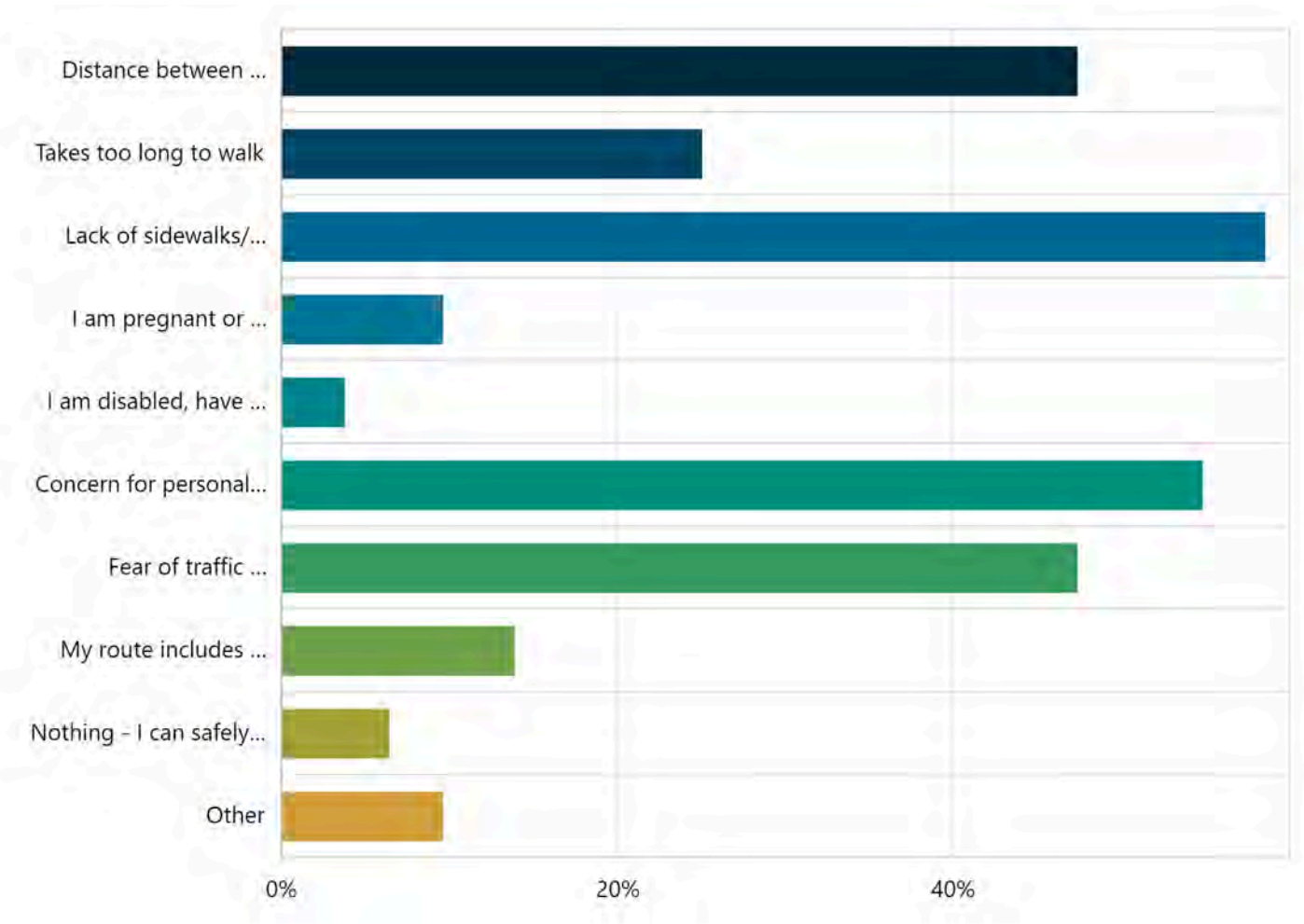
Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
Work	34.57%	65
School (for yourself or your children)	39.36%	74
Grocery store	46.28%	87

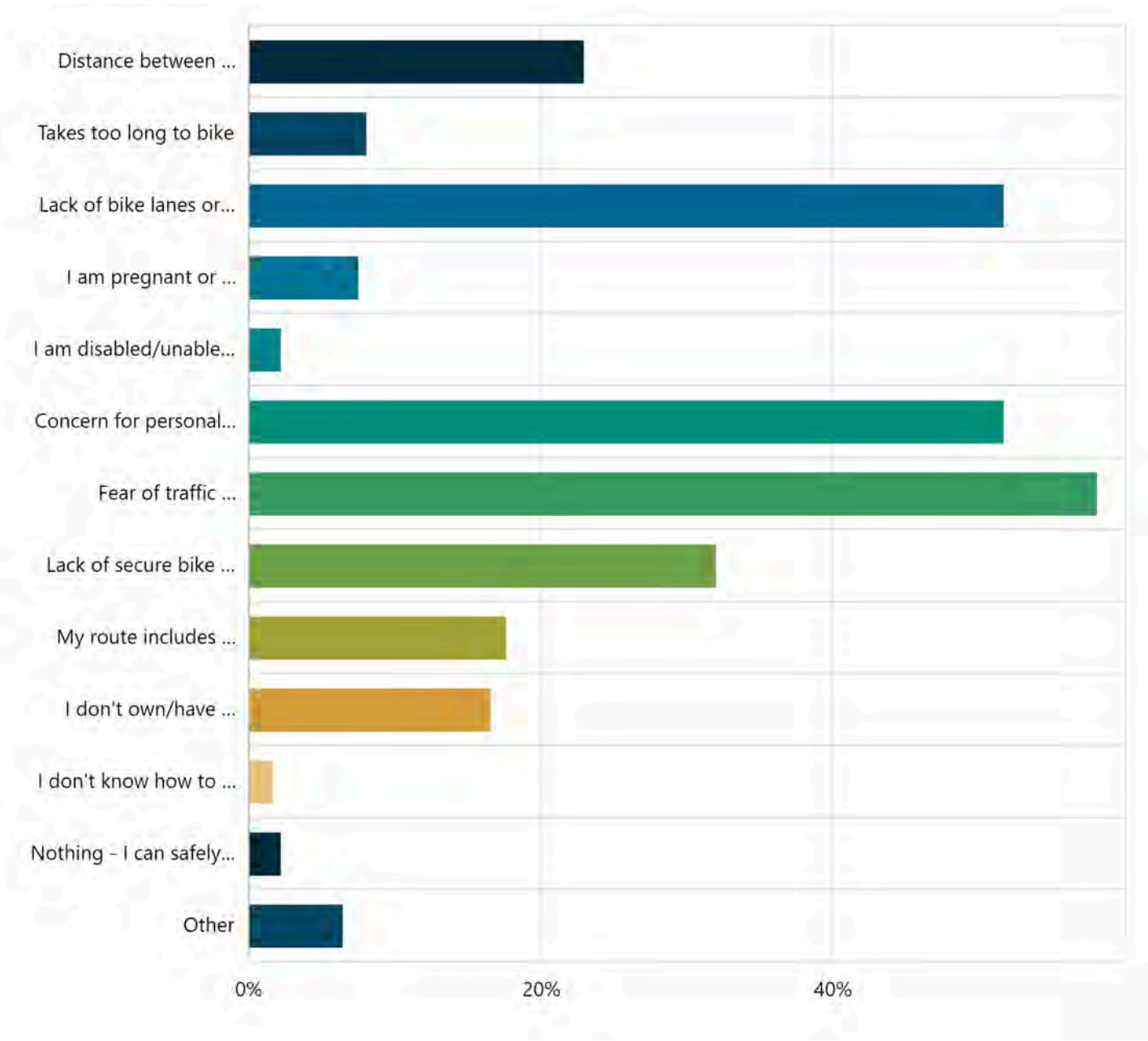
Transit stop	16.49%	31
Restaurant	36.70%	69
Park	46.81%	88
Homes of friends/family	38.83%	73
For exercise/leisure	59.57%	112
For running errands	29.79%	56
N/A - I can walk, bike, or ride transit to everywhere I'd like to go.	5.85%	11
Other	4.26%	8

2. What currently prevents you from walking to places you would like to go? (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
Distance between origin/destination is too far	47.34%	89
Takes too long to walk	25.00%	47
Lack of sidewalks/crosswalks or poor sidewalk/crosswalk conditions	58.51%	110
I am pregnant or have children/dependents	9.57%	18
I am disabled, have difficulty walking, or use an assistive device (walker, wheelchair, etc.)	3.72%	7
Concern for personal safety	54.79%	103
Fear of traffic collision or reckless driving behavior	47.34%	89
My route includes hilly terrain	13.83%	26
Nothing - I can safely walk everywhere I'd like to go.	6.38%	12
Other	9.57%	18

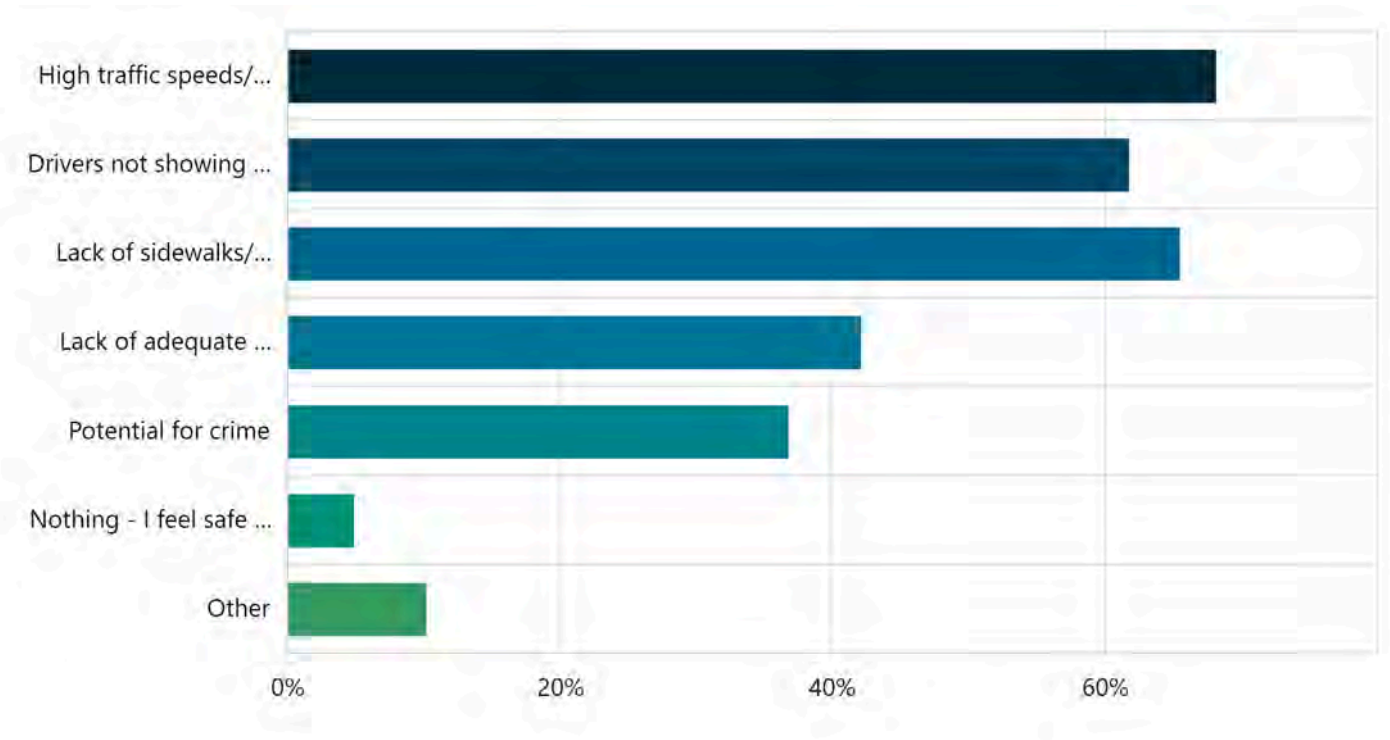
3. What currently prevents you from biking to places you would like to go? (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
Distance between origin/destination is too far	22.87%	43
Takes too long to bike	7.98%	15
Lack of bike lanes or poor bike lane conditions	51.60%	97
I am pregnant or have children/dependents	7.45%	14
I am disabled/unable to bike	2.13%	4
Concern for personal safety	51.60%	97
Fear of traffic collision or reckless driving behavior	57.98%	109

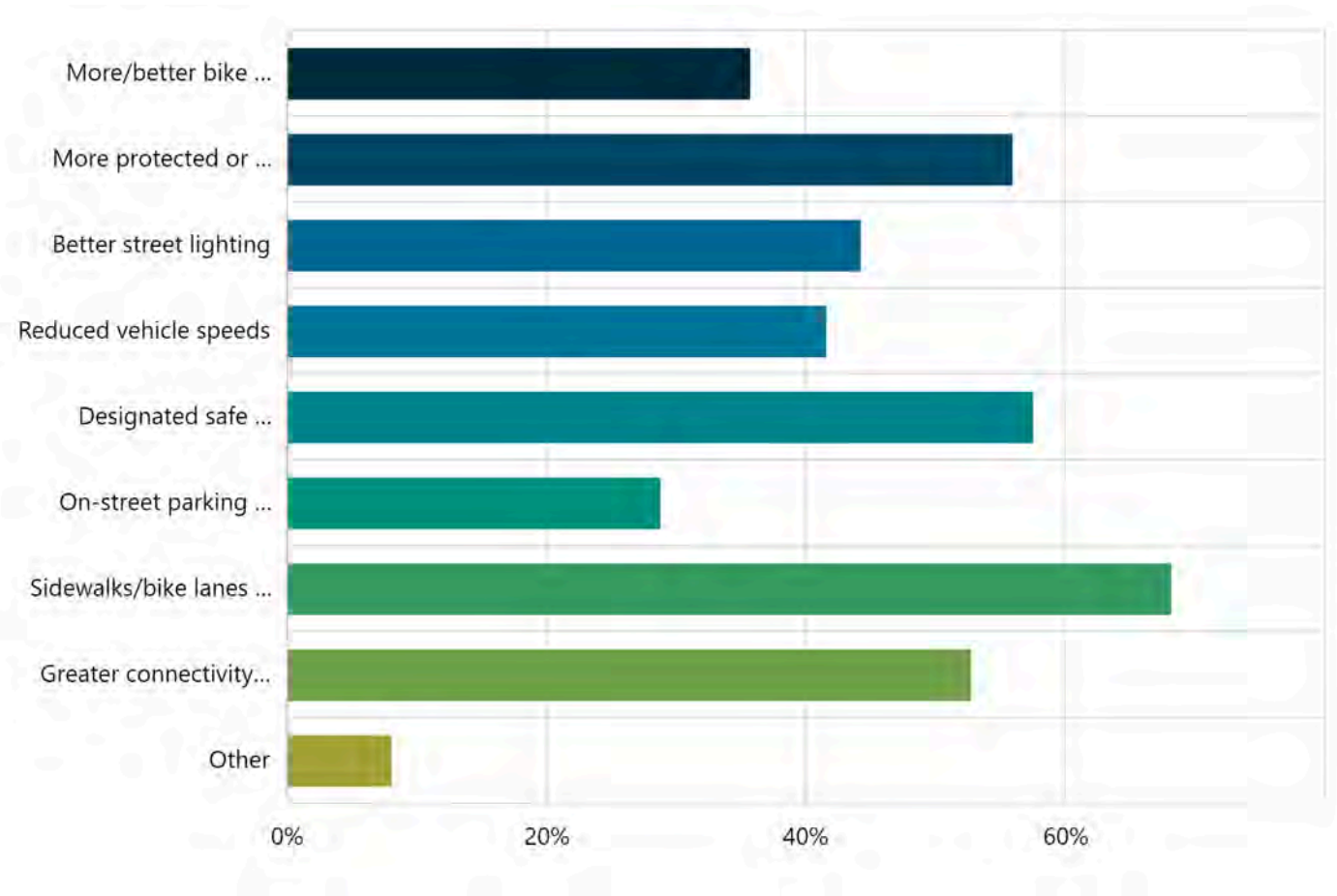
Lack of secure bike parking	31.91%	60
My route includes hilly terrain	17.55%	33
I don't own/have access to a bike	16.49%	31
I don't know how to ride a bike	1.60%	3
Nothing - I can safely bike everywhere I'd like to go.	2.13%	4
Other	6.38%	12

4. What makes you feel unsafe while walking or biking? (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
High traffic speeds/volume	68.09%	128
Drivers not showing courtesy to pedestrians/bicyclists	61.70%	116
Lack of sidewalks/crosswalks/bike lanes or poor sidewalk/crosswalk/bike lane conditions	65.43%	123
Lack of adequate lighting	42.02%	79
Potential for crime	36.70%	69
Nothing - I feel safe while walking and biking.	4.79%	9
Other	10.11%	19

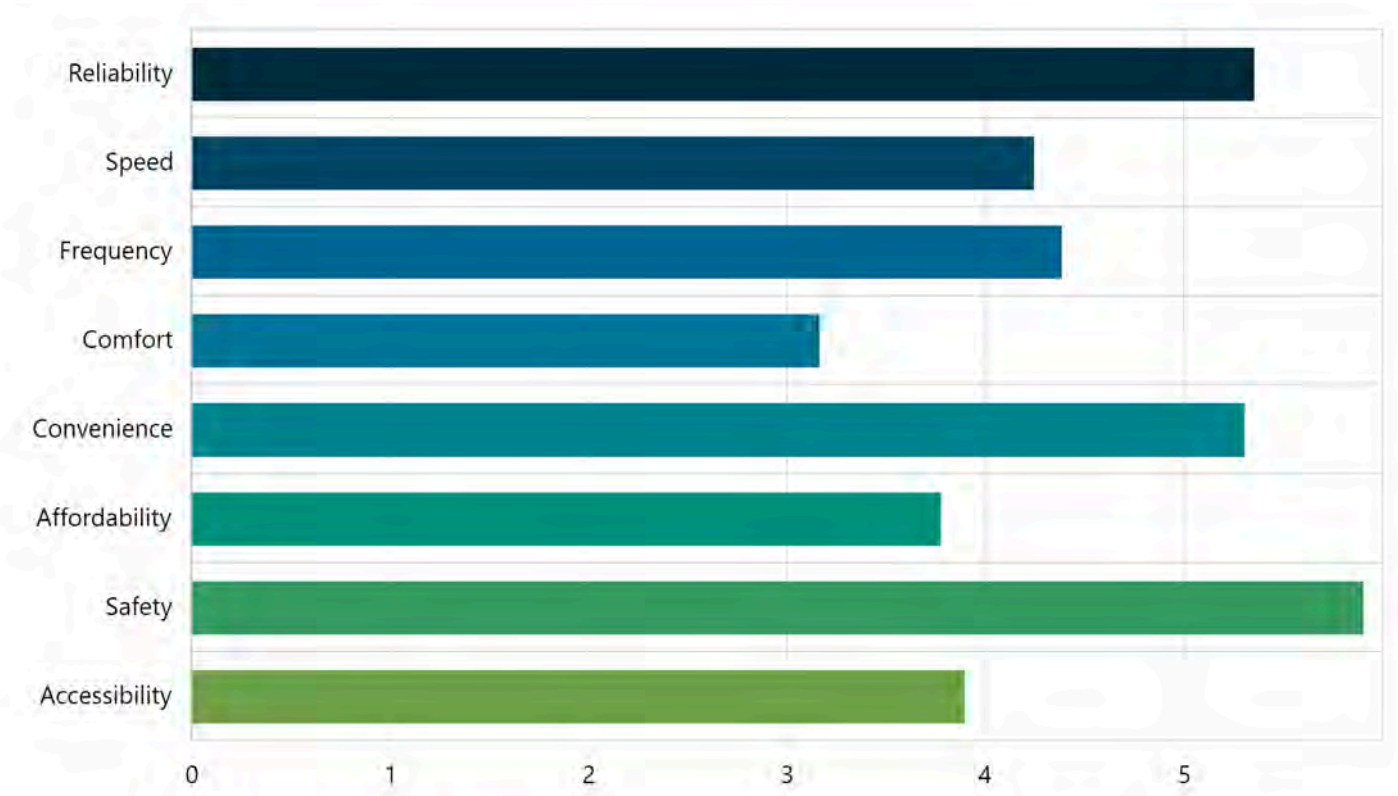
5. Which of the following would make you more likely to walk or bike? (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
More/better bike parking infrastructure	35.64%	67
More protected or marked crossings	55.85%	105
Better street lighting	44.15%	83
Reduced vehicle speeds	41.49%	78
Designated safe routes for walking/biking to school	57.45%	108
On-street parking that serves as a buffer between people and cars	28.72%	54
Sidewalks/bike lanes that are separated from traffic	68.09%	128
Greater connectivity between regional walking/biking paths and neighboring communities	52.66%	99
Other	7.98%	15

6. What are your priorities when it comes to taking transit? Rank the following options in order of priority, with 1 being your highest priority and 8 being your lowest priority. Required

Ranking | Skipped: 4 | Answered: 184 (97.9%)

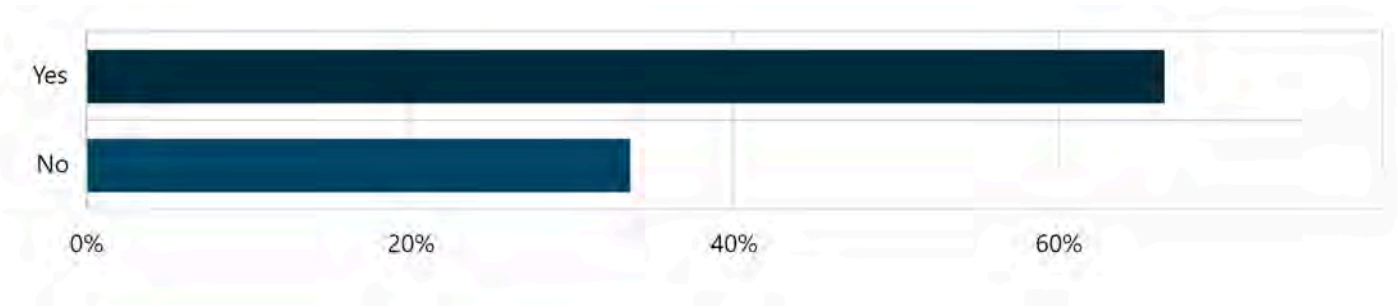


	1	2	3	4	5	6	7	8	Count	Score	Avg Rank
Reliability	19.57% 36	14.67% 27	14.13% 26	16.85% 31	15.76% 29	8.15% 15	8.70% 16	2.17% 4	184	5.35	3.65
Speed	8.15% 15	14.67% 27	11.96% 22	12.50% 23	10.87% 20	13.04% 24	10.87% 20	17.93% 33	184	4.24	4.76
Frequency	8.70% 16	11.96% 22	13.04% 24	10.87% 20	15.22% 28	16.85% 31	17.39% 32	5.98% 11	184	4.38	4.62
Comfort	0.54% 1	4.89% 9	6.52% 12	10.87% 20	12.50% 23	21.74% 40	26.09% 48	16.85% 31	184	3.16	5.84
Convenience	11.96% 22	17.39% 32	22.83% 42	14.67% 27	14.13% 26	10.87% 20	5.43% 10	2.72% 5	184	5.30	3.70
Affordability	4.89% 9	8.70% 16	11.41% 21	15.22% 28	12.50% 23	10.87% 20	13.04% 24	23.37% 43	184	3.77	5.23
Safety	36.41% 67	14.67% 27	9.24% 17	10.87% 20	11.96% 22	7.61% 14	6.52% 12	2.72% 5	184	5.90	3.10
Accessibility	9.78% 18	13.04% 24	10.87% 20	8.15% 15	7.07% 13	10.87% 20	11.96% 22	28.26% 52	184	3.89	5.11

Score - Sum of the weight of each ranked position, multiplied by the response count for the position choice, divided by the total contributions. Weights are inverse to ranked positions.

Avg Rank - Sum of the ranked position of the choice, multiplied by the response count for the position choice, divided by the total 'Count' of the choice.

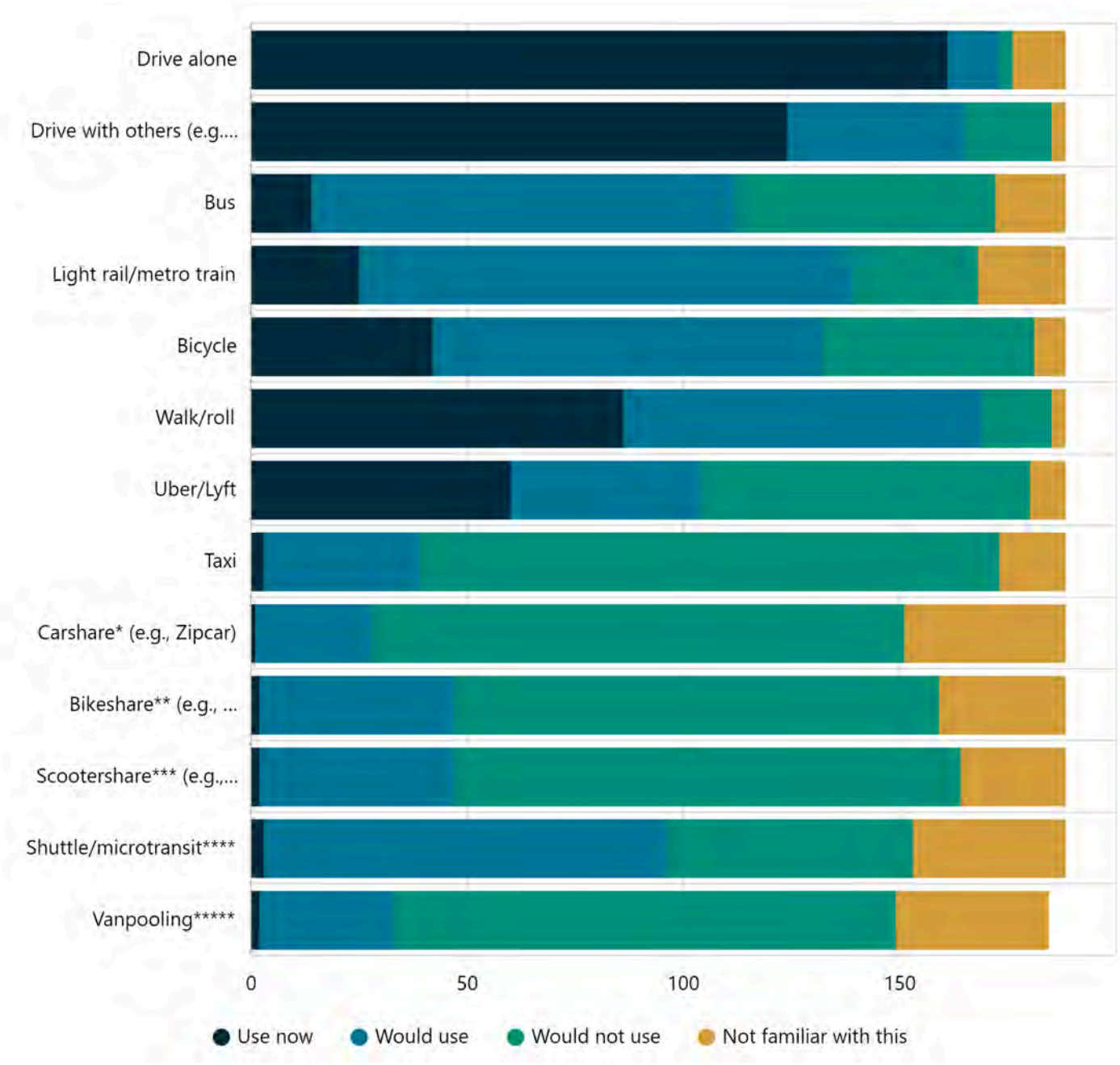
7. If there was a circulator bus in downtown Escondido, would you ride it? Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
Yes	66.49%	125
No	33.51%	63
Total	**100.00%**	**188**

8. Which transportation options do you use now, and which transportation options would you use if they were readily available and affordable? (Select all that apply) Required

Matrix | Skipped: 0 | Answered: 188 (100%)

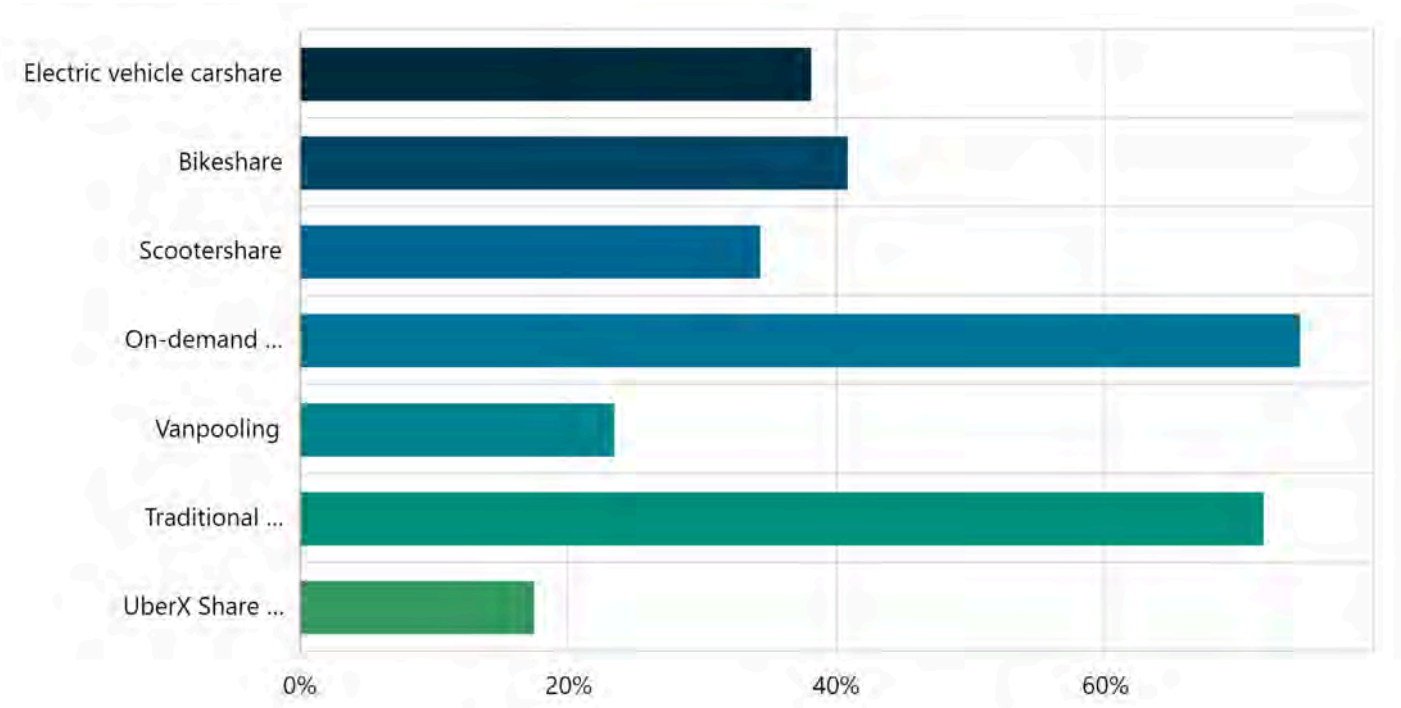


	Use now	Would use	Would not use	Not familiar with this	Count	Score
Drive alone	85.64% 161	6.38% 12	1.60% 3	6.38% 12	188	1.29
Drive with others (e.g., coworkers, family, friends, etc.)	65.96% 124	21.81% 41	10.64% 20	1.60% 3	188	1.48

Bus	7.45% 14	52.13% 98	31.91% 60	8.51% 16	188	2.41
Light rail/metro train	13.30% 25	60.64% 114	15.43% 29	10.64% 20	188	2.23
Bicycle	22.34% 42	47.87% 90	26.06% 49	3.72% 7	188	2.11
Walk/roll	45.74% 86	44.15% 83	8.51% 16	1.60% 3	188	1.66
Uber/Lyft	31.91% 60	23.40% 44	40.43% 76	4.26% 8	188	2.17
Taxi	1.60% 3	19.15% 36	71.28% 134	7.98% 15	188	2.86
Carshare* (e.g., Zipcar)	0.53% 1	14.36% 27	65.43% 123	19.68% 37	188	3.04
Bikeshare** (e.g., Lime, Lyft)	1.06% 2	23.94% 45	59.57% 112	15.43% 29	188	2.89
Scootershare*** (e.g., Bird, Lime)	1.06% 2	23.94% 45	62.23% 117	12.77% 24	188	2.87
Shuttle/microtransit****	1.60% 3	49.47% 93	30.32% 57	18.62% 35	188	2.66
Vanpooling*****	1.09% 2	16.85% 31	63.04% 116	19.02% 35	184	3.00

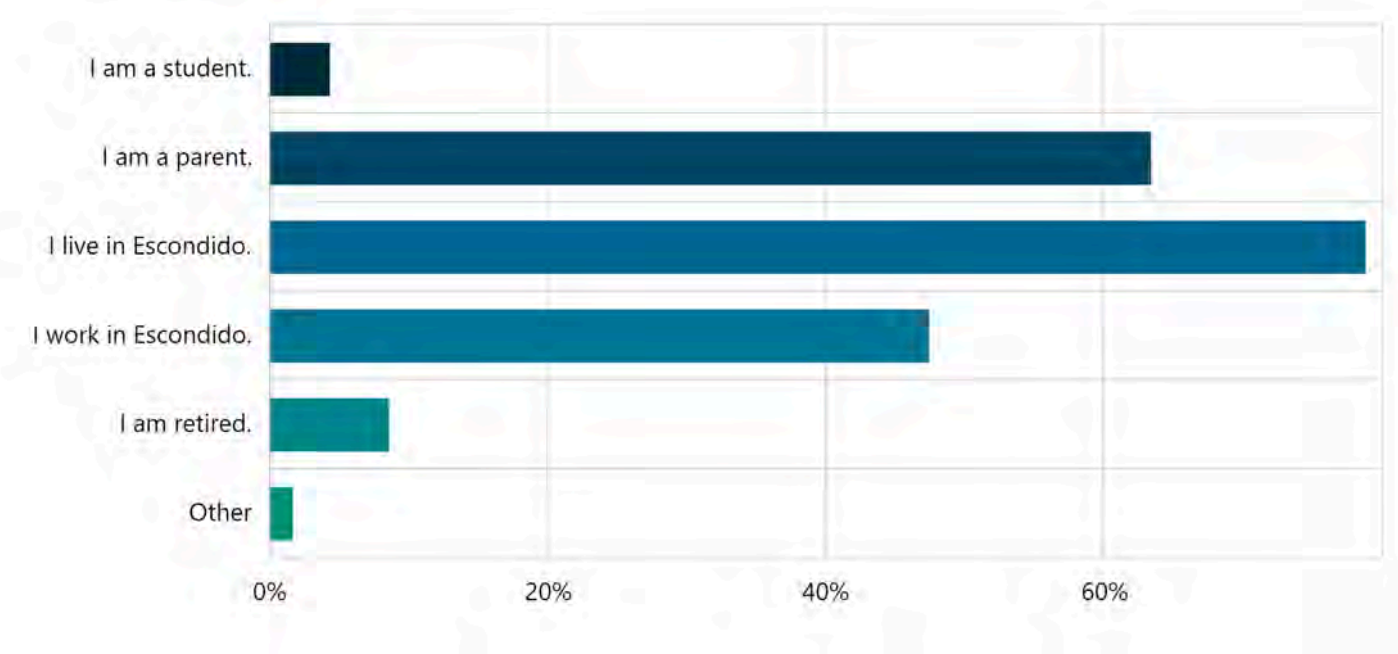
9. Shared mobility is defined as transportation services and resources that are shared among users, either concurrently or one after another. Which three shared mobility options would you MOST like to see the City invest in? See definitions above. Required

Multi Choice | Skipped: 4 | Answered: 184 (97.9%)



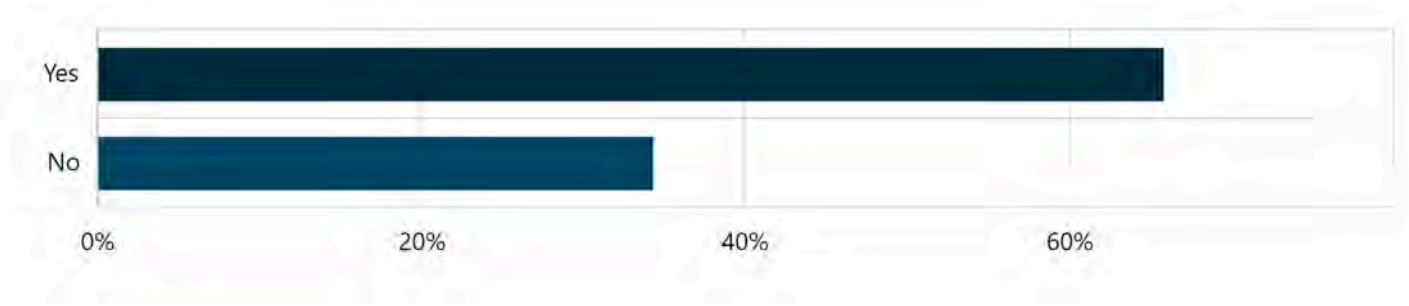
Answer choices	Percent	Count
Electric vehicle carshare	38.04%	70
Bikeshare	40.76%	75
Scootershare	34.24%	63
On-demand microtransit	74.46%	137
Vanpooling	23.37%	43
Traditional fixed-route transit	71.74%	132
UberX Share (previously Uber Pool)	17.39%	32

10. Please tell us a bit about yourself. (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



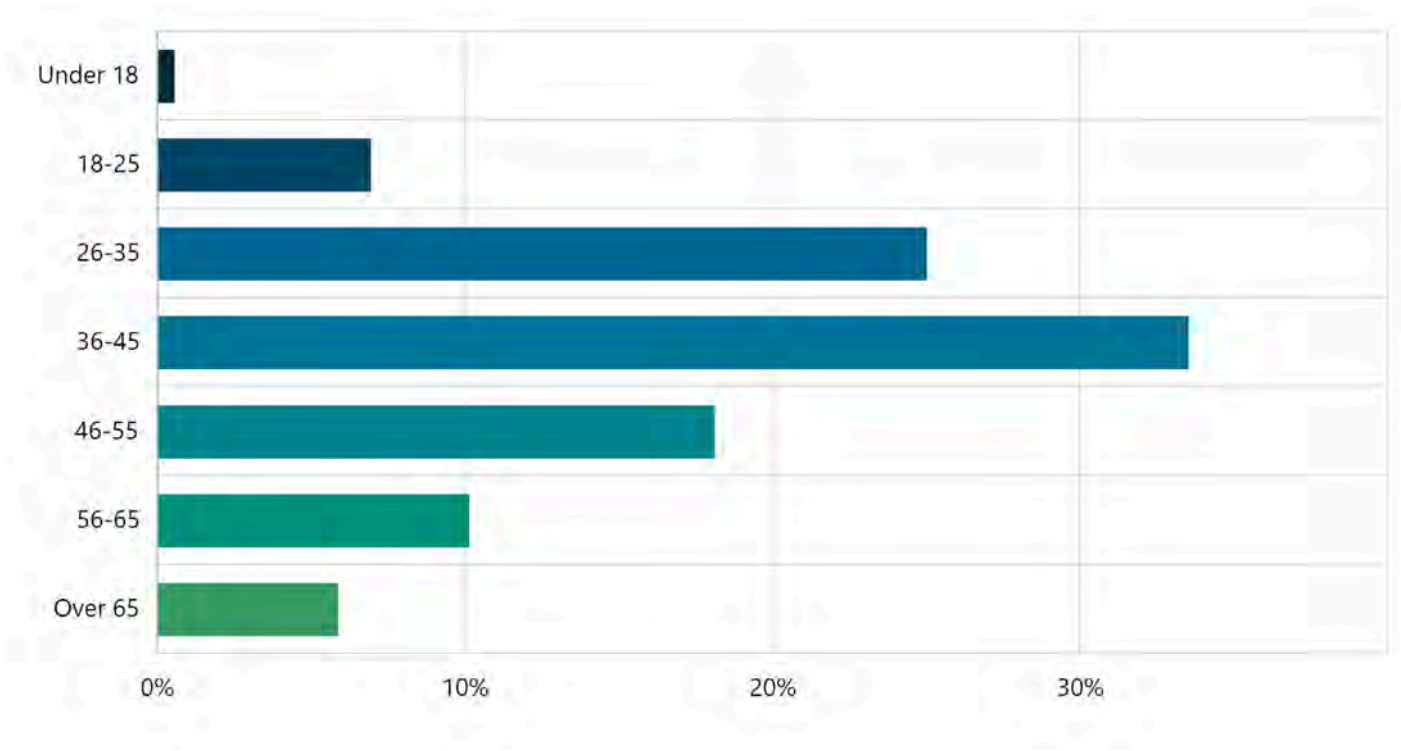
Answer choices	Percent	Count
I am a student.	4.26%	8
I am a parent.	63.30%	119
I live in Escondido.	78.72%	148
I work in Escondido.	47.34%	89
I am retired.	8.51%	16
Other	1.60%	3

11. Below is a map of the CMO Grant Coverage Area. Do you live in one of the census tracts identified in blue?
Required
Multi Choice | Skipped: 4 | Answered: 184 (97.9%)



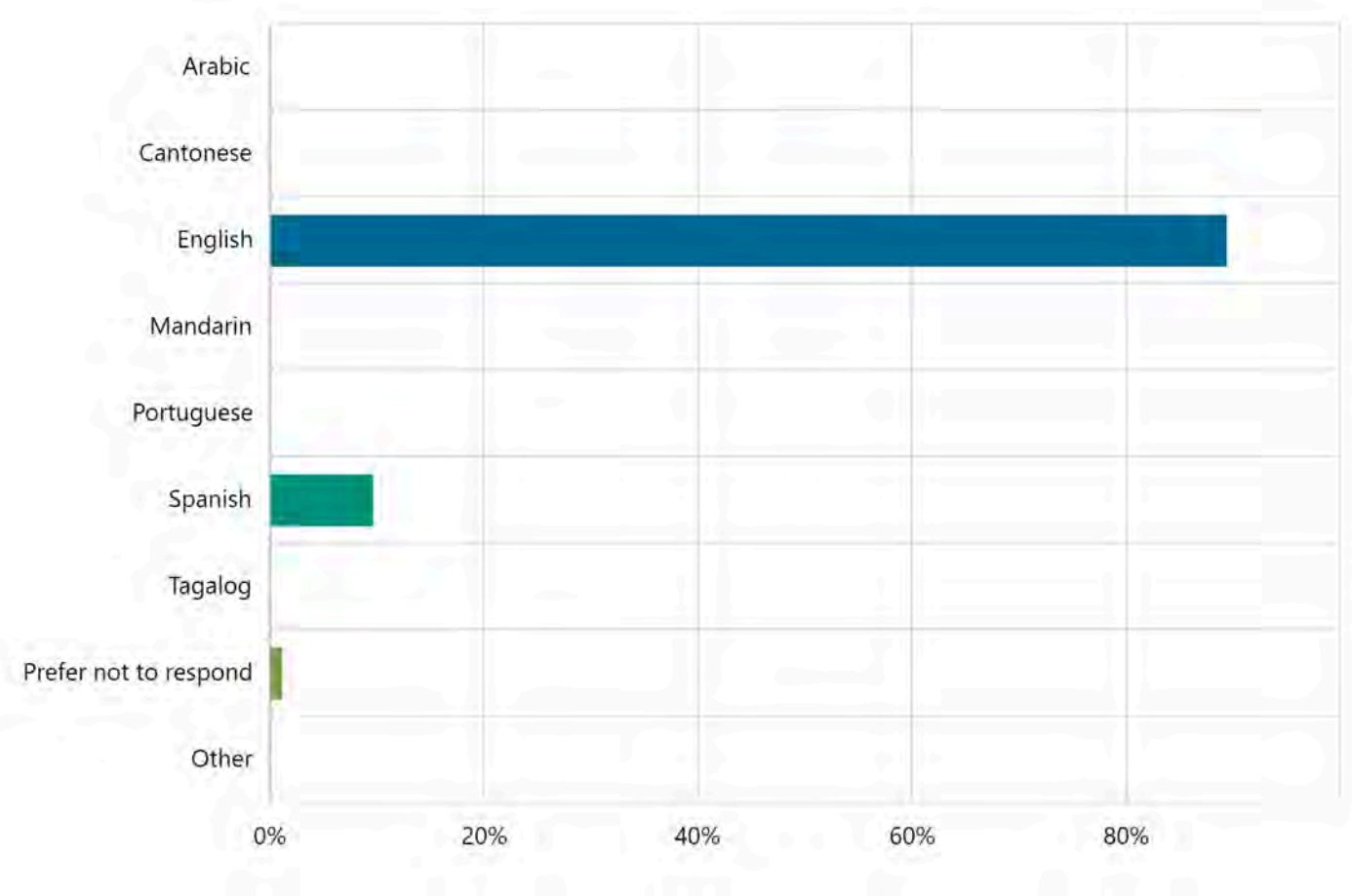
Answer choices	Percent	Count
Yes	65.76%	121
No	34.24%	63
Total	**100.00%**	**184**

12. What is your age? Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



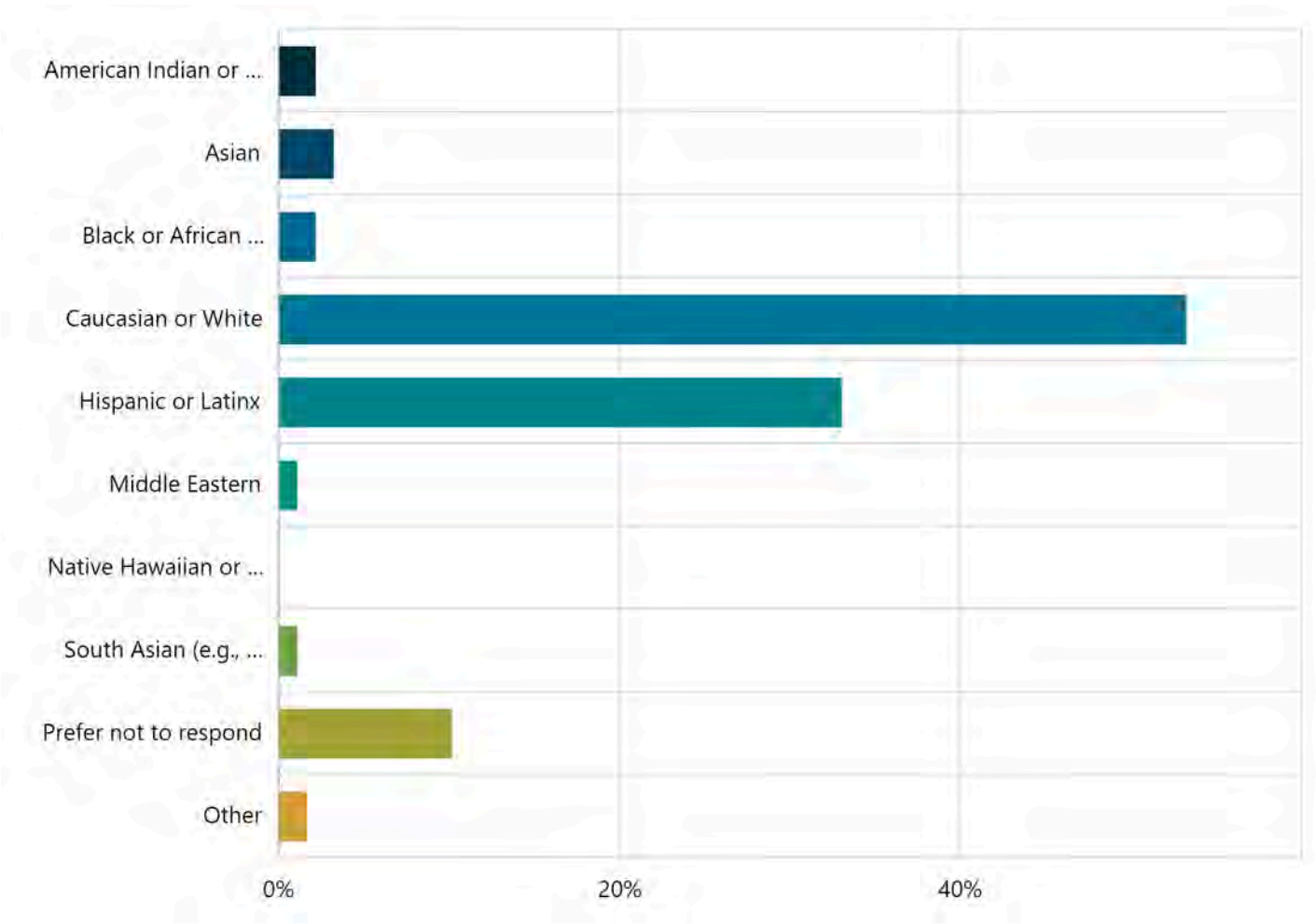
Answer choices	Percent	Count
Under 18	0.53%	1
18-25	6.91%	13
26-35	25.00%	47
36-45	33.51%	63
46-55	18.09%	34
56-65	10.11%	19
Over 65	5.85%	11
Total	**100.00%**	**188**

13. What is your primary language (i.e., the language you speak most of the time)? Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



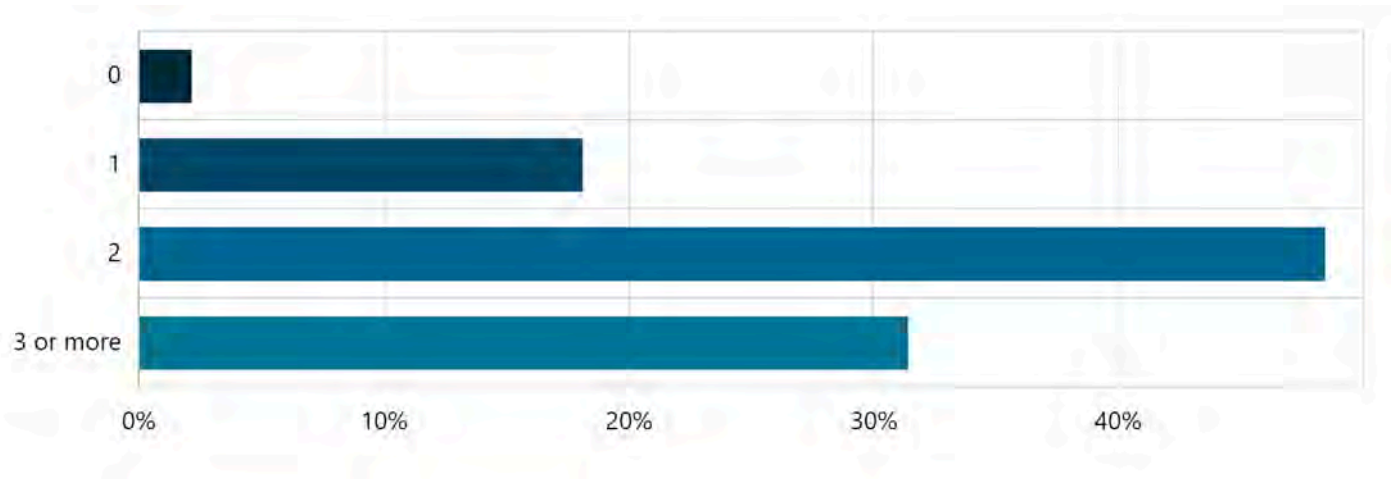
Answer choices	Percent	Count
Arabic	0%	0
Cantonese	0%	0
English	89.36%	168
Mandarin	0%	0
Portuguese	0%	0
Spanish	9.57%	18
Tagalog	0%	0
Prefer not to respond	1.06%	2
Other	0%	0
Total	**100.00%**	**188**

14. How would you describe your race/ethnicity? (Select all that apply) Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
American Indian or Alaskan Native	2.13%	4
Asian	3.19%	6
Black or African American	2.13%	4
Caucasian or White	53.19%	100
Hispanic or Latinx	32.98%	62
Middle Eastern	1.06%	2
Native Hawaiian or Pacific Islander	0%	0
South Asian (e.g., Indian, Pakistani, etc.)	1.06%	2
Prefer not to respond	10.11%	19
Other	1.60%	3

15. How many cars does your household (including family members and roommates) have access to? Required
Multi Choice | Skipped: 0 | Answered: 188 (100%)



Answer choices	Percent	Count
0	2.13%	4
1	18.09%	34
2	48.40%	91
3 or more	31.38%	59
Total	**100.00%**	**188**

16. Is there anything else you would like to share about your walking, biking, or transit experiences in Escondido?

Long Text | Skipped: 74 | Answered: 114 (60.6%)

Sentiment

No sentiment data

Tags

No tag data

Featured Contributions

No featured contributions

Mike Bullock
1800 Bayberry Drive
Oceanside, CA 92054

July 18, 2025

Re: SANDAG Regional Transportation Plan
Via Email: regionalplan@sandag.org

Subject: Comments on SANDAG's Draft 2025 Regional Plan and its Draft EIR

Dear SANDAG Leaders,

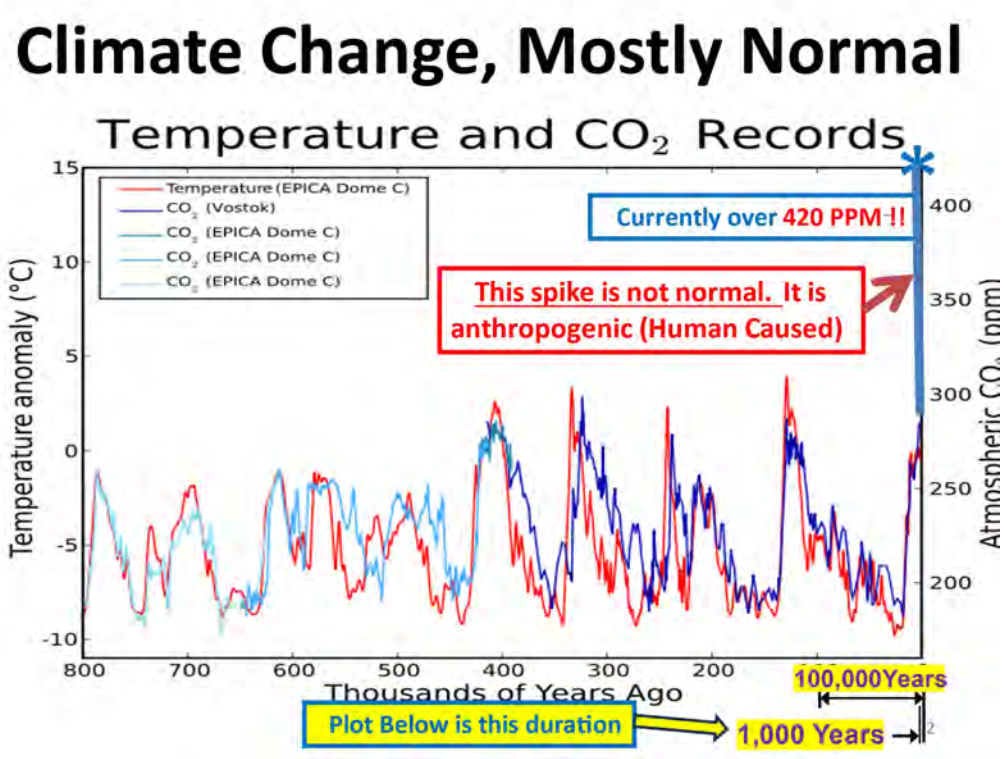
Introductory Comment

I appreciate the opportunity to comment on the Draft RTP 2025 and its DEIR.

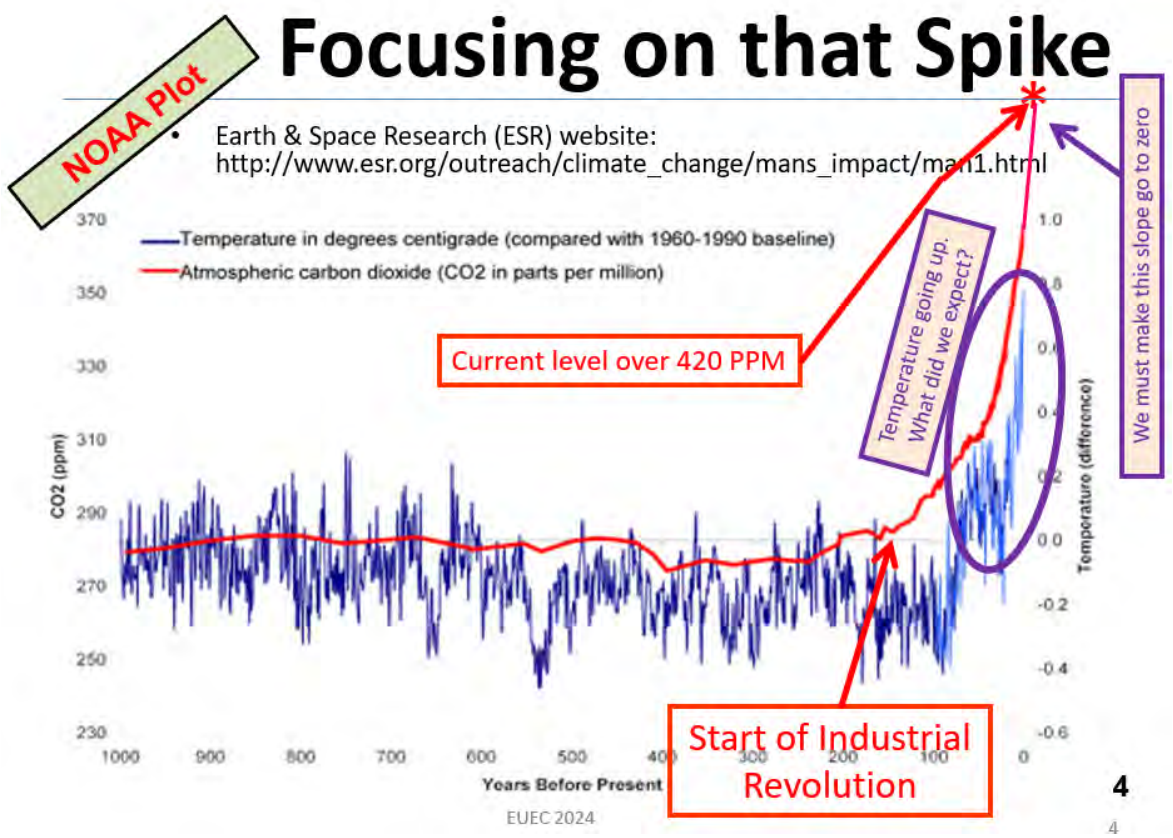
Failure to Report on the Environmental Impact of the RTP, Regarding Climate Change

Neither the Draft RTP nor the DEIR for the Draft RTP provides the reader with a sufficient description of the risk we are facing from climate change. This is covering up the impact of failing to operate within the operational climate stabilization plan. That means that the proposed RTP's environmental impact far exceeds any reasonable significance threshold. There is a CA Plan to achieve CA's climate mandates, and SANDAG must ensure that its project, the RTP, conforms to that plan's measures.

The best way to show a reader what we are facing and the magnitude of the changes needed is to show the National Oceanic and Atmospheric Administration (NOAA) Plots, as follows:



The atmospheric CO2 spike's amplitude, at time zero years ago, is outrageously high, as is its slope. We are living in that spike and yet our institutions seem to be oblivious to how serious this is. SANDAG can't be oblivious, because CEQA demands that SANDAG report the environmental impacts of its project, the subject RTP. The temperature anomaly and the atmosphere CO2 stay close together, over the shown 800,000 years, *except* in the time in which we are living. The temperature anomaly that goes with our current atmospheric CO2 value is approximately 15 degrees. Sadly, just 5 degrees of temperature anomaly will destroy our habitat. This next plot shows that the industrial revolution and the combustion of fossil fuels is the reason we have this crisis. It also shows that the temperature anomaly is moving up, as we expect, due to the fact that atmospheric CO2 will trap "heat", which is IR, a particular frequency of electromagnetic radiation.



These plots seem to show that humanity has no chance to avoid catastrophe. However, CA has a plan to avoid climate destabilization and catastrophe. This Plan corresponds with the work of the UN's IPCC, with its yearly COP (Committee of Parties) meetings, which strive to get countries to increase their commitment to reduce their 2030 emissions. 2030 is the key year, NOT 2035, which is the target year for SB 375 and for the RTP's Sustainable Community Strategies. The plan to achieve CA's climate mandates (one for 2030 and one for 2045) is the 2022 CARB Scoping Plan, which I will sometimes refer to herein as "the Plan," that matters. SANDAG must help to implement the Plan, not ignore it.

Here are recent quotes from the Secretary General of the UN describing our climate crisis:

1.) We have a Code Red Climate Emergency
2.) We are solidly on a path to an unlivable planet.
3.) We are driving towards Climate Hell with our foot on the accelerator.
4.) We are dangerously close to the point of no return.

California's (CA's) attempt to do its part to avoid the catastrophe of climate destabilization is to achieve its two climate mandates. One is for 2030, and the

other is for 2045. The most important mandate is the 2030 climate mandate, which has been created by SB 32. CA's official plan to achieve its 2030 Climate Mandate is CARB's Scoping Plan, dated December 2022.

SANDAG should remember the importance of this because in early 2012 SANDAG was sued by CNFF and the suit was joined by AG Harris, which is to say, the state of California ("CA").

Reference 0 (yes, zero) is a power point presentation which summarizes the rulings that resulted, and the other needed background information, for the subject documents. The Superior Court, the Appellant Court, and the Supreme Court agreed with the AG when she asserted (paraphrasing here) that no project under CEQA can ignore the CA Climate mandate (here, it is SB 32 which matters the most) and the official plan to achieve it, which you should know is the CARB Scoping Plan released in December of 2022. However, the CA Supreme Court agreed with SANDAG that you did not ignore the official plan because you talked about it. At that time the important CA mandate was the final year of S-3-05, which was to reduce emissions to 80% below CA's 1990 value by 2050. The Supreme Court ruling was very wise. It said that it was a close call. It said that SANDAG had time to correct its work in time, since the mandate was in 2050.

We are in a very different situation today. The CA mandate that matters is in 2030 (SB 32) and the official CA Plan to achieve it makes it clear that significant changes are needed. SANDAG was in no position to ignore this, as it created its RTP 2025. "Ignore" here, means failure to adopt the Plan's applicable mitigation measures and failure to recognize that since a large VMT reduction is needed there is no reason to increase the capacity of our roads. Increasing road capacity will reduce the elasticity of the Scoping Plan's pricing strategy. The Draft RTP pushes us toward climate change failure, which is to say climate destabilization and catastrophe.

The Scoping Plan has computed (based on reasonable assumptions about what cars will be on our roads in 2030 and what fraction of our 2030 electricity will be renewable) that we will need to reduce driving 25% with respect to our 2019 levels, by 2030. The Plan's three primary driving-reduction-mitigation measures are as follows:

- A Road Use Charge (I believe it must be means based, with privacy protections, and it must ***replace*** the very regressive and dwindling CA gas tax, to be politically viable.),
- Priced Parking (we can say "Managed Parking" and it must provide earnings to those for whom the parking is built and have other features, to be practical and economically fair), and
- the doubling of transit-service, by 2030, with respect to 2019.

Since the pricing of parking and road use is so important in our efforts to stabilize the climate, it should not be ignored in your RTP. SANDAG needs to respect

CARB and respect the CA Supreme Court. It was not easy for CARB to tell the truth in the Scoping Plan. Numbers don't lie. We are running out of time and physics will not wait for our other problems to be solved. SANDAG is ignoring the mitigation measures of the Plan. Instead, it should lobby CA to do the pricing measures. It should assume that CA is not so irresponsible as to ignore its own Plan. It should assume that both pricing measures (pricing parking use and road use) will be fully implemented by 2030. SANDAG should double transit service by 2030, with respect to the 2018 transit service level.

It should also be clearly stated that cars and light-duty trucks (Light-Duty Vehicles, or LDVs) emit more GHG than any other category of emission. Electricity emits the 2nd most. However, there is a good chance that California can achieve the 2030 climate-stabilization requirement that is derived below (80% below our 1990 value), for the category of electricity. By approximating the renewable content of our electricity as zero, in 1990, the 2030 climate-stabilization requirement for electricity is to have its renewable content be 80%. Many cities in California have stated in their Climate Action Plans (CAPs) that their electricity will be 100% renewable by 2035. Unfortunately, such comparable optimism cannot be expressed for LDVs. Our only hope is the implementation of a plan, containing enforceable mitigation measures, that will, taken together, do these two things,

- cause the cars on the road in 2030 to be more efficient (more EVs and higher CAFÉ standards) and
- reduce our per-capita driving (VMT).

As stated, the CARB Scoping Plan is such a plan. CARB did the work. SANDAG's job is to not ignore that work. This should be stated as part of the required discussion of climate stabilization.

With that background provided, the DEIR must include a discussion of climate stabilization, as follows.

Climate Stabilization/Destabilization

Climate stabilization at a livable level is the avoidance of climate destabilization. Human survival requires climate stabilization. Given this fact, climate stabilization is an overwhelmingly important topic and requirement. This is defined in Slide 13 of Reference 0.

In 2011, California's Attorney General sent a comment letter to SANDAG regarding its Draft Regional Transportation Plan. In the letter she stated that *climate stabilization is the objective that is relative under CEQA*. This is shown in Footnote 21 at the bottom of Page 8 of Reference 1, the 3rd attached file in the email containing this letter. Therefore, the topic of climate stabilization/destabilization must be fully covered in any legal and legitimate EIR for a project that has an impact on GHG emissions. That includes an honest, no "rose-colored-glasses" allowed, and complete description of climate destabilization. Such a description must include phrases such as "a devastating collapse of the human population" (from Scientific American), "mass starvation" (this would be caused by destroying our planet's human habitat), "loss of most life forms on

the planet except perhaps considering microbiology" (climate destabilization may not sterilize the planet), and so on.

An Environmental Impact Report must report on environmental impacts in a complete and honest way, regardless of how grim that message might be. Climate destabilization will be very difficult to avoid. We are "solidly on a path" as the Secretary General has stated. The practices of the Project (RTP 2025) will either be part of a solution, or they will be part of the impending failure.

The legal principle of "cumulative effects" is important. What if all transportation plans failed to conform to the CARB Scoping Plan?

The practices used in the Project, which will take infrastructure and written understandings, must be the practices needed to achieve climate stabilization, unless the SANDAG Staff (the entity that is responsible for the EIR) wants to admit in the EIR that it is contributing to climate destabilization, which must be fully defined and described. Since Light Duty Vehicles (LDVs) are the category of GHG emission that emits the most, the EIR must also evaluate the driving reductions achieved from its enforceable mitigation measures and practices.

Mitigation Measures Necessary to Achieve Climate Stabilization

CARB's 2022 Scoping Plan is about achieving California's Climate Mandates. The first-occurring California Climate Mandate is to emit at no more than 40% below our 1990 GHG emission value, by 2030. This falls short of the science-based 2030 climate-stabilization requirement that can be derived from an unambiguous statement by James Hansen, as follows.

Reference 2 (the 4th attached file in the email with this letter as the 1st attached file) statement on Page 14 is that the required rate of reduction, if commenced in 2020, would be 15%. That rate means that the factor of 0.85 must be achieved, year after year. If done for 10 years, the factor would be $(0.85)^{10} = 0.2$, by 2030. This reduction of 80% down from the 2020 value matches the 2050 target requirement of Executive Order S-3-5, which is 80% below the 1990 value. According to S-3-05, the 2020 emission value should be the same as the 1990 emission value. The S-3-05 emission of 2050 was designed to support capping atmospheric CO2 at 450 PPM. "Capping" means that the sum of all emissions (anthropogenic and natural) equals the sum of all sequestration (mostly photosynthesis.) Therefore, the Reference 2 statement author (Dr. James Hansen) wanted the world to achieve the third target of S-3-05, to get the atmospheric CO2 to stop going up, 20 years sooner (2030 instead of 2050) than what S-3-05 was written to achieve by 2050. Part of the problem with S-3-05 is that it was written in 2005 and, since then, humanity has not reduced its emissions as much as was hoped and we have learned more about our climate predicament.

To put this in focus, it is helpful to view the 2030 climate stabilization requirement against our state climate mandates. This is shown on Slide 13 of Reference 0.

The California climate mandate for 2030 is only 40 percent below the 1990 value. However, Reference 3, the CARB Scoping Plan, which is the 4th attached file, makes it clear that significant driving reductions are needed to achieve the 40% reduction value, because we cannot possibly phase out the internal combustion engine LDVs fast

enough. For example, on Page 100 of Reference 3, it says we must reduce VMT. On Page 117 of Reference 3, it says that we are failing, and we must therefore "double down" on our VMT reduction.

Page 192 of Reference 3 says, "VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals."

Page 194 of Reference 3 says, "The pace of change to reduce VMT must be accelerated."

Page 192 of Reference 3 says, "Appendix E (Sustainable and Equitable Communities) elaborates on reasons for reducing VMT and identifies a series of policies that, if implemented by various responsible authorities, could help to achieve the recommended VMT reduction trajectory included in this Scoping Plan (and related mode share increases for transit and active transportation)."

The 6th attached file in the email with this letter is Appendix E of the 2022 Scoping Plan. It is Reference 4 for the email.

On Page 4 of Reference 4 the truth is stated about our need to reduce VMT:

> ***2.1 Zero-emission vehicles are not enough to solve the climate crisis.***
>
> *Contrary to popular belief, zero-emission vehicles (ZEV) alone are not enough to solve the climate crisis. The 2022 Scoping Plan illustrates that despite cleaner vehicles and low-carbon fuels, the path to carbon neutrality by 2045 also depends on reducing per capita VMT (the total passenger vehicle miles driven by an average person in California on any given day). To meet the carbon neutrality goal, the Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles by 2030 (a 25 percent reduction) and to 17.2 miles per day by 2045 (a 30 percent reduction).*

Note the large per-capita driving reduction that is needed by 2030, just to achieve the 2030 State Mandate, which is only half of what is needed, according to Dr. James Hansen, who wants to avoid climate catastrophe.

On its Page 16, Reference 4 advocates for "parking fees."

On its Page 18, Reference 4 states that "free parking" incentivizes driving alone; and that for the State to meet its climate goals, parking cash-out is needed. Also, that a state action is to end its subsidies to car parking for its 200,000 employees. Would the Port do the same for its employees? This letter shows a painless way to make that happen. Painless in the sense that even employees that drive everyday will not lose any money.

In Reference 4, on Page 27, the Scoping plan says the State should take this action, with reasons then added, as follows:

> *Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations. Building parking for infill development makes construction costs more prohibitive, considering parking can cost up to $100,000 per stall, which takes*

away both physical space and budget from the construction of housing and other needed services and amenities.

Reference 5 is Appendix D of the CARB Scoping Plan. It is the 6th attached file in the email with this letter. It has a focus on local actions.

From Page 9 of Reference 5:

Local jurisdictions should focus on these three priority areas when preparing a CEQA-qualified CAP:

- *Transportation electrification*
- *VMT reduction*
- *Building decarbonization*

By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction.

Here is the key: ***Table 1 of Reference 5 says, "pricing parking" is a priority GHG Reduction Strategy.***

Table 3 of Reference 5 says, "For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit" is a key project attribute that reduces GHG.

Footnote 54 of Reference 5 states that, "AB 2097, adopted by the Legislature and signed by the Governor in September 2022 eliminates parking requirements for residential and commercial development within a half mile of transit". I point this out without comment as to whether less parking could be provided.

RTP 2025 is a Project under CEQA. It must at least match the recommendations of References 2, 3, and 4 because they are about State Mandates, which are easier than the climate stabilization requirement of 80% below our 1990 level by 2030. (Note: the 2030 requirement explains why all the COP 25, 26, 27, etc. meetings are trying to get larger commitments from member countries, for 2030. It also explains the UN Secretary's comments shown above.)

Many of RTP 2025's Projects Make No Sense, Given the CARB Scoping Plan's Call for a Significant Drop in VMT, and the Facts Surrounding our Climate Crisis

The most obvious example of not making sense is that since VMT must be 25% lower in 2030, compared to 2019, why does SANDAG want to waste money on highway expansion that won't be needed?

The following words, shown in indented paragraphs, to identify these words, come from a draft of a letter composed by the local Sierra Club. I have checked its assertions and have found them to be correct. They are as follows, with some slight edits, that are not identified:

SANDAG's draft 2025 Regional Plan not only fails to prioritize GHG emission reductions, it proposes many projects that will increase GHG emissions and contribute to urban sprawl.

A major flaw in the draft Plan is the emphasis on freeway and road projects that will increase GHG emissions over rail public transit that would reduce emissions. The Plan includes at least 61 freeway and road projects benefiting single-occupancy vehicle users that would cost $10.84 billion by 2035. In contrast, the Plan proposes just 6 rail projects that would cost $8.8 billion by 2035.

Many new and harmful freeway lanes are proposed in the Plan including new general purpose freeway lanes, general purpose interchange improvements, and "managed lanes" including "managed lane connectors" at freeway interchanges and "direct access ramps" at freeway entrance/exits. The 2025 RTP includes 7 new general purpose freeway lanes and related projects by 2035 for $1.3 billion. And the 2025 RTP includes 26 managed-lanes and related projects by 2035 for $4.6 billion.

Sierra Club does support several public transit projects included in the Plan including double-tracking and grade separations for the Sprinter between Oceanside and Escondido, realigning the LOSSAN corridor off the bluffs in Del Mar and new bridges and double-tracking of the LOSSAN corridor (except in Carroll Canyon/Miramar Hill).

SANDAG should revise the 2025 Regional Plan to reduce GHG emissions, discourage urban sprawl, and benefit public transit.

That is the end of the Sierra Club Draft letter material that I support.

References

The referenced documents were attached to the email sent with this letter as its first attachment. They are all available from Mike Bullock at mike_bullock@earthlink.net.

In Closing

Thank you for your leadership in performing your critical work. Thank you for reading this material. Please let me know if you would like to meet to discuss this letter or related topics.

Highest regards,

Mike Bullock
1800 Bayberry Drive

Oceanside, CA 92054
760 421 9482

Former California Democratic Party Delegate, 76th Assembly District (author of 2 adopted resolutions and 5 Platform changes)
Former Elected (now Associate) Member of the San Diego County Democratic Party Central Committee (author of 5 adopted resolutions)

Final title before leaving Aerospace: ***Senior Staff Systems Engineer***

Air and Waste Management Association (AWMA) published and presented papers:

Author, ***The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving***
Author, ***A Climate-Killing Regional Transportation Plan Winds Up in Court: Background and Remedi****es*
Co-author, ***A Plan to Efficiently and Conveniently Unbundle Car Parking Cost***

Quotes from the Secretary General of the UN:

5.) We have a Code Red Climate Emergency
6.) We are solidly on a path to an unlivable planet.
7.) We are driving towards Climate Hell with our foot on the accelerator.
8.) We are dangerously close to the point of no return.

.

Climate Crisis, Leading to the Requirements to *Reduce Driving* and Reform Car Parking

The Reform would increase equity and transparency AND reduce driving

The Reform would include Solar Panels, Charging, and Buying/Selling Electricity

Mike Bullock

mike_bullock@earthlink.net

760-421-9482

Reducing Driving

Anthropogenic Climate Change

From CA's official plan to achieve CA's official 2030 Climate Mandate

1. **Why?**
2. ***How much?***
3. ***How?***

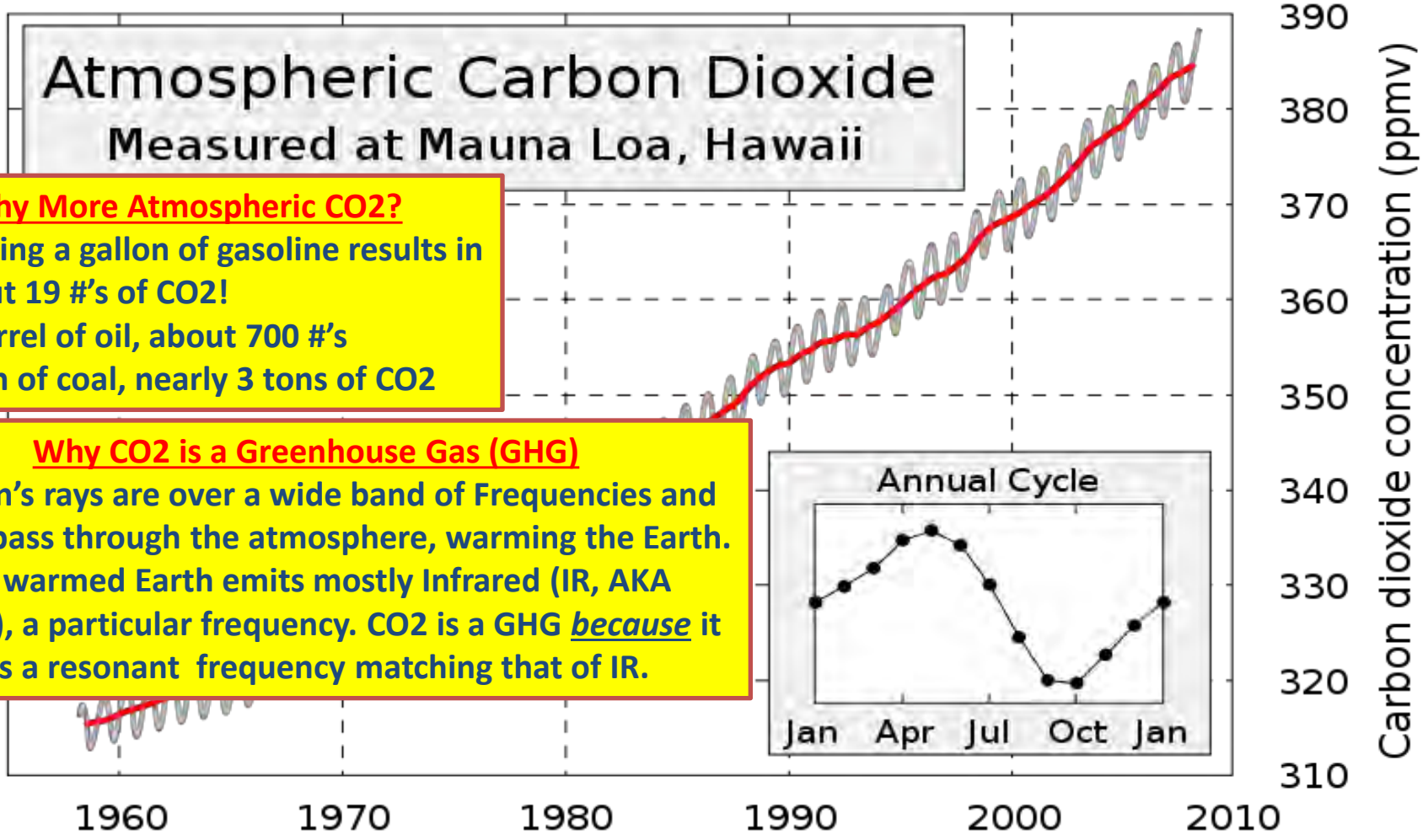
Why reduce driving?

Climate Data

Currently 420 PPM!

- Keeling Curve:

http://en.wikipedia.org/wiki/An_Inconvenient_Truth#Scientific_basis *



Why More Atmospheric CO2?

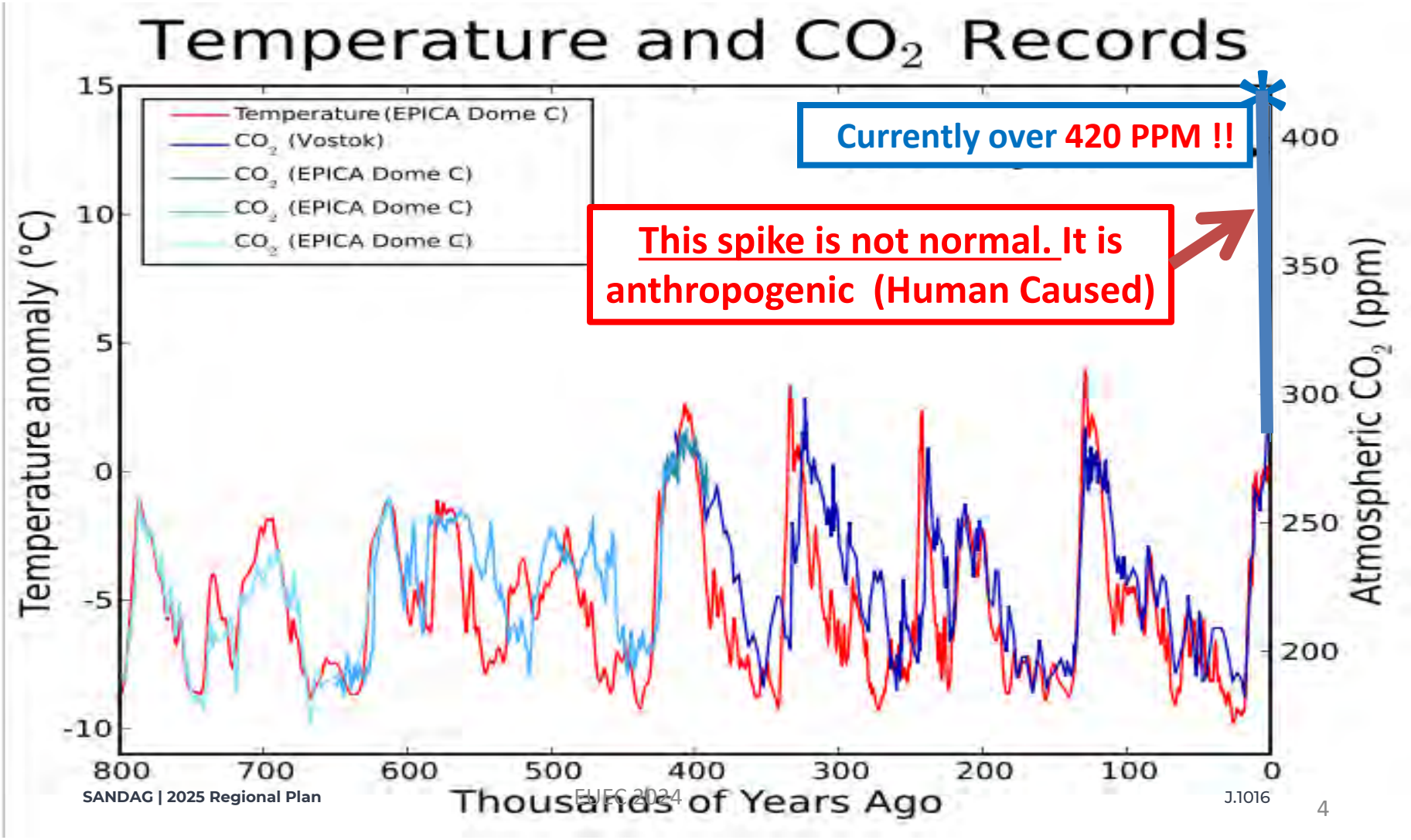
- Burning a gallon of gasoline results in about 19 #'s of CO2!
- A barrel of oil, about 700 #'s
- A ton of coal, nearly 3 tons of CO2

Why CO2 is a Greenhouse Gas (GHG)

The Sun's rays are over a wide band of Frequencies and mostly pass through the atmosphere, warming the Earth. The warmed Earth emits mostly Infrared (IR, AKA "Heat"), a particular frequency. CO2 is a GHG ***because*** it has a resonant frequency matching that of IR.

Why reduce driving?

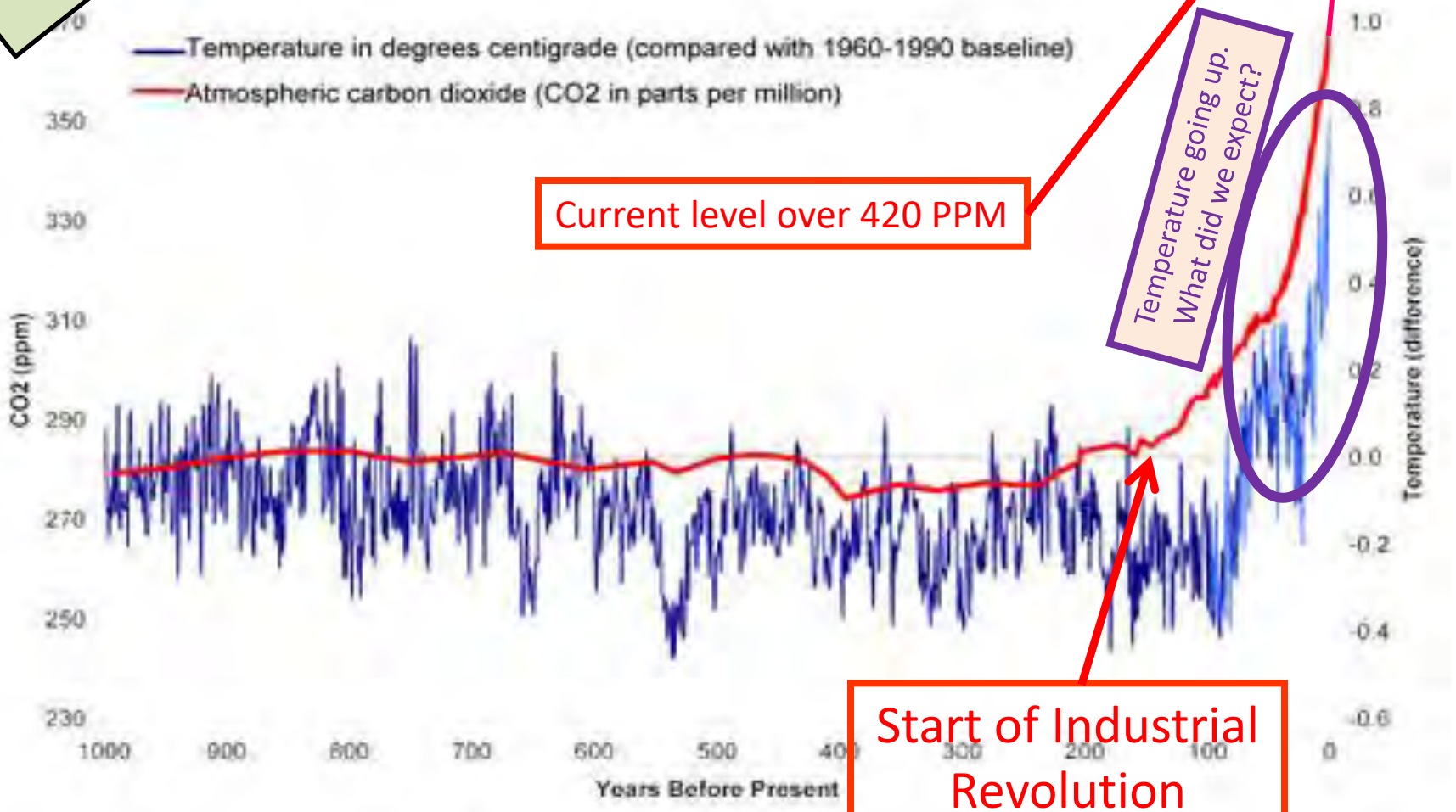
Climate Change, Mostly Normal



Focusing on that Spike

Why reduce driving?

Earth & Space Research (ESR) website:
http://www.esr.org/outreach/climate_change/mans_impact/man1.html



How Bad Could It Get?

Governor Brown to the Pope:

Humanity must

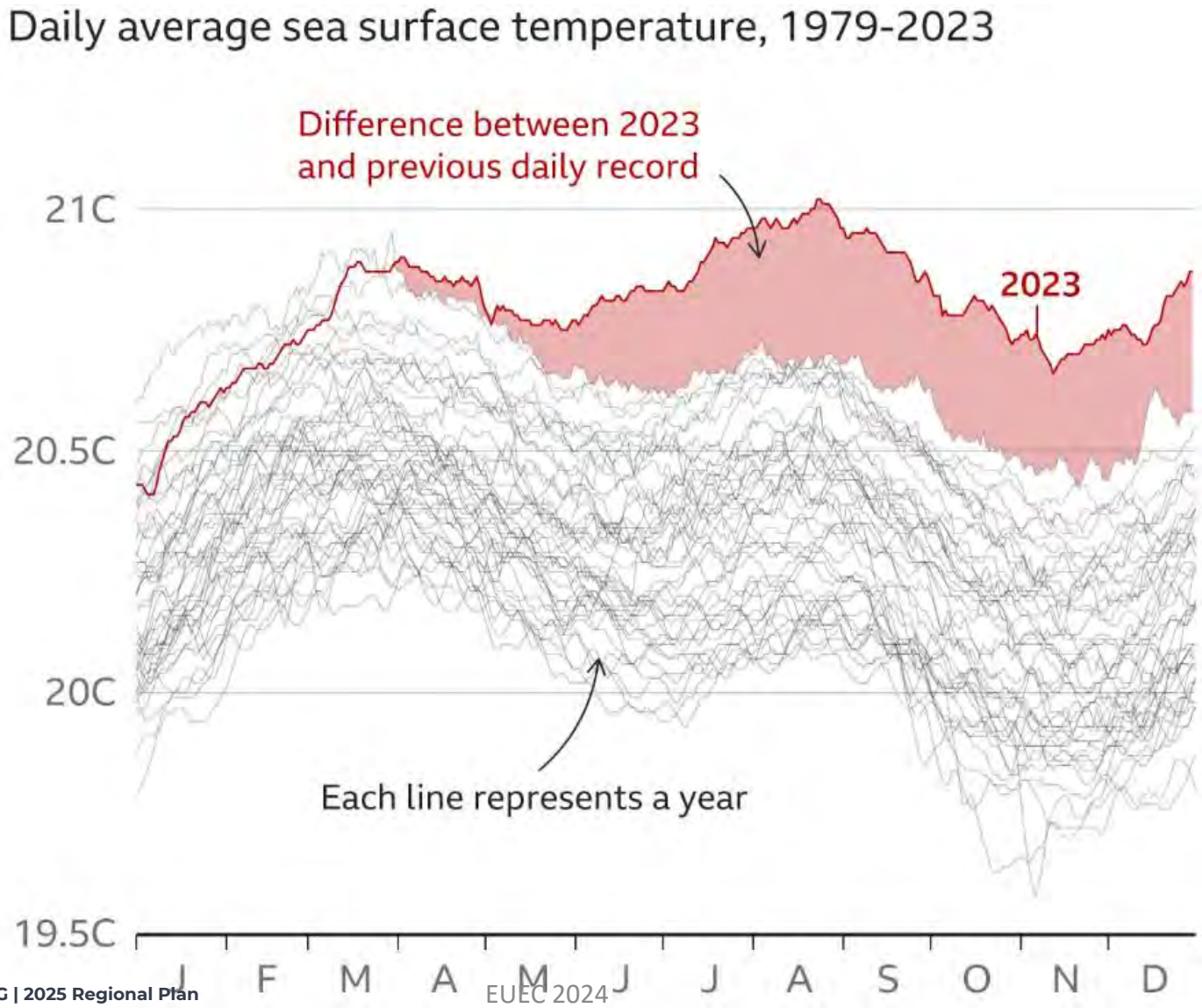
Reverse Course* | **or** | ***Face Extinction***

* ***T*hese words should have been "*Adopt Sufficient Mitigation Measures*"**

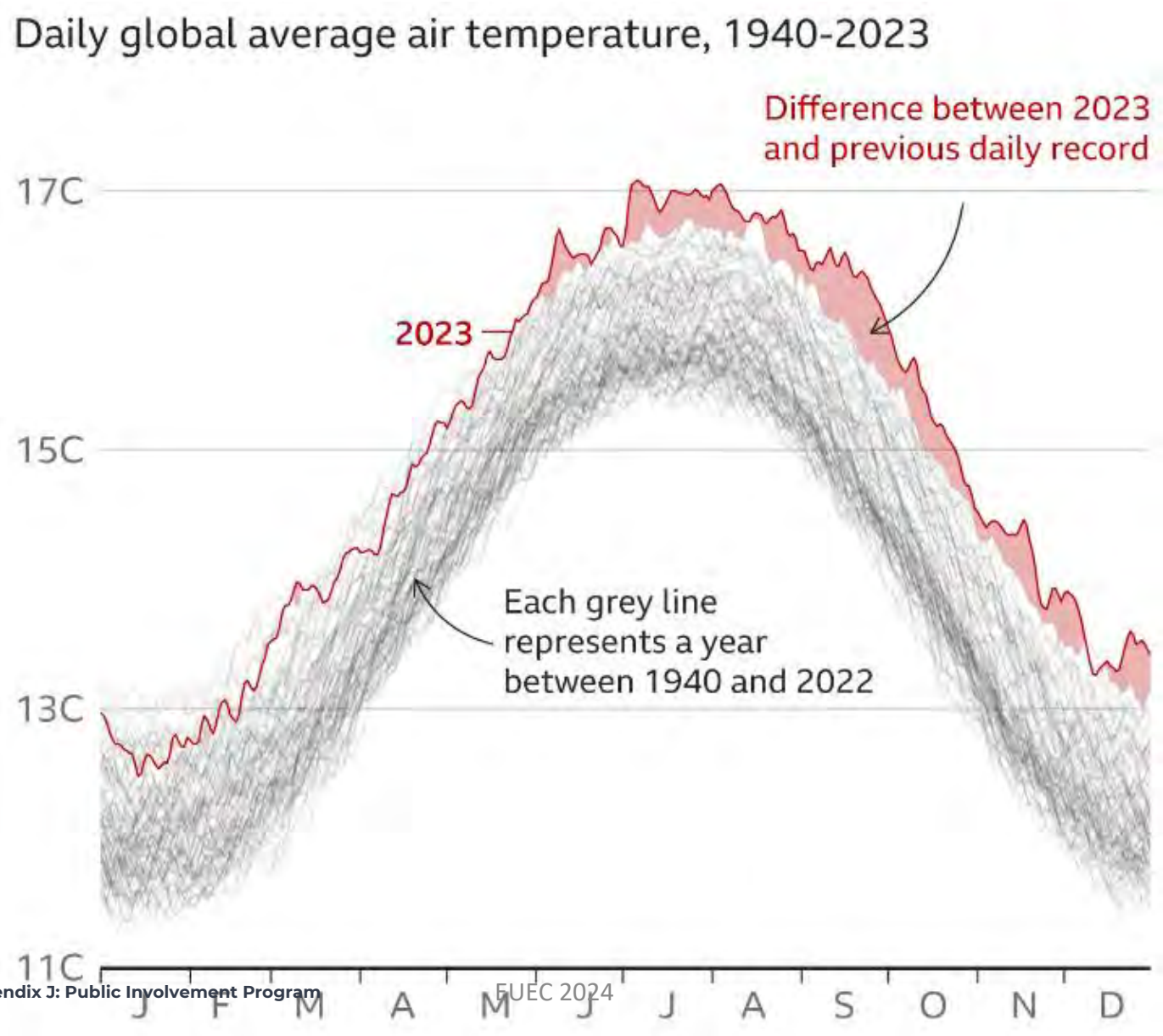
How Bad Could It Get?

From a reliable 2012 source (then, same topic, *updated*) "Such a large temperature rise occurred ~~250~~ 252 million years ago and extinguished ~~90~~ 97% of the life on Earth. The current rise is of the same magnitude but ***is occurring about 10 times faster!!!!!!!!"***

2023 Ocean Temperature



2023 Air Temperature



How Bad Could It Get?

Comments from the Secretary General of the UN:

1. *We have a **Code Red** Climate Emergency.*
2. *We are solidly on a path to an **unlivable** planet.*
3. *We are driving toward a Climate Hell, with our foot on the accelerator.*
4. *We are dangerously close to a point of no return.*

Climate Destabilization & Climate Stabilization

Climate Destabilization

- A process with a large warming potential, that is also *caused by* warming, proceeds at a rate that is large enough to perpetuate warming, even if we stop our emissions
- One such process would trigger other such processes
- Outcome: human habitat destruction
  - High food prices, then mass starvation
  - Human extinction

Climate Destabilization Example

- Permafrost melting, at a sufficiently high rate
- The melting releases large amounts of Methane (CH4, which happens to be what many use to fry eggs)
- The released methane (a very potent GHG) traps more atmospheric heat, accelerating the permafrost melting

Climate Stabilization

Avoiding Climate Destabilization

Human Survival Requires *Climate Stabilization*

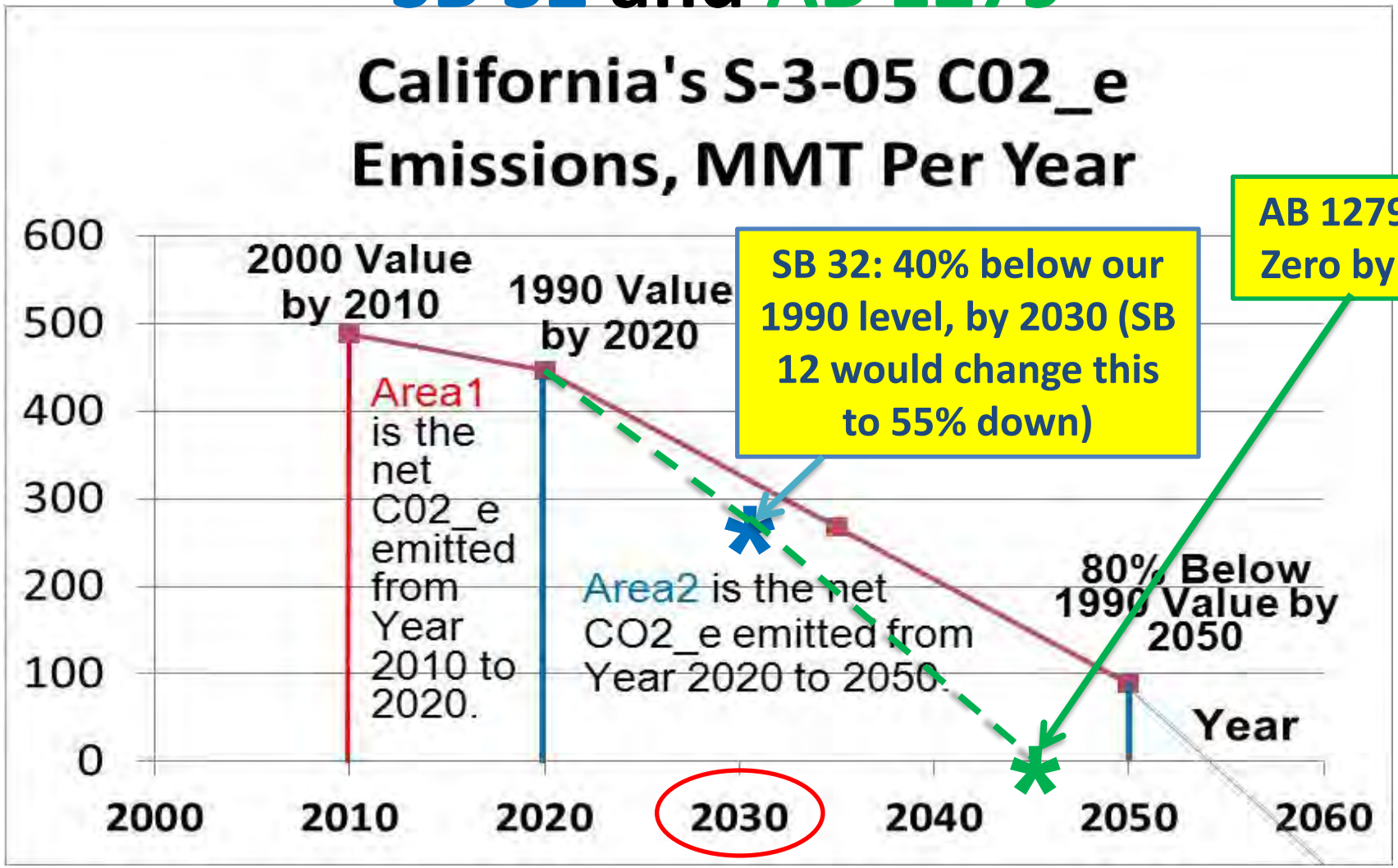
2011 Letter to SANDAG from CA AG Harris (paraphrasing):

1. CA's GHG Climate Mandates represent the level scientists believe is necessary to ***stabilize climate***.
2. They are official policies of CA, designed to meet the environmental objective under CEQA, ***climate stabilization.***
3. SANDAG cannot ignore them. **(Court rulings agreed.)**

Conclusion: neither municipal governments nor MPOs (like SANDAG) can legally ignore CA's Climate Mandates and the Official Plan to achieve them. CEQA projects must include the Official Plan mitigation measures, if applicable.

CA Climate Mandates

SB 32 and AB 1279

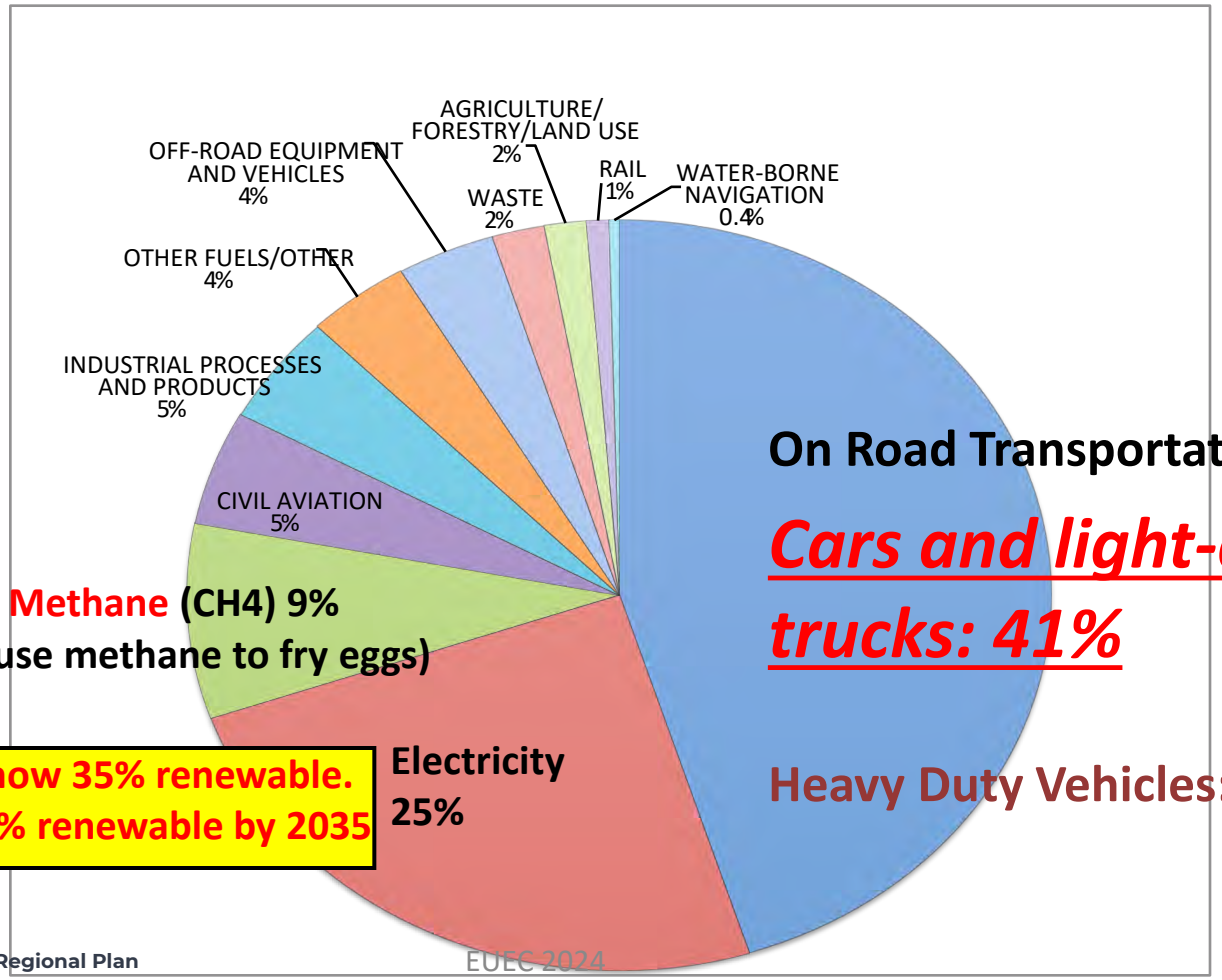


Why Pick on Cars?

Greenhouse Gas (GHG) Emissions, SD County

Source: Energy Policy Initiatives Center (EPIC, USD)

http://www.sandiego.edu/EPIC/ghginventory/GHG-On-Road1.pdf.pdf



~~Natural Gas~~ Methane (CH4) 9%
(Note: many still use methane to fry eggs)

Our electricity is now 35% renewable.
Some promise 100% renewable by 2035

CARB's 2022 Scoping Plan

The CARB (California Air Resources Board) *Scoping Plan* is CA's official Plan to achieve its Climate Mandates.

https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents

From Page 4 of Appendix E of the Scoping Plan

2.1 Zero-emission vehicles are not enough to solve the climate crisis.

*Contrary to popular belief, zero-emission vehicles (ZEVs) alone are not enough to solve the climate crisis. [It] also depends on reducing per capita vehicle-miles travelled (VMT.) [The] Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles per day by 2030 (**a 25 percent reduction**).*

CARB's 2022 Scoping Plan

From Appendix E, emphasis added:

Pricing strategies include fees for miles driven, **parking fees**, and dynamic fees on highway lanes. **Authorizing pricing strategies is *essential* . . .**

Actions

- California employs over 200,000 people. **End the State's subsidies for employee parking** and take additional actions to move away from subsidizing public spaces for car parking

CARB's 2022 Scoping Plan

From Appendix D (Local Actions) emphasis added:

Table 1– *Priority* GHG Reduction Strategies	
VMT Reduction	Implement parking pricing or transportation demand management pricing strategies

CARB's 2022 Scoping Plan

What to do, regarding car parking

Having observed CARB for over 10 years, I believe that they have finally done the math and come to the correct conclusions. Although the conversion to battery-electric cars will be very fast, and although renewable electricity in CA will probably be over 80% by 2030, there will still be GHG from using electricity and there will still be Internal Combustion Engine cars on the roads in 2030. The 25% driving reduction CARB computes is reasonable. CA is very car centric. **Pricing is required**. *If someone wants to "shoot the messenger", shoot the climate scientists.*

Regarding car parking policy, if we value human survival and understand the political difficulties of pricing, a good interpretation of the Scoping Plan is that it requests municipal governments to adopt an enforceable mitigation measure to procure *well-managed car parking* for their workers, in such a way that the parking system will spread to all places of employment, apartment complexes, shopping centers, train stations, and so on, for both on-street and off-street parking. "Well Managed" must incorporate economic equity, and social justice. It must reduce driving.

Car Parking **Pricing** Strategy

Not from the Scoping Plan

Managed Parking: provides earnings to those for whom it is built; is shared, value-priced (with congestion pricing), & automated

The first system would be installed by a third-party vendor, that is selected by an RFP (Request for Proposal) process, for municipal government employees, as part of a government's **Climate Action Plan**. It would be operated for the financial gain of the employees, such that the employees that drive every day would still at least break even. This would require an "add-in" payment. The vendor would be skilled at monetizing parking that is not being used by the employees, monetizing data, building solar canopies, operating charging stations, selling electricity, and expanding the parking system into nearby streets and developments. Managed Parking must increase economic equity and reduce driving alone to work.

Dividend-Account Parking

A System Designed to Eliminate the Harm (less net take-home pay and no benefit from the parking for those that don't use the parking) of so-called "Free" Parking for Employees

- **Top-Level Outcome & Overview**
- **Some Top-Level Calculations**
- **Who gets to use the system**
- **Outcomes of a new incentive**

Top-Level Outcomes

- Employees that drive every day, “break even” **(Lose no money!)**
- Employees get *paid not to drive* **(Make more money!)**
- Fewer employees drive, reducing Greenhouse Gas (GHG) emissions **(Less GHG!)**

Overview

- Fully-automated parking system, implemented by a 3rd-party vendor (RFP selection process)
- operated for the financial gain of employees
  - Earnings = Money Generated Minus Operational Cost
    - Operational Cost Would be Contractually Bounded
  - Earnings go to employees
- An employee's **Earnings** ("**Dividend**") is proportional to their time at the work site
- Price is charged per minute
  - Such as 1.85 cents per minute (= $1.11 per hour= $10 per 9 hours at the workplace)

Calculations of an Employee's Earnings

- An employee's earning is proportional to time spent at work (automatic collection of enter/exit times, using employee RFID)

Definitions to Compute an Employee's Monthly Earnings	
$T_{Employee}$	The Employee's Monthly Time at the Work Site
$T_{AllEmployees}$	Total Monthly Time at the Work Site, All Employees
$E_{AllEmployees}$	Total Monthly Earnings from the Employee Parking

$$\text{Employee Earnings} = E_{AllEmployees} \times (T_{Employee} / T_{AllEmployees})$$

"Add In" Payment so Those that Drive Every Day Will Lose No Money

Note: This is for an individual employee

The employee's Parking Payment =

The employee's Earnings – The employee's parking charge + The employee's "Add In"

"Add In" is zero, unless it must take on a positive value so that the employee loses nothing

In many cases, the "Add-In" payments will be covered by non-employees using the parking.

Charge, Earnings, & Add-In, Payment *For Each Employee*

- **Charge**
  - Total Minutes Parked x Cost per Minute
- **Earnings**
  - As shown on earlier slide (proportional to employee's time spent at work)
- **Add-In**
  - If **Charge** > **Earnings**, **Add-In** = **Charge** – **Earnings**
  - **Otherwise, Add-In = zero**
- **Payment** = **Earnings** – **Charge** + **Add-In**

Who Gets To Use Dividend-Account Parking

- ***Anyone*** (not necessarily an employee) driving a car registered in the system
  - There is a person with an account associated with the car
    - Note: (A CA Car's owner is in the CA system and can be billed, in any case.)
  - Typically, the car will be identified and associated with an account
    - License plate reader
    - An account could be established on the spot: credit card info and license number

Results of 3 Actions, Including Cash-out

Case (#1), Reference Patrick Siegman's article in Bicycle Pedestrian Federation

- Company: CH2M Hill
  - Location: Bellevue, WA (Seattle suburb)
  - Engineering Firm with 430 employees
- Actions
  - $54/month (1995 $'s), *to not drive*
  - Improved Transit
  - Improved Bike/Ped facilities

CH2M Hill Work Trips		
Mode	***Before***	***After***
Drive Alone	**89%**	**54%**
Carpool	**9%**	**12%**
Bus	**1%**	**17%**
Bike, Walk	**1%**	**17%**
	100%	***100%***

Since these changes are brought about by more than just cashout, this case is not used in the tabulation of cashout results (next chart)

Cash-Out Results

(11 Locations, 3 Groups, 1995 Dollars)

Money Matters !!!!!

- Reference: *How to Get Paid to Bike to Work: A Guide to Low-traffic, High- Profit Development* by Patrick Siegman*. Published in *Bicycle Pedestrian Federation of America*, 1995.
- 3 Largest Responses
  - 38%, 36%, 31%
- 3 Smallest Responses
  - **15%** , 18%, 24%
- Responses are the *change;* car vacancy rates would be larger

*Patrick Siegman, of Nelson Nygaard

Impact of Financial Incentives on Parking Demand			
Location	**Scope**	**1995 dollars per mo.**	**Parking Use Decrease[1]**
Group A: Areas with little or no public transportation			
CenturyCityDistrict, West Los Angeles	3500 employees at 100+ firms	$81	15%
Cornell University, Ithaca, NY	9000 faculty & staff	$34	26%
San Fernando Valley, Los Angeles	1 employer, 850 employees	$37	30%
Costa Mesa, CA		$37	22%
Average for Group		**$47**	**23%**
Group B: Areas with fair public transportation			
Los Angeles Civic Center	10000+ employees, several firms	$125	36%
Mid-Wilshire Blvd., Los Angleles	1 mid-size firm	$89	38%
Washington DC Suburbs	5500 employees at 3 worksites	$68	26%
Downtown Los Angeles	5000 employees, 118 firms	$126	25%
Average for Group		**$102**	**31%**
Group C: Areas with good public transportation			
University of Washington, Seattle Wa.	50,000 faculty, staff & students	$18	24%
Downtown Ottowa, Canada	3500+ government staff	$72	18%
Bellevue, WA	1 firm with 430 employees	$54	39%[2]
Average for Group, but not Bellevue Washington		**$45**	**21%**
Over All Average, Excluding Bellevue Washington			**25%**

[1] **Parking vacancy would be higher!** [2] **Not used, since transit & walk/bike facilities also improved.**

Unused, Background Slides

Difficult-to-Not-Drive Example

Fictional, Simplified Case with Pricing and Payout Considered per Day, *Page 1*

- Employment Center (factory and office)
- Outside Hemet, California
- 100 employees; parking lot has 100 spaces
- No Transit, 110-degree temperature with poor roads for biking, culture of not car-pooling
- Before installing
  - 99 drive
  - 1 bikes

Difficult-to-Not-Drive Example

Fictional, Simplified Case with Pricing and Payout Considered per Day, *Page 2*

- Dividend-Account Parking charges $10/day
- After installing
  - 99 drive
  - 1 bikes
- Total collected each day: $990
- Each employee gets $9.90 earnings per day ($990/100)
- Each driver loses 10 cents per day
- The “crazy” bike rider gets $9.90 per day extra

Hey, isn’t this an improvement? I would say the “crazy” bike rider is earning his money!

If another employee bikes, the drivers would lose 20 cents per day and the bike riders would get $9.80 per day. If the company president rented out the 2 extra spaces for $10 per day, the drivers would lose nothing and the bike riders would get $10 per day. Biking would increase by 100%! **What’s wrong with that?**

Human survival requires climate stabilization

Therefore, *climate stabilization* is critically important.

However, the current 2030 CA Climate Mandate, is insufficient to support climate stabilization, based on an unambiguous statement from Dr. James Hansen, our preeminent climate scientist. SB 12 (Stern) would increase CA's 2030 mandate from 40% below our 1990 level to 55% below.

Climate Literacy, CA Democratic Party Platform's Education Plank

- **Work to ensure that all graduating high school students are climate literate, including knowing**
  - **Reasons for climate change and its potential for harm**
  - **The difference between climate stabilization and destabilization**
  - **Climate-stabilizing GHG reduction targets**
    - **The basis for those targets, and**
    - **The measures needed to achieve them; and**
  - **Primary categories of emissions, including the most problematic category: cars**

Human Survival Requires Climate Stabilization

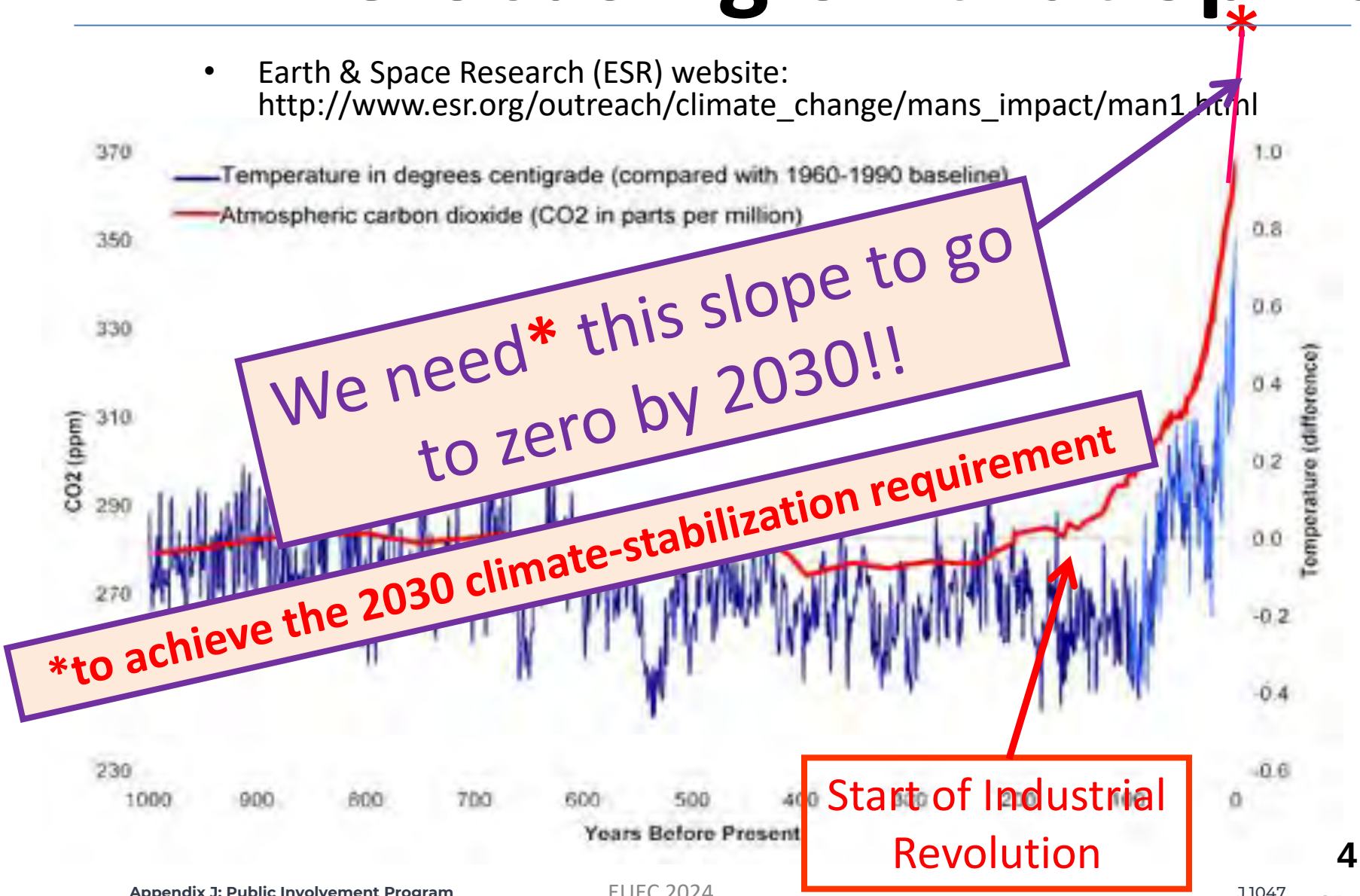
2023 CA Democratic Party Platform:

Support the requirement that all projects requiring California Environmental Quality Act (CEQA) analysis incorporate a climate impacts analysis incorporating and conforming to the policies and goals of the state's 2022 **Scoping Plan** for Achieving Carbon Neutrality.

CARB's **Scoping Plan** is the official Plan to achieve CA" Climate Mandates

Refocusing on that Spike

- Earth & Space Research (ESR) website: http://www.esr.org/outreach/climate_change/mans_impact/man1.html



An Important **Pricing** Strategy

Not from the Scoping Plan

A Road-Usage-Charge (RUC) Pricing & Payout System to Replace the State Gas Tax

THEREFORE, BE IT RESOLVED, that the Oceanside Bicycle and Pedestrian Committee supports replacing the state gas tax with a road-use charge (RUC) pricing and payout system that (1) would cover all road-use costs; (2) would protect the economic interests of low- and middle-income drivers by use of a progressive price structure that also recognizes the needs of rural drivers; (3) would protect privacy by requiring a search warrant to obtain location or travel information and has built in safeguards against unauthorized data use; (4) would include an instantaneous congestion-pricing algorithm; (5) would ensure that the per-mile price incentive to drive energy-efficient cars would still be sufficient to support necessary fleet electrification; (6) would ensure that cyclists & pedestrians are not charged under the system, since they contribute no emissions or wear-and-tear on the road system, and they help alleviate congestion.

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE

110 WEST "A" STREET, SUITE 1100
SAN DIEGO, CA 92101

P.O. BOX 85266
SAN DIEGO, CALIFORNIA 92186-5266

Public: (619) 645-2001
Telephone: (619) 645-2013
Facsimile: (619) 645-2012
E-Mail: tim.patterson@doj.ca.gov

September 16, 20I1

Honorable Jerome Stocks
Chair, Board of Directors
San Diego Association of Governments
401 B Street, Suite 700
San Diego, CA 92101

RE: **Oraft Environmental Impact Report for 2050 Regional Transportation Plan and Sustainable Communities Strategy**

Dear Chairman Stocks and Honorable Members of the Board:

Attorney General Kamala D. Harris submits the following comments on the Draft Environmental Impact Report (DEIR) prepared for the San Diego Association of Governments' (SANDAG) 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).[1] While we recognize the difficulty of SANDAG's task- to prepare the first SCS in the State as required by SB 375[2]..:.our review of the DEIR for the RTP/SCS has revealed some significant legal problems, as set forth below. We believe that SANDAG has the ability to correct these problems and improve the RTP/SCS, which will benefit not only the San Diego region, but will help to set the standard for other Metropolitan Planning Organizations across California.

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[1] The Attorney General submits these comments pursuant to her independent power and duty to protect the environment and natural resources of the State from pollution, impairment, or destruction, and in furtherance of the public interest. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d I, 14-15.) This letter is not intended, and should not be construed, as an exhaustive discussion of the DEIR's compliance with the California Environmental Quality Act (CEQA).

[2] Senate Bill 375 (Chapter 728, Statutes of2008).

Comments on the DEIR

Localized Air Pollution

The SANDAG region has some of the most serious local air quality problems in the State and the nation - in substantial part caused by vehicle emissions. The harm from these pollutants is not necessarily distributed equally throughout the region, but may be more concentrated in communities immediately adjacent to large-scale industrial and commercial development and major transportation corridors, and may more particularly affect certain segments of the population. As discussed below, our review of the DEIR indicates that SANDAG has set too low a bar for determining whether the air quality impacts of its RTP/SCS are significant, and, further, has failed to analyze the impacts of projected increases in pollution on communities that are sensitive or already overburdened with pollution, in violation of CEQA.

Background: PoHutants of Concern in the San Diego Air Basin

It is well established that "[t]he significance of an activity depends upon the setting." *(Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718 [citing Cal. Code Regs., tit. 14, § 15064, subd. (b)]; see also *id.* at 721.) Accordingly, the significance of any added pollutant emissions must be judged in the context of an air basin that already exceeds health-based federal air quality standards. (See *ibid.)* The San Diego area was ranked by the American Lung Association this year as having the seventh worst ozone problem, and the fifteenth worst particulate pollution problem, in the nation.[3] Pollutants of concern in the San Diego air basin include ozone, the chemical commonly called "smog," which may permanently decrease lung furiction;[4] and particulate matter, which impairs lung function and can exacerbate asthma. Small particulate matter (2.5 microns in size or less), a component of diesel exhaust, is of particular concern, because it can penetrate deeply into the lungs, bypassing the body's defenses, and can carry carcinogens on the surface of the particles.

The seriousness of the localized air pollution problem as it exists today in the region can hardly be overstated. The area exceeded the health-based federal ozone standard on 24 days in 2009, and it exceeded the federal particulate standard on 4 days. The basin exceeded the more stringent California standard for ozone on 127 days in 2009, and the fine-particulate standard on 78 days. The area has a history of failing to meet applicable air quality objectives. The San Diego Air Pollution Control District (APCD) stated in its 2009 Regional Air Quality Strategy (RAQS) that it has not consistently met the Health and Safety Code's 5% per year ozone reduction target during any year during the 2003-2006 time period, and that the APCD expects reductions of only about 3% per year during the 2006-2009 time period. (San Diego APCD 2009-RAQS, p. 2.)

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[3] American Lung Association, *State of the Air 201I,* at pp. 11, 13.
[4] Gauderman, et al., *The Effects of Air Pollution on Lung Development from IO to I8 Years of* Age (Sept. 9, 2004) 351 The New England Journal of Medicine 1057-1068.

SANDAG's Focus on "Conformity" with the State Air PoUution Plans Fajls Adequately to Address the Region's Serious Air Quality Problems.

Where an area exceeds federal air quality standards for air pollutants, federal law allows funding of the individual transportation projects listed in an RTP only if the RTP "conforms" to a federally approved state plan to meet those federal standards. The DEIR's analysis of whether localized air pollution resulting from the RTP/SCS is significant under CEQA focuses almost exclusively on whether such conformity is achieved. There are significant problems with this limited approach, which substitutes a determination of whether certain federal laws are met for SANDAG's obligation under CEQA to conduct a thorough analysis of the actual effects on the air and on public health that will result from the addition of the many hundreds of miles of highway expansion and extensions that are in the RTP/SCS.

California's most recent federally approved plan was prepared in 2007, and therefore does not reflect current conditions. The DEIR acknowledges that the federal EPA is expected to soon reclassify the San Diego Air Basin as in "serious" nonattainment of the federal ozone standard, a designation that requires attainment of the federal standard by June of 2013. (DEIR, p. 4.3-6.) Demonstrating conformity with the 2007 plan emissions budgets does not, by itself, show that relevant health effects created by the new pollution generated by the RTP/SCS have been analyzed and disclosed, or even that the relevant federal standards will be met. Instead, EPA's reclassification of the air basin as having worse air quality, and the imposition of such a short deadline for meeting the federal. ozone standard, indicates a more serious air pollution problem that may require more stringent control measures to protect the public health.[5]

In addition, the DEIR fails to analyze whether the California standard for ozone, more stringent than the federal standard, will be met during the life of the RTP/SCS, or what the RTP/SCS's contribution to current or future violations of that standard will be. The DEIR appears to rely solely on the RAQS to meetthe state ozone standard. (See DEIR at p. 4.3-29-30.) Yet, as noted, the region has not consistently met the RAQS 5% per year ozone reduction target. The fact that U.S. EPA is expected to reclassify the Basin as in "serious" nonattainment of the less stringent federal ozone standard would indicate that the RAQS standards have not been enough to prevent deteriorating air quality. Thus, any assumption that the RAQS will consistently achieve the 5% reduction target in the future is unsupported, and any assertion that the RAQS will attain the state ozone standard at a time certain unfounded. A full analysis is

[5] Even if conformity with federal standards in state-approved plans were an appropriate benchmark for significance under CEQA, the DEIR does not contain a quantitative analysis, using the most recent available air quality measurements as the baseline, to determine whether the federal air quality standards will actually be met, and what the public health consequences would be of adding the expected pollutant load from the RTP/SCS to existing conditions. (DEIR, at p. 4.3-14.)

needed to show that the emissions caused by the RTP/SCS at different time points during its life will not contribute significantly to violations of the state ozone standard in the San Diego Air Basin.

SANDAG Has Failed Adequately to Address Impacts to Public Health and Communities Already Burdened with Pollution.

We commend SANDAG for including in its DEIR a chapter entitled "Environmental Justice." (DEIR, ch. 4.06.) That section appears to focus primarily on the RTP/SCS's effect on access to transit by traditionally underserved communities. SANDAG has, however, failed to analyze other equally, if not more, significant effects of the RTP/SCS on communities currently experiencing environmental !!]justice. The principal omission of the DEIR is the lack of any discussion of the impacts of the increased air pollution that will result from carrying out the RTP/SCS on communities already severely impacted by air pollution. As noted, CEQA requires that the significance of environmental impacts be considered in context. *(Kings County Farm Bureau, supra,* 221 Cal.App.3d at 718.) Such context may appropriately include (1) whether the region includes communities or subpopulations that may be particularly sensitive to increases in pollution; and (2) whether such communities or groups are already at or near their capacity to bear any additional pollution burden.

The DEIR does not identify whether the area affected by the RTP/SCS includes particularly sensitive communities that will be affected disproportionately by the acknowledged increase in pollution. "[A] number of studies have reported increased sensitivity to pollution, for communities with low income levels, low education levels, and other biological and social factors. This combination of multiple pollutants and increased sensitivity in these communities can result in a higher cumulative pollution impact." (Office of Environmental Health Hazard Assessment, *Cumulative Impacts: Building a Scientific Foundation* (Dec. 2010), Exec. Summary at p. ix.)[6] Research in other parts of California has shown that disadvantaged and minority communities are often exposed to unhealthful air more frequently and at higher levels than other groups.[7] Identifying these communities is an essential part of describing the relevant CEQA setting.

Once such communities are identified, SANDAG must analyze how the health of the residents in these communities would be expected to be particularly affected. As discussed, residents already are experiencing serious air pollution that is impacting health and welfare, and it is reasonable to assume that these effects currently are more concentrated in certain areas of the region, for example, in communities adjacent to large-scale industrial or commercial operations or transportation corridors used by heavy-duty trucks. In addition, viewed at the individual community scale, there may be synergistic adverse effects. For example, research

[6] Available at http://oehha.ca.gov/ej/cipa123110.htm1.
[7] Hall and Brajer, *The Benefits of Meeting Federal Clean Air Standards in the South Coast and San Joaquin Valley Air Basins* (2008) at 22-23.

has shown that increases in greenhouse gas emissions may result in localized ozone increases; such increases have been observed in California.[8]

We believe that particulate pollution may be of special concern to already burdened communities. As discussed, diesel particulate emissions have serious health effects, since they impact respiratory function and can exacerbate asthma. Further, diesel particulates are known to the State of California to cause cancer,9 and have been listed by the Air Resources Board (ARB) as a toxic air contaminant.[10] The DEIR shows that particulate matter pollution will increase over the life of the RTP/SCS. (DEIR, Table 4.3-5, p. 4.3-25.) It also reports that the ARB estimated in 2000 - over a decade ago - that a subset of particulate pollution, fine particulates emitted by diesel vehicles, created an additional cancer risk of 720 cancer cases per one million persons exposed in the San Diego Air Basin. (DEIR, p. 4.3-8.) For comparison purposes, a private business must provide a warning if it exposes individuals to a chemical that poses an increased cancer risk often cases in one million people exposed. (Cal. Code Regs, tit. 27, § 25703(b).)

Despite this high cancer risk, and the DEIR's own recognition that particulate pollution will increase over the life of the RTP/SCS, the DEIR does not analyze what public health effects the increase in particulate matter will cause. Nor does it estimate what portion of the increase in particulate pollution will be carcip.ogenic diesel particulate matter, and disclose the public health effects that increase may cause. Such an analysis is required under CEQA, so that both the decision maker and the public can know the full consequences of the decision being made. *(Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219-1220.) We are especially concerned that no analysis is presented either of the current risk from particulate pollution, nor of the impact of the projected increase in particulate pollution, on already overburdened or sensitive communities. Given the increase in particulate emissions shown in the DEIR, given the emphasis in the RTP/SCS on the Goods Movement Strategy for the San Diego region (RTP/SCS, Chapter 6), and given the DEIR's recognition that much of this goods movement will be accomplished by diesel trucks (DEIR, p. 4-16-8; see, also, RTP/SCS, Tech. Appdx. 4, p. 4 [estimating that roads and truckways will carry 90% by volume of goods through the region]), it is incumbent on SANDAG to fully analyze the public health consequences of the RTP/SCS in general, and of the Goods Movement Strategy, in particular.[11]

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[8] Jacobson, *Enhancement of Local Air Pollution by Urban CO2 Domes* (2010) Environ. Sci. Technol. 2497-2502. This phenomenon is of concern because, as discussed, under the RTP/SCS, vehicle miles travelled (VMT) trends up as the total number of vehicles on the road increases. (DEIR, pp. 4.12-16, 4.12-21, 4.12-24; contrast with Table TA 3.1, showing an overall decrease of 1% in VMT by 2050.) Increases in VMT cause increased emissions of greenhouse gases, which may in turn exacerbate localized pollution.

[9] Cal. Code Regs., tit. 27, § 27001.

[1] Cal. Code Regs., tit. 17, § 93000.

[11] See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219-1220, cited above.

The goal of an RTP/SCS is a sustainable community, and no community can be sustainable unless its public health is protected. Thus, while the inclusion of a separate chapter of the DEIR on environmental justice is commendable, the current analysis is deficient, and should be redone and expanded to disclose the full scope of the air pollution and public health consequences of the RTP/SCS, and to propose mitigation measures for those consequences that are proportional to the seriousness of the impacts. *(City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 361-62.) We would be happy to work with SANDAG in making this part of the DEIR more meaningful.

SANDAG Has Failed Adequately to Consider Feasible Mitigation for Localized Air Quality Impacts.

Although it finds the RTP/SCS's impacts on localized air pollution to be significant, the DEIR proposes almost no mitigation measures to reduce or offset these impacts. Instead, the DEIR states that "mitigation measures at the program level is [sic] infeasible" for ozone precursors and carbon monoxide, and defers all mitigation for these pollutants to individual project-level CEQA processes. (DEIR, pp. 4.3-46, 4.3-47, 4.3-48.) CEQA requires that project changes or mitigation either be adopted or shown through substantial evidence to be infeasible; the DEIR, however, does not make such a showing.

The DEIR offers virtually no evidence that program-level mitigation is actually infeasible, and the mitigation measures it does propose lack certainty and are incomplete. For example, compliance with future local land use plans (the scope of which is not now known) is identified as the only feasible mitigation for ozone-related impacts. (DEIR, p. 4.3-48.) Mitigation for fine particulate matter is not discussed separately from mitigation for coarse particulates, despite their different sizes, health impacts, and sources. The dust control measures in the DEIR are not shown to be effective against fine particulates, which come more from industrial processes and fuel combustion than from ground disturbance.. The DEIR's treatment of mitigation for conventional air pollution does not comply with CEQA's substantive mandate to mitigate all significant impacts. (Pub. Resources Code,§§ 21002, 2108l(a).)

It is vital for the health of the San Diego region's public that all feasible mitigation be adopted and carried out to prevent further deterioration of the already unhealthy air, and it is also vital for the region's economy. Research shows consistently that the costs of reducing pollution are far outweighed by clean-air benefits such as increased worker productivity, increased agricultural outputs, and reductions in mortality and illness that result from cleaner air.[12] The research cited above -- finding minority communities more severely affected by air pollution -- also calculated the significant costs associated with polluted air in other air basins. Costs ranged

[12] On a nationwide basis, the Office of Management and Budget has estimated that the benefits of clean air regulations outweigh the costs by a ratio of about four to one. 0MB, "Informing Regulatory Decisions: 2003 Report to Congress on the Coasts and Benefits of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities."

from $1,250 per person per year in the South Coast Air Basin to $1,600 per person per year in the San Joaquin Valley Air Basin, due to increased health care costs and emergency room visits, missed work and school days, and even premature deaths.[13] CEQA mandates that SANDAG improve its analysis of the feasibility oflocalized air pollution mitigation, and the economic benefits of cleaner air and healthier communities must be considered in the feasibility calculus.

Climate Change Impacts: Greenhouse Gas Emissions

Before discussing the DEIR's treatment of GHG emissions, it is important first to establish the relevant context for evaluating significance. The climate is affected by the concentration of GHGs in the atmosphere. The concentration of carbon dioxide, the primary GHG, has increased from approximately 280 parts per million (ppm) in pre-industrial times to well over 380 ppm, according to the National Oceanic and Atmospheric Administration's (NOAA) Earth Systems Research Laboratory.[14] Almost all•of the increase is due to human activities (such as fossil fuel use).[15] The current rate of increase in carbon dioxide concentrations is about 1.9 ppm/year; present carbon dioxide concentrations are higher than any time in at least the last 650,000 years.[16] GHGs persist in the atmosphere for decades and in some cases millennia.[17]

The atmosphere and the oceans are reaching their capacity to absorb GHGs without significantly (and perhaps abruptly) changing the Earth's climate. California is already seeing the effects of climate change. As the Resources Agency observed in its 2009 report, we already are experiencing sea level rise, coastal erosion, increased average temperatures, more extreme hot days and increased heat waves, fewer shifts in the water cycle, and increases in the fre?uency and intensity of wildfires. (Resources Agency, *2009 Cliinate Adaptation Strategy* at p. 3.) [8] These effects are expected to increase with rising GHG levels in the atmosphere.

The burdens of climate change will not be shared equally. Future climate scenarios are expected to disproportionately affect, for example, the urban poor, the elderly and children, traditional societies, agricultural workers and rural populations. (Office of Environmental Health Hazard Assessment, *Indicators of Climate Change in California: Environmental Justice Impacts* (Dec. 2010) at p. 2.)[19]

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[13] Hall and Brajer, at 5.
[14] See http://www.epa.gov/climatechange/science/recentac.html.
[15] *Id.*
[16] *Id.*
[17] Intergovernmental Panel on Climate Change, *Frequently Asked Questions,* FAQ 10.3 (2007), available at www.ipcc.ch/pdf/assessment-report/ar4/wgl/ar4-wgl-fags.pdf.
[18] Available at http://www.cHmatechange.ca.gov/adaptation/.
[19] Available at http://oehha.ca.gov/multimedia/epic/epicl23110.html.

In order to stabilize the climate and avoid the most catastrophic outcomes of climate change, we must substantially reduce our annual GHG emissions over time, achieving a low-carbon future by midcentury. California has memorialized this overarching environmental objective in law. Under AB 32[20], by 2020, California must reduce its total statewide greenhouse gas emissions to the level they were in 1990. (Health & Saf. Code,§ 38550). To achieve AB 32's 2020 target, total statewide greenhouse gas emissions must be reduced by approximately 15 percent from current (2008) levels. AB 32 implements Executive Order S-03-05 (2005),[21] which set the statewide 2020 target as an interim step to reducing statewide emission levels, by 2050, to 80 percent below 1990 levels. "The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 greenhouse gas emissions reduction goal represents the level scientists believe is necessary to reach levels that will stabilize climate." (Air Resources Board (ARB), Scoping Plan at p. 4.)2[2]

The emissions reductions required to reach our statewide climate objective are substantial. In the longer term, we must reduce our total GHG emissions by approximately four percent per year between 2020 and 2030, and our per capita emissions by slightly less than five percent per year during the 2020 to 2030 period, with continued reductions required through midcentury. (These reductions required are graphically illustrated by the chart from ARB's Scoping Plan, attached to this letter as Exhibit A.) One of the prime objectives of SB 375, a law supporting and complementary to AB 32, and of the requirement for Sustainable Communities Strategies, is to create a long-term downward trajectory for GHG emissions in California through transportation and land use strategies.

Given the seriousness of the climate change problem, and the enormity of our GHG reduction task, we are greatly concerned that, when viewed in context, the RTP/SCS seems to be setting the region on acourse that is inconsistent with the State's climate objectives. Specifically, per capita GHG emissions from cars and light-duty trucks increase as compared to the previous year after 2020 (see RTP, Table 301 at p. 3-3), while AB 32 requires that we must aggressively and steadily reduce total per capita GI-IG emissions during this time period. (See Exhibit A.) Moreover, the total number of vehicle miles travelled (VMT) driven in the San Diego region will steadily increase over the life of the RTP/SCS over the 2010 baseline by 10%, 32%, and 51% in 2020, 2035, and 2050, respectively. (DEIR, pp. 4.12-16, 4.12-21, 4.12-24;

2[o] Cal. Health and Safety Code, § 38,500, *et seq.*

[21] The DEIR states that the Executive Order "does not constitute a 'plan' for GHG reduction, and no state plan has been adopted to achieve the 2050 goal." (DEIR, pp. 4.8-29 to 4.8-30.) The DEIR therefore does not find the RTP/SCS's failure to meet the Executive Order's goals to be a significant impact. This position fails to recognize that Executive Order S-3-05 is an official policy of the State of California, established by a gubernatorial order in 2005, and designed to meetthe environmental objective that is relevant under CEQA (climate stabilization). SANDAG thus carmot simply ignore it.

[22] Available at http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. The Scoping Plan was readopted by ARB on August 24, 2011.

contrast with Table TA 3.1.) Under the most optimistic figures presented in the DEIR, total VMT will drop only 1% over current levels by 2050. Moreover, the DEIR predicts that the 14.33 million metric tons of greenhouse gases (expressed as MMT of carbon dioxide equivalent) emitted by cars and light duty trucks in 2010 (DEIR, p. 4.8-5) will fall to 12.04 MMT in 2020 (DEIR, p. 4.8-20), based largely on statewide tailpipe and fuel standards, but will then begin rising again, to 12.94 MMT in 2035 and 14.74 MMT in 2050. (DEIR, pp. 4.8-23, 4.8-25, respectively.) Thus, although SANDAO will meet the SB 375 goals for per capita OHO targets for cars and trucks set for it by ARB in 2020 and 2035, the DEIR shows that total OHO emissions from cars and light-duty trucks in 2050 will increase over the 2010 emissions level.

The DEIR finds the impact of the RTP/SCS on OHO emissions to be not significant in 2020 (DEIR, p. 4.8-20), significant in 2035 (DEIR, p. 4.8-23), and significant in 2050 (DEIR, p. 4.8-25). SANDAO must, however, make a determination whether the project as a whole has significant climate change impacts. We believe strongly that it does. What the DEIR shows is that the suite of strategies relied on by SANDAO, which include a heavy reliance on roadway expansion projects, does not deliver OHO reductions that are sustainable in the long term. In fact, infrastructure and land use decisions made in the early years of the RTP/SCS may lock in transportation inefficiencies and preclude any realistic possibility of meeting the Executive Order's goal of an 80% reduction in OHO emissions. The DEIR states that "[t]otal land-use based OHO emissions in 2050 are projected to be 21.85 MMT CO2e, or 50 percent greater than OHO emissions in 2010 (Table 4.8-11)," (DEIR at p. 4.8-24.) The DEIR should address the impact of the draft RTP/SCS on this important long-term policy in greater detail.

The DEIR is legally deficient for the additional reason that it does not analyze potential changes to the project design or specific mitigation measures for the OHO emissions impacts from land use; it makes only a generalized promise to prepare future RTPs "to incorporate policies and measures that lead to reduced OHO emissions." (DEIR, p. 4.8-35.) Further, the DEIR proposes some mitigation measures for OHO emissions attributable to transportation, but does not include any transportation mitigation that relates to land use, nor does it show that any such measures would be infeasible. We believe that CEQA requires much more analysis of potential mitigation measures, and that postponing this discussion and analysis until future RTP/SCS's and individual projects is a violation ofCEQA's substantive provisions. (Public Res. Code§§ 21002, 21081(a); see *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89-96.) SANDAO has the authority to approve the RTP/SCS even if it will have substantial environmental impacts, and CEQA will not second-guess the wisdom of that choice, so long as substantial evidence supports SANDAO's findings. (Public Res. Code § 21081(b).) However, SANDAO may not approve an environmentally damaging project until and unless it has adopted all feasible mitigation measures or shown that further mitigation - including land use mitigation - is infeasible. The DEIR does not yet do so.

We recognize that this is the first SCS prepared in California, and that SANDAO is chaiting new territory·. However, the legal requirements of CEQA, including the requirement to mitigate significant impacts to the extent feasible, are not satisfied simply because the RTP/SCS meets the targets contained in SB 375 for 2020 and 2035. CEQA demands a full analysis and all

feasible mitigation of every significant impact resulting from the implementation of the RTP/SCS, throughout the full life of the Plan. The DEIR does not now provide this for GHG emissions.

Comments on RTP/SCS

Although we are not commenting directly onthe legal adequacy of the RTP/SCS under SB 375, we concur in the comments submitted to SANDAG by the California Office of Planning and Research (QPR). As discussed above, we are particularly concerned that per capita greenhouse gas (GHG) emissions associated with cars and light-duty trucks (and associated co-pollutants like particulate matter) begin to rise after 2020. (See QPR comment letter at pp. 3-4; Draft RTP at p. 3-3, Table 3.1; see also DEIR at Tables 4.3-5, p. 4.3-25.) As OPR notes, this "implies that future growth will be unavoidably less transportation efficient, which counters SB 375's underlying purpose." (QPR comment letter at p. 3.) If the RTP/SCS in fact runs counter to SB 375's purpose to reduce transportation-related GHG emissions over time, this would bear on whether the effects of the plan should be considered significant under CEQA.

In addition, OPR's comments discuss a failure of the DEIR and RTP/SCS to fully disclose the methodology by which VMT was projected, making it difficult or impossible for the lay public to determine for itself whether the information presented in the two documents is accurate and supported by substantial evidence. This lack of transparency is also a crucial flaw under CEQA, a statute whose purposes include accountability as to governmental decisions that affect the environment. *(Laurel Heights Improvement Ass'n v. Regents of the University of California* (1989) 47 Cal.3d 376,392 [holding that "the EIR ... is a document of accountability" forthe public officials who certify it].)

Conclusion

We appreciate the difficulty of preparing the first SCS in California. We believe that SANDAG has not yet prepared a DEIR on the RTP/SCS that fully satisfies CEQA's requirements, and urge SANDAG to redo several parts of the DEIR, as described in our comments herein. This RTP/SCS presents SANDAG with an opportunity to integrate transportation and land-use planning in a way that reduces GHG emissions and harmful air pollution, and that produces other benefits such as increased mobility and better public health for all the region's residents, particularly its sensitive and already overburdened communities. We

would be happy to work with SANDAG to take the additional steps needed to take full advantage of this opportunity. We appreciate your consideration of our comments.

Sincerely,

/ tf.A,,{4.,u.r-0

TIMOTHY R TTERSON 4_et 8-L_!)
Supervising Deputy Attorney G¥!eral

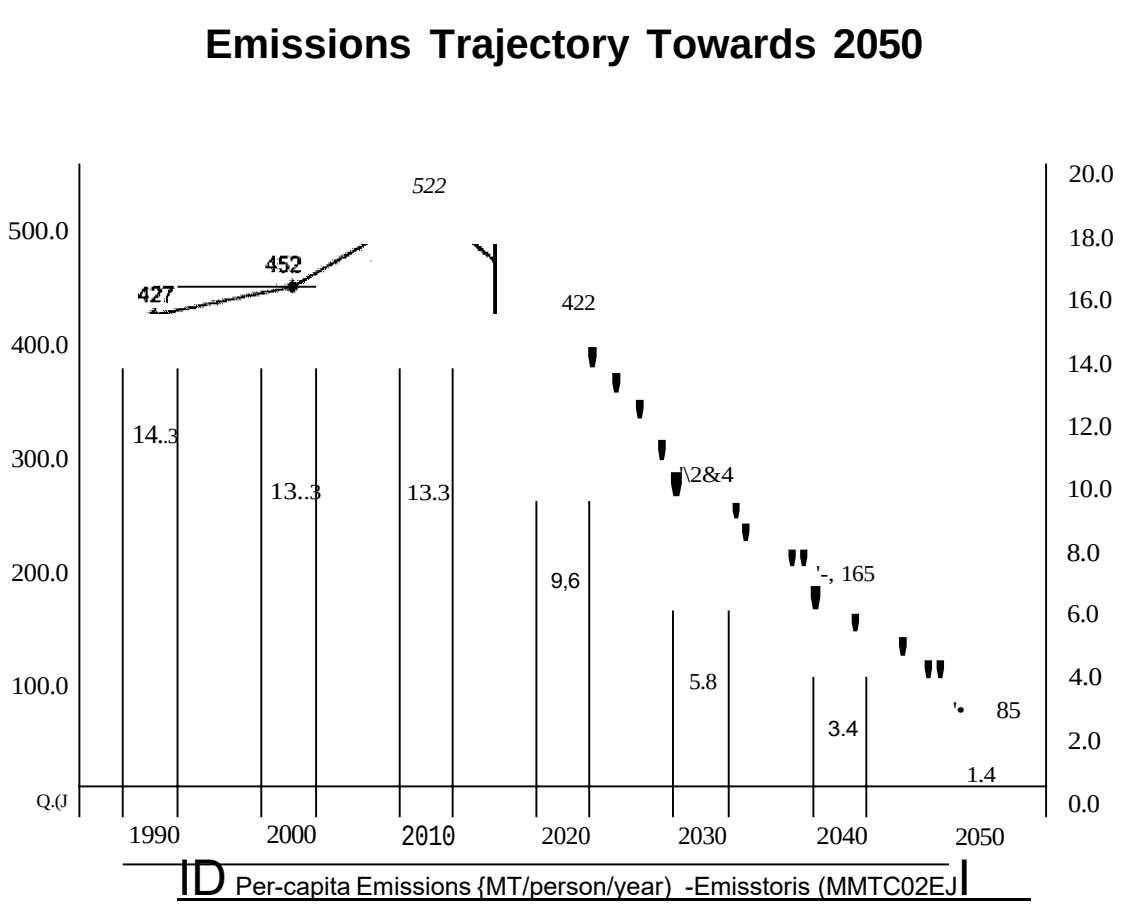
SUSAN DURBIN
Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

cc: Gary Gallegos, Executive Director, San Diego Association of Governments.
Julie D. Wiley, General Counsel, San Diego Association of Governments

Attachment

EXHIBIT A



(ARB, Scoping Plan, Figure 6, at p. 118.)

Exhibit A

Brief of Amicus Curiae James Hansen

DANIEL M. GALPERN (*Pro Hac Vice Pending*)
Western Environmental Law Center
1216 Lincoln Street
Eugene, OR 97401
T: (541) 359-3243 / F: (541) 485-2457
Email: galpern@westernlaw.org

PAIGE M. TOMASELLI State Bar No. 237737
Center for Food Safety
303 Sacramento St., 2nd Floor
San Francisco, CA 94111
T: (415) 826-2770 / F: (415) 826-0507
Emails: ptomaselli@icta.org

Counsel for Amicus Curiae

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALEC L., *et al.*, Plaintiffs, vs. LISA JACKSON, *et al.*, Defendants.	Case No.: 4:11-cv-02203 EMC Brief for Amicus Curiae Dr. James Hansen (Hon. Edward M. Chen)

TABLE OF CONTENTS

TABLE OF AUTHORITIES ……iii

INTEREST AND IDENTITY OF AMICUS CURIAE DR. JAMES HANSEN……1

SUMMARY OF ARGUMENT..... 2

ARGUMENT……...3

I. INTRODUCTION: THE RELEVANT STATUS QUO IS AN ATMOSPHERE THAT ENSURES A HABITABLE CLIMATE SYSTEM. ……..3

II. GLOBAL WARMING HAS ALREADY REACHED THE DANGEROUS LEVEL AND, WITHOUT EFFECTIVE ACTION, WILL PRODUCE CATASTROPHIC AND IRRETRIEVABLE LOSSES……...4

a. Present Impacts……... 5

b. Future Effects…….. 7

III. ACTION TO PHASE OUT CO2 EMISSIONS IS URGENTLY REQUIRED, WHILE DELAY VIRTUALLY ENSURES CALAMITY.....9

CONCLUSION……..12

TABLE OF AUTHORITIES

Page(s)

CASES

Massachusetts v. EPA,
549 U.S. 497 (2007).....11

OTHER AUTHORITIES

Hansen, Decl. at ¶ 40, 2006 WL 4761053 (D. Vt. 2006)……..,.5

Hansen et al, The Case for Young People and Nature: A Path to a Healthy, Natural, Prosperous Future……*Passim*

Hansen et al, Target Atmospheric CO_2: Where Should Humanity Aim?, hereinafter referred to as "Target CO_2," 225, The Open Atmospheric Science Journal (2008)……..……..…..4

Hansen et al., Dangerous human-made interference with climate, Atmos. Chem. Phys., 7, 2287, 2308 (2007)…….5

Hansen et al., Brief of Amici Curiae Climate Scientists, *Chamber of Commerce of the United States v. EPA*, 2010 WL __.....6

Hansen et al, Climate Variability and Climate Change: The New Climate Dice, Nov. 10, 2011……...6

INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, 2007: IMPACTS, ADAPTATION, AND VULNERABILITY, Table 4.1 ("IPCC Working Group II")……6

James Hansen and Makiko Sato, Paleoclimate Implications for Human-Made Climate Change 8-14 (2011)……3

U.S. Global Change Research Program, 2009: *Global Climate Change Impacts in the United States*, T. Karl, J.M. Melillo, T.C. Peterson (eds.), Cambridge Univ. Press……...6

INTEREST AND IDENTITY OF *AMICUS CURIAE* JAMES HANSEN

Amicus Curiae James Hansen, Ph.D., appears here in his individual capacity and not as a representative of any institution with which he is affiliated. The information and opinions in this brief are not necessarily those of any institution with which he is affiliated or those of any party to the present litigation. This brief is offered as an aid to the Court's deliberations over whether the relief sought by plaintiffs in their motion for preliminary injunction is needed to preserve a climate system that is conducive to the survival and wellbeing of our children and their progeny.

Dr. James Hansen directs the NASA Goddard Institute for Space Studies in New York City and is an Adjunct Professor of Earth Sciences at Columbia University's Earth Institute. He was trained in physics and astronomy in the space science program of Dr. James Van Allen at the University of Iowa, receiving his Ph. D. in physics in 1967. Since the mid-1970s, Dr. Hansen has focused on computer simulations and studies of the Earth's climate, for the purpose of understanding the human impact on global climate. Dr. Hansen's testimony to Congress in the 1980s helped raise broad awareness of the global warming issue. In recent years Dr. Hansen has drawn attention to the danger of passing climate tipping points, producing irreversible climate impacts that would yield a different planet from the one on which civilization developed. As part of his work in recent years, Dr. Hansen has outlined steps that are needed to stabilize climate, with a cleaner atmosphere and ocean.

Dr. Hansen was elected to the National Academy of Sciences in 1995.

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SUMMARY OF ARGUMENT

Global warming due to emissions of greenhouse gases, mainly CO_2 from fossil fuel consumption, is already 0.8°C, and a similar or greater amount is "in the pipeline" without any further change of atmospheric composition. Already-observed impacts of this warming include rising sea levels, increased atmospheric moisture resulting in more intense precipitation events, higher temperatures causing more frequent and intense heat waves and droughts, loss of sea ice, ice sheet mass and glaciers, expansion of the subtropics, acidification of the oceans, shifting distributions of plant and animal species, and an increasing rate of species extinctions.

Maintaining a climate that resembles the Holocene epoch, the world of a relatively stable climate system under which civilization developed, requires rapid reduction of fossil fuel CO_2 emissions and reforestation. Atmospheric CO_2 concentrations passed the level that is estimated to be safe on the long term in, approximately, 1988; global mean temperature now exceeds the Holocene peak; and unabated fossil fuel emissions continue to drive the Earth increasingly out of energy balance. Unless action is undertaken without further delay, so as to return the atmospheric concentration of CO_2 to 350ppm by 2100, Earth's climate system will be pressed toward and past points of no return. Effective action remains possible, but delay in undertaking sharp reductions in emissions will undermine any realistic chance of preserving a habitable climate system -- needed by future generations no less than by prior generations.

Plaintiffs in this case seek a preliminary injunction to ensure that Defendants in this matter submit to the Court a plan to preserve the climate system, including a cap on CO_2 emissions at 2011 levels by 2013, and emissions reductions thereafter by a minimum of 6% annually. That prescription is consistent with scientific understanding of what is minimally needed to avert truly dangerous climate change and preserve the physical status quo of a habitable climate system. In light of the fossil fuel industry's stranglehold of Congress, the President's demonstrated disinclination to utilize his authority to act, and the fact that further delay vastly increases the risk of irretrievable damage to the climate system, action by this Court now is essential.

ARGUMENT

I. INTRODUCTION: THE RELEVANT STATUS QUO IS AN ATMOSPHERE THAT ENSURES A HABITABLE CLIMATE SYSTEM.

Plaintiffs and Defendants both appeal to the Court to preserve the "status quo." Pl's Mot'n for Prelim. Inj at 10; Def. Opp'n to Pl. Mot'n for Prelim. Inj. at 9. Amicus James Hansen also seeks to preserve the status quo; accordingly, this brief begins with an explanation as to what this implies for the global climate system.

Paleoclimate research conducted by Dr. Hansen and others establishes that for most of the Holocene period – the period of the most recent 10,000 years – Earth's climate, though highly variable on a regional basis, has been characterized by reasonably constant mean global temperatures. James Hansen et al., The Case for Young People and Nature: A Path to a Healthy, Natural, Prosperous Future (attached hereto as Exhibit 1) at 6.[1] This constancy enabled the Greenland and Antarctic ice sheets to remain in near mass balance, sea levels to be relatively stable, species to diversify, and civilization to develop.

Largely due to the burning of fossil fuels, the atmospheric CO_2 concentration has climbed sharply in recent decades – from 316ppm in 1959 to 390ppm in 2010.[2] In that period, US CO_2 emissions more than doubled, from 2.83 to 5.67 billion metric tons.[3] The CO_2 concentration is now to a level not seen on Earth for at least 3 million years. Exhibit 1 at 6. The CO_2 increment functions as an added blanket on the planet, reducing the amount of heat that would otherwise be re-radiated to space and throwing the planet into energy imbalance. In response, Earth has warmed by approximately 0.8°C over the last century, likely exceeding the prior Holocene peak.

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[1] *See also*, James Hansen and Makiko Sato, Paleoclimate Implications for Human-Made Climate Change 8-14 (2011).

[2] Mauna Loa CO_2 annual mean data from http://www.esrl.noaa.gov/gmd/ccgg/trends/.

[3] Carbon Dioxide Information Analysis Center (CDIAC), National CO_2 Emissions from Fossil-Fuel Burning, Cement Manufacture, and Gas Flaring: 1751-2008, http://cdiac.ornl.gov/ftp/trends/emissions/usa.dat. The text of this amicus brief here provides the data in units of CO_2 by utilizing the CDIAC's carbon-to-CO_2 conversion factor of 3.667.

Exhibit 1 at 7-8. The already apparent impact of this warming is reviewed in the next section. Due to Earth's thermal inertia, a similar or greater amount of additional 2.0°C warming is "in the pipeline" before Earth reaches energy balance at the present level of atmospheric CO_2 concentration.[4]

Avoidance of climate tipping points and subsequent points of no return[5] requires effective action to return the atmospheric CO_2 concentration to approximately 350ppm by the end of the century. *Exhibit 1* at 8. This would allow additional heat radiation to escape to space so as to restore the planet's energy balance without additional prolonged global warming. *Id.* Such action could stabilize Earth's climate system and mitigate human suffering, but further delay may doom this prospect.

The relevant status quo with respect to the present litigation, therefore, is an atmosphere whose composition of greenhouse gases ensures a relatively stable climate system conducive to the survival and well being of humanity and nature. This requires, then, action to restore the atmospheric CO_2 concentration to no more than 350ppm. In that we have currently overshot this safe atmospheric concentration level, as discussed *infra*, failure to act with all deliberate speed in the face of the clear scientific evidence of the danger[6] functionally becomes a decision to eliminate the option of preserving a habitable climate system.

II. GLOBAL WARMING HAS ALREADY REACHED THE DANGEROUS LEVEL AND, WITHOUT EFFECTIVE ACTION, WILL PRODUCE CATASTROPHIC AND IRRETRIEVABLE LOSSES.

Global climate change does not present merely "the possibility of some remote future injury." Def. Opp'n to Pl. Motion for Prelim. Inj at 9. Instead, it is a phenomenon that is already undermining human and natural systems, causing loss of life, and pressing species to extinction.

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[4] Hansen et al, Target Atmospheric CO_2: Where Should Humanity Aim?, hereinafter referred to as "Target CO_2," 225, The Open Atmospheric Science Journal (2008).

[5] *Id.*

[6] J. Hansen et al., Dangerous human-made interference with climate, Atmos. Chem. Phys., 7, 2287, 2308 (2007)

Unless arrested by effective action, climate change will produce calamitous consequences for humanity and nature alike, as tipping points are reached and points of no return are crossed.[7] Present and future impacts are addressed in turn.

(a) Present Impacts

While, as noted, global warming to date measures 0.8°C above the 1880-1920 period,[8] it has already led to a 40 percent reduction and an accelerating downward trend in summer Arctic sea ice cover, and an even faster decline in its thickness. *Exhibit 1* at 4. Continental ice sheets of Greenland and Antarctica have begun to shed ice at a rate of several hundred cubic kilometers per year. *Id.* In the past decade, sea level increased about 3cm—a rate of about one foot per century, and nearly twice as fast as the rate of increase during the preceding century.[9] This rise has resulted in losses of coastal wetland areas and greater levels of damage from coastal flooding.[10] For example, in the United States, increased sea level has led to the loss of 1900 square miles of coastal wetland in Louisiana, which in turn exacerbates the area's vulnerability to storm surges like Hurricane Katrina.[11] Mountain glaciers, the source of fresh water to major world rivers during the dry season, are receding rapidly all around the world. *Exhibit 1* at 4. In 1850, Glacier National Park in Montana had 150 glaciers measuring larger than twenty-five acres—today, it has just twenty-five.[12]

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[7] Hansen, et al define "the tipping level [as] the global climate forcing that, if long maintained, gives rise to a specific consequence [and] the point of no return [as] a climate state beyond which the consequence is inevitable, even if climate forcings are reduced. Target CO_2 at 225.

[8] The 1880-1920 period is the earliest time at which instrumental data allows accurate specification of global temperature, and the temperature in that period is estimated to be close to pre-industrial temperature averaged over several centuries.

[9] Decl. James Hansen at ¶ 40, 2006 WL 4761053 (D. Vt. 2006).

[10] INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE, 2007: IMPACTS, ADAPTATION, AND VULNERABILITY, Table 4.1 (hereinafter "IPCC Working Group II").

[11] U.S. Global Change Research Program, 2009: *Global Climate Change Impacts in the United States*, T. Karl, J.M. Melillo, T.C. Peterson (eds.), Cambridge Univ. Press.

[12] Brief of Amici Curiae Climate Scientists James Hansen et al., *Chamber of Commerce of the United States v. EPA*, 2010 WL __ (*citing to* U.S. Geological Survey, *Melting Glaciers Signal Change in National Parks,* http://www.nwrc.usgs.gov/world/content/land5.html).

Tropospheric water vapor and heavy precipitation events have increased. Droughts are more common, especially in the tropics and subtropics. *Exhibit 1* at 4. Coral reef ecosystems are being impacted by a combination of ocean warming and acidification from rising atmospheric CO_2, resulting in a 1-2% per year decline in geographic extent. *Exhibit 1* at 4. World health experts have concluded with "very high confidence" that climate change already contributes to the global burden of disease and premature death with altered distribution of some infectious disease vectors.[13] Subtropical climate belts have expanded, contributing to more intense droughts, summer heat waves, and devastating wildfires in the southern United States, the Mediterranean and Middle East regions, and Australia. *Exhibit 1* at 4. Mega-heat waves have become noticeably more frequent, including the 2010 heat wave in Moscow and in Texas in 2011. *Exhibit 1* at 4. It is nearly certain that such "outlier" heat events would not have occurred in the absence of global warming.[14]

(b) Future effects

Scientific prediction of long-term impacts from climate change is imprecise in part because of uncertainty about the relative speed with which amplifying feedbacks, including disintegration of Earth's major ice sheets, will occur. *Exhibit 1* at 13. Citing the Paleoclimate record, Dr. Hansen and colleagues noted the following most recently:

> Precise consequences of continuing [business as usual] emissions for several decades are difficult to define, because Earth has never experienced such a large rapid increase of climate forcings as would occur with burning of most fossil fuels this century. The closest analogy in Earth's history is probably the PETM (Paleocene-Eocene Thermal Maximum) in which rapid global warming of at least 5°C occurred. The PETM warming spike occurred in conjunction with injection of 3000-5000 GtC of carbon into the surface climate system during two 1-2 thousand year intervals separated by several thousand years. It is often assumed that the carbon originated from melting of methane hydrates, because of the absence of other known sources of that magnitude. PETM occurred during a 10-million year period of slow global warming, and thus methane release might have been a feedback magnifying that warming.
>
> The PETM witnessed extinction of about half of small shelled deep ocean

[13] IPCC Working Group II.

[14] J. Hansen, M. Sato, R. Ruedy, Climate Variability and Climate Change: The New Climate Dice, Nov. 10, 2011.

> animals that serve as a biological indicator for ocean life in general, but, unlike several other large warming events in Earth's history, there was little extinction of land plants and animals. An important point is that the magnitude of the PETM carbon injection and warming is comparable to what will occur if humanity burns most of the fossil fuels, but the human-made warming is occurring 10-100 times faster. The ability of life on Earth today to sustain a climate shock comparable to the PETM but occurring 10-100 times faster is highly problematic. Climate zones would be shifting much faster than species have ever faced. Thus if humanity burns most of the fossil fuels, Earth, and all species residing on it, will be pushed into uncharted climate change territory.

Exhibit 1 at 13 (internal citations omitted).

Based on measurements of observed climate change, computer simulations of the climate system's responses to additional CO_2 emissions, as well as information from the paleoclimate record, Dr. Hansen and others have concluded that continued burning over several decades of fossil fuels renders multi-meter sea level rise "practically certain," and create cause "millions of global warming refugees from highly populated low-lying areas . . . throwing existing global demographics into chaos." *Exhibit 1* at 14 (internal citations omitted).

These researchers note, as well, that acidification stemming from ocean uptake of a portion of increased atmospheric CO_2 is expected to increasingly disrupt coral reef ecosystem health, with potentially devastating impacts to certain nations and communities. *Exhibit 1* at 16. Hansen and others warn of receding mountain glaciers "with effects on seasonal freshwater availability of major rivers," *Exhibit 1* at 4, illustrating that present atmospheric CO_2 leves are "already a threat for future fresh water security." *Id.* at 16.

Increased concentration of CO_2 and associated increased global temperatures will deepen impacts on human health, with children being especially vulnerable. *Exhibit 1* at 16. Climate threats to health move through various pathways, especially by placing additional stress on the availability of food, clean air, and clean water. *Exhibit 1* at 16 (*citing to* Bernstein and Myers, *Climate Change and Children's Health*, Current Opin. Pediatrics, 23, 221-226 (2011)). Other principle climate-related impacts on human health include heat waves, asthma and allergies, infectious disease spread, drought, pests and disease spread across taxa: forests, crops and marine life, and winter weather anomalies. *Exhibit 1* at 18 (Table 1).

As noted *supra*, climate zones are already shifting at rates that exceed natural rates of change; this trend will continue as long as the planet is out of energy balance, a conclusion "based on comparison of the observed trend with inter-decadal variability in climate simulations."[15] Dr. Hansen and others note that "as the shift of climate zones becomes comparable to the range of some species, the less mobile species will be driven to extinction." *Exhibit 1* at 15. In 2007, the Intergovernmental Panel on Climate Change (IPCC) summarized studies estimating species extinctions from additional global warming and estimated[16] that for global warming of 1.6°C or more, relative to pre-industrial levels, 9-31 percent of species will be driven to extinction, while with global warming of 2.9°C, an estimated 21-52 percent of species will be driven to extinction.[17]

III. ACTION TO PHASE OUT CO_2 EMISSIONS IS URGENTLY REQUIRED, WHILE DELAY VIRTUALLY ENSURES CALAMITY.

The 2007 consensus statement by the IPCC, summarizing research through 2005, indicated that human-induced warming of Earth of approximately 2°C constituted dangerous climate change. From that, however, no conclusion logically could be drawn as to the danger inherent in lower levels of global warming.

Research by Dr. Hansen and others to assess this question has been spurred on by the realization, as described *supra*, that large climate impacts have commenced already, even though Earth's lagged temperature response to the recent climb in atmospheric CO_2 is only 0.75°C above preindustrial levels. Hansen et al estimate that this warming is already at least 0.25°C above the prior Holocene maximum. *Exhibit 1* at 5. Empirical research showing an ongoing and

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[15] Hansen, J., M. Sato, R. Ruedy, *et al.,* 2007b: Dangerous human-made interference with climate: a GISS modelE study, *Atmos. Chem. & Phys.*, 7, 2287-2312.

[16] IPCC Working Group II.

[17] Hansen et al note that "mass extinctions have occurred in conjunction with rapid climate change during Earth's long history. While new species evolved over hundreds of thousands and millions of years, such time scales are almost beyond human comprehension. Accordingly, if we drive many species to extinction we will leave a more desolate planet for our children, grandchildren, and as many generations as we can imagine." *Exhibit 1* at 15.

accelerating mass loss of the Greenland and West Antarctic ice sheets, which began within the last few decades, provides strong confirmation that today's global temperature has reached a level higher than prior Holocene temperatures. *Id.*

Accordingly, the best available current science establishes that today's global temperature is already close to or into the "dangerous zone." *Exhibit 1* at 106. Because the recently-observed climate effects with respect to the ice sheets are still relatively small compared to total ice sheet mass, these feedbacks may not be a major factor if maximum global warming overshoot of ~1^{o}C occurs only briefly and then recedes. *Exhibit 1* at 10-12.

Action therefore must be undertaken to restore the atmosphere's safe level of CO_2 concentration to 350ppm, so as to avert any avoidable additional warming that may drive the climate system past tipping points "that assure transition to a very different planet," *Id.* at 12, and keep the period of overshoot to an absolute minimum.

Two underlying reasons that such action must be undertaken without further delay is indicated in Amicus Hansen's most recent research, summarized here, and illustrated in Fig. 1 *infra*. First, a substantial share of any additional infusion of CO_2 lasts in the atmosphere for centuries (and while there, continuously acts to further heat the planet). Accordingly, Earth's temperature response to the "radiative forcing" effect of the higher atmospheric CO_2 concentration is a function not only of recent emissions, but the persisting share of prior emissions. Second, as a consequence of the long-lived nature of CO_2 and the fact that human-derived emissions have already cause a substantial overshoot of the long-term safe atmospheric concentration level, any substantial delay in undertaking effective action – even if such action compelled a sharp cut-off of emissions – would render it impossible to return the atmospheric CO_2 concentration to 350ppm within this century. Thus, as illustrated in Fig. 1b, if emissions of CO_2 are allowed per business as usual for even two decades longer the concentration of CO_2 in the atmosphere will not return, until the year 2150, to the nominally safe level of 350ppm even if

all such emissions were abruptly ceased in the year 2030.[18] In contrast, complete cessation in 2011 would return to the atmospheric CO_2 concentration to 350ppm by mid-century. *Exhibit 1* at 9.

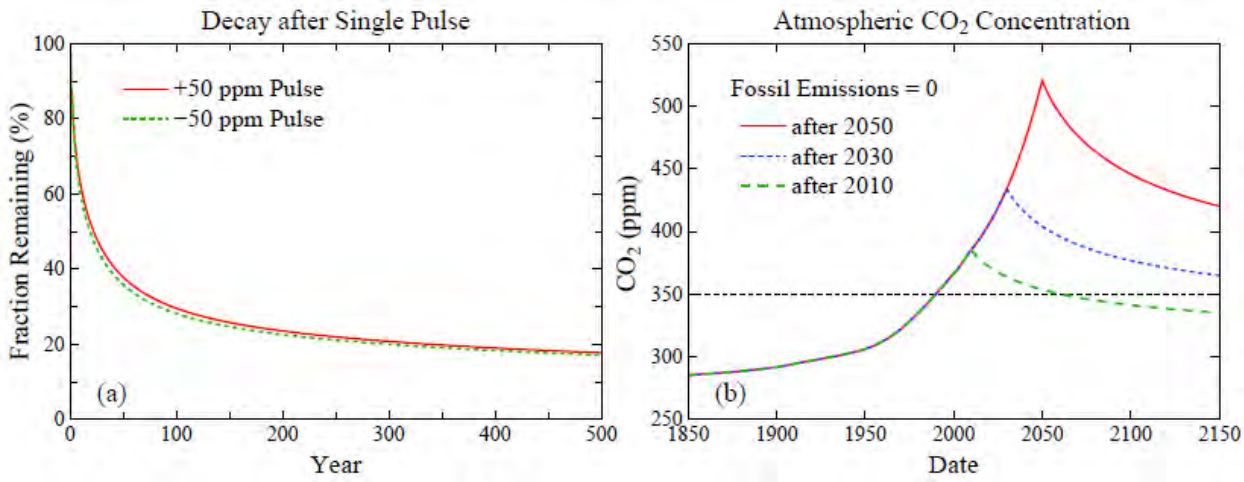

Figure 1. (a) Decay of instantaneous (pulse) injection and extraction of atmospheric CO_2, (b) CO_2 amount if fossil fuel emissions are suddenly terminated at the end of 2010, 2030, 2050. (Hansen et al., The Case for Young People and Nature: A Path to a Health, Natural, Prosperous Future.)

An abrupt cessation of all CO_2, whether in 2011 or 2030, is unrealistic, in part because industry, other business, and consumers alike need time to retool and reinvest in emission-free options to fossil fuels. Accordingly, Hansen et al have proposed a glide path to secure an atmosphere whose CO_2 concentration is no higher that 350ppm. Their plan requires emission reductions of 6 percent annually, coupled with a program of reforestation. *Exhibit 1* at 10. This will achieve the goal of restoring the atmosphere to approximately 350ppm if the plan is commenced without delay, and then adhered to. However, consistent with the abrupt phase out scenarios discussed in the prior paragraph *supra*, if the 6 percent annual emission reductions are delayed until 2030, then the global temperature will remain above 1°C higher than preindustrial

[18] *Exhibit 1* at 9. Further, were the emission cessation to commence only after 40 years, Dr. Hansen estimates that the atmosphere would not return to 350ppm CO_2 for nearly a 1000 years. *Id.*

levels for nearly 300 years. It would be "highly unlikely," that the planet's major ice sheets would remain "stable at their present size with such long-lasting warmth." *Exhibit 1* at 12-13.

Considered in another way, the required rate of emissions reduction would have been about 3.5% per year if reductions had started in 2005, while the required rate of reduction, if commenced in 2020, will be approximately 15% per year. *Id.* at 6. This illustrates, again, that "the dominant factor, by far, is the date at which fossil fuel emission phase-out begins." *Id.* at 11.

The present danger and impending calamities presented by continued CO_2 emissions, and the urgent need to get beyond fossil fuels before Earth is altered in fundamental respects – including its ability to sustain civilization – renders it a first-order tragedy that all serious attempts to address the problem in Congress to date either have been still-borne or killed after some debate. Equally tragic, the executive branch, including our current president, has declined to act with any degree of effectiveness to restrict CO_2 and other greenhouse gas emissions from the largest sources – bowing to industry pressure at virtually every turn even though, pursuant to the Supreme Court's leading global warming decision, *Mass. v. EPA*, 549 U.S. 497 (2007), it retains authority to act. The "absence of effective leadership" is attributable, as Amicus Hansen points out, to the "undue sway of special financial interests on government policies."[19] In the absence of political leadership, an Order by this Court granting the injunctive relief sought by plaintiffs in this matter may be the best, the last, and, at this late stage, the only real chance to preserve and restore the atmosphere and climate system.

CONCLUSION

Systematic reductions in CO_2 emissions, for the reasons provided by Dr. Hansen in his work cited throughout this amicus brief, must be undertaken in conjunction with reforestation so as to return the concentration of CO_2 in the atmospheric to a level no higher than 350ppm by the end of the century, if not sooner. Plaintiffs in this matter seek an Order by the Court to require Defendants to submit a "Climate Recovery Plan" by next March whose key features, if followed,

[19] *Exhibit 1* at 10 (citing to Oreskes, N.; Conway, E.M., 2010: Merchants of Doubt: How a Handful of Scientists Obscured the Truth on Issues from Tobacco Smoke to Global Warming. Bloomsbury Press, 355 pp. merchantsofdoubt.org.).

will restore the atmosphere and preserve a habitable climate system. This brief has established that such action is urgently required. In particular, the failure to commence CO_2 reductions without further delay, and to undertake other measures consistent with the prescription developed by Dr. Hansen and others, and advanced in these proceedings by Plaintiffs, would consign our children and their progeny to a very different planet, one far less conducive to their survival.

Respectfully submitted this 14th day of November, 2011.

/s/

Daniel M. Galpern
Western Environmental Law Center
1216 Lincoln Street
Eugene, OR 97401
T: (541) 359-3243 / F: (541) 485-2457
Email: galpern@westernlaw.org

PAIGE M. TOMASELLI State Bar No. 237737
Center for Food Safety
303 Sacramento Street, 2nd Floor
San Francisco, CA 94111
T: (415) 826-2770 / F: (415) 826-0507
Email: ptomaselli@icta.org

Counsel for Amicus

2022 SCOPING PLAN FOR ACHIEVING CARBON NEUTRALITY

NOVEMBER 16, 2022

Table of Contents

Table of Contents i

List of Figures vii

List of Tables x

List of Appendices xii

Abbreviations xiii

Executive Summary 1

The Scoping Plan Process 5

Ensuring Equity and Affordability 8

Energy and Technology Transitions 9

Cost-Effective Solutions Available Today 10

Continue with a Portfolio Approach 11

Conclusion 11

Post-adoption of the Scoping Plan 12

Chapter 1: Introduction 13

Severity of Climate Change Impacts 15

Wildfires 15

Drought 17

Extreme Heat 19

Imperative To Act 21

Consequences of Further Warming 21

Scoping Plan Overview 23

Previous Scoping Plans 23

Overview of this Scoping Plan 24

Principles That Inform Our Approach to Addressing the Climate Challenge 25
Unprecedented Investments in a Sustainable Future 25
Centering Equity 27
Role of the Environmental Justice Advisory Committee 29
Maximizing Air Quality and Health Benefits 32
Economic Resilience 34
Partnering Across Government 35
Partnering with the Private Sector 35
Supporting Innovation 37
Engagement with Partners to Develop, Coordinate, and Export Policies 38
Working Toward Carbon Neutrality 41
Supporting Healthy and Resilient Lands 42
Maintaining the Focus on Methane and Short-Lived Climate Pollutants 42
Process for Developing the Scoping Plan 44
Guidance from the Administration and Legislature 44
Consideration of Relevant State Plans and Regulations 53
Input from Partners and Stakeholders 54
Emissions Data That Inform the Scoping Plan 54
Greenhouse Gas Emissions 54
Natural and Working Lands 57
Black Carbon 60
Tracking Life-Cycle and Out-of-State Emissions 60
Tracking Progress 61
Chapter 2: The Scoping Plan Scenario 63
Scenarios for the AB 32 GHG Inventory Sectors 63
Scenarios for Natural and Working Lands 65
Evaluation of Scoping Plan Alternatives 67

NWL Scoping Plan Alternatives 67
Scoping Plan Scenario 70
AB 32 GHG Inventory Sectors 70
Natural and Working Lands 79
Strategies for Carbon Removal and Sequestration 83
The Role of Carbon Capture and Sequestration 84
The Role of Natural and Working Lands Emissions and Sequestration 89
The Role for Carbon Dioxide Removal (Direct Air Capture) 91
Carbon Dioxide Removal and Capture Targets for 2030 and 2045 94
Scenario Uncertainty 97
Greenhouse Gas Emissions Modeling 97
Implementation 98
Targeted Evaluations for the Scoping Plan: Oil and Gas Extraction and Refining 100
Oil and Gas Extraction 101
Petroleum Refining 106
Progress Toward Achieving the Accelerated 2030 Target 108
Cap-and-Trade Program Update 112
Chapter 3: Economic and Health Evaluations 118
Economic Analysis 118
Estimated Direct Costs 119
AB 32 GHG Inventory Sectors 120
Natural and Working Lands 121
Economy and Employment 123
AB 32 GHG Inventory Sectors 123
Natural and Working Lands 127
Health Analysis 128
AB 32 GHG Inventory Sectors 129

Natural and Working Lands 133
AB 197 Measure Analysis 135
Estimated Emissions Reductions 136
AB 32 GHG Inventory Sectors 136
Natural and Working Lands 139
Estimated Health Endpoints 140
AB 32 GHG Inventory Sectors 140
Natural and Working Lands 146
Estimated Social Cost 148
AB 32 GHG Inventory Sectors 150
Natural and Working Lands 151
Social Costs of GHGs in Relation to Cost-Effectiveness 153
Estimated Cost per Metric Ton 153
AB 32 GHG Inventory Sectors 154
Natural and Working Lands 155
Climate Vulnerability Metric 157
Public Health 160
Health Analysis Overview 160
Health Analysis Components 162
Social and Environmental Determinants of Health Inequities 164
Environmental Determinants of Health Inequities 166
Climate Vulnerabilities 169
Summary of the Qualitative Health Analysis 171
Heat Impacts 172
Wildfires and Smoke 172
Children's Health and Development 172
Economic Security 173

Food Security....173
Mobility and Physical Activity....173
Affordable Housing....174
Urban Greening....174
No Action Scenario (Reference)....174
Take Action Scenario....175
Summary of Health Benefits....177
Environmental Analysis....180
Chapter 4: Key Sectors....182
Transportation Sustainability....184
Sector Transition....185
Technology....185
Strategies for Achieving Success....187
Fuels....189
Strategies for Achieving Success....191
Vehicle Miles Traveled....192
Strategies for Achieving Success....194
Clean Electricity Grid....195
Sector Transition....199
Strategies for Achieving Success....205
Sustainable Manufacturing and Buildings....206
Sector Transition....207
Industry....207
Strategies for Achieving Success....210
Buildings....211
Strategies for Achieving Success....214
Carbon Dioxide Removal and Capture....216

Sector Transition 220
Strategies for Achieving Success 221
Short-Lived Climate Pollutants (Non-Combustion Gases) 222
Methane 225
Hydrofluorocarbons 227
Anthropogenic Black Carbon 229
Sector Transition 230
Methane 230
Dairy and Livestock Methane 231
Strategies for Achieving Success 232
Landfill Methane 233
Strategies for Achieving Success 234
Upstream Oil and Gas Methane Reduction 235
Strategies for Achieving Success 236
Hydrofluorocarbons 237
Strategies for Achieving Success 239
Anthropogenic Black Carbon 240
Strategies for Achieving Success 240
Natural and Working Lands 241
Landscapes 243
Trends of Carbon on Landscapes 245
Goals and Accelerating Nature-Based Solutions 246
Strategies for Achieving Success: Crosscutting Items for all NWL 249
Forests, Shrublands, and Chaparral 250
Strategies for Achieving Success 252
Grasslands 252
Strategies for Achieving Success 253

Croplands 254
Strategies for Achieving Success 255
Wetlands....257
Strategies for Achieving Success 257
Developed Lands....258
Strategies for Achieving Success 259
Sparsely Vegetated Lands....260
Strategies for Achieving Success 260
Additional Management Strategies 261
Considerations....261
Additional NWL Actions and Strategies 263
Chapter 5: Challenge Accepted....265
State-level Action 265
Regulations and Programmatic Development....266
Incentive Programs 266
Local Action....267
Local Climate Action Planning and Permitting 268
Unlocking CEQA Mitigation for Local Success....270
Communities and Environmental Justice 271
Academic Institutions and the Private Sector 277
Individuals 279

List of Figures

Figure 1-1: California total and per capita GHG emissions.... 14
Figure 1-2: The real costs of inaction.... 23
Figure 1-3: Comprehensive California climate change investments 26

Figure 1-4: California climate investments cumulative outcomes 29

Figure 1-5: Carbon neutrality: Balancing the net flux of GHG emissions from all sources and sinks 42

Figure 1-6: Short-lived climate pollutant impacts 43

Figure 1-7: 2019 State GHG emission contributions by GHG 55

Figure 1-8: 2019 State GHG emission contributions by Scoping Plan sector 56

Figure 1-9: Carbon stocks in natural and working lands (MMT carbon) 58

Figure 1-10: Changes in carbon stock by landscape type 59

Figure 2-1: Reference and Scoping Plan Scenario GHG emissions 71

Figure 2-2: Forms of carbon removal and sequestration considered in this Scoping Plan 84

Figure 2-3: Petroleum refining emissions with and without carbon capture and sequestration 88

Figure 2-4: Comparison of the Scoping Plan Scenario (NWL) with existing research 90

Figure 2-5: Residual emissions in 2022, 2030, and 2045 for the Scoping Plan Scenario 92

Figure 2-6: Oil and gas extraction sector GHG emissions in 2022 and 2045 when activity is phased down with in-state fuel demand 102

Figure 2-7: California in-state crude oil production 103

Figure 2-8: Crude oil imports by transportation type 104

Figure 2-9: Petroleum refining sector GHG emissions in 2022 and 2045 (with and without CCS) when activity is phased down with fuel demand 107

Figure 2-10: Impact of delayed implementation on 2030 GHG emissions 111

Figure 3-1: Projected California gross state product (left) and employment growth (right) from 2021 to 2035 and 2045 119

Figure 3-2: Cost and savings relative to the growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors) 121

Figure 3-3: Gross state product (left) and employment (right) relative to a growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors) 124

Figure 3-4: Illustration of NOx emission reductions from current levels for the Reference Scenario and the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 130

Figure 3-5: Difference in annual average $PM_{2.5}$ ($\mu g/m^3$) in the Scoping Plan scenario relative to the Reference scenario in 2045 (AB 32 GHG Inventory sectors) 131

Figure 3-6: Total health benefits estimated from air quality improvements in the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 132

Figure 3-7: Disadvantaged community health benefits relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 133

Figure 3-8: Total average annual health benefits relative to the Reference Scenario for the Scoping Plan Scenario (NWL) 134

Figure 3-9: Categories of climate change impacts on human welfare included in the Climate Vulnerability Metric. 158

Figure 3-10: Combined impacts of climate change in 2050 under a moderate emissions scenario; damages as share of 2019 tract income (%) 159

Figure 3-11: Scoping Plan outcome and the path to health improvements.....163

Figure 3-12: Least and most impacted neighborhoods from CalEnviroScreen.....165

Figure 3-13: Top sources of $PM_{2.5}$ and their contribution to $PM_{2.5}$ exposures by race and in disadvantaged communities 168

Figure 3-14: Quantified health benefits of active transportation from increased physical activity 177

Figure 4-1: Transition of on-road vehicle sales to ZEV technology in the Scoping Plan Scenario 186

Figure 4-2: Transportation fuel mix in 2022, 2030, and 2045 in the Scoping Plan Scenario ..190

Figure 4-3: 2021 total system electric generation (based on GWh).....196

Figure 4-4: Electricity supply trend by resource for a California summer day, July 2022.....199

Figure 4-5: Projected new electricity resources needed by 2045 in the Scoping Plan Scenario 203

Figure 4-6: Electric loads in 2022, 2030 and 2045 for the Scoping Plan Scenario 204

Figure 4-7: Final energy demand in industrial manufacturing (left) and in oil and gas extraction and petroleum refining (right) in 2022, 2030, and 2045 in the Scoping Plan Scenario 208

Figure 4-8: Final energy demand in buildings in 2022, 2030, and 2045 in the Scoping Plan Scenario 213

Figure 4-9: Residential space heating appliance sales in the Scoping Plan Scenario.....214

Figure 4-10: Carbon management infrastructure 217

Figure 4-11: Expected progress toward SB 1383 targeted emissions reductions by 2030 through strategies currently in place 224

Figure 4-12: Sources of California methane emissions (2019) 226

Figure 4-13: Sources of hydrofluorocarbon (HFC) emissions (2019) 229

Figure 4-14: Sources of anthropogenic black carbon (preliminary 2017 estimates; AR5 100-yr GWP 900) 230

Figure 4-15: Methane emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario 231

Figure 4-16: Degradable carbon deposited in landfills 234

Figure 4-17: Hydrofluorocarbon emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario 237

Figure 4-18: Potential emissions from refrigerants in existing equipment 239

Figure 4-19: Remaining non-combustion emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario 241

Figure 4-20: Acreage of burned wildland vegetation area 242

Figure 4-21: Forest (left) and shrubland (right) carbon stocks by 2045 251

Figure 4-22: Grassland carbon stocks by 2045 253

Figure 4-23: Cumulative CO_2e emissions from annual croplands in 2045 255

Figure 4-24: Cumulative CO_2e emissions from Delta wetlands by 2045 257

Figure 4-25: Carbon stocks in urban forests by 2045 259

Figure 4-26: Carbon stocks in sparsely vegetated lands by 2045 260

List of Tables

Table 1-1: Major climate legislation and executive orders enacted since the 2017 Scoping Plan 45

Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory sectors 72

Table 2-2: Actions for the Scoping Plan Scenario: NWL sectors 80

Table 2-3: GHG emissions and removals needed to achieve carbon neutrality and meet the 20 $MMTCO_2$ removal and capture target in 2030 and the 100 $MMTCO_2$ removal and capture target in 2045. 96

Table 2-4: Estimates of 2030 GHG emissions 109

Table 2-5: Comparison of 2017 Scoping Plan and two Reference Scenarios 116

Table 3-1: Cost and savings relative to a growing California economy for the Scoping Plan Scenario (NWL) 122

Table 3-2: Income Impacts by California household income group in 2035 and 2045 for the Scoping Plan Scenario (AB 32 GHG Inventory Sectors) 125

Table 3-3: Percentage of households in each race/ethnicity category by household income group 127

Table 3-4: Gross state product and employment relative to a growing California economy for the Scoping Plan Scenario in 2035 / 2045 (NWL) 128

Table 3-5: Estimated GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario in 2035/2045 (AB 32 GHG Inventory sectors) 138

Table 3-6: Estimated average annual GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario from 2025–2045 (NWL) 140

Table 3-7: Estimated avoided incidence of mortality, cardiovascular and respiratory disease onset, work loss days and hospital admissions relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 143

Table 3-8: Estimated average annual avoided incidence of hospital admissions, emergency room visits, and mortality relative to the Reference Scenario for the Scoping Plan Scenario resulting from forest, shrubland, and grassland wildfire emissions (NWL) 148

Table 3-9: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 151

Table 3-10: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (NWL) 152

Table 3-11: Estimated cost per metric ton of reduced CO_2e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors) 155

Table 3-12: Estimated average cost per metric ton of reduced CO_2e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (NWL) 156

Table 3-13: Examples of vulnerable groups due to socioeconomic, environmental, developmental, and climate change factors 171

Table 3-14: Scoping Plan directional benefits for health co-benefit areas (heat, affordable housing, food security, economic security, and urban greening) 178

Table 3-15: Scoping Plan directional benefits for health co-benefit areas (traffic pollution, wildfire, and active transportation) 179

Table 4-1: Scoping Plan modeled target for NWL, based on increasing action on NWL 247

List of Appendices

Appendix A. Public Process

Appendix B. Final Environmental Analysis

Appendix C. AB 197 Measure Analysis

Appendix D. Local Actions

Appendix E. Sustainable and Equitable Communities

Appendix F. Building Decarbonization

Appendix G. Public Health

Appendix H. AB 32 GHG Inventory Sector Modeling

Appendix I. Natural and Working Lands Technical Support Document

Appendix J. Uncertainty Analysis

Appendix K. Climate Vulnerability Metric

Abbreviations

°F	Fahrenheit
°C	Celsius
AB	Assembly Bill
AQMD	Air Quality Management District
AR5	IPCC Fifth Assessment Report
BECCS	bioenergy with carbon capture and storage
CAISO	California Independent System Operator
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CalSTA	California State Transportation Agency
CAP	climate action plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CCS	carbon capture and sequestration
CCUS	carbon capture, utilization, and storage
CDFA	California Department of Food and Agriculture
CDPH	California Department of Public Health
CDR	carbon dioxide removal
CE	common era
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CES	CalEnviroScreen
CH_4	methane
CMAQ	Community Multiscale Air Quality
CNRA	California Natural Resources Agency
CO_2	carbon dioxide
COPD	chronic obstructive pulmonary disease

CORE	Clean Off-Road Equipment
CPUC	California Public Utilities Commission
CVM	Climate Vulnerability Metric
DAC	direct air capture
DPR	Department of Pesticide Regulation
Draft EA	Draft Environmental Analysis for this Scoping Plan
EA	Environmental Analysis
ED	emergency department
EIA	U.S. Energy Information Administration
EJ	environmental justice
EJ Advisory Committee	Environmental Justice Advisory Committee
EO	executive order
EV	electric vehicle
F-gas	fluorinated gas
FCEV	fuel cell electric vehicle
GCF	Governors' Climate and Forests Task Force
GDP	gross domestic product
GHG	greenhouse gas
GSP	gross state product
GW	gigawatt
GWh	gigawatt-hour
GWP	global warming potential
HDV	heavy-duty vehicle
HD ZEV	heavy-duty zero-emission vehicle
HFC	hydrofluorocarbon
IBank	Infrastructure and Economic Development Bank
ICE	internal combustion engine
IPCC	Intergovernmental Panel on Climate Change

IPT	incidence-per-ton
IWG	Interagency Working Group
LCFS	low-carbon fuel standard
LDV	light-duty vehicle
MDV	medium-duty vehicle
MMT	million metric tons
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MOU	memorandum of understanding
MRR	Mandatory Reporting of GHG Emissions
$MTCO_2e$	metric tons of carbon dioxide equivalent
MW	megawatt
N_2O	nitrous oxide
NEMS	National Energy Systems Model
NF_3	nitrogen trifluoride
NOAA	National Oceanic and Atmospheric Administration
NOx	nitrogen oxides
NRDC	National Resources Defense Council
NWL	Natural and Working Lands
OEHHA	Office of Environmental Health Hazard Assessment
OGV	Ocean-Going Vessel
OPR	Governor's Office of Planning and Research
OTC	once-through cooled
PFC	perfluorocarbon
PHMSA	Pipelines and Hazardous Materials Safety Administration
PM	particulate matter
$PM_{2.5}$	fine particulate matter
PPP	public-private partnership
RFS	renewable fuel standard

ROG	reactive organic gases
RPS	Renewables Portfolio Standard
SB	Senate Bill
SC-CH_4	social cost of methane
SC-CO_2	social cost of carbon
SC-GHG	social cost of greenhouse gases
SC-N_2O	social cost of nitrous oxide
SF_6	sulfur hexafluoride
SGIP	Self-Generation Incentive Program
SLCP	short-lived climate pollutant
TSD	Technical Support Document
UC	University of California
UCLA	University of California, Los Angeles
UNFCCC	United Nations Framework Convention on Climate Change
U.S. EPA	United States Environmental Protection Agency
VMT	vehicle miles traveled
WUI	wildland-urban interface
ZEV	zero-emission vehicle

Executive Summary

This Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth[1] largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. This is a challenging but necessary goal to minimize the impacts of climate change. There have been three previous Scoping Plans. Previous plans have focused on specific greenhouse gas (GHG) reduction targets for our industrial, energy, and transportation sectors—first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. This plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon these earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. This plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches.

What this means for California is an ambitious and aggressive approach to decarbonize every sector of the economy, setting us on course for a more equitable and sustainable future in the face of humanity's greatest existential threat, and ensuring that those who benefit from this transformation include communities hardest hit by climate impacts and the ongoing pollution from the use of fossil fuels. The combustion of fossil fuels has polluted our air—particularly in low-income communities and communities of color—for far too long and is the root cause of climate change. This Scoping Plan helps us chart the path to a future where race and class are no longer predictors of disproportionate burdens from harmful air pollution and climate impacts.

The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution. It also means phasing out the use of fossil gas used for heating our homes and buildings. It means clamping down on chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide (CO_2). It means providing our communities

[1] In October 2022, California was poised to become the world's fourth largest economy.

with sustainable options for walking, biking, and public transit to reduce reliance on cars and their associated expenses. It means continuing to build out the solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation. It also means scaling up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed. Successfully achieving the outcomes called for in this Scoping Plan would reduce demand for liquid petroleum by 94 percent and total fossil fuel by 86 percent in 2045 relative to 2022.[2] Despite these world-leading efforts, some amount of residual emissions will remain from hard-to-abate industries such as cement, internal combustion vehicles still on the road, and other sources of GHGs, including high global warming chemicals used as refrigerants.

The plan addresses these remaining emissions by re-envisioning our natural and working lands—forests, shrublands/chaparral, croplands, wetlands, and other lands—to ensure they play as robust a role as possible in incorporating and storing more carbon in the trees, plants, soil, and wetlands that cover 90 percent of the state's 105 million acres while also thriving as a healthy ecosystem. Modeling indicates that natural and working lands will not, on their own, provide enough sequestration and storage to address the residual emissions. For that reason, it is necessary to research, develop, and deploy additional methods of capturing CO_2 that include pulling it from the smokestacks of facilities, or drawing it out of the atmosphere itself and then safely and permanently utilizing and storing it, as called for in recent legislation. Carbon removal also will be necessary to achieve net negative emissions to address historical GHGs already in the atmosphere.

This is a plan that aims to shatter the carbon status quo and take action to achieve a vision of California with a cleaner, more sustainable environment and thriving economy for our children. This ambitious plan will serve as a model for other partners around the world as they consider how to make their transition. As we have so often in the past, California can continue to serve as a leader in innovation that has produced not only the fifth largest economy on the planet, but ultimately one of the most energy-efficient economies, with a track record of demonstrating the ability to decouple economic growth from carbon pollution. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, this plan:

[2] See *https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx* for energy demand reductions.

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

The path forward is informed by robust science. The recent Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO_2 have increased by 50 percent since the industrial revolution and continue to increase at a rate of two parts per million each year.[3] By the 2030s, and no later than 2040, the world will exceed 1.5˚C warming unless there is drastic action. While every tenth of a degree matters—every incremental increase in warming brings additional negative impacts—climate-related risks to human health, livelihoods, and biodiversity are projected to increase further under 2˚C warming, compared to 1.5˚C.[4] For example, at 1.5˚C of global warming, we would experience increasing heat waves, longer warm seasons, and shorter cold seasons, but at 2°C of global warming, heat extremes would more often reach critical tolerance thresholds for human health and agriculture.[5] We are already seeing unprecedented climate change impacts, such as continued sea level rise, that are

[3] IPCC. 2021. *Climate Change 2021: The Physical Science Basis.* Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press. In Press. https://www.ipcc.ch/report/ar6/wg1/.

[4] IPCC. 2018. *Global Warming of 1.5°C.* World Meteorological Organization. Geneva, Switzerland. 32 pp. https://www.ipcc.ch/sr15/.

[5] IPCC. 2021. Climate change widespread, rapid, and intensifying – IPCC. August. *https://www.ipcc.ch/2021/08/09/ar6-wg1-20210809-pr/.*

"irreversible" for centuries to millennia, and we are dangerously close to hitting 1.5ºC in the near term.[6] To avoid climate catastrophe and remain below 1.5˚C with limited or no overshoot of that threshold, global net anthropogenic CO_2 emissions need to reach net zero by 2050.

It has been 16 years since the Global Warming Solutions Act of 2006 was passed and signed into law. In 2017, the second update to the Assembly Bill (AB) 32 Climate Change Scoping Plan[7] (2017 Scoping Plan) laid out a cost-effective and technologically feasible path to achieve the 2030 GHG reduction target. At the time, many characterized the plan and the AB 32 target as unachievable, citing that it would lead to massive business and job loss, and excessive costs. Those predictions proved to be incorrect as California achieved its AB 32 target years ahead of schedule, all the while growing our economy, with the state distinguishing itself as a hub for green technology investment. This Scoping Plan draws on a decade and a half of proven successes and additional new approaches to provide a balanced and aggressive course of effective actions to achieve carbon neutrality in 2045, if not before, in addition to the 2030 goal.

California's economy is projected to grow vigorously in the coming years and decades. In 2045, under a Reference Scenario, the gross state product would be $5.1 trillion, nearly $2 trillion more than in 2021, and allow growth that would add hundreds of thousands of jobs. Under the Scoping Plan scenario, impacts to economic and job growth would be negligible in both 2035 and 2045, while delivering $199 billion of benefits in the form of reduced hospitalizations, asthma cases, and lost work and school days due to the cleaner air supported by this plan. This should come as no surprise given the tremendous growth of California's economy since the Great Recession of 2007–2009, even as the state has taken drastic measures to lower emissions. As noted, the savings associated with ambitious climate action are extensive, both in terms of avoided climate impacts and health costs. As described in Chapter 1, the health costs of climate and air pollution in the U.S. are well over $800 billion today and will continue to grow in the coming years[8] without robust action. Similarly, the costs of delayed or insufficient climate action could cost the

[6] United Nations. 2021. IPCC report: 'Code red' for human driven global heating, warns UN chief. August 9. *https://news.un.org/en/story/2021/08/1097362*.
[7] CARB. 2017. *California's 2017 Climate Change Scoping Plan.* *https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf*.
[8] Alwis, D. D., and V. S. Limaye. No date. *The Costs of Inaction: The Economic Burden of Fossil Fuels and Climate Change on Health in the United States.* NRDC, The Medical Society Consortium on Climate and Health, and WHPCA. https://www.nrdc.org/sites/default/files/costs-inaction-burden-health-report.pdf.

U.S. upwards of $14.5 trillion over the next 50 years.[9] We can either take action now or pay the cost of inaction, both now and later.

We cannot take on this unprecedented challenge alone. Collaboration with the federal government, other U.S. states, and other jurisdictions around the world will continue to be fundamental for California to succeed in achieving its climate targets, especially as the pace of our efforts increases in the coming years. We believe this collaboration and coordination also creates a race to the top, encouraging and enabling other jurisdictions to achieve climate and air quality goals as well, and often providing lessons for national action.

One example of fruitful collaboration is California's longstanding vehicle emissions standards programs, which have repeatedly been freely adopted by other states, consistent with the federal Clean Air Act. California's programs frequently pioneer more rigorous standards or new technologies—such as the now-standard catalytic converter and the rules that led directly to the nation-leading numbers of zero-emission vehicles on our roads today. From initial standards for cars and trucks decades ago to the world-leading Advanced Clean Trucks program currently helping to electrify heavy-duty vehicles, this partnership continues to offer regulatory options and spread innovative technologies. A major example of future work is the Advanced Clean Cars II program, which lays out California's legally binding path to achieving 100 percent zero emission vehicle (ZEV) sales in 2035.[10] The California Air Resources Board (CARB) continues to work closely with many other states that also see zero-emission vehicles as critical to their climate and public health goals and expects many states to choose to adopt this regulation as well. This partnership with other states also creates market certainty for automakers, which in turn helps to ensure that California consumers have access to a variety of ZEVs at multiple price points.

The Scoping Plan Process

Four scenarios were extensively modeled to develop this Scoping Plan, with the objective of informing the most viable path to remain on track to achieve our 2030 GHG reduction target: a reduction in anthropogenic emissions by 85% below 1990 levels and carbon neutrality by 2045. All four have their merits and are informed by stakeholder input. The scenario ultimately chosen as the basis of this Scoping Plan is the alternative that most

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[9] Deloitte. 2022. *The Turning Point: A New Economic Climate in the United States.* https://www2.deloitte.com/content/dam/Deloitte/us/Documents/about-deloitte/us-the-turning-point-a-new-economic-climate-in-the-united-states-january-2022.pdf?id=us:2el:3dp:wsjspon:awa:WSJSBJ:2021:WSJFY22.

[10] Executive Department. State of California. Executive Order N-79-20. *https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf.*

closely aligns with existing statute and Executive Orders. It was selected because it best achieves the balance of cost-effectiveness, health benefits, and technological feasibility.

For the first time, this Scoping Plan includes modeling and quantification of GHG emissions and carbon sequestration in natural and working lands (NWL). To date, the focus has been only on reducing the emissions of GHGs from our transportation, energy, and industrial sectors. The state's 2020 and 2030 GHG reductions targets only include these sources, as they are the primary drivers of climate change and disproportionate harmful air pollution in our vulnerable communities. This Scoping Plan, through the lens of carbon neutrality, expands the scope to more meaningfully consider how our NWL contribute to our long-term climate goals. For the first time, new and cutting-edge modeling tools allow us to estimate the quantitative ability of our forests and other landscapes to remove and store carbon under different scenarios. These cutting-edge tools were developed through a stakeholder process and in coordination with other agencies for the purpose of this update and will continue to be refined over time and made available to others seeking to do similar work.

As recent data and Scoping Plan modeling shows, our NWL also can act as a source of emissions, principally in the form of wildfires. California's forests are experiencing a deadly combination of drought and heat combined with a century of misguided fire suppression management. Scoping Plan modeling shows that, at this time and until our forests reach a balance through appropriate treatments, California's NWL will act as a net source of emissions, not a sink. As such, the Scoping Plan includes policy direction and actions intended to quickly move the sector toward being a net sink and a more natural state, where wildfires will continue to be an important part of the healthy forest cycle but not at the intensity and frequency observed in recent years.

Development of this Scoping Plan also includes careful consideration of, and coordination with, other state agencies, consistent with Governor Gavin Newsom's whole-of-government approach to tackling climate change. State agency plans and regulations, including the SB 100 Joint Agency Report,[11] State Implementation Plan, Climate Action Plan for Transportation Infrastructure,[12] AB 74 Studies on Vehicle Emissions and Fuel

[11] California Public Utilities Commission (CPUC), California Energy Commission (CEC), and CARB. 2021. *SB 100 Joint Agency Report.* https://www.energy.ca.gov/sb100.
[12] California State Transportation Agency (CalSTA). 2021. Climate Action Plan for Transportation Infrastructure. https://calsta.ca.gov/subject-areas/climate-action-plan.

Demand and Supply,[13,14,15] Short-Lived Climate Pollutant Strategy (SLCP Strategy),[16] CARB's Achieving Carbon Neutrality Report,[17] Climate Smart Lands Strategy,[18] Natural Working Land Implementation Plan,[19] and the California Climate Insurance Report: *Protecting Communities, Preserving Nature, and Building Resiliency,*[20] among others, provided critical inputs and data points for this plan. This Scoping Plan is the product of work by multiple agencies across the Administration, including dozens of public workshops and years of rigorous analysis and economic modeling by California's leading institutions. This cooperation on planning lays the foundation for even closer coordination among and between state agencies to put the plan into effect.

The plan is also the product of tireless efforts of, and recommendations from, the AB 32 Environmental Justice Advisory Committee (EJ Advisory Committee). The EJ Advisory Committee, created by statute, plays a critical role to inform the development of each Scoping Plan and helps to ensure environmental justice is integrated throughout the plan. CARB reconvened the EJ Advisory Committee in early 2021 to advise on the development of this Scoping Plan. In their advisory role, the EJ Advisory Committee has worked together to provide inputs to CARB to inform the development of scenarios and the associated modeling. And in April 2022, the EJ Advisory Committee provided draft preliminary recommendations in advance of the Draft 2022 Scoping Plan to help ensure the draft plan meaningfully addresses environmental justice. The CARB Board and EJ Advisory Committee held a joint board hearing on September 1, 2022, where the EJ Advisory Committee presented their final recommendations on the Scoping Plan. Over five dozen of the recommendations are reflected in the Scoping Plan. Going forward, as this plan is ultimately acted on by the Board, ongoing input from the EJ Advisory

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[13] California Environmental Protection Agency (CalEPA). 2021. Carbon Neutrality Studies. https://calepa.ca.gov/climate/carbon-neutrality-studies/.
[14] Brown, A. L., et. al. 2021. *Driving California's Transportation Emissions to Zero.* University of California Institute of Transportation Studies. https://escholarship.org/uc/item/3np3p2t0.
[15] Deschenes, O. 2021. *Enhancing equity while eliminating emissions in California's supply of transportation fuels.* University of California Santa Barbara. https://zenodo.org/record/4707966#.YKPiaKhKi73.
[16] CARB. Short-Lived Climate Pollutants. https://ww2.arb.ca.gov/our-work/programs/slcp.
[17] Energy and Environmental Economics, Inc. 2020. *Achieving Carbon Neutrality in California: PATHWAYS Scenarios Developed for the California Air Resources Board*. October. *https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf*.
[18] California Natural Resources Agency (CNRA). 2021. Draft Climate Smart Lands Strategy. *https://resources.ca.gov/Initiatives/Expanding-Nature-Based-Solutions*.
[19] CARB. 2019. *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan. https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft*.
[20] California Department of Insurance. 2021. *Protecting Communities, Preserving Nature, and Building Resiliency. climate-insurance-report.pdf (ca.gov)*.

Committee will be essential to address environmental justice and achieve the ambitious vision outlined in the plan throughout its implementation in the coming years.

Importantly, per legislative direction, the Scoping Plan development includes modeling and analyses of emissions, economics, air quality, health, jobs, and public health. This work is important to inform the discussion around trade-offs and how to balance the various legislative direction in identifying a path to achieve the state's climate goals. The technical work serves as a backdrop to what this means to Californian's daily lives—to how they will work, play, and live as we act to eliminate fossil fuel combustion and achieve the many public health and environmental benefits that will result from that action.

Ensuring Equity and Affordability

The state has a long history of public health and environmental protection. However racist and discriminatory practices such as redlining have resulted in low-income communities and communities of color being disproportionately exposed to health hazards and pollution burdens.[21] These communities are often located adjacent to major roadways and large stationary sources that not only emit GHGs, but also harmful localized air pollution. The plan delivers on the promise to transform the way we move, live, and work by nearly eliminating our dependence on fossil fuels. It includes effective actions to move with all possible speed to clean energy, zero-emission cars and trucks, energy-efficient homes, sustainable agriculture, and resilient NWL. And it prioritizes working with the communities most impacted to ensure that these strategies address their needs.

An important part of our equity consideration is ensuring the transition to a zero-emission economy is affordable and accessible, and that it uplifts disadvantaged, low-income communities and communities of color. Some aspects of the transition will have associated costs (e.g., escalating efforts to retrofit existing homes and businesses to support electric appliances and vehicles and increased costs of insurance). The state must ensure that these costs do not disproportionately burden consumers. In addition, the state has an important role to play in providing financial incentives, especially to low-income consumers, to allow for uptake of clean technologies. The Department of Community Services and Development's Low Income Weatherization Program is a prime example of this approach, enabling low-income Californians to be part of the zero-emission transition, all while lowering energy bills. The program provides low-income households with solar photovoltaic systems and energy efficiency upgrades at no cost to residents, helping cushion the impact of climate change on vulnerable communities.

[21] CalEPA. 2021. Pollution and Prejudice: Redlining and Environmental Injustice in California. August 16. *https://storymaps.arcgis.com/stories/f167b251809c43778a2f9f040f43d2f5*.

With this Scoping Plan, the state also adds another tool to help identify and close climate change impact gaps that will emerge over time. As California invests in climate mitigation and adaptation, it is essential to understand the relative impact of climate change across the state's diverse communities. We know not all communities are equally resilient in the face of climate impacts due to persisting health and opportunity gaps. We also know that a global metric such as the Social Cost of Carbon cannot adequately capture the incremental additional impact faced by overly burdened communities. The Climate Vulnerability Metric (CVM) is specifically focused on quantifying the community-level impacts of a warming climate on human welfare.

Energy and Technology Transitions

To support the transformation needed, we must build the clean energy production and distribution infrastructure for a carbon-neutral future. The solution will have to include transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. In almost all sectors, electrification will play an important role. That means that the grid will need to grow at unprecedented rates and ensure reliability, affordability, and resiliency through the next two decades and beyond. It also means we need to keep all options on the table, as it will take time to fully grow the electricity grid to be the backbone for a decarbonized economy. We also know that electrification is not possible in all situations. As such, this plan systematically evaluates and identifies feasible clean energy and technology options that will bring both near-term air quality benefits and deliver on longer-term climate goals.

This transition will not happen overnight. It will take time and planning to ensure a smooth transition of existing energy infrastructure and deployment of new clean technology. And while this Scoping Plan has the longest planning horizon of any Scoping Plan to date, this 25-year horizon is still relatively short in terms of transforming California's economy. We must avoid making choices that will lead to stranded assets and incorporate new technologies that emerge over time. Importantly, given the pace at which we must transition away from fossil fuels, we absolutely must identify and address market and implementation barriers to be successful. The scale of transition includes adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply.

As we transition our energy systems, we must also rapidly deploy the clean technologies that rely on a decarbonized grid. As called for in Executive Order N-79-20, all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045. This means the percentage of fossil fuel combustion vehicles will continue to rapidly decrease, becoming a fading vision of the past. Successful implementation of this Executive Order (EO) and other zero-emission priorities will have to be attractive to consumers. As an example,

electric and hydrogen transportation refueling must be readily accessible, and active transportation and clean transit options must be cheaper and more convenient than driving.

Cost-Effective Solutions Available Today

Ultimately, to achieve our climate goals, urgent efforts are needed to slash GHG emissions. Fortunately, cost-effective solutions are available to do so in many cases. In short, this plan relies on existing technologies—it does not require major technological breakthroughs that are highly uncertain.

For example, targeted action to reduce methane emissions can be achieved at low or negative cost, and with significant near-term climate and public health benefits. In many cases, renewable energy and energy storage are cheaper than polluting alternatives, and are already firmly part of our business-as-usual approach; modeling related to the most recent integrated resource planning process at the California Public Utilities Commission (CPUC) has shown that scenarios associated with the best emissions outcomes had the lowest average rates. As another example, research from Energy Innovation shows that the U.S. can achieve 100 percent zero-carbon power by 2035 without increasing customer costs.[22]

The same is either already true, or soon to be true, for zero-emission vehicles as well. Myriad studies show cost parity for light-duty and heavy-duty ZEVs being achieved by mid-decade or shortly thereafter. A carbon neutrality study conducted by the University of California (UC) Institute of Transportation Studies and funded by the California Environmental Protection Agency (CalEPA) shows that achieving carbon neutrality in the transportation sector will *save* Californians $167 billion through 2045.[23] Similar research from the Goldman School of Public Policy at UC Berkeley finds that achieving 100 percent light-duty ZEV sales nationwide would save consumers $2.7 trillion through 2050; equivalent to $1,000 per household, per year, for 30 years.[24]

Many of these outcomes are a direct result of California's vision and policy development to advance clean energy and climate solutions, including through the Renewables Portfolio Standard, Advanced Clean Cars II regulations, SLCP Reduction Strategy, and

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[22] Phadke, A. et al. 2020. "Illustrative Pathways to 100 Percent Zero Carbon Power by 2035 Without Increasing Customer Costs, Energy Innovation." September. *https://energyinnovation.org/wp-content/uploads/2020/09/Pathways-to-100-Zero-Carbon-Power-by-2035-Without-Increasing-Customer-Costs.pdf*.

[23] Brown, A. L., et al. 2021. *Driving California's Transportation Emissions.* *http://dx.doi.org/10.7922/G2MC8X9X*. Retrieved from https://escholarship.org/uc/item/3np3p2t0.

[24] Goldman School of Public Policy. 2021. *2035: The Report: Transportation.* UC Berkeley. April. *https://www.2035report.com/transportation/*.

others. While the world collectively has not yet fully deployed clean energy and climate solutions at the scale needed to adequately address climate change, California has made tremendous progress—even since the last Scoping Plan update in 2017. Continued ambition, leadership, and climate policy development from California will help the state achieve the scale of emissions reductions needed from technologies and strategies that are already cost-effective or close to it today, and will move additional technologies and strategies to that point in the near future. Achieving those outcomes and reducing costs for the entire array of climate solutions needed to achieve carbon neutrality and then maintain net-negative emissions will prove the true measure of California's success. This will enable California to not just meet our own climate targets, but to ultimately develop the replicable solutions that can scale globally to address global warming.

Continue with a Portfolio Approach

Over the past decade and a half, the state has undertaken a successful three-pronged approach to reducing GHGs: incentives, regulations, and carbon pricing. The 2017 Scoping Plan leveraged existing programs such as the Renewables Portfolio Standard, Advanced Clean Cars, Low Carbon Fuel Standard, Short-lived Climate Pollutant Strategy, mobile source measures to achieve federal air quality targets, and a Cap-and-Trade Program, among others, to lay out a technologically feasible and cost-effective path to achieve the 2030 GHG reduction target. When looking toward the 2045 climate goals and the deeper GHG reductions needed across the AB 32 GHG Inventory sectors, all of the existing programs must be evaluated and, as necessary, strengthened to support the rapid production and deployment of clean technology and energy, as well as the increased pace and scale of actions on our natural and working lands.

The challenge before us requires us to keep all tools on the table. Given the climate mitigation co-benefits, critical actions to deliver near-term air quality benefits, such as those included in the State Implementation Plan to achieve the federal air quality standards, are incorporated into this Scoping Plan, as are new legislative mandates to decarbonize the electricity and cement sectors. And, if additional gaps are identified, new programs and policies must be developed and implemented to ensure all sectors are on track to reduce emissions. Opportunities to leverage these programs to address ongoing air quality disparities must also be considered, along with targeted environmental justice policies such as the AB 617 Community Air Protection Program and the investments made possible through the California Climate Investments Program.

Conclusion

California has never undertaken such a comprehensive, far-reaching, and transformative approach to fighting climate change as that called for in this plan. Once implemented, it will place every aspect of how we live, work, play, and travel in California on a more sustainable footing, with a focus on directly benefitting those communities already most burdened by pollution. This comprehensive approach reflects how climate change is

already changing life in California. We have all experienced the impacts of devastating wildfires, extreme heat, and drought. Despite much progress, California still has some of the worst air pollution in the nation, especially in the San Joaquin Valley and the Los Angeles Basin, which is driven by the continued use of fossil fuel-powered trucks and cars.

This Scoping Plan provides a solution; a way forward and a vision of a California where we can and will address those impacts. This plan is fundamentally based on hope. It is a hope grounded in experience and science that we can fundamentally improve the California we leave to future generations. The plan is built on the legacy of effective actions and on the conviction that we can effectively marshal the combined capabilities of California—from state, regional, tribal, and local governments to industry to our research institutions, and most importantly, to the nearly 40 million Californians who will benefit from the actions laid out in the plan. It addresses the challenge of our generation by laying out a pathway and guideposts for action across three decades. But the Scoping Plan is only that: a plan. The hard work—and hopeful work—is putting its recommendations into action. And there is no time to waste.

Post-adoption of the Scoping Plan

As with previous Scoping Plans, CARB Board approval is the beginning of the next phase of climate action. Specifically, approval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies. The unprecedented rate of transition will also require the identification and removal of market and implementation barriers to the production and deployment of clean technology and energy. All of these actions and more will be needed if we are to achieve our climate goals.

Chapter 1: Introduction

"The debate is over around climate change. Just come to the state of California. Observe it with your own eyes."

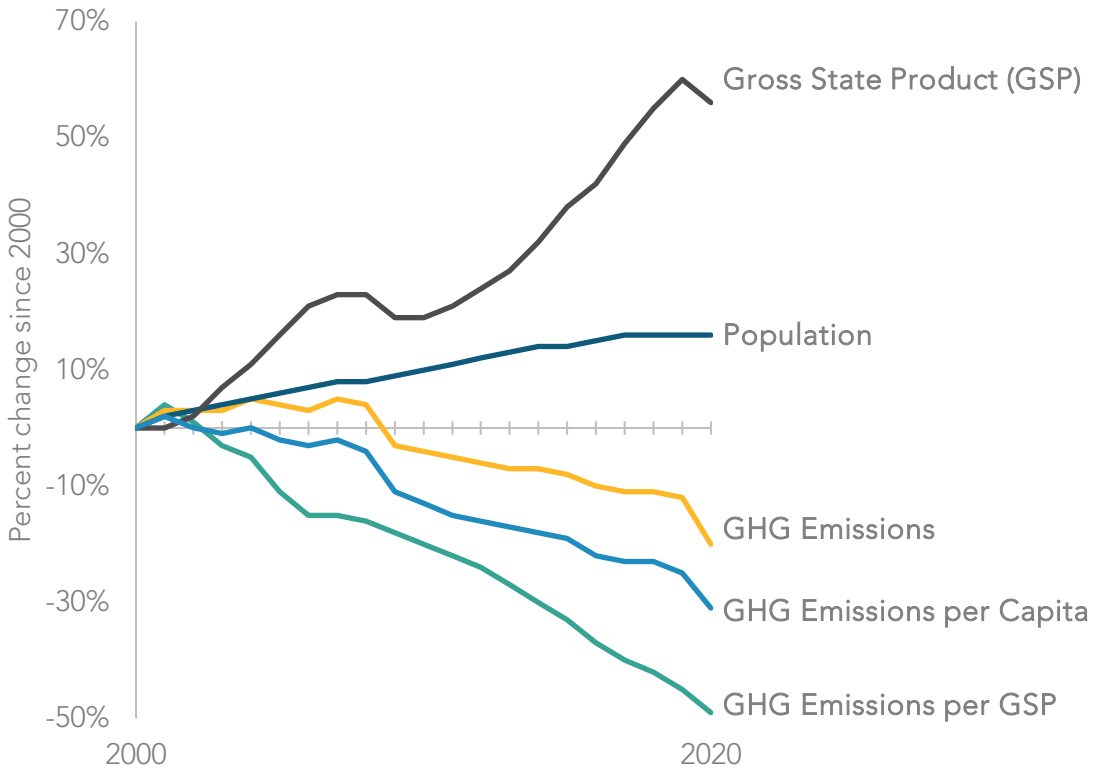
- California Governor Gavin Newsom in September 2020 after surveying the devastation caused by catastrophic wildfires

The impacts of climate change are no longer a distant threat on the horizon—they are right here, right now, with a growing intensity that is adversely affecting our communities and our environment, here in California and across the globe. The science that, decades ago, predicted the impacts we are currently experiencing is even stronger today and unambiguously tells us what we must do to limit irreversible damage: we must act with renewed commitment and focus to do more and do it sooner. That science is indisputable. Unless we increase ambition, we will be faced with more fire, more drought, more temperature extremes, and deadly, choking air pollution. The future of our state—our communities, economy, and ecosystems—is inextricably tied to the way we respond in this decade and the partnerships we forge along the way.

The impacts of climate change fall most heavily on frontline communities that bear the brunt of extreme heat, drought, wildfires, and other effects. Low-income communities and communities of color are also disproportionately impacted by fossil fuel combustion-related air pollution and related health problems. The continued phaseout of fossil fuel combustion will advance both climate and air quality goals and will deliver the greatest health benefits to the most impacted communities.

As it has responded to this climate crisis, California has established itself as a global leader in science-based, public health-focused climate change mitigation and air quality control. The California Legislature has worked with both Republican and Democratic governors to advance action on public health and environmental protections—and California has made progress on addressing climate change during periods of both Republican and Democratic federal administrations. Since the passage of Assembly Bill 32 (AB 32) (Núñez and Pavley, Chapter 488, Statutes of 2006), California has developed bold, creative, and durable policy solutions to protect our environment and public health, all while growing our economy. In fact, California met the target established in AB 32—a return of greenhouse gas (GHG) emissions to 1990 levels by 2020—years ahead of schedule, even as the state established itself as the one of the largest economies in the world. As Figure 1-1 below shows, California's emissions and economic growth have continued to decouple, and California is now the fifth largest economy in the world.

Figure 1-1: California total and per capita GHG emissions[25]



Recognizing both California's early successes in achieving GHG emissions reductions while growing the economy, as well as the worsening impacts of climate change, our governors and legislators have continued to enact ambitious goals. California's unwavering commitment to address climate change is based on indisputable science and data. This commitment is also informed by our collective efforts to address environmental justice and advance racial equity, such that race will no longer be a predictor for disproportionate environmental burdens faced by low-income communities and communities of color. As the Office of Environmental Health Hazard Assessment's

[25] Due to the global pandemic, 2020 is an outlier year and should not be considered indicative of a trend; emissions are likely to increase as economies recover from the impacts of the pandemic.

(OEHHA's) recent analysis of race/ethnicity and air pollution vulnerability and CalEnviroScreen 4.0 scores demonstrate, much work remains to be done.[26]

Many of California's environmental policies have served as models for similar policies in other U.S. states, and at national and international levels. Moving forward, California will continue its pursuit of collaborations and advocacy for action to address climate change at all levels of government. While California is responsible for just one percent of global GHG emissions, and we must do our part, we also play an important role in exporting both political will and technical solutions to address the climate crisis globally.

Today, we have a chance to re-envision California's future and set the state on a path to be carbon neutral no later than 2045 while advancing equity, addressing environmental justice, and continuing to grow our economy. This Scoping Plan provides a roadmap outlining key policies we can implement to achieve our climate goals while improving the health and welfare of Californians and addressing disparities in health outcomes to create a more equitable future. It will enable us to turn the corner in our efforts to protect and preserve our critical natural and public resources, all while providing unparalleled opportunities for clean, pollution-free economic growth.

Severity of Climate Change Impacts

With the increasing severity and frequency of drought, wildfire, extreme heat, and other impacts, Californians just have to look out their windows to know that climate change is real and rapidly getting worse. The impacts we thought we would see in the decades to come are happening now. We must act decisively to both reduce our GHG emissions and build resilience to these impacts for ourselves, future generations, and our iconic landscapes.

Wildfires

Of the twenty largest wildfires ever recorded in California, nine occurred in 2020 and 2021. The worst wildfire season in California's recorded history was in 2018, with over 24,226 structures damaged or destroyed and over 100 lives lost. The largest wildfire season ever recorded in state history was in 2020, where more than 4.3 million acres burned, albeit at different intensity and with varying ecological impacts, and over 112 million metric tons of

[26] OEHHA and CalEPA. 2021. Analysis of Race/Ethnicity and CalEnviroScreen 4.0 Scores. https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40raceanalysisf2021.pdf.

carbon dioxide (CO_2) emitted into the atmosphere.[27] The economic damage of these fires was estimated to be over $10 billion in property damage and over $2 billion in fire suppression costs.[28] The Camp Fire, which destroyed much of Paradise, California, was the world's costliest natural disaster in 2018, with overall damages of $16.5 billion.[29] It was also the deadliest fire in California history, with 85 civilian fatalities. Wildfires have always been part of California's natural ecology and will continue to be. However, changes to the state's climate and precipitation expands the footprint of wildfire threat, severity, and intensity, with one quarter of California—more than 25 million acres—now classified as being under very high or extreme fire threat.[30]

The impacts of wildfire smoke have been linked to respiratory infections, cardiac arrests, low birth weight, mental health conditions, and exacerbated asthma and chronic obstructive pulmonary disease.[31] In 2020, with all of California covered by wildfire smoke for over 45 days—and 36 counties for at least 90 days—maximum fine particulate ($PM_{2.5}$) levels persisted in the "hazardous" range of the Air Quality Index for weeks in several areas of the state.[32,33]

Catastrophic wildfire damages extend beyond human health and the economy. The Castle Fire in 2020 and the KNP Complex and Windy Fires in 2021 led to the loss of an unprecedented number of giant sequoias: an estimated 13 to 19 percent of the giant

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[27] CARB. 2020. Public Comment Draft Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities. https://ww3.arb.ca.gov/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf.

[28] News18. 2021. San Francisco Bay Area Receives its First Wildfire Warning of 2021, After California Concludes its Driest Year. https://www.news18.com/news/buzz/san-francisco-bay-area-receives-its-first-wildfire-warning-of-2021-after-california-concludes-its-driest-year-3722897.html.

[29] Munich RE. 2019. Extreme Storms, Wildfires and Droughts Cause Heavy Nat Cat Losses In 2018. https://www.munichre.com/en/company/media-relations/media-information-and-corporate-news/media-information/2019/2019-01-08-extreme-storms-wildfires-and-droughts-cause-heavy-nat-cat-losses-in-2018.html#-1808457171.

[30] CARB. No date. Wildfires. https://ww2.arb.ca.gov/our-work/programs/wildfires/about.

[31] Reid, C. E., M. Brauer, F. H. Johnston, M. Jerrett, J. R. Balmes, and C. T. Elliott. 2016. "Critical Review of Health Impacts of Wildfire Smoke Exposure." *Environmental Health Perspectives* http://dx.doi.org/10.1289/ehp.1409277.

[32] Vargo J. A. 2020 (updated in 2021 using the NOAA Hazard Mapping System). "Time Series of Potential US Wildland Fire Smoke Exposures." *Frontiers in Public Health* https://doi.org/10.3389/fpubh.2020.00126.

[33] CalFire. 2020 *Fire Siege Report.* https://www.fire.ca.gov/media/hsviuuv3/cal-fire-2020-fire-siege.pdf.

sequoia population in the Sierra Nevada. An iconic species, giant sequoias are the largest trees on earth, with exceptional longevity outside of climate extremes.[34,35]

It is clear that we must take drastic measures to prepare for future wildfires, which is why California invested $2.7 billion in wildfire resilience from fiscal years 2020 to 2023. The exponential increase in funding launched more than 552 wildfire resilience projects in less than a year, and CAL FIRE met its 2025 goal of treating 100,000 acres a full three years ahead of schedule. Since Fiscal Year 2019–20, treatment work has significantly increased, and CAL FIRE has averaged 100,000 acres treated each fiscal year.

Although we are making progress, we have a lot more work to do in order to achieve our goal of treating one million acres annually by 2025. The Governor's Wildfire and Forest Resilience Strategy details 99 actions needed to address the key drivers of catastrophic wildfires, ramp up the pace and scale of forest management, and make threatened communities more resilient to catastrophic fires. It is also important to note that natural wildfire cycles are a part of a sustainable forest ecosystem and will continue to play a role in a healthy forests' future. We should not expect wildfires to cease, but we must manage our lands to address catastrophic wildfires that result from buildup of carbon stocks due to our interventions to suppress wildfires and from climate change resulting from fossil fuel combustion.

Drought

Drought is a recurring feature of the California climate that has been intensified by increasingly warmer average temperatures. Anthropogenic climate trends have exacerbated drought conditions; human-caused climate change accounts for 19 percent of drought severity and 42 percent of the soil moisture deficit in this region since 2000. The governor declared a drought state of emergency in October 2021, and as of September 2022, 94 percent of California was in severe drought, and 99.8 percent[36] of the state was in at least moderate drought. The first three months of 2022 were the driest January, February, and March on record in California.[37] The harsh drought conditions affecting California are part of a larger megadrought—a drought lasting more than two

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[34] Shive, K., C. Brigham, T. Caprio, and P. Hardwick. 2021. 2021 Fire Season Impacts to Giant Sequoias. The Nature Conservancy and National Park Service. *https://www.nps.gov/articles/000/2021-fire-season-impacts-to-giant-sequoias.htm*.

[35] Shive, K. L., A. Wuenschel, L. J. Hardlund, S. Morris, M. D. Meyer, and S. M. Hood. 2022. "Ancient Trees and Modern Wildfires: Declining Resilience to Wildfire in the Highly Fire-adapted Giant Sequoia." *Forest Ecology and Management* 511, 120110. *https://doi.org/10.1016/j.foreco.2022.120110*.

[36] Drought.gov. California. National Oceanic and Atmospheric Administration (NOAA) and the National Integrated Drought Information System. *https://www.drought.gov/states/california*.

[37] Drought.ca.gov. September 26, 2022. California Drought Update. *https://drought.ca.gov/media/2022/09/Weekly-CA-Drought-Update-09262022-FINAL.pdf*.

decades—that has been ongoing in the Southwestern region of North America since 2000. The past 22 years have been the region's driest period since at least 800 CE.[38]

While large urban water districts with diversified sources of water supply have maintained water deliveries to customers through the drought, hundreds of individual well owners and some small water systems have suffered disruption. The state is providing funding for water system consolidation and modernization projects in small communities, emergency repairs and replacements for dry wells, and bottled and hauled water deliveries. A 2021 law requires small suppliers to create drought contingency plans. During the drought of the last three years the state has delivered emergency drinking water assistance to nearly 10,000 households and 150 water systems.

California agriculture is responsible for more than half of all U.S. domestic fruit and vegetable production, and in 2021 drought resulted in the fallowing of nearly 400,000 acres of fields.[39] Direct crop revenue losses were approximately $962 million, and total economic impacts were more than $1.7 billion, with over 14,000 full- and part-time job losses.[40] During the 2011–2017 drought, California's agricultural industry suffered at least $5 billion in losses.[41] The 2022–23 budget includes $100 million to support agricultural water conservation practices, provide on-farm technical assistance, and provide direct relief to small farm operators.

Though native California species are adapted to drought, human engineering has altered most streams and wetlands in the state, making drought increasingly stressful to fish and wildlife. The state has conducted hundreds of fish and amphibian rescues in this drought to move creatures from diminished habitat, upgraded hatcheries, and boosted hatchery production, and has hauled millions of young hatchery salmon to San Francisco Bay to avoid adverse river conditions. State biologists monitor dozens of streams statewide and have negotiated voluntary agreements with landowners and water users to improve stream flows and temperatures.

California has started to implement major policies to build resilience to combat drought—such as the Sustainable Groundwater Management Act of 2014, the governor's Water Resilience Portfolio (2020), the governor's Water and Supply Strategy (August 2022), and

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[38] Williams, A. P., B. I. Cook, and J. E. Smerdon. 2022. "Rapid Intensification of The Emerging Southwestern North American Megadrought in 2020–2021." *Nature Climate Change* https://doi.org/10.1038/s41558-022-01290-z.

[39] Medellín-Azuara, J. 2022. *Economic Impacts of the 2021 Drought on California Agriculture.* University of California Merced. https://wsm.ucmerced.edu/wp-content/uploads/2022/02/2021-Drought-Impact-Assessment_20210224.pdf.

[40] Medellín-Azuara. *Economic Impacts of the 2021 Drought*.

[41] National Resources Defense Council (NRDC). 2019. Climate Change and Health in California. Issue Brief. https://www.nrdc.org/sites/default/files/climate-change-health-impacts-california-ib.pdf.

new standards for indoor, outdoor, and industrial water use. However, it is crucial that we take further actions to minimize the impacts of drought in the years to come.

Extreme Heat

California's hottest summer on record was 2021.[42] Death Valley recorded the world's highest reliably measured temperature (130°F) in July 2021, breaking its own record (129°F) from summer 2020.[43] Meanwhile, Fresno also broke one of its own records, with 64 days over 100°F in 2021.[44] This is part of a trend: the daily maximum average temperature, an indicator of extreme temperature shifts, is expected to rise 4.4°F–5.8°F by 2050 and 5.6°F–8.8°F by 2100.[45] Heat waves that result in public health impacts are also projected to worsen throughout the state. By 2050, these heat-related health events are projected to last two weeks longer in the Central Valley and occur four to ten times more often in the Northern Sierra region.[46]

Heat ranks among the deadliest of all climate hazards in California, and heat waves in cities are projected to cause two to three times more heat-related deaths by mid-century.[47] Climate vulnerable communities[48] will experience the worst of these effects, as heat risk is associated and correlated with physical, social, political, and economic factors. Aging populations, infants and children, pregnant people, and people with chronic illness are especially sensitive to heat exposure.[49,50] Combining these characteristics and existing health inequities with additional factors such as poverty, linguistic isolation,

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[42] NOAA. 2022. Climate at a Glance. *https://www.ncdc.noaa.gov/cag/statewide/time-series/4/tavg/3/8/1895-2021?base_prd=true&firstbaseyear=1901&lastbaseyear=2000*.
[43] Masters, J. 2021. Death Valley, California, breaks the all-time world heat record for the second year in a row. Yale Climate Connections. *https://yaleclimateconnections.org/2021/07/death-valley-california-breaks-the-all-time-world-heat-record-for-the-second-year-in-a-row/*.
[44] NOAA. Climate Data Online Search. Accessed on 16 March 2022. *https://www.ncdc.noaa.gov/cdo-web/search*.
[45] Governor's Office of Planning and Research (OPR), CEC, and CNRA. 2018. *California's Fourth Climate Change Assessment*. Page 23. *https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf*.
[46] OPR, CEC, and CNRA. *California's Fourth Climate Change Assessment - Statewide Summary Report. https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf*.
[47] Ostro, B., S. Rauch, and S. Green. 2011. "Quantifying the health impacts of future changes in temperature in California." National Library of Medicine. *https://pubmed.ncbi.nlm.nih.gov/21975126/*.
[48] CARB. Priority Populations. California Climate Investments. *https://www.caclimateinvestments.ca.gov/priority-populations*.
[49] Basu, R. 2009. "High Ambient Temperature and Mortality: A Review of Epidemiologic Studies from 2001 to 2008." National Library of Medicine. *https://pubmed.ncbi.nlm.nih.gov/19758453/*.
[50] Basu, R., and B. Malig. 2011. "High Ambient Temperature and Mortality in California: Exploring the Roles of Age, Disease, and Mortality Displacement." National Library of Medicine. *https://pubmed.ncbi.nlm.nih.gov/21981982/*.

housing insecurity, and the legacy of racist redlining practices, can put individuals at a disproportionately high risk of heat-related illness and death.[51,52] Rising temperatures will also speed up smog-forming chemical reactions, leading to worse asthma, reduced lung function, cardiac arrest, and cognitive decline. African American, American Indian/Alaskan Native, and Puerto Rican Californians are particularly sensitive to smog, as they are between 28.6 and 132.5 percent more likely to be diagnosed with asthma than white Californians.[53]

In addition to the dangers to public health, California's September 2022 heat wave is particularly illustrative of how more frequent extreme heat strains the state's infrastructure we depend on to adapt to a changing climate. For example, as all-time high temperature records were broken in Sacramento, San Jose, Santa Rosa and Fairfield, electricity demand for air conditioning threatened to overwhelm the state power supply.[54]

California has taken major steps to protect communities from the impacts of extreme heat. Our recent budgets invest $800 million to cool our schools and neighborhoods, including projects to reduce urban overheating. The Extreme Heat Action Plan, released in April 2022, outlines the all-of-government approach California is taking to reduce urgent risks and build long-term resilience to the impacts of extreme heat. In September 2022, Governor Newsom signed multiple bills addressing extreme heat, including AB 2238 (Rivas, Chapter 264, Statutes of 2022), which will create the nation's first extreme heat advance warning and ranking system to better prepare communities ahead of heat waves. The Administration is committed to addressing extreme heat, but we still have a lot of work to do.

Wildfires, drought, and extreme heat are some of the most pronounced climate impacts California is experiencing, but they are not the only ones. Sea level rise, rising ocean temperatures, ocean acidification, and inland flooding are also already having devastating impacts on our communities, ecosystems, and economy, and will continue to do so in the years and decades to come. The decisions and actions that we take today will determine how strongly we will feel the impacts of climate change in the future.

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[51] Hoffman, J. S., V. Shandas, and N. Pendleton. 2020. "The Effects of Historical Housing Policies on Resident Exposure to Intra-Urban Heat: A Study of 108 US Urban Areas." MDPI. https://www.mdpi.com/2225-1154/8/1/12/htm.

[52] U.S. Climate Resilience Toolkit. No date. Heat and Social Inequity in the United States. https://toolkit.climate.gov/tool/heat-and-social-inequity-united-states.

[53] NRDC. 2019. Climate Change and Health. Issue Brief. https://www.nrdc.org/sites/default/files/climate-change-health-impacts-california-ib.pdf.

[54] Samenow, Jason. 2022. No September on record in the West has seen a heat wave like this. *The Washington Post.* September 9. https://www.washingtonpost.com/climate-environment/2022/09/08/western-heatwave-records-california-climate/.

Imperative To Act

Consequences of Further Warming

The Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) found that it will not be possible to keep global warming within the threshold of 1.5°C to avoid the most severe impacts of climate change unless we make immediate and large-scale reductions in GHG emissions. It finds that atmospheric concentrations of CO_2 have increased by 50 percent since the industrial revolution, and that they continue to increase at a rate of two parts per million each year.[55] Without immediate action, the world will exceed 1.5°C (or 2.7°F) warming by the 2030s, and no later than 2040.

While every tenth of a degree matters—every incremental increase in warming brings additional negative impacts—climate-related risks to human health, livelihoods, and biodiversity are projected to increase further under 2°C (or 3.6°F) warming, compared to 1.5°C.[56] To remain below 1.5°C with limited or no overshoot of that threshold, global net anthropogenic CO_2 emissions need to be cut by about half by 2030 and reach net-zero by 2050.

If we fail to make rapid changes, we may not be able to limit global warming to 2°C,[57] and the consequences of inaction would be catastrophic. Our planet is already 1.2°C warmer than pre-industrial times due to human-induced warming, and many impacts we are already experiencing, such as sea level rise, are "irreversible" for centuries to millennia.[58] Californians with the fewest resources, who are disproportionately low-income communities and communities of color, are the most vulnerable to the impacts of climate change. While the human costs associated with health impacts can never be fully monetized, a recent report finds that the health costs of climate and air pollution in the U.S. are well over $800 billion today and will continue to grow in the coming years.[59]

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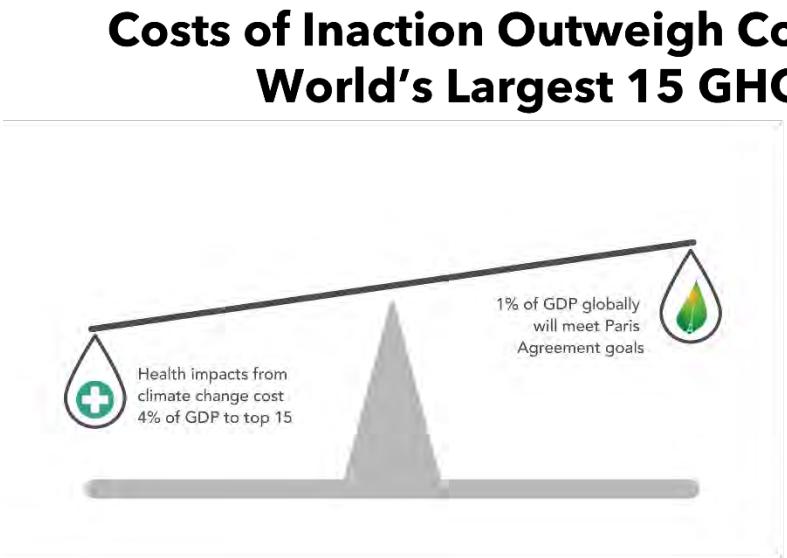
[55] IPCC. 2021. *Climate Change 2021: The Physical Science Basis.* https://www.ipcc.ch/report/ar6/wg1/.
[56] IPCC. 2018. *Special Report: Global Warming of 1.5°C.* World Meteorological Organization. https://www.ipcc.ch/sr15/.
[57] IPCC. 2021. Summary for Policymakers. In: *Climate Change 2021: The Physical Science Basis.* Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J. B. R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. In Press. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf.
[58] United Nations. 2021. IPCC report: 'Code red.' https://news.un.org/en/story/2021/08/1097362#:~:text=%27Code%20red%20for%20humanity%27&text=We%20are%20at%20imminent%20risk,%2C%20to%20keep%201.5%20alive.%22.
[59] Alwis, D. D., and V. S. Limaye. No date. *The Costs of Inaction*. https://www.nrdc.org/sites/default/files/costs-inaction-burden-health-report.pdf.

Any delays in action or insufficient action are a threat to public health and the environment. The impacts to our economy would be devastating as well. While not specific to California, a 2022 report from Deloitte Economics Institute finds that failing to take sufficient action to reduce emissions could result in economic losses to the U.S. of more than $14.5 trillion over the next 50 years.[60] On a hopeful note, however, the report finds that if the country invests now and in the coming years in a net-zero economy, $3 trillion could be added to the economy over the next 50 years. The U.S. annual gross domestic product (GDP) would be 2.5 percent higher in 2070 in this fast-action scenario than in the delayed action scenario. The lessons for California from these analyses are clear: invest now or pay the price later. As shown in Figure 1-2, inaction can lead to negative consequences for individuals, communities, the economy, and society as a whole. As discussed later, Governor Newsom and the Legislature have accepted this imperative and made significant investments in climate action. This Scoping Plan combined with the historic investments and policy direction from the governor and Legislature, will result in unprecedented action to address the climate crisis.

[60] Deloitte. 2022. *The Turning Point.* *https://www2.deloitte.com/content/dam/Deloitte/us/Documents/about-deloitte/us-the-turning-point-a-new-economic-climate-in-the-united-states-january-2022.pdf?id=us:2el:3dp:wsjspon:awa:WSJSBJ:2021:WSJFY22*.

Figure 1-2: The real costs of inaction[61]



Exposure to air pollution causes 7 million deaths worldwide every year and costs an estimated US$5.11 trillion in welfare losses globally. In the 15 countries that emit the most greenhouse gas emissions, the health impacts of air pollution are estimated to cost more than 4% of their GDP. Fossil fuel combustion contributes to both air pollution and climate change. Actions to meet the Paris goals would cost about 1% of global GDP.

Scoping Plan Overview

Previous Scoping Plans

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least one every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. This Scoping Plan is the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual.[62] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 limit and made the case for addressing

[61] Katowice, P. 2018. *Health benefits far outweigh the costs of meeting climate change goals.* WHO. https://www.who.int/news/item/05-12-2018-health-benefits-far-outweigh-the-costs-of-meeting-climate-change-goals.

[62] CARB. 2008. *Climate Change Scoping Plan.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

short-lived climate pollutants (SLCPs).[63] The most recent update, the 2017 Scoping Plan,[64] also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the Senate Bill 32 (SB 32, Pavley, Chapter 249, Statutes of 2016) target of reducing GHGs by at least 40 percent below 1990 levels by 2030.

Overview of this Scoping Plan

It is paramount that we continue to build on California's success by taking effective actions and doubling down on implementation of the strategies outlined here. As such, this Scoping Plan builds on and integrates efforts already underway to reduce the state's GHG, criteria pollutant, and toxic air contaminant emissions by identifying the clean technologies and fuels that should be phased in as the state transitions away from combustion of fossil fuels. By selecting and pursuing a sustainable and clean economic path, the state will continue to successfully execute existing programs, work to eliminate air pollution inequities, demonstrate the coupling of economic growth and environmental progress, and enhance new opportunities for engagement within the state to address and prepare for climate change.

The 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[65] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. Modeling for this Scoping Plan shows that this decade must be one of transformation on a scale never seen before to set us up for success in 2045.

The relatively longer path assessed in this Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, this Scoping Plan also includes discussion for the first time of the Natural and Working Lands (NWL) sectors as both sources of emissions and carbon sinks. Chapter 2 of this document

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[63] CARB. 2014. *First Update to the Climate Change Scoping Plan.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.
[64] CARB. 2017. *California's 2017 Climate Change Scoping Plan.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.
[65] CARB. 2017. *California's 2017 Climate Change Scoping Plan.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

includes a description of a suite of specific actions to drastically reduce GHGs across all sectors. Chapter 3 provides the air quality and economic evaluations of the actions. Chapter 4 provides a broader description of the many actions needed across all sectors to achieve carbon neutrality. Chapter 5 provides an overview of the next steps and partnerships needed to implement this Scoping Plan. Guided by legislative direction, the actions identified in this Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low carbon economy. This Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and subsequent updates while identifying new, technologically feasible, and cost-effective strategies.

Principles That Inform Our Approach to Addressing the Climate Challenge

California has decades of experience addressing the climate challenge. Through this experience, and based on extensive engagement with stakeholders through our regulatory and program development processes, we have developed a set of principles to inform our approach.

Unprecedented Investments in a Sustainable Future

The scale of transformation needed over this decade to avoid the worst impacts of climate change and meet our ambitious climate goals is extraordinary. This is why Governor Newsom and the Legislature invested over $15 billion in climate action through the 2021–2022 California Comeback Plan, and why the 2022–2023 budget marks the beginning of the California Climate Commitment—the governor's multi-year plan to invest $54 billion in climate action. The enacted budgets (Figure 1-3) and the California Climate Commitment represent investments of a historic scale and will advance precisely the type of all-of-government approaches necessary to create the whole-of-society changes described in this Scoping Plan that will enable us to avert the worst impacts of climate change.

Figure 1-3: Comprehensive California climate change investments

The *California Climate Commitment* includes the following game-changing elements:

- $10 billion for zero-emission vehicles (ZEVs), including $1.5 billion for electric school buses to protect students' health and $3 billion to build an accessible charging network. ZEV investments will particularly focus on programs such as heavy-duty vehicle and port electrification that will reduce emissions and protect public health in low-income communities.
- $2.1 billion for clean energy investments, such as long duration storage, offshore wind, green hydrogen,[66] and industrial decarbonization.
- $13.8 billion for programs that reduce emissions from the transportation sector, such as improving public transportation while also funding walking, biking, and adaptation projects.
- Over $720 million for California's higher education institutions and research that will support the next generation of climate innovations.

[66] For the purposes of this Scoping Plan, "renewable hydrogen" and "green hydrogen" are interchangeable and are not limited to only electrolytic hydrogen produced from renewables.

- Nearly $1 billion to build sustainable, affordable housing and over $1 billion to help low-income Californians realize energy cost savings through building decarbonization.
- Nearly $9 billion for wildfire risk reduction, drought mitigation, extreme heat resilience, and nature-based solutions.

These investments are incredibly important in the context of this Scoping Plan in that they accompany and help support implementation of the many policies and regulations that will continue to be necessary to achieve our 2030 and carbon neutrality targets. In addition, these incentive programs jump-start emission reduction strategies for priority sectors, sources, and technologies, leveraging private-sector investment and building sustainable, growing markets for clean and efficient technologies. Many of California's incentive programs work in concert with federal and other state programs to drive emission reductions. As an example, as California pushes to move to 100% sales of new zero emission-vehicles, including plug-in hybrid vehicles, the Newsom Administration continues to invest heavily in incentive programs that allow families, communities, and businesses to choose zero-emission vehicles. This is done while simultaneously working with the federal government, other states, and jurisdictions around the world to align policies, regulations, and incentives, creating market certainty for the automakers that serve our markets.

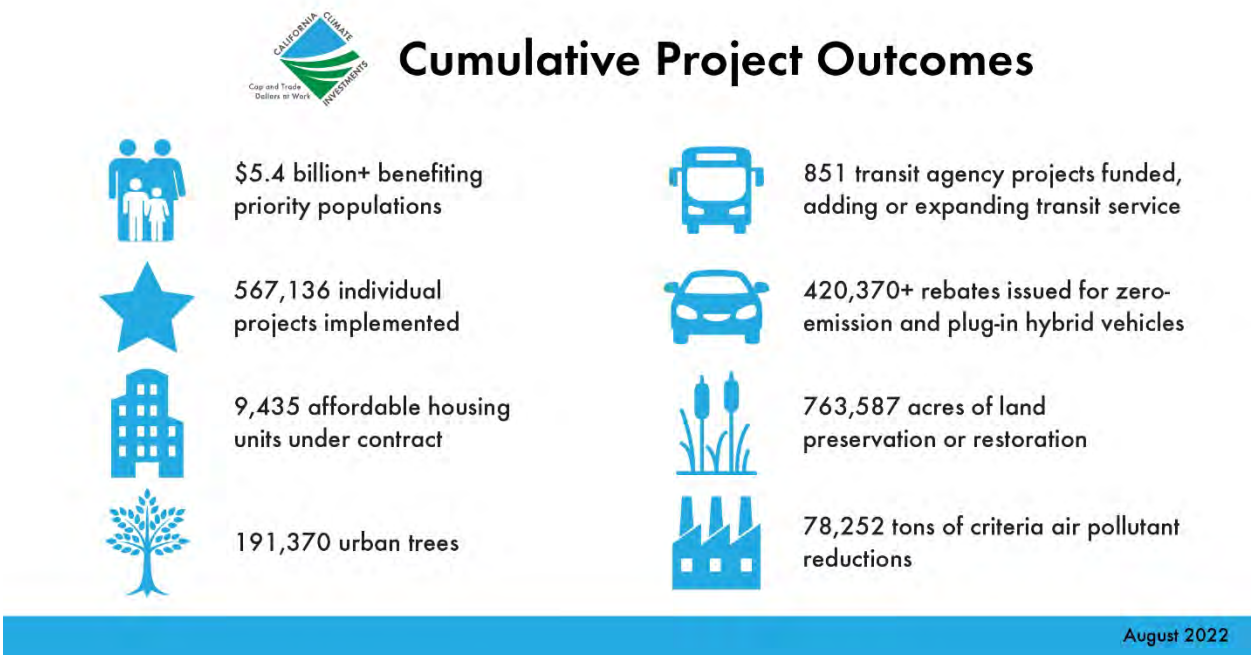
Centering Equity

Prioritizing equity is just as important as the magnitude of the climate investments California is making. Addressing climate change and advancing our equity and economic opportunity goals cannot be decoupled. In line with the governor's Executive Order[67] to take additional actions to embed equity analysis and considerations, this plan works to center equity by addressing disparities for historically underserved and marginalized communities. California strives to ensure that our climate and air research, regulations, investments, and plans include provisions that specifically address and advance equity. This includes reducing and eliminating air pollution disparities, removing barriers that can prevent frontline communities from accessing benefits, lowering costs for low-income Californians, and promoting high-quality jobs. CARB's incentive programs regularly surpass their mandated equity targets, and CARB has incorporated equity-focused provisions in our research, planning, and regulatory efforts. For instance, statute requires that a minimum of 35 percent of California Climate Investments benefit low-income households along with disadvantaged and low-income communities (referred to as *priority*

[67] Executive Department. State of California. 2022. Executive Order N-16-22. *GSS_9320_2-20220912152941 (ca.gov)*.

populations). However, 48 percent—over $5.4 billion—of implemented California Climate Investments project funding is benefiting priority populations, greatly exceeding the statutory minimums (see Figure 1-4). Senate Bill 535 (De León, Chapter 830, Statutes of 2012) and AB 1550 (Gomez, Chapter 369, Statutes of 2016) direct state and local agencies to make significant investments using auction proceeds to assist California's most vulnerable communities. Under these laws, a minimum of 25 percent of the total investments are required to be located within and provide benefits to disadvantaged communities, and at least 10 percent of the total investments must benefit low-income communities and households. Moving forward, the state will continue to devote a greater share of incentive funding to priority populations, with the light-duty vehicle incentive program as just one example. We can simultaneously confront the climate crisis and build a more resilient, just, and equitable future for all communities.

Figure 1-4: California climate investments cumulative outcomes[68,69]



Role of the Environmental Justice Advisory Committee

To inform the development of the Scoping Plan, AB 32 calls for the convening of an Environmental Justice Advisory Committee (EJ Advisory Committee) to advise CARB in developing the Scoping Plan, and any other pertinent matter in implementing AB 32. It requires that the Committee be comprised of representatives from communities with the most significant exposure to air pollution, including communities with minority populations and/or low-income populations. On January 25, 2007, CARB appointed the first

[68] CARB. 2022. California Climate Investments program implements $10.5 billion in greenhouse gas-reducing programs, expected to reduce 76 million metric tons of emissions. April 11. https://ww2.arb.ca.gov/news/california-climate-investments-program-implements-105-billion-greenhouse-gas-reducing-projects.

[69] SB 535 and AB 1550 require investments located in and benefiting low-income communities and households, which are termed *priority populations. Disadvantaged communities* are currently defined by CalEPA as the top 25 percent of communities experiencing disproportionate amounts of pollution, environmental degradation, and socioeconomic and public health conditions according to the Office of Environmental Health Hazard Assessment's CalEnviroScreen tool, plus certain additional communities including federally recognized Tribal Lands. Low-income communities and households are defined by statute as those with incomes either at or below 80 percent of the statewide median or below a threshold designated as low-income by the Department of Housing and Community Development.

Environmental Justice Advisory Committee to advise it on the Initial Scoping Plan and other climate change programs.

For this Scoping Plan, CARB reconvened the EJ Advisory Committee in May 2021. The committee is currently comprised of 14 environmental justice and disadvantaged community representatives, including the EJ Advisory Committee's first tribal representative, who was appointed in February 2022. In October 2021, the EJ Advisory Committee formally created eight workgroups. These workgroups are a space for EJ Advisory Committee members to better understand specific sectors of the Scoping Plan and to assist the EJ Advisory Committee in the development of recommendations on this Scoping Plan. In December 2021, the EJ Advisory Committee provided scenario input responses to help shape the modeling for this Scoping Plan. In February 2022, San Joaquin Valley EJ Advisory Committee members hosted their first community workshop, with over 100 attendees. In March 2022, the CARB Board held a joint public meeting with the EJ Advisory Committee to discuss their draft preliminary recommendations for this Scoping Plan. In June 2022, over 165 attendees participated in a statewide community workshop held by EJ Advisory Committee members. The full schedule of EJ Advisory Committee Meetings and meeting materials are available on CARB's website.[70] This Scoping Plan includes references where EJ Advisory Committee Final Recommendations[71] are included in the document. The final recommendations were discussed at a joint CARB and EJ Advisory Committee Hearing on September 1, 2022.

The integration of environmental justice is critical to ensure that certain communities are not left behind. The AB 32 EJ Advisory Committee provided recommendations on September 30 in advance of the final Scoping Plan. There are footnotes to indicate where there is alignment between the AB 32 EJ Advisory Committee's recommendations and this Scoping Plan. While the language in the text may not fully incorporate the specific EJ Advisory Committee's recommendation, the footnotes do acknowledge the places in the text where there is general alignment with the spirit of the EJ Advisory Committee's recommendation.

Partnering with Tribes

[70] CARB. Environmental Justice Advisory Committee Meetings and Events. https://ww2.arb.ca.gov/environmental-justice-advisory-committee-meetings-and-events.
[71] Environmental Justice Advisory Committee. September 30, 2022. 2022 Scoping Plan Recommendations. https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/finalejacrecs.pdf.

There are 109 federally recognized tribes and over 60 non-federally recognized tribes in California.[72] In 2011, Governor Brown issued Executive Order B-10-11, recognizing and reaffirming the inherent right of tribes to exercise sovereign authority over their members and territory and directing state agencies to engage in government-to-government consultation with tribe and to work to develop partnerships and consensus.[73] In 2019, Governor Newsom issued Executive Order N-15-19, which acknowledges and apologizes on behalf of the state for the historical "violence, exploitation, dispossession and the attempted destruction of tribal communities."[74] Establishing partnerships with tribal leaders to incorporate their priorities, traditional expertise, and knowledge will be important to achieving California's climate goals. The Scoping Plan includes actions that tribal partners can voluntarily implement for sources under their jurisdiction (e.g., transitioning to zero emission fleets, installing infrastructure and control technologies, conducting climate smart land management). The Scoping Plan also uplifts the importance of having our tribal partners help guide actions that may impact tribal cultural resources and of benefitting from tribal input.

We also need alignment between state and local partners and tribes on actions related to land-use decisions. This means respecting and reinforcing tribal sovereignty and self-determination. As tribes do not always draw clear lines between the "natural" and "cultural" resources of a place, taking a holistic perspective will result in positive impacts in ability to address the complex issues of land management and regulatory undertakings.

Tribes have an intimate and historical knowledge of places and should be engaged early on to inform planning and future management related to activities that may impact tribal resources and areas including potential funding opportunities, technical assistance, and capacity building, where appropriate. Additionally, tribes should be involved in the identification of their own significant resources and areas of use. As decisions are made related to Scoping Plan undertakings, agencies should recognize and appropriately consider cultural resources and management from the beginning, not as an afterthought; and consider how the project could impact tribes.

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[72] These numbers are subject to change depending on determinations made by the Bureau of Indian Affairs (BIA) and the Native American Heritage Commission (NAHC). Please consult the most current Federal Register for a list of federally recognized tribes and the NAHC for a list of non-federally recognized tribes in California. As of the date of the Scoping Plan, the current list for federally recognized tribes is located at 87 Fed. Reg. 4636 (Jan. 28, 2022).

[73] Executive Order B-10-11. *https://www.ca.gov/archive/gov39/2011/09/19/news17223/index.html#:~:text=EXECUTIVE%20ORDER%20B-10-11%20Published%3A%20Sep%2019%2C%202011%20WHEREAS,and%20affirmed%20in%20state%20and%20federal%20law%3B%20and*.

[74] Executive Order N-15-19. *https://tribalaffairs.ca.gov/wp-content/uploads/sites/10/2020/02/Executive-Order-N-15-19.pdf*.

Finally, to the extent allowed by law, traditional ecological knowledge and culturally sensitive information should be protected, as this is information that may not be common knowledge and may not be known outside the tribe, as each tribe is unique and influenced by its local environment and cultural practices. Protection of this information will help foster productive relationships with tribes and should be included as part of the process. CARB and other agencies should continue to foster relationships with tribal partners.

Maximizing Air Quality and Health Benefits

The state has over 50 years of experience successfully cleaning the air in California by addressing criteria pollutants and toxic air contaminants from mobile and stationary sources. CARB has been a leader in measuring, evaluating, and reducing sources of air pollution that impact public health. Its air pollution programs have been adapted for national programs and emulated in other countries. Significant progress has been made in reducing diesel particulate matter (PM), which is a designated toxic air contaminant, and many other hazardous air pollutants. CARB partners with local air districts to address stationary source emissions and adopts and implements state-level regulations to address sources of criteria and toxic air pollution, including mobile sources. CARB also collaborates with federal agencies to address air pollution from sources primarily under federal jurisdiction. In many instances, actions to reduce fossil fuel combustion and achieve federal air quality standards also help to reduce GHG emissions.

However, air pollution disparities still exist, and more must be done to ensure the most vulnerable populations have safe air to breathe. California must continue to evaluate opportunities to harmonize our climate and air quality programs through innovative policymaking and by building on existing programs like the Low Carbon Fuel Standard (LCFS) and Community Air Protection Program. The LCFS includes a provision that allows electric utilities to opt-in and generate residential electric vehicle (EV) charging credits, where some of the revenues are invested back into rebate programs that address air quality and climate pollution.[75] The Community Air Protection Program[76] is the first of its kind in the country and brings together diverse stakeholders, including CARB, local air districts, and residents of environmental justice communities to increase local air monitoring and develop community-led plans to improve air quality in the communities most impacted by air pollution.

This Scoping Plan identifies actions that will deliver near-term air quality benefits to communities with the highest exposures and provide long-term GHG benefits. Many of the actions in this Scoping Plan are key elements of the 2022 State Strategy for the State

[75] CARB. LCFS Utility Rebate Programs. *https://ww2.arb.ca.gov/resources/documents/lcfs-utility-rebate-programs*.
[76] CARB. Community Air Protection Program. *https://ww2.arb.ca.gov/capp*.

Implementation Plan to meet federal air quality standards,[77] which has a primary focus of reducing harmful air pollution and achieving federal air quality targets. California's approach of leveraging air quality and GHG policies together has yielded results. A 2022 report by the Office of Environmental Health and Hazard Assessment (OEHHA)[78] that evaluated GHG and harmful air pollution emissions from the heavy-duty vehicle (HDV) and large stationary source sectors found declines in emissions in both sectors, with the greatest declines in disadvantaged communities. Both sectors are subject to state GHG and air quality policies, in addition to federal and local rules on harmful air pollution. Because of historically racist and discriminatory practices such as redlining, both types of sources are disproportionately located adjacent to vulnerable communities, which are predominantly communities of color.[79] The key findings from the OEHHA report are as follows:

- Both HDVs and facilities subject to the Cap-and-Trade Program have reduced emissions of co-pollutants, with HDVs showing a clearer downward trend when compared to stationary sources. These emission reductions have major health benefits, including a reduction in premature pollution-related deaths.
- The greatest beneficiaries of reduced emissions from both HDVs and facilities subject to the Cap-and-Trade Program have been in communities of color and in disadvantaged communities in California, as identified by CalEnviroScreen (CES). This has reduced the emission gap between disadvantaged and non-disadvantaged communities, but a wide gap still remains.
- The transition to zero-emission HDVs will expedite further emissions reductions.
- While the progress observed is encouraging, inequities persist, and federal, state, and local climate and air quality programs must do more to reduce emissions of GHGs and co-pollutants to reduce the burden of emissions on disadvantaged communities and communities of color.

It will take all tools at all levels of government, with robust enforcement, to ensure that vulnerable communities continue to see improvements in air quality until no disparities exist in air pollution across the state.

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[77] CARB. 2022 State Strategy for the State Implementation Plan. *https://ww2.arb.ca.gov/resources/documents/2022-state-strategy-state-implementation-plan-2022-state-sip-strategy*.
[78] OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits within Disadvantaged Communities: Progress Toward Reducing Inequities. https://oehha.ca.gov/environmental-justice/report/ab32-benefits*.
[79] CalEPA. 2021. Pollution and Prejudice. *https://storymaps.arcgis.com/stories/f167b251809c43778a2f9f040f43d2f5*.

Economic Resilience

The state's efforts to tackle the climate crisis will create economic and workforce development opportunities in the clean energy economy in communities across the state. Transitioning existing skills and expanding workforce training opportunities in climate-related fields are critical for reducing harmful emissions and supporting workers in transitioning to new, high-quality jobs. The Administration's recent budgets acknowledge the challenges facing workers in industries most affected by the state's response to climate change—especially those in the fossil fuel industry. It will invest $1 billion in regional partnerships and economic diversification to create new jobs and support a local tax base and workforce transition and development once opportunities are identified. It also will invest in safety nets to protect, and support impacted communities as part of the transition to a carbon neutral economy. Specifically, the Community Economic Resilience Fund Program[80] (CERF) supports communities and regional groups in producing regional roadmaps for economic recovery and transition that prioritize the creation of accessible, high-quality jobs in sustainable industries. The budget investments create the opportunity to future-proof and increase economic resilience in the face of more frequent climate impacts and shifting economic conditions. For these investments and implementation of the Scoping Plan to be successful in supporting the transition to a carbon neutral economy, workers and affected communities must be included in ongoing dialogue to ensure a high-road transition for regional economies.

That state also recognizes it can play a more direct role in supporting a sustainable work force through its incentive programs. In 2021, Assembly Bill 680 (AB 680) (Burke, Chapter 746, Statutes of 2021) was signed into law, requiring CARB to work with the California Labor and Workforce Development Agency to update the Funding Guidelines to include new workforce standards. CARB's Funding Guidelines currently include requirements for administering agencies to, wherever possible, foster job creation within California, provide employment opportunities or job training tied to employment, and target these opportunities to priority populations. The Funding Guidelines also recommend administering agencies prioritize investments in projects that directly support jobs or a job training and placement program, and that they report the estimated employment benefits and employment outcomes for projects that meet specified criteria. These new requirements apply to agencies administering certain California Climate Investments

[80] Office of Planning and Research. Community Economic Resilience Fund. *https://opr.ca.gov/economic-development/cerf/*.

programs that receive continuous appropriations from the Greenhouse Gas Reduction Fund and fall into the following six categories of standards:

- fair and responsible employer standards,
- inclusive procurement policies,
- prevailing wage for construction work,
- community workforce agreements for construction projects over one million dollars,
- preference for projects with educational institutions or training programs, and
- creation of high-quality jobs. CARB will be updating the Funding Guidelines through a public process over the next year to operationalize these new requirements.

Partnering Across Government

The Scoping Plan is an actionable plan to identify and align programs and policies to achieve California's climate targets. To realize the outcomes and deliver results in any Scoping Plan, action is critical. For this Scoping Plan, there are also actions that rely on our federal partners to take on sources primarily under their jurisdiction (such as aviation, and federally owned/managed lands) while they also continue to develop national programs for GHG reductions. The federal government is already taking major steps to advance these types of programs. The Inflation Reduction Act of 2022[81] includes $369 billion for domestic energy production and manufacturing and is expected to lead to U.S. GHG emission reductions of roughly 40 percent by 2030. Direct incentives will include those for clean vehicles and ENERGY STAR appliances, as well as improving transportation and clean energy in underserved communities.

We also need our local partners to align on actions related to land-use decisions that support sustainable, resilient, low-carbon communities and permitting for clean energy production facilities and infrastructure; diversion of organics from landfills; and other climate-related projects. State agencies also should use the Scoping Plan to review and update their own programs and policies to support the actions identified in this Scoping Plan. Importantly, the Scoping Plan also can serve as a resource as the Legislature considers new legislative direction and funding to support the state's path to carbon neutrality and continue action to address near-term air pollution disparities.

Partnering with the Private Sector

Government cannot achieve our climate targets alone. The scale of investment needed requires both private-sector investment and partnerships with philanthropies. Public

[81] Pub.L. No. 117-169 (August 16, 2022).

sector dollars, accompanied by strong and steady policy signals, must be a catalyst for deeper and broader investments by the private sector in both reducing emissions and building the resilience of our communities. Governor Newsom is committed to working collaboratively with businesses, including small businesses, to deploy the technologies, capital, and ingenuity that are hallmarks of the private sector.

California structures our climate policies and regulations to create market signals and certainty that spur private sector investment. For example, the Governor's Executive Order on Zero-Emission Vehicles[82] set 2035 as the target year for 100 percent zero-emission vehicle sales, creating a time horizon that allows automakers to scale up zero-emission fleets and sending a clear signal to the companies and utilities that would deploy charging infrastructure. The Executive Order has been followed by development and adoption of the Advanced Clean Cars II regulation. CARB convened auto manufacturers, environmental justice groups, labor organizations, and many other stakeholders to provide input into development of the regulation in a robust and transparent manner; again, with the aim of providing certainty for producers and consumers.

California also pursues public-private partnerships (PPP) as a mechanism to advance our collective climate goals. We know these vehicles can be effective at increasing the impact of public sector dollars and helpful in moving markets in a direction aligned with state policy. A new PPP the Administration is advancing is the Climate Catalyst Revolving Loan Fund, housed at the state's Infrastructure and Economic Development Bank (IBank). The fund offers a range of financial instruments—including flexible credit and credit support—to help bridge financing gaps currently preventing advanced climate solutions from scaling in the marketplace. The Catalyst Fund's initial areas of investment include forest biomass management and utilization (unlocking innovation to reduce wildfire threats), climate-smart agriculture, and clean energy transmission. The fund leverages public sector investments by mobilizing private finance for shovel-ready projects that are stuck in the deployment phase. As such, IBank is ideally positioned as the state's all-purpose "Green Bank," with increasing connection to federal financing programs such as US DOE's Loan Programs Office and the United States Environmental Protection Agency's (U.S. EPA) Greenhouse Gas Reduction Fund.

The Catalyst Fund builds from existing IBank financing programs that are themselves increasingly focused on the climate imperative. The IBank's Infrastructure State Revolving Fund provides supportive capital to climate-aligned projects promoted by local governments and certain nonprofit entities, and will be refining its criteria and market outreach strategies to increase its level of service. IBank's bonds program has supported

[82] Executive Department. State of California. Executive Order N-79-20. *https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf.*

multiple large environmental projects, including more than $2 billion in “green bonds,” and is poised to help expand access to the state’s deep and liquid bond capital market. Within IBank’s Small Business Finance Center, the new Climate Tech Loan Guarantee program encourages commercial banks to back climate-focused small businesses, leveraging federal capital to insure a portion of the private bank’s loan. And through IBank’s Expanding Venture Capital Access Fund program, the state is promoting greater diversity in the venture capital community, including climate equity and climate justice.

All of these financing programs exist to leverage private capital in support of the state’s climate goals, and to partner with state policy agencies driving the transition. IBank will also continue to collaborate closely with the State Treasurer’s Office in its provision of capital support to climate solutions, ensuring that funding flows to programs best positioned to deliver success. This partnership of public and private capital, responsive to and in communication with the climate policy community, will ensure that California gets the maximum possible benefit from its allocation of scarce resources.

Supporting Innovation

Reaching our ambitious, deep decarbonization goals will require continued technological innovation. Investment in research, development, and deployment of clean technologies has never been more critical. Sending clear and sustained market and policy signals will encourage large and small companies alike to pursue innovation that can be scaled up and deployed here and beyond our borders. The full suite of AB 32 policies[83] has touched nearly every sector of California’s economy and spurred technology innovation in the state, including the growth of technology developers, manufacturers, processors, and assemblers in many areas. Specifically, AB 32 policies and programs support both the supply side and the demand side to build new markets in California. On the supply side, AB 32 policies support businesses to demonstrate and refine technologies, and to help establish critical supply chains. On the demand side, AB 32 policies and programs provide outreach, education, and incentives—as well as disincentives—to motivate everyone from consumers to institutional purchasers to utility planners to adopt new, climate smart technologies. Innovations resulting directly from the state’s climate policies include the following:

- In the past 10 years, a growing market for heavy-duty zero-emission vehicles (HD ZEVs) was established in California, and this market now represents the largest single share of North American supply and demand for HD ZEVs. Vehicle

[83] CARB. Climate Change Programs. *https://ww2.arb.ca.gov/our-work/topics/climate-change*.

and component manufacturers are making long-term investments to develop and produce HD ZEVs within California.

- Total consumption of renewable diesel in the California LCFS market has skyrocketed from approximately 1.8 million gallons in 2011 to nearly 589 million gallons in 2020. The LCFS is a key driver of market development for renewable diesel and its coproducts. While the federal renewable fuel standard (RFS) and blenders tax credit also benefit producers, an analysis of their respective contributions to market development, and interviews with industry representatives and independent experts, point to LCFS as a more important factor in market development, at least in recent years.
- In the past five years, a market for small-scale energy storage in California was created where none previously existed. As of 2020, 185 megawatts (MW) of small-scale energy storage projects have been interconnected to the grid. The significant increase in deployment in the last five years is a result of the Self-Generation Incentive Program (SGIP), which significantly reduces the upfront costs to purchase and install small-scale energy storage devices, and of growing customer interest in disaster resiliency in the face of increasing risk from wildfire and related utility outages. These systems have already provided disaster resiliency benefits for residential and non-residential customers.

We have seen how quickly market barriers can be overcome in response to strong policy signals, as occurred in the solar panel and electric vehicle battery space. Government-stated priorities have a significant role in guiding private and public research, development, and deployment. This Scoping Plan unequivocally puts the marker down on the need for innovation to continue in non-combustion technologies, clean energy, CO_2 removal options, and alternatives for SLCPs. The five-year update to the Scoping Plan allows for a periodic evaluation of new tools to add to the state's toolkit.

Engagement with Partners to Develop, Coordinate, and Export Policies

California works closely with other states, tribal governments, the federal government, and international jurisdictions to identify the most effective strategies and methods to reduce GHGs, manage GHG control programs, and facilitate the development of integrated and cost-effective regional, national, and international GHG reduction programs. For example, the state's Cap-and-Trade Program has been linked with Québec's since 2014, and CARB staff regularly engage with jurisdictions throughout the world on the design features of our Cap-and-Trade Program through memoranda of understanding (MOUs) and venues such as the International Climate Action

Partnership.[84] Low carbon fuel mandates similar to California's LCFS have been adopted by the U.S. EPA and by other jurisdictions, including Oregon, Washington, British Columbia, the European Union, and the United Kingdom. Many other jurisdictions from Japan to New Zealand, Australia, and the European Commission also continue to seek information and technical experience on our LCFS. California has and will continue to share information and encourage ambitious emissions reductions with interested jurisdictions, with a focus on China, India, Mexico, Canada, and the European Union. California's early action to reduce super-pollutants such as methane and other SLCPs was reaffirmed by the 2021 Global Methane Pledge signed by the U.S. and over 100 other countries at the 26th Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC).[85]

In addition, under the Clean Air Act, the federal government is authorized to allow California to set more stringent vehicle emissions regulations than federal standards. California's goals and regulations to transition to 100 percent sales of new zero-emission passenger vehicles by 2035 (including plug-in hybrid vehicles), to drayage trucks by 2035, and other trucks and buses where feasible by 2045 are being emulated by partner states across the U.S. and in jurisdictions around the world. CARB's Advanced Clean Cars II regulation, [86] which codifies these targets, was approved in August 2022, and already at least four other states have announced their plans to adopt this regulation. Earlier in June 2020 CARB adopted the Advanced Clean Truck regulation, which requires truck manufacturers to meet increasing sale targets of zero-emission trucks in California through 2035. Since adoption, at least five other states—20 percent of the U.S. truck market—have adopted this regulation. These kinds of coordinated policies help signal to vehicle manufacturers a widespread and growing demand for zero-emissions technology, which in turn helps scale production and lower costs for consumers.

With the Mexican Secretariat for Environment and Natural Resources (SEMARNAT), California has engaged in a technical exchange on clean vehicle policies and helped to establish Mexico's Emissions Trading System (being piloted in 2022). A 2019 MOU signed between California and Environment and Climate Change Canada enables in-depth collaboration on policies and programs to decarbonize vehicles, engines, and fuels. This partnership has led to tangible emissions reductions, from aligning vehicle emissions targets and policies to collaborating on emissions testing and research critical to enforcing

[84] International Carbon Action Partnership (ICAP). Homepage. *https://icapcarbonaction.com/en?msclkid=dac30cb7b4f511ec94ccd0f1ae323e98*.
[85] Global Methane Pledge. Homepage. *https://www.globalmethanepledge.org/*.
[86] Cal. Code Regs., tit. 13, §§ 1900,1961.2, 1961.3, 1962.2, 1962.3, 1962.4, 1962.5, 1962.6, 1962.7, 1962.8, 1965, 1968.2, 1969, 1976, 1978, 2037, 2038, 2112, 2139, 2140, 2147, and 2903; and Test Procedures located here: *https://ww2.arb.ca.gov/rulemaking/2022/advanced-clean-cars-ii*.

emissions limits for vehicle manufactures. At the national level, China has looked to California for cutting-edge requirements for car diagnostics and policies that promote zero-emissions vehicles. At a local level, Beijing has adopted California's vehicle emissions standards and several other progressive environmental regulations. California will continue and renew such efforts across China, including through a 2022 MOU signed with China's Ministry of Ecology and Environment.

Between 2021 and 2023, California also will serve as president of the Transport Decarbonisation Alliance, a global network of countries, regions, cities, and companies that come together to share experiences and technical expertise, and to increase the ambition and accelerate the deployment of targeted transportation decarbonization policies across freight, electric vehicle infrastructure, and active mobility. Throughout its presidency, California will focus its leadership on decarbonizing the cross-jurisdiction network of medium- and heavy-duty vehicles, both to ensure cleaner air in freight-adjacent communities and to stem the effects of climate change.

Over the years, California has also asserted the importance of and supported the ongoing efforts of state and local clean air and climate leadership. Through our participation in the Pacific Coast Collaborative alongside British Columbia, Washington, and Oregon,[87] the Under2 Coalition,[88] the U.S. Climate Alliance,[89] the International ZEV Alliance,[90] the Transportation Decarbonisation Alliance, and many more organizations, California has and will continue to build climate partnerships with state and local governments.

California also recognized the need to address the substantial emissions caused by the deforestation and degradation of tropical and other forests, and continues its work alongside other subnational governments as part of the Governors' Climate and Forests Task Force (GCF).[91] Founded in 2008, there are currently 39 GCF members, including states and provinces in Brazil, Colombia, Ecuador, Indonesia, Ivory Coast, Mexico, Nigeria, Peru, Spain, and the United States—all of whom are considering or operating programs to reduce emissions from deforestation, land-use, and rural development, and to benefit local and indigenous communities. CARB's California Tropical Forest Standard provides a rigorous methodology to assess jurisdiction-scale programs that reduce deforestation and to incentivize responsible action and investment.[92] The standard

[87] Pacific Coast Collaborative. Homepage. *https://pacificcoastcollaborative.org/*.
[88] Under2 Coalition. Homepage. *https://www.theclimategroup.org/under2-coalition*.
[89] United States Climate Alliance (USCA). Homepage. *https://www.usclimatealliance.org/*.
[90] ZEV Alliance. Homepage. Accelerating the Adoption of Zero-Emission Vehicles. *https://zevalliance.org/*.
[91] Governors' Climate and Forests Task Force. University of Colorado Boulder: Colorado Law. *https://www.gcftf.org/*.
[92] CARB. California Tropical Forest Standard. *https://ww2.arb.ca.gov/our-work/programs/california-tropical-forest-standard*.

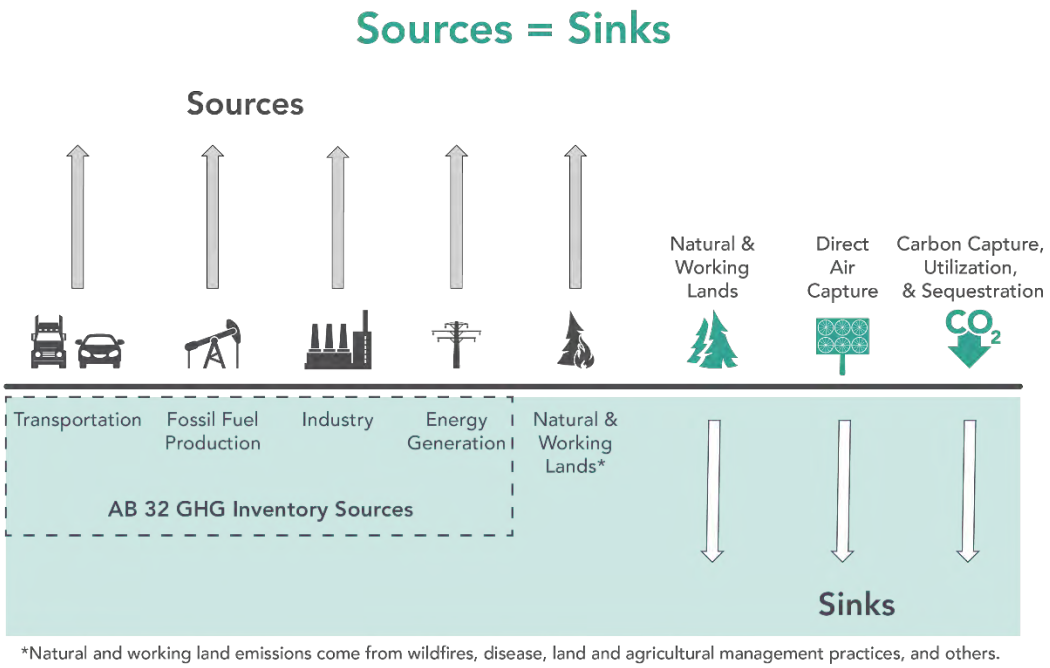
provides a strong signal to value the preservation of tropical forests over continued destructive activities such as oil exploration and extraction and ensures rigorous social and environmental safeguards for indigenous peoples and local communities.

Working Toward Carbon Neutrality

To date, California and many other regions have focused on reducing GHG emissions from the industrial, energy, and transportation sectors. As defined in statute, the state's 2020 and 2030 targets include all in-state sources of GHG emissions—and those emissions associated with imported power that is consumed in the state. By moving to a framework of carbon neutrality, the scope for accounting is expanded to include all sources and sinks. As such, carbon neutrality is achieved when the GHG fluxes are at equilibrium—when sources equal sinks. Figure 1-5 depicts the sources included in the AB 32 GHG Inventory and the new sources and sinks added in this Scoping Plan under the framework of carbon neutrality. Natural and working lands are able to sequester carbon and therefore play an increasingly important role in this framework. However, modeling for this plan shows that carbon sequestration in our natural and working lands alone will be insufficient to achieve carbon neutrality no later than 2045. Therefore, this plan also considers the role of carbon capture and sequestration, as well as biological and mechanical carbon sequestration processes that are included in the IPCC Sixth Assessment Report,[93] as necessary tools for climate change mitigation.

[93] IPCC. 2021. *Climate Change 2021: The Physical Science Basis.* https://www.ipcc.ch/report/ar6/wg1/.

Figure 1-5: Carbon neutrality: Balancing the net flux of GHG emissions from all sources and sinks



Supporting Healthy and Resilient Lands

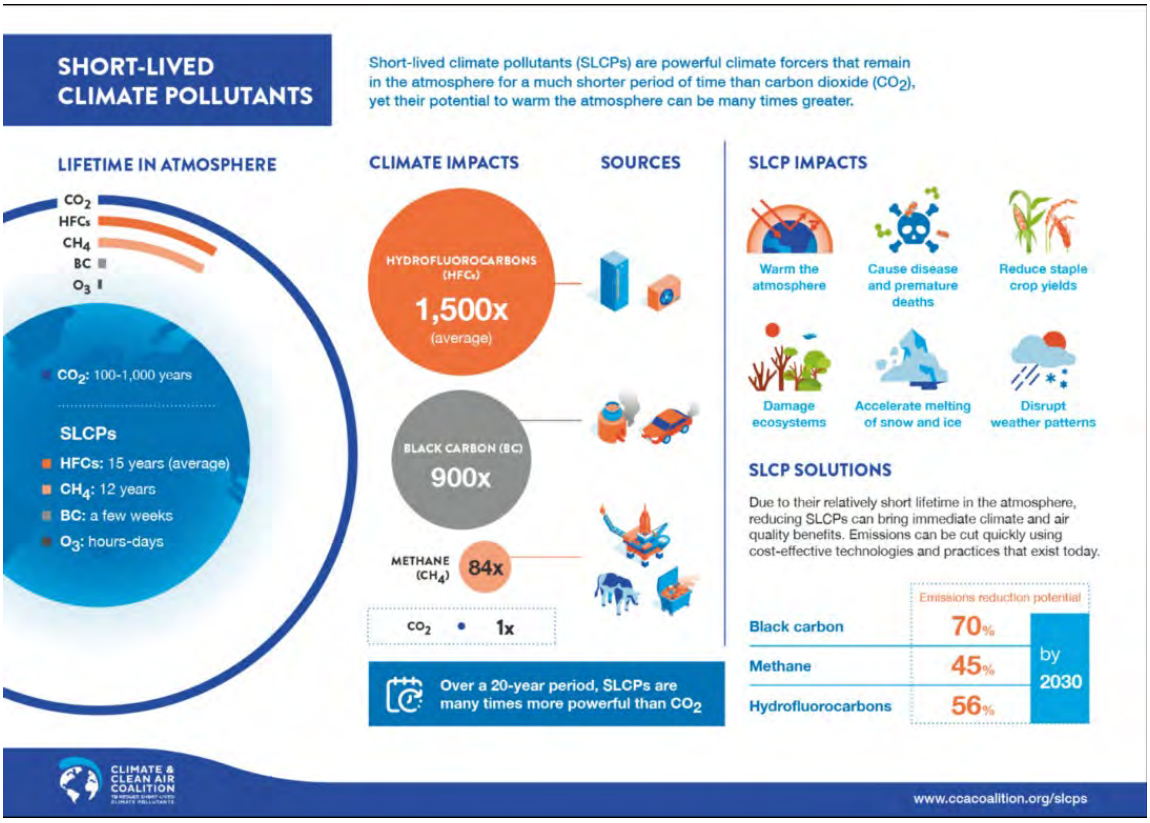
Our natural and working lands are an important piece in California's fight to achieve carbon neutrality and build resilience to the impacts of climate change. Healthy land can sequester and store atmospheric carbon dioxide in forests, grasslands, soils, and wetlands. Healthy lands can also reduce emissions of powerful short-lived climate pollutants, limit the release of future GHG emissions, protect people and nature from the impacts of climate change, and build our resilience to future climate risks. Unhealthy lands have the opposite effect—they release more GHGs than they store and are more vulnerable to future climate change impacts. Through climate smart land management that focuses on supporting healthy living systems, we can support our carbon neutrality goals, reduce emissions, advance sequestration, and support healthy and more climate-resilient lands.

Maintaining the Focus on Methane and Short-Lived Climate Pollutants

Given the urgency of climate change, the often-disproportional impacts already being felt by underserved populations across California and the world, and the need to rapidly decarbonize and avoid climate tipping points as identified in the most recent IPCC assessment, efforts to reduce short-lived climate pollutants are especially important. SLCPs include methane (CH_4), black carbon (soot), and fluorinated gases (F-gases,

including hydrofluorocarbons, or HFCs), and they are among the most harmful pollutants to both human health and the global climate. SLCPs are more potent than CO_2 in terms of their impact on climate change (and subsequently, global warming) and have a much shorter lifetime in the atmosphere than CO_2 does. That means they have an outsized impact on climate change in the near term—they are responsible for up to 45 percent of current climate forcing. It also means that targeted efforts to reduce short-lived climate pollutant emissions can provide outsized climate and health benefits, within weeks to about a decade (see Figure 1-6).

Figure 1-6: Short-lived climate pollutant impacts[94]



California has been a leader in addressing SLCP emissions. As part of the 2014 Scoping Plan,[95] CARB committed to developing a dedicated strategy to reduce SLCP emissions.

[94] Climate and Clean Air Coalition. Short-Lived Climate Pollutants (SLCPs). https://www.ccacoalition.org/en/content/short-lived-climate-pollutants-slcps.
[95] CARB. 2014. *First Update.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

The resulting SLCP Reduction Strategy,[96] adopted by CARB in 2017, implements targets codified in SB 1383 (Lara, Chapter 395, Statutes of 2016) to reduce methane and HFC emissions by 40 percent by 2030 and anthropogenic black carbon emissions by 50 percent. California worked with several other states through the U.S. Climate Alliance to establish a similar goal to reduce SLCP emissions in line with the requirements of the Paris Agreement,[97] identifying the potential to reduce SCLPs by 40 to 50 percent by 2030 across the U.S. Climate Alliance.[98]

Process for Developing the Scoping Plan

This Scoping Plan was developed in coordination with the Governor's Office and state agencies, in accordance with direction from the Chair and Members of CARB, through engagement with the Legislature, with advice from the EJ Advisory Committee, in consultation with tribes, and with open and transparent opportunities for stakeholders and the public to engage in workshops and other meetings. Appendix A (Public Process) includes details of the public workshops, and Chapter 5 includes details of the EJ Advisory Committee's role in the Scoping Plan update process.

Guidance from the Administration and Legislature

This Scoping Plan reflects existing and recent direction in the Governor's Executive Orders and Statutes. Table 1-1 provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

[96] CARB. 2017. *Short-Lived Climate Pollutant Reduction Strategy.* https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf.
[97] UNFCCC. 2015. Paris Agreement. https://unfccc.int/sites/default/files/english_paris_agreement.pdf.
[98] USCA. 2018. *From SLCP Challenge to Action: A Roadmap for Reducing Short-Lived Climate Pollutants to Meet the Goals of the Paris Agreement.* http://www.usclimatealliance.org/slcp-challenge-to-action.

Table 1-1: Major climate legislation and executive orders enacted since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in this Scoping Plan.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The Scoping Plan modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The Scoping Plan explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird,	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040.

Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The Scoping Plan describes the implications of this legislation on emissions.
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes

	associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in this Scoping Plan.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO_2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This Scoping Plan describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high- global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021)	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO_2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state

Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects	that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in this Scoping Plan as CO_2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net-zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The Scoping Plan modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.

	Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs this Scoping Plan.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero-electric passenger vehicles, medium- and heavy-duty

	vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The Scoping Plan modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector.

	The Scoping Plan modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie-Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals.

	This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. This Scoping Plan is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	SB 100 mandates that the CPUC, CEC, and CARB plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. This bill also updates the state's Renewables Portfolio Standard (RPS) to include the following interim targets: • 44% of retail sales procured from eligible renewable sources by December 31, 2024. • 52% of retail sales procured from eligible renewable sources by December 31, 2027. • 60% of retail sales procured from eligible renewable sources by December 31, 2030. Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. This Scoping Plan reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40% below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in this Scoping Plan.

Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this Scoping Plan.

Consideration of Relevant State Plans and Regulations

Development of this Scoping Plan also included careful consideration of, and coordination with, other state agency plans and regulations, including the SB 100 Joint Agency Report,[99] the 2022 State Strategy for the State Implementation Plan,[100] Climate Action Plan for Transportation Infrastructure,[101] AB 74 Studies on Vehicle Emissions and Fuel Demand and Supply,[102,103,104] Short-Lived Climate Pollutant Strategy (SLCP Strategy),[105]

[99] CPUC, CEC, and CARB. 2021. *SB 100 Joint Agency Report.* https://www.energy.ca.gov/sb100.
[100] CARB. January 31, 2022. Draft 2022 State Strategy for the State Implementation Plan. https://ww2.arb.ca.gov/sites/default/files/2022-01/Draft_2022_State_SIP_Strategy.pdf.
[101] CalSTA. 2021. *Climate Action Plan.* https://calsta.ca.gov/subject-areas/climate-action-plan.
[102] CalEPA. 2021. Carbon Neutrality Studies. https://calepa.ca.gov/climate/carbon-neutrality-studies/.
[103] Brown, A. L., et. al. 2021. *Driving California's Transportation Emissions.* https://escholarship.org/uc/item/3np3p2t0.
[104] Deschenes, O. 2021. *Enhancing equity*. https://zenodo.org/record/4707966#.YKPiaKhKi73.
[105] CARB. Short-Lived Climate Pollutants. https://ww2.arb.ca.gov/our-work/programs/slcp.

CARB's Achieving Carbon Neutrality Report,[106] Climate Smart Strategy,[107] and draft Natural and Working Lands Implementation Plan,[108] among others.

Input from Partners and Stakeholders

CARB also collaborated with other state agencies, held consultations with tribes, and solicited comments and feedback from affected stakeholders, including labor organizations and the public. The process to update the Scoping Plan began with kickoff workshops in early June 2021,[109] followed by over a dozen public workshops, including engagement with tribes,[110] and featured a series of EJ Advisory Committee and environmental justice community meetings.[111] The June 2021 workshop and several others were a joint agency effort, as there are many agencies with direct authority or jurisdiction over different sectors of the economy. Consultation with agencies also included bi-weekly, monthly, and weekly meetings.

During the summer of 2022 CARB held three community listening sessions, hosted by the CARB Chair and Board, in communities around the state, along with one virtual community listening session and one tribal listening session specifically for tribes. Many tribes provided written feedback, which was incorporated into this Scoping Plan. In addition, CARB respects tribal sovereignty and also engaged in a consultation campaign with tribes, which resulted in government-to-government consultations, and this Scoping Plan is reflective of this process.[112]

Emissions Data That Inform the Scoping Plan

Greenhouse Gas Emissions

AB 32 includes which GHGs are to be regulated, reduced, and included in the state's targets and goals. That list includes seven GHGs: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons (HFCs),

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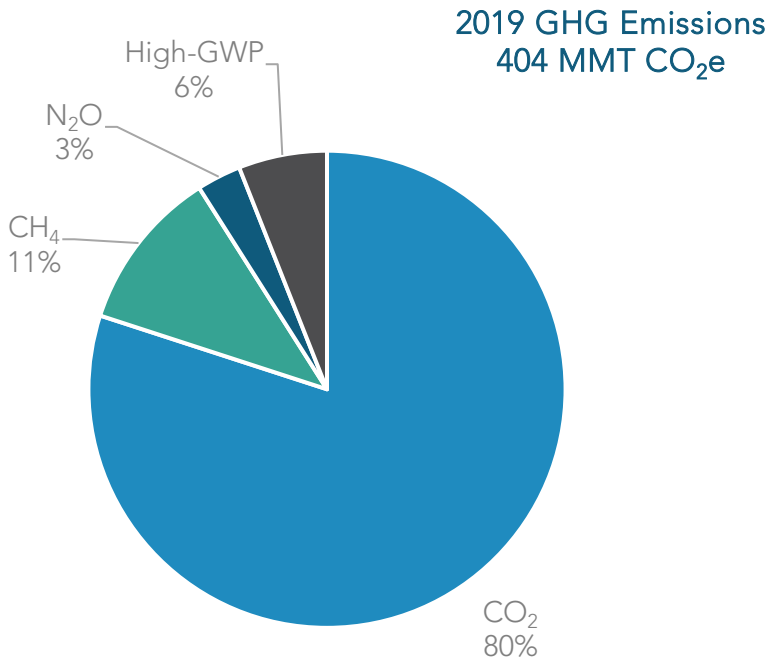
[106] Energy and Environmental Economics, Inc. 2020. *Achieving Carbon Neutrality.* https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.
[107] CNRA. 2022. Natural and Working Lands Climate Smart Strategy. https://resources.ca.gov/Initiatives/Expanding-Nature-Based-Solutions.
[108] CARB. 2019. *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan.* https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft.
[109] Appendix A (Public Process).
[110] CARB. Scoping Plan Meetings & Workshops. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops.
[111] CARB. Environmental Justice Advisory Committee Meetings and Events. https://ww2.arb.ca.gov/environmental-justice-advisory-committee-meetings-and-events.
[112] CARB. 2018. Tribal Consultation Policy. October. https://www.arb.ca.gov/regact/nonreg/2018/california_air_resources_board_tribal_consultation_policy.pdf.

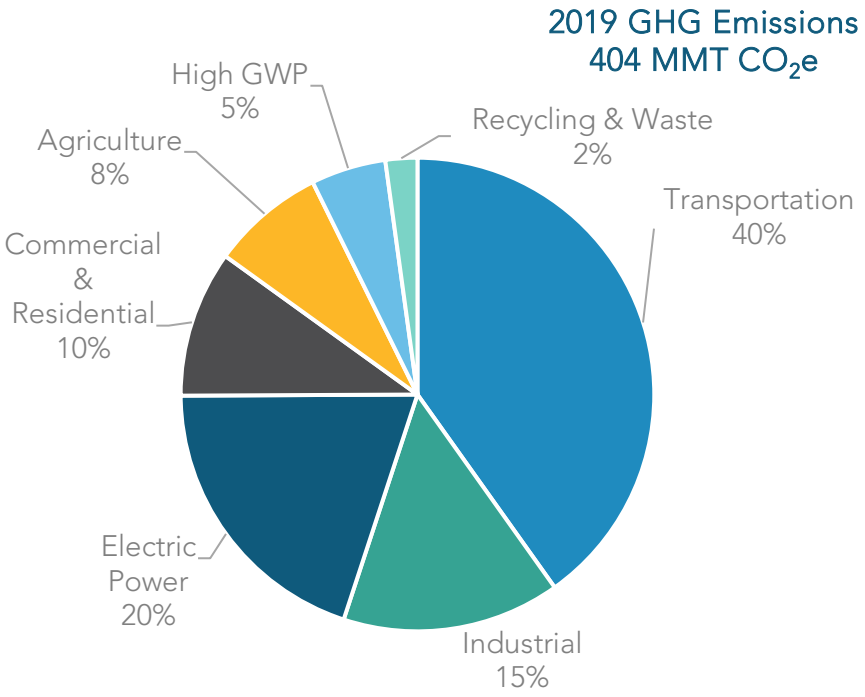
perfluorocarbons (PFCs), and nitrogen trifluoride (NF_3). Carbon dioxide is the primary GHG emitted in California, accounting for 83 percent of the total GHG emissions in 2019, as shown in Figure 1-7 below. Figure 1-8 illustrates that transportation (primarily on-road travel) is the single largest source of CO_2 emissions in the state. Upstream transportation emissions from the refinery and oil and gas sectors are categorized as CO_2 emissions from industrial sources and constitute about 50 percent of the industrial source emissions. When including these emissions, the transportation sector accounts for approximately half of statewide GHG emissions. Other significant sources of CO_2 include electricity production, industrial sources like refineries and cement plants, and residential sources like fossil gas. Figures 1-7 and 1-8 show state GHG emission contributions by GHG and sector based on the 2020 Greenhouse Gas Emission Inventory; GHG emissions for 2019 are shown because 2020 was an outlier due to the global pandemic. Emissions in Figure 1-8 are depicted by Scoping Plan sector, which includes separate categories for high-global warming potential (GWP) and recycling/waste emissions that are otherwise typically included within other economic sectors.

Figure 1-7: 2019 State GHG emission contributions by GHG[113]



[113] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020: Trends of Emissions and Other Indicators.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

Figure 1-8: 2019 State GHG emission contributions by Scoping Plan sector[114]



The scope of the AB 32 GHG Inventory encompasses emission sources within the state's borders, as well as imported electricity consumed in the state. This construct for the inventory is consistent with IPCC practices to allow for comparison of statewide GHG emissions with those at the national level and with other international GHG inventories. Statewide GHG emissions calculations use many data sources, including data from other state and federal agencies. However, a significant source of data comes from reports submitted to CARB through the Regulation for the Mandatory Reporting of GHG Emissions (MRR). The MRR requires facilities and entities with more than 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. Furthermore, this regulation requires that reports from entities that emit more than 25,000 $MTCO_2e$ be verified by a CARB-

[114] The High GWP sector includes high global warming potential gas emissions from releases of ozone depleting substance (ODS) substitutes, SF_6 emissions from the electricity transmission and distribution system, and gases that are emitted in the semiconductor manufacturing process. ODS substitutes, which are primarily HFCs, are used in refrigeration and air conditioning equipment, solvent cleaning, foam production, fire retardants, and aerosols.

accredited third-party verification body. More information on MRR emissions reports can be found at CARB's Mandatory Greenhouse Gas Emissions Reporting website.[115]

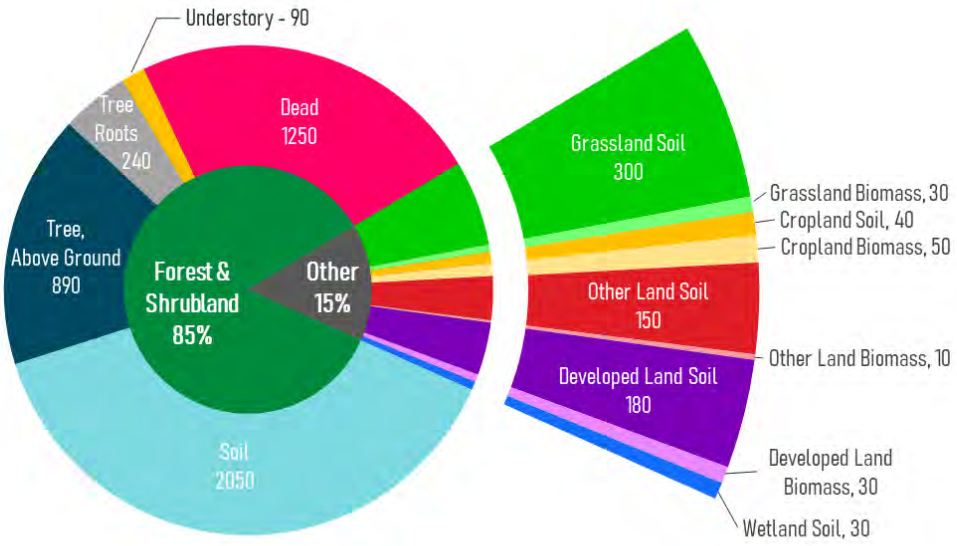
All data sources used to develop the GHG Emission Inventory are listed in CARB's inventory supporting documentation.[116]

Natural and Working Lands

For natural and working lands, the 2018 ecosystem carbon inventory (NWL Inventory)[117] shows there are approximately 5,340 million metric tons (MMT) of carbon in the carbon pools[118] (reservoirs of carbon that have the ability to both take in and release carbon) that CARB has quantified (see Figure 1-9). For purposes of comparison, 5,340 MMT of ecosystem carbon stock is equivalent to 19,600 MMT of atmospheric CO_2. Forests and shrublands contain the majority of California's carbon stock because they cover the majority of California's landscape and have the highest carbon density of any land cover type. All other land categories combined comprise over 35 percent of California's total acreage, but only 15 percent of carbon stocks. Roughly half of the 5,340 MMT of carbon resides in soils and half in plant biomass.

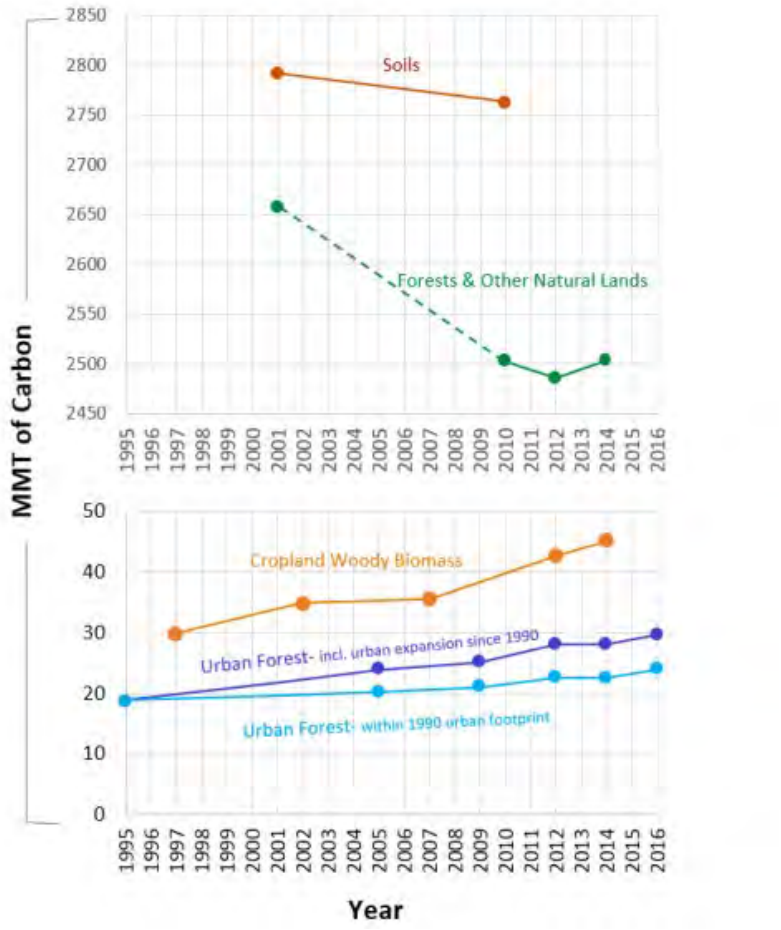
[115] CARB. Mandatory Greenhouse Gas Emissions Reporting. *https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting*.
[116] CARB. Current California GHG Emission Inventory Data. *www.arb.ca.gov/cc/inventory/data/data.htm*.
[117] CARB. 2018. *An Inventory of Ecosystem Carbon in California's Natural and Working Lands. https://ww3.arb.ca.gov/cc/inventory/pubs/nwl_inventory.pdf*.
[118] "Carbon pools" are Above-Ground Live Biomass (boles, stems, and foliage in shrubs, trees, grasses, and herbaceous vegetation), Below-Ground Live Biomass (roots in shrubs, trees, grasses, and herbaceous vegetation), Dead Organic Matter (standing or downed dead wood and litter), Harvested Wood Products (all wood and bark material that leaves harvest sites regardless of whether it is eventually incorporated into merchandisable products), and Soil Organic Matter (organic carbon in the top 30 centimeters of soil).

Figure 1-9: Carbon stocks in natural and working lands (MMT carbon)



In addition to providing an estimate of the ecosystem carbon that exists on California's landscape, the NWL Inventory also shows how those carbon stocks are changing (see Figure 1-10). The inventory attributes stock change to human activity, such as land use change, or to disturbances, such as wildfire. CARB's inventory shows these lands were a source of GHG emissions from 2001 to 2011, releasing more carbon than they stored, and then they returned to be a slight carbon sink from 2012 to 2014. These trends highlight the interannual and interdecadal variability of lands and their ability to be both a source and a sink of carbon.

Figure 1-10: Changes in carbon stock by landscape type



For natural and working lands, California's inventory is also based on IPCC methods for tracking ecosystem carbon over time, providing for comparability with other national and subnational inventories and carbon accounting. As such, the NWL Inventory is an important tool for tracking both carbon stock changes in California over time and the impacts that interventions such as those identified in this Scoping Plan, actions identified in the Climate Smart Land Strategy, and others have on NWL carbon stocks.

All data sources used to develop the NWL Inventory are listed in the technical support documentation at CARB's California Natural & Working Lands Inventory website.[119]

[119] CARB. California Natural & Working Lands Inventory. https://ww2.arb.ca.gov/nwl-inventory.

Black Carbon

In addition, CARB has developed a statewide emission inventory for black carbon in support of the SLCP Strategy. The inventory is reported in two categories: non-forestry (anthropogenic) sources and forestry sources.[120] The black carbon inventory is calculated using existing $PM_{2.5}$ emission inventories combined with speciation profiles that define the fraction of $PM_{2.5}$ that is black carbon. The black carbon inventory helps support implementation of the SLCP Strategy, but it is not part of California's GHG Inventory that tracks progress toward the state's climate targets under AB 32 or SB 32. The state's major anthropogenic sources of black carbon include off-road transportation, on-road transportation, residential wood burning, fuel combustion, and industrial processes. CARB estimated 2017 black carbon emissions to be approximately 8 $MTCO_2e$.[121] The majority of anthropogenic sources come from transportation—specifically, heavy-duty vehicles. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion. The forestry category includes non-agricultural prescribed burning and wildfire emissions.

Tracking Life-Cycle and Out-of-State Emissions

In recent years there has been increased interest in the embedded carbon in products, also known as *life-cycle emissions.* A life-cycle accounting framework refers to all of the GHG emissions generated from the sourcing, production, and transportation of products to an endpoint. In doing such assessments for a product, emissions may be associated with sourced materials and production activity outside a jurisdiction's borders. While life-cycle emissions can provide a more comprehensive picture of the emissions associated with the goods we consume and ongoing demand, life-cycle inventories are inconsistent with IPCC standards, as they would result in double counting of emissions across jurisdictions. Other countries and regions do produce their own inventory reports consistent with IPCC methods and are taking action to reduce emissions within their jurisdictions. In addition, jurisdictions often lack legal authority to regulate sources outside of their borders. Finally, it is difficult to obtain accurate data for sources and production activities outside of a region's border that would impact the accuracy of such an inventory. For these reasons, the inventory used in the Scoping Plan does not use a life-cycle

[120] SB 1383. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB1383.
[121] This is a preliminary estimate developed for this Scoping Plan. Official Black Carbon emissions estimates are provided in the SLCP inventory here: https://ww2.arb.ca.gov/ghg-slcp-inventory.

approach and remains consistent with international accounting standards and consistent with how other countries and regions track emissions within their jurisdictions.

However, GHG mitigation action may cross geographic borders as part of subnational and international collaboration, or as a natural result of implementation of regional policies. In addition to the state's existing GHG inventory, CARB will develop an accounting framework that reflects the benefits of our policies accruing outside of the state. This accounting framework will be important to better understand the true impact of the state's policies on what is emitted into the atmosphere. For example, the LCFS incentivizes GHG reductions along the entire supply chain for the production and delivery of transportation fuel imported for use in the state. However, our inventory only captures the change in emissions from the tailpipe of when that fuel is used in California and does not capture any GHG reductions that occur in the production process if the fuel is produced out of state.

Natural and working lands forestry actions are another example, where California's policies are inspiring forest management actions in other states that result in increased permanent carbon sequestration. California's NWL inventory does not capture the increased carbon stocks resulting from forestry projects happening outside of California, and the CO_2 removals resulting from these projects are not applied in either CARB's NWL inventory or CARB's AB 32 GHG Emissions Inventory. For GHG reductions outside of the state to be attributed to our programs, those reductions must be real, quantifiable, verifiable, and permanent.

It also will be important to avoid any double counting (including claims to those reductions by other jurisdictions) and to transparently indicate whether any extra-jurisdictional emissions reductions might be included in another region's inventory. CARB is collaborating with other jurisdictions to ensure GHG accounting rules are consistent with international best practices, as robust accounting rules instill confidence in the reductions claimed and maintain support for joint action across jurisdictions. The policy goals of consistency and transparency are critical as we work together with other jurisdictions on our parallel paths to achieve our GHG targets with real benefits to the atmosphere.

Tracking Progress

Historically, the AB 32 GHG Inventory has been the primary metric to track progress toward achieving climate targets.[122] However, we must now deploy clean technology at unprecedented rates. The emissions modeling underpinning this Scoping Plan and

[122] Starting with the 2022 Edition of the AB 32 GHG inventory, the inventory development now relies more directly on the annually reported and third-party verified emissions from the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

targets for clean technology in statute can serve as leading indicators across the economy on how our actions compare to the pace of action needed to be on track to achieve carbon neutrality. The California Climate Dashboard[123] was launched in 2022 and provides high-level metrics for clean energy production and technology deployment. Statistics such as the deployment of zero emission vehicles and clean electricity generation are just some of the examples of metrics across the economy that can be tracked, in addition to GHG emissions, to understand if the state is on track to meet its climate goals. A key indicator to track will be building of new energy infrastructure and deployment of clean technology as evaluated in the uncertainty analysis in Chapter 2. CARB will coordinate with state agencies to establish and make public similar metrics across all economic sectors to help provide transparency on the state's progress in deploying clean technology at the pace and scale needed to achieve carbon neutrality no later than 2045.

[123] CalEPA. California Climate Dashboard. *https://calepa.ca.gov/climate-dashboard/*.

Chapter 2: The Scoping Plan Scenario

This chapter describes the Scoping Plan Scenario, which for the first time includes sources in both the AB 32 GHG Inventory and Natural and Working Lands (NWL). It begins with a short description of the alternatives evaluated. Four scenarios for the AB 32 GHG Inventory and NWL were considered separately and helped to inform the Scoping Plan Scenario. Each of the alternatives were considered in terms of the important criteria and priorities that the state's comprehensive climate action must deliver, including the need for GHG reductions that are not only technologically feasible and cost-effective, but also can deliver health and economic benefits for the state. All the scenarios were set against what is called the *Reference Scenario*—that is, what the GHG emissions would look like if we did nothing at all beyond the existing policies that are required and already in place to achieve the 2030 target of at least 40 percent below 1990 levels, or those expected with no new actions in the NWL sector. For this Scoping Plan, two sets of modeling tools were used to evaluate the AB 32 GHG Inventory and NWL sectors because no single model can assess both AB 32 sectors and NWL together. As a result, two different sets of scenarios were developed for each sector type. While this chapter breaks out discussion separately for the two sector types, the Scoping Plan Scenario reflects the combined actions across both sectors by choosing an alternative from each sector type. The modeling provides point estimates; however, that does not imply precision. As discussed in the uncertainty section, several types of uncertainties are associated with any outcomes projected by the modeling results. There will be ranges of estimates associated with each point that are not shown in the graphs or results.

Scenarios for the AB 32 GHG Inventory Sectors

The Reference Scenario for the AB 32 GHG Inventory sectors shows continuing but modest GHG reductions beyond 2030 that level off toward mid-century. The comprehensive analysis of all four alternatives indicates that the Scoping Plan Scenario is the best choice to achieve California's climate and clean air goals while balancing the legislative direction on prioritizing direct emissions reductions, reducing anthropogenic emissions by at least 85 percent by 2045, being technologically feasible, and being cost-effective. It also protects public health, provides a solid foundation for continued economic growth, and drastically reduces the state's dependence on fossil fuel combustion and does not disproportionately impact disadvantaged communities. Each of the alternative scenarios was the product of a process of development informed by public input, the

governor,[124] CARB, legislative direction, and input by the EJ Advisory Committee.[125,126] Future updates to the Scoping Plan may consider new clean technologies and fuels beyond those included in this Scoping Plan.

The four scenarios evaluated shared many similarities. They each embodied the following characteristics:

- Drastic reduction in fossil fuel dependence, with some remaining in-state demand for fossil fuels for aviation, marine, and locomotion applications, and for fossil gas for buildings and industry
- Ambitious deployment of efficient non-combustion technologies such as zero emission vehicles and heat pumps
- Rapid growth in the production and distribution of clean energy such as zero carbon electricity and hydrogen
- Progressive phasedown of fossil fuel production and distribution activities as part of the transition to clean energy
- Remaining emissions of fugitive SLCPs such as refrigerants and fugitive methane
- Strong consumer adoption of clean technology and fuel options
- Removal of remaining CO_2 emissions to achieve carbon neutrality
- Some reliance on carbon capture and sequestration (CCS)

While the four scenarios had a lot in common, they also had some differences:

- Year in which carbon neutrality is achieved (2035 or 2045)
- Rate of deployment of clean technology and production and distribution of zero carbon energy
- Remaining amount of demand for fossil energy in the year carbon neutrality is achieved
- Constraints on technology and fuels deployed in certain sectors
- Consumer adoption rates of clean technologies and fuels
- Degree of reliance on CO_2 removal
- Degree of reliance on CCS

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[124] Newsom, Gavin. July 22, 2022. Letter from Governor Newsom to CARB Chair Liane Randolph. Retrieved from *https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf*.

[125] EJ Advisory Committee. December 2, 2021. EJ Advisory Committee Responses for the CARB Scenario Inputs. *https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Final%20Responses%20to%20CARB%20Scenario%20Inputs_12_2_21.pdf*.

[126] CARB. January 25, 2022. Update on PATHWAYS Scenario Modeling Assumptions. *https://ww2.arb.ca.gov/sites/default/files/2022-01/Scenario%20Slides%20for%20Jan25%20EJAC%20Mtg_01242022.pdf*.

The summary below provides an overview of the alternatives designed and considered for the energy and industrial sectors in this update. Full details of each scenario considered can be found in the *Draft 2022 Scoping Plan Update*

Scoping Plan Scenario (modeling scenario Alternative 3 from the Draft): carbon neutrality by 2045, deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor

Alternative 1: carbon neutrality by 2035, nearly complete phaseout of all combustion, limited reliance on carbon capture and sequestration and engineered carbon removal, and restricted applications for biomass-derived fuels

Alternative 2: carbon neutrality by 2035 and aggressive deployment of a full suite of technology and energy options, including engineered carbon removal

Alternative 4: carbon neutrality by 2045, deployment of a broad portfolio of existing and emerging fossil fuel alternatives, slower deployment and adoption rates than the Scoping Plan Scenario, and a higher reliance on CO_2 removal

Other considerations for the AB 32 GHG Inventory sectors include the following:

- To what extent does an alternative meet the statewide targets and any sector targets, and also deliver clean air benefits (especially in the near term) to address ongoing healthy air disparities, prioritize reductions for mobile and large stationary sources, and emphasize continued investment in disadvantaged communities?
- Does an alternative support California in building on efforts to collaborate with other jurisdictions and include exportable policies based on robust science?
- Does an alternative provide for compliance options and a cost-effective approach to reduce GHG emissions?
- Does the alternative present a realistic and ambitious path forward consistent with statute and science, and support economic opportunities, particularly in anticipated growth sectors?

Scenarios for Natural and Working Lands

For the natural and working lands sector, the Reference Scenario shows that NWL will continue to emit GHGs and lose carbon stocks into the future as the combined effects of past unhealthy management practices and climate change impact our lands. Relative to the Reference Scenario, the four NWL scenarios represent different scales of land management on seven landscapes (forests, shrublands/chaparral, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands) to support carbon neutrality.

The analysis of the four NWL scenarios shows that the Scoping Plan Scenario is the preferred choice because it prioritizes sustainable land management to sequester carbon over the long term, GHG and air pollution reductions, ecosystem health and resilience, and implementation and technological feasibility and cost-effectiveness. The Scoping Plan Scenario reduces catastrophic wildfire risk to the state; increases the health and resilience of California's forests, shrublands, and grasslands; increases soil health; and protects, restores, and enhances California's natural and working lands for future generations. The Scoping Plan Scenario takes into consideration the priority landscapes and nature-based strategies identified in California's Climate Smart Strategy[127] and reflects the state's priorities to manage lands in ways that support the multiple benefits they provide. The Scoping Plan Scenario, as well as each of the alternative NWL scenarios, were informed by input from other agencies, the public, and the EJ Advisory Committee. Additional landscapes and land management activities will be added and evaluated in future Scoping Plan updates and in response to AB 1757.

Each of the NWL scenarios have several similarities, including the following:

- Prioritizing NWL management actions on forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands. These actions can reduce GHG emissions from these lands, protect ecosystems against future climate change, protect communities, and enhance the ecosystem benefits they provide to nature and society.
- Exploring the potential impacts of different levels of NWL management actions that are designed to achieve the objective associated with each scenario.
- Analyzing the carbon impacts of land management actions, climate change, wildfire, and water use on California's diverse natural and working lands through 2045.

There are also differences across the four NWL scenarios. These include:

- The level of NWL management actions taken on each landscape, such as varying the acres of healthy soils practices for croplands.
- The types of NWL management actions taken on each landscape, such as prescribed burning or thinning for forests, grasslands, and shrublands.

[127] CNRA. 2022. Natural and Working Lands Climate Smart Strategy. *https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible_Compressed.pdf*.

The summary below provides an overview of the alternatives designed and considered for the NWL sectors in this Scoping Plan. Full details of each scenario considered can be found in the *Draft 2022 Scoping Plan Update*.

Scoping Plan Scenario (NWL Alternative 3 from the Draft): land management activities that prioritize restoration and enhancement of ecosystem functions to improve resilience to climate change impacts, including more stable carbon stocks

NWL Alternative 1: land management activities that prioritize short term carbon stocks in our forests and through increased climate smart agricultural practices on croplands

NWL Alternative 2: land management activities representative of California's current commitments and plans

NWL Alternative 4: land management activities that prioritize reducing catastrophic wildfires in forests, shrublands, and grasslands

Evaluation of Scoping Plan Alternatives

CARB staff solicited feedback from topical experts, affected stakeholders, and the EJ Advisory Committee, including a tribal representative, at public meetings to assemble input assumptions for four carbon neutrality scenarios to model using PATHWAYS. Revisions to the Draft Scoping Plan were informed by direction in statute, the Governor's Executive Orders, public comments, and the recommendations of the EJ Advisory Committee. The three alternative scenarios were designed to explore the potential speed, magnitude, and impacts of transitioning California's energy demand away from fossil fuels. The modeling assumptions listed below identify the primary fossil fuel alternative that is commercially available and technically feasible for widespread use by 2045 for each sector. CARB assumes that any energy demand that remains after the alternative technology or fuel is applied—such as on-road internal combustion engines, industrial processes, and gas use in existing buildings that have not yet decarbonized—will continue to be met by fossil fuels, resulting in residual GHG emissions.

NWL Scoping Plan Alternatives

For the NWL sectors, staff significantly expanded the scale of the scientific analysis for NWL from previous Scoping Plan efforts. CARB staff utilized modeling tools for this expanded analysis to assess both the carbon and other ecological, public health, and economic outcomes of management actions on forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands. CARB staff aligned the scenarios with both the landscape types and actions identified in other efforts called for in Governor Newsom's Executive Order N-82-20 (e.g., California's Climate Smart Strategy and Pathways to 30x30). As part of this Scoping Plan, CARB staff modeled as many of the management actions identified in the Natural and Working Lands Climate

Smart Strategy as were feasible. The management actions that were included in the model were selected because of the State of California's previous work to quantify these actions' impacts. It was not feasible to model every land management strategy for NWL, and so it is possible that larger volumes of sequestration (e.g., in soils or in oceans) could result from additional non-modeled activities. California's Natural and Working Lands Climate Smart Strategy includes a more comprehensive listing of priority nature-based solutions and management actions. It is important to note that the absence of a particular management action or its climate benefit in the modeling is not an indication of its importance or potential contributions toward meeting the target or toward supporting the carbon neutrality target for California.

Forests: Management strategies were modeled for forests: biological/chemical/ herbaceous treatments (e.g., herbicide application), clearcut, various timber harvests (e.g., variable retention, seed tree / shelterwood, selection harvesting), mastication, other mechanical treatments (e.g., piling of dead material, understory thinning), prescribed burning, and thinning. Avoided land conversion to another land use was also included in the modeling. Wildfire was modeled and is responsive to management strategies and climate conditions.

Shrublands and chaparral: Management strategies were modeled for shrublands and chaparral: biological/chemical/herbaceous treatments, prescribed burning, mechanical treatment (e.g., mastication, crushing, mowing, piling), and avoided conversion from shrubland to another land use. Wildfire was modeled and is responsive to management strategies and climate conditions.

Grasslands: Management strategies were modeled for grasslands: biological/chemical/herbaceous treatments, prescribed burning, and avoided land conversion from grasslands to another land use. Wildfire was modeled and is responsive to management strategies and climate conditions.

Croplands: Management strategies were modeled for row crops: cover cropping, no till, reduced till, compost amendment, transition to organic[128] farming, avoided conversion of annual crop agricultural land through easements, establishing riparian forest buffers, alley cropping, establishing windbreaks/shelterbelts, establishing tree and shrubs in croplands, and establishing hedgerows. For perennial crops, windbreaks/shelterbelts, hedgerows, conversion from annual crops to perennial crops, and avoided conversion to other land uses were modeled.

[128] Note: N_2O reductions from decreases in synthetic fertilizer application in organic farming were not modeled.

Developed lands: Management strategies were modeled for developed lands: Increasing tree canopy cover through planting trees and improved management of existing trees, and removing vegetation surrounding structures in accordance with the CAL FIRE Defensible Space PRC 4291.

Wetlands: Management strategies were modeled for wetlands: Restoring wetlands through submerging cultivated land in the Sacramento-San Joaquin Delta and avoided land conversion in the Sacramento-San Joaquin Delta.

Sparsely vegetated lands: Management strategies were modeled for sparsely vegetated lands: Avoided conversion of sparsely vegetated lands to another land use.

Scoping Plan Scenario

The Scoping Plan Scenario achieves GHG emission reductions that exceed the levels expected based on existing policies represented in the Reference Scenario, keeping California on track to achieve the SB 32 GHG reduction target for 2030 and become carbon neutral no later than 2045. Actions that reduce GHG emissions and transition AB 32 GHG Inventory sources away from fossil fuel combustion affect each economic sector. Actions that lead to improved carbon stocks affect each landscape.

AB 32 GHG Inventory Sectors

The AB 32 GHG Inventory Sector Reference scenario is the forecasted statewide GHG emissions through mid-century, with existing policies and programs but without any further action to reduce GHGs beyond those needed to achieve the 2030 limit. The Reference Scenario was developed based on other projections of business-as-usual conditions. Sources of data and policies included are:

- California Energy Demand Forecast[129]
- The two transportation carbon neutrality studies required by AB 74[130]
- The Mobile Source Strategy[131]
- SB 100 60 percent Renewables Portfolio Standard
- A Low Carbon Fuel Standard carbon intensity reduction target of 20 percent

Policies that are under study or design, such the Advanced Clean Fleets regulation, are not included. The Reference Scenario reflects current trends and expected performance of policies identified in the 2017 Scoping Plan—some of which are performing better (such as the RPS and LCFS) and others that may not meet expectations (such as vehicle miles traveled [VMT] reductions and methane capture). Figure 2-1 provides the modeling results for a Reference Scenario for the AB 32 GHG Inventory sectors compared to the Scoping Plan Scenario.

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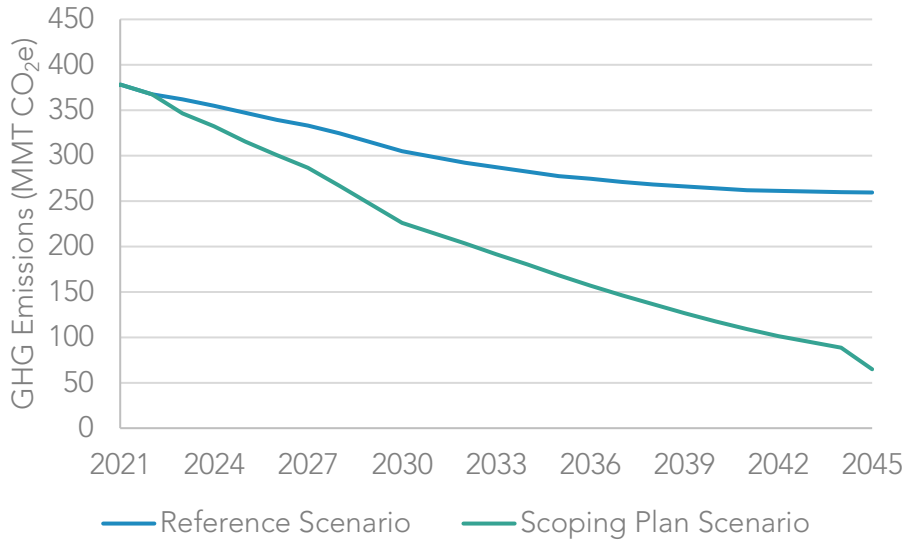
[129] California Energy Commission (CEC). 2020. *2019 Integrated Energy Policy Report.* https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report.

[130] Brown et al. 2021. *Driving California's Transportation Emissions.* https://escholarship.org/uc/item/3np3p2t0 and Deschenes et al. 2021. *Enhancing equity.* https://zenodo.org/record/4707966#.Yl72RNrMKUn.

[131] CARB. 2021. 2020 *Mobile Source Strategy.* https://ww2.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf.

Figure 2-1: Reference and Scoping Plan Scenario GHG emissions[132]



The Scoping Plan Scenario is summarized in Table 2-1. The table shows the types of technologies and energy needed to drastically reduce GHG emissions from the AB 32 Inventory sectors. It also includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Each action is expected to both reduce GHGs and help improve air quality, primarily by transitioning away from combustion of fossil fuels. The Scoping Plan Scenario achieves the AB 1279 target of 85 percent below 1990 levels by 2045 and identifies a need to accelerate the 2030 target to 48 percent below 1990 levels.

[132] The drop in emissions in 2045 reflects both the need to achieve an 85% reduction below 1990 levels in anthropogenic emissions per AB 1279 and Governor Newsom's request for a 100 MMT CO2e carbon removal and capture target in 2045. This was modeled by extending CCS to electric sector emissions.

Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory sectors

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
GHG Emissions Reductions Relative to the SB 32 Target[133]	40% below 1990 levels by 2030	SB 32: Reduce statewide GHG emissions. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. In response to Board direction and EJ Advisory Committee recommendations
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of LDV sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory 2035 target aligns with the EJ Advisory Committee recommendation.

[133] While the SB 32 GHG emissions reduction target is not an Action that is analyzed independently, it is included in this table for reference.

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report)	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Reduce demand for petroleum aviation fuel and reduce GHGs. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter to CARB Chair Liane Randolph
Ocean-going Vessels (OGV)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Freight and Passenger Rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2030 and 30 $MMTCO_2e$ in 2035 Retail sales load coverage[134] 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources.	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter, Board direction, and EJ Advisory Committee recommendation
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter

[134] SB 100 speaks only to retail sales and state agency procurement of electricity. The *2021 SB 100 Joint Agency Report* reflects the agency authors' understanding that other loads—wholesale or non-retail sales and losses from storage and transmission and distribution lines—are not subject to the law.

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Reduce demand for fossil gas and GHGs, and improve ambient and indoor air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In response to Governor Newsom's July 2022 letter
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	Reduce demand for fossil gas and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Combined Heat and Power	Facilities retire by 2040.	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Reduce demand for petroleum fuel and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane[135] blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	Reduce demand for fossil energy and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory

[135] *Biomethane* is also known as renewable natural gas (RNG).

Sector	Action	Statutes, Executive Orders, Other Direction, Outcome
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	SB 1383: Reduce short-lived climate pollutants.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 1383: Reduce short-lived climate pollutants.

Natural and Working Lands

The Reference Scenario for NWL represents the amount of land management that occurred between 2001 and 2014, and projects the outcomes from maintaining the 2001–2014 levels of land management until 2045. The management and land use practices that occur within the Reference Scenario were derived from empirical data used by staff. For forests, shrublands/chaparral, and grasslands, the Reference Scenario constitutes approximately 250,000 acres of annual statewide treatments. For croplands, the Reference Scenario represents no healthy soil practices because during this period the healthy soil program did not yet exist. For land use change within all land types that consider land use change, historical rates of land conversion from 2001–2014 also were taken from empirical data and modeled into the future for the Reference Scenario.

Table 2-2 summarizes the Scoping Plan Scenario. The table also includes references to relevant statutes and Executive Orders where available.

Table 2-2: Actions for the Scoping Plan Scenario: NWL sectors

Sector	Action	Statutes, Executive Orders, Outcome
Natural and Working Lands	Conserve 30% of the state's NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions. SB 1386: NWL are an important strategy in meeting GHG reduction goals.

Sector	Action	Statutes, Executive Orders, Outcome
Forests and Shrublands	At least 2.3 million acres[136] treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	Restore health and resilience to overstocked forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization. EO B-52-18: CARB to increase the opportunity for using prescribed fire. AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.

[136] The 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045.

Sector	Action	Statutes, Executive Orders, Outcome
Grasslands	At least 2.3 million acres[137] treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.	Help to achieve climate targets, improve air quality, and reduce health costs.
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/ conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	Reduce short-lived climate pollutants. Increase soil water holding capacity. Increase organic farming and reduce pesticide use. SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands. Target increased in response to Governor Newsom's direction to prioritize sustainable land management.

[137] The 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045.

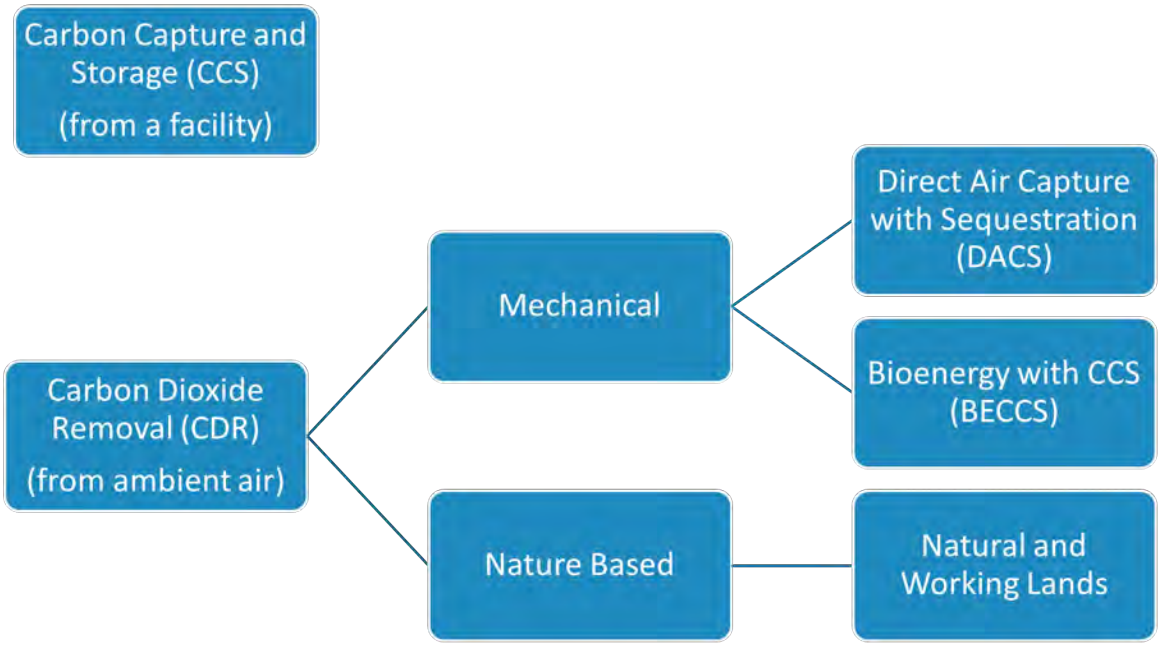
Sector	Action	Statutes, Executive Orders, Outcome
Developed Lands	Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	Increase urban tree canopy and shade cover. Reduce heat island effects and support water infrastructure. Reduce fire risk via defensible space. AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban tree canopy 10% by 2035. Target increased in response to AB 2251 and Governor Newsom's direction on CO_2 removal targets in his July 2022 letter.
Wetlands	Restore 60,000 acres of Delta wetlands.	Increase carbon sequestration and reduce short-lived climate pollutants. Helps to reverse land subsidence while improving flood protection and providing critical habitat.
Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.	Reduce the rate of land conversion to more GHG-intensive land uses.

Strategies for Carbon Removal and Sequestration

To achieve carbon neutrality, any remaining emissions must be compensated for using carbon removal and sequestration tools. The following discussion presents more detail

on the options available to capture and sequester carbon. Carbon removal and sequestration will be an essential tool to achieve carbon neutrality, and the modeling clearly shows there is no path to carbon neutrality without carbon removal and sequestration. Governor Newsom also recognized the importance of CO_2 removal strategies and directed CARB to establish CO_2 removal and carbon capture targets of 20 $MMTCO_2$ and 100 $MMTCO_2$ by 2030 and 2045, respectively, as well as signing 2022 legislation on carbon removal and sequestration, including: AB 1279, SB 905, SB 1137, and AB 1757. Carbon removal and sequestration can take different forms. Figure 2-2 illustrates the types of carbon removal and sequestration included in this Scoping Plan. There are numerous other carbon removal options undergoing research, development, and pilot deployment. As these options mature and new approaches emerge, they can be considered in future Scoping Plan updates.

Figure 2-2: Forms of carbon removal and sequestration considered in this Scoping Plan



The Role of Carbon Capture and Sequestration

Carbon capture and sequestration (CCS) will be a necessary tool to reduce GHG emissions and mitigate climate change while minimizing leakage and minimizing emissions where no technological alternatives may exist. CCS is a process by which large amounts of CO_2 are captured, compressed, transported, and sequestered. CCS projects are paired with a source of emissions, as the CCS project captures CO_2 as it leaves a facility's smokestack. CCS projects are often paired with large GHG-emitting facilities such as energy, manufacturing, or fuel production facilities. The sequestration component

of CCS includes CO_2 injection into geologic formations (such as depleted oil and gas reservoirs and saline formations), as well as use in industrial materials (e.g., concrete). CCS is distinct from biological sequestration, which is typically accomplished through NWL management and conservation practices that enhance the storage of carbon or reduce CO_2 emissions with nature-based approaches. CCS is also distinct from mechanical CO_2 removal technologies, where CO_2 is removed directly from the atmosphere using mechanical and/or chemical processes.

CARB adopted a CCS Protocol in 2018 as part of amendments to the Low Carbon Fuel Standard.[138] At this time, no CCS projects have been implemented or have generated any credits under that protocol. However, CCS projects have been implemented elsewhere since the 1970s, largely on coal-fired power plants, with over two dozen projects operational around the world. Over 100 are at the stages of advanced or early development and are expanding beyond coal-fired plants to fossil gas, fuel production, and electricity generation facilities.[139] CCS projects are in development for addressing emissions from fuel, gas, energy production, and chemical production. As of November 2019, more than half of global large-scale CCS facilities (representing approximately 22 $MMTCO_2$/yr in capacity[140]) were in the U.S., mostly as a result of sustained governmental support for these technologies.[141] This support includes the federal 45Q tax credit for CCS[142,143] and research and deployment grants from federal agencies.[144, 145] California's deep sedimentary rock formations in the Central Valley represent world-class

[138] CARB. 2022. Carbon Capture & Sequestration. *https://ww2.arb.ca.gov/our-work/programs/carbon-capture-sequestration*.
[139] Global CCS Institute. 2021. *Global Status of CCS 2021.* *https://www.globalccsinstitute.com/wp-content/uploads/2021/11/Global-Status-of-CCS-2021-Global-CCS-Institute-1121.pdf*.
[140] IHS Markit. August 2021. Carbon Removal Potential: An Overview. *https://ww2.arb.ca.gov/sites/default/files/2021-08/ihsmarkit_presentation_sp_engineeredcarbonremoval_august2021.pdf*.
[141] Beck, Lee. 2019. *Carbon capture and storage in the USA: The role of US innovation leadership in climate-technology commercialization.* *https://academic.oup.com/ce/article/4/1/2/5686277*.
[142] Congressional Research Service. 2021. Carbon Storage Requirements in the 45Q Tax Credit. IF11639. *https://crsreports.congress.gov/product/pdf/IF/IF11639*.
[143] The Inflation Reduction Act of August 2022 expands and enhances the 45 Q tax credit for CCS. Pub.L. No. 117-169 (August 16, 2022).
[144] U.S. Department of Energy. 2020. U.S. Department of Energy Announces $131 Million for CCUS Technologies. *https://www.energy.gov/articles/us-department-energy-announces-131-million-ccus-technologies*.
[145] U.S. Department of Energy. 2021. Funding Opportunity Announcement 2515, Carbon Capture R&D for Natural Gas and Industrial Point Sources, and Front-End Engineering Design Studies for Carbon Capture Systems at Industrial Facilities and Natural Gas Plants. *https://www.energy.gov/fecm/articles/funding-opportunity-announcement-2515-carbon-capture-rd-natural-gas-and-industrial*.

CO_2 storage sites that would meet the highest standards, with storage capacities of at least 17 billion tons of CO_2.[146,147]

In this Scoping Plan, CCS is included to address emissions from limited sectors, including electricity generation, cement production facilities, and refineries, to ensure anthropogenic emissions are reduced by at least 85 percent below 1990 levels in 2045, as directed in AB 1279. While the modeling outputs show CCS not being applied to the electricity sector until 2045, CCS could be implemented earlier on the electricity sector with a similar ramp up over time as that for refineries and cement plants. An earlier application of CCS in the electricity sector would yield additional reductions in years prior to 2045. In addition, CCS can support hydrogen production until such time as there is sufficient renewable power for electrolysis and an abundant water source.

Cement plants have emissions associated with combustion and process-related activities. Combustion emissions account for approximately 40 percent of the total emissions at cement plants. The remaining emissions are related to process-related activities. Due to the high heat content needed to produce cement, there is currently no technically feasible alternative to combustion. SB 596 calls for a 40 percent reduction in GHG intensity in cement emissions from 2019 levels by 2035, and then net zero emissions by 2045. To meet in-state demand, the state relies on cement both produced in state and imported. There are seven cement plants operating in California.[148] To minimize emissions leakage and address emissions from cement plants, the Scoping Plan Scenario includes CCS for cement plants. Additional reductions will need to be pursued and considered as part of implementation of SB 596, which calls for CARB to develop a comprehensive strategy by July 1, 2023, for the state's cement sector to achieve net-zero emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. This effort began in the summer of 2022 and included sector specific workshops.

Even with implementation of EO N-79-20, and despite all of the ambitious efforts in the Scoping Plan Scenario, there will remain some demand for petroleum fuels for legacy vehicles on road applications, and in aviation, rail, and marine applications. Petroleum refineries will need to implement technology to decarbonize their operations and reduce their emissions. This Scoping Plan also assumes CCS at petroleum refineries as one of those potential strategies. Currently, there are seventeen petroleum refineries operating

[146] For comparison purposes, California's emitted 418.2 million metric tons of CO_2e in 2019.
[147] Lawrence Livermore National Laboratory. 2020. *Getting to Neutral: Options for Negative Carbon Emissions in California.* Revision 1. https://www-gs.llnl.gov/content/assets/docs/energy/Getting_to_Neutral.pdf.
[148] CARB. Mandatory GHG Reporting – Reported Emissions. https://ww2.arb.ca.gov/mrr-data

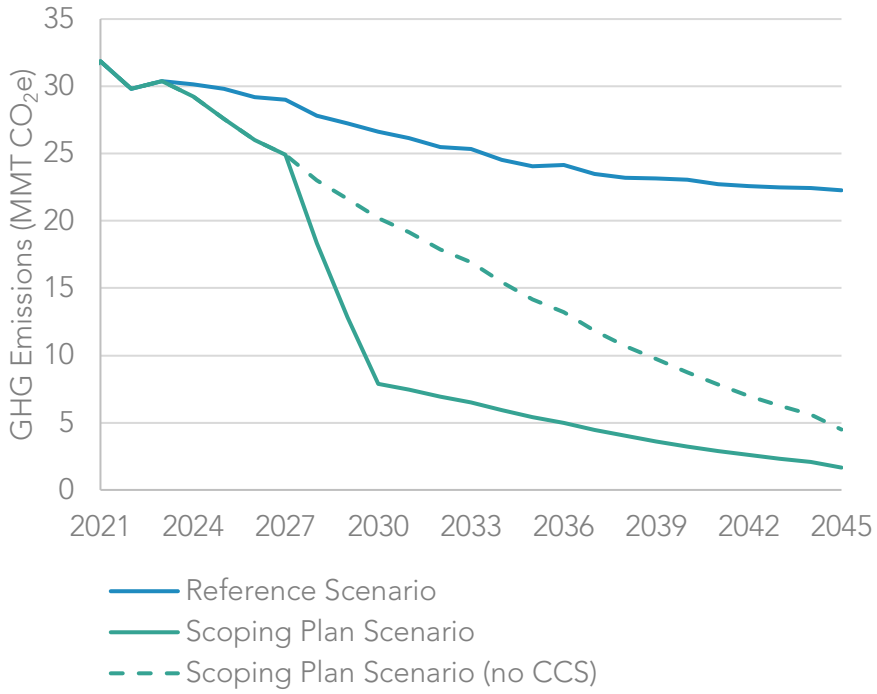
in the state.[149] On the supply side, the modeling assumes all in-state demand is met through some very limited refining activities in California. Figure 2-3 shows the emissions from the refining sector with and without CCS. If CCS is not deployed, the emissions would be directly emitted into the atmosphere, and CO_2 removal by NWL or direct air capture would need to increase to compensate for the sector's emissions.

Refineries can have a variety of point sources that emit CO_2—such as steam methane reformers for producing hydrogen, combined heat and power units, and catalytic crackers—that are best suited for CCS. Each configuration of a refinery can be unique to its footprint, onsite operations, and the types of crude oils processed. There are newer technologies with smaller footprints[150] that can be deployed in modular configurations to capture CO_2 in space-constrained and multiple-point-source facilities such as refineries. CCS can provide a path to reducing GHG emissions from these facilities to meet petroleum demand while avoiding leakage and until such time as some refineries can be transitioned to produce clean energy to support the transition away from fossil fuels.

While the Scoping Plan modeled deployment of CCS on refineries and identifies significant emissions reductions that can be achieved, the refineries in California are large and complex. The actual deployment of CCS at these facilities as modeled in the Scoping Plan is uncertain. It will be important to closely monitor the evolution of CCS deployment in the refinery sector and, in the next Scoping Plan update, to evaluate the progress toward use in this sector to determine whether the projected reductions will be achieved.

[149] CARB. Mandatory GHG Reporting. *https://ww2.arb.ca.gov/mrr-data*.
[150] Carbon Clean. Modular Carbon Capture Systems for Industry. https://www.carbonclean.com/modular-systems?hsLang=en.

Figure 2-3: Petroleum refining emissions with and without carbon capture and sequestration



This Scoping Plan also calls for accelerating the transition from combustion of fossil fuels to hydrogen. Hydrogen can be produced through electrolysis with renewable electricity or through steam methane reformation of biomethane. There is a high degree of uncertainty around the availability of solar to support both electrification of existing sectors and the production of hydrogen through electrolysis. Producing hydrogen required under the Scoping Plan Scenario with electrolysis would require about 10 gigawatts (GW)[151] of additional solar capacity. If steam methane reformation is paired with CCS, the hydrogen produced could potentially be low carbon. Additionally, the biomethane used to generate hydrogen could be sourced from gasification of forest or agricultural waste resulting from forest management and other NWL management practices, which could also lead to net negative carbon outcomes. Steam methane reformation paired with CCS can thus ensure a rapid transition to hydrogen and increase hydrogen availability until such time as

[151] The Draft Scoping Plan included an estimate for solar capacity (40 GW) to support only electrolysis to produce all hydrogen in the Proposed Scenario. The Scoping Plan now includes steam methane reformation of biomethane and biomass gasification with CCS to produce hydrogen, along with electrolysis from off-grid solar. See Appendix H (AB 32 GHG Inventory Sector Modeling) for additional details.

electrolysis with renewables can meet the ongoing need, assuming there is also sufficient water supply. Additional background and next steps for CCS can be found in Chapter 4.

The EJ Advisory Committee has raised multiple concerns related to the inclusion of CCS and mechanical CDR in the Scoping Plan. Concerns range from potential negative health and air quality impacts in communities from operation of facilities utilizing CCS that continue to emit other emissions, to safety concerns related to potential leaks, to the viability of the current technology. Additionally, the EJ Advisory Committee has policy concerns about the strategy and wants to ensure that engineered carbon removal is not used as a substitute for strategies to achieve emissions reductions onsite and that it does not result in delays in phasing out fossil fuel use. Given these and other concerns and the importance of building public awareness, CARB recognizes the need for a multi-stakeholder process including other state, federal, and local agencies; tribes; independent experts; and community residents to further understand and address community concerns related to CCS. CARB hosted a CCS Symposium with U.S. EPA Region 9 and the Stanford Doerr School of Sustainability to discuss some of these critical issues with community members and other participants. As CARB begins the process of implementing SB 905 in 2023, that will provide an opportunity for further engagement.

In the context of CCS deployment, the Council of Environmental Quality (CEQ) also highlighted the need to further assess and quantify potential impacts on local criteria air pollutants and other emissions resulting from carbon capture retrofits at industrial facilities in response to concerns regarding potential cumulative emissions from single and/or multiple sources.[152] An October 2020 Stanford report[153] discussed how the potential post-combustion capture for CO_2 could also reduce emissions of criteria air pollutant emissions from certain facilities. Exploring these potential outcomes will be important to ensure deployment of CCS does not exacerbate air pollution impacts in communities and maximizes any air pollution benefits. The need for these types of evaluations is also included in SB 905.

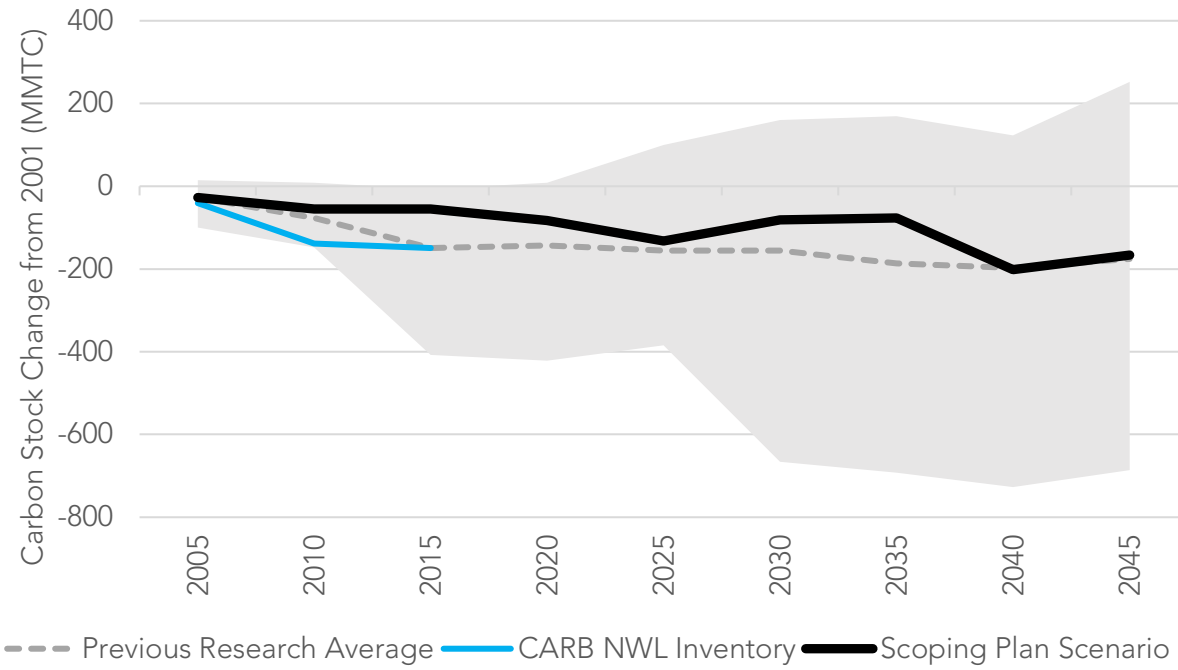
The Role of Natural and Working Lands Emissions and Sequestration

California's NWL assessments highlight the importance of increasing the pace and scale of NWL actions to ensure that our ecosystems are better equipped to withstand future climate change so they continue to provide the benefits that nature and society depend

[152] Carbon Capture, Utilization, and Sequestration Guidance. 87 Fed. Reg. 8808 (Feb. 16, 2022), *2022-03205.pdf (govinfo.gov)*.
[153] Stanford Center for Carbon Storage. 2020. *An Action Plan for Carbon Capture and Storage in California: Opportunities, Challenges, and Solutions.* October. *https://sccs.stanford.edu/ccs-in-ca/full-report-form?msclkid=6f9177f6c57811ecbebc473e75203b21*.

upon for survival. As climate change increases the likelihood of extreme wildfires, drought, heat, and other impacts, carbon stocks in California's NWL will face increased risks and impacts. We know from previous climate change and Scoping Plan work[154] that lands can be a net source of GHG emissions or a net sink, and that the magnitude of carbon stock changes and GHG emissions and sequestration from NWL are dependent on the effects of climate change and land management. The expanded modeling conducted for this Scoping Plan shows that NWL are projected to be a net source of emissions through 2045 and indicates a probable decrease of carbon stocks into the future. This projection is further corroborated by previous, independent research that has reached the same conclusion, showing a range of varying levels of carbon stock loss. Figure 2-4 shows the modeling results of the Scoping Plan Scenario overlaid with the NWL inventory and findings from independent research.

Figure 2-4: Comparison of the Scoping Plan Scenario (NWL) with existing research



The modeling indicates that immediate and aggressive climate action can reduce the environmental impacts that would occur in the absence of this action. The results of the modeling demonstrate that regular NWL management over the next two decades can

[154] CARB. 2019. January 2019. *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan*. https://ww2.arb.ca.gov/sites/default/files/2020-10/draft-nwl-ip-040419.pdf.

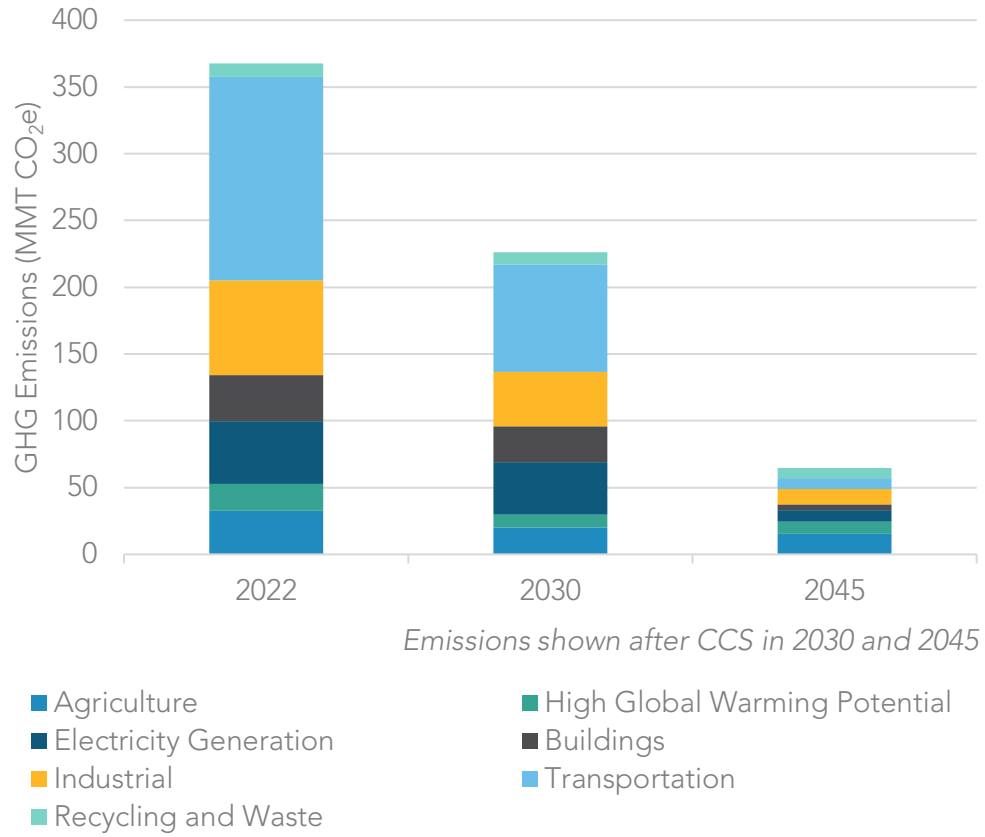
increase carbon stocks from the Reference Scenario trajectory, reduce GHG emissions from lands, and improve ecosystem and public health. This effort is the most comprehensive scientific effort taken by any government to include NWL within its overall climate strategy. Even so, we know that uncertainty exists about future climate and economic forces and the impacts they may have on our ecosystems, so it is important that the state take decisive and aggressive action to improve and diversify ecosystem structures and management.

The effects of climate change, including increased drought, wildfire, and extreme heat, play a significant role in determining the future of California's carbon stocks. And while management actions will help to reduce the impact that climate change will have on California, it is clear from the analysis that NWL sinks and sources are highly variable from year to year, and short time frames do not adequately demonstrate the impact that climate and management are having on ecosystems. For the purposes of climate planning, therefore, it is best to focus on carbon stock changes over longer periods rather than focusing on sequestration or emissions on shorter time frames. The Scoping Plan Scenario is estimated to result in additional NWL emissions of 7 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) annually from 2025–2045. The Reference Scenario is estimated to result in annual emissions of 9 $MMTCO_2e$ over the same time period, and so the Scoping Plan Scenario slows the rate of emissions and provides an approximate 2 $MMTCO_2e$ in additional annual sequestration relative to the Reference Scenario. Because NWL are projected to be a net emissions source, the annual NWL emissions of approximately 7 $MMTCO_2e$ from the Scoping Plan Scenario will need to be compensated by additional CO_2 removal approaches to ensure California can achieve carbon neutrality by 2045.

The Role for Carbon Dioxide Removal (Direct Air Capture)

Even if anthropogenic emissions are reduced to at least 85 percent below 1990 levels by 2045 as called for by AB 1279, there will still be residual emissions in the AB 32 GHG Inventory sectors in 2045 that must be addressed in order to achieve the California's carbon neutrality target. Figure 2-5 includes the emissions by sector for the AB 32 GHG Inventory Sectors in 2022, 2030, and 2045 for the Scoping Plan Scenario.

Figure 2-5: Residual emissions in 2022, 2030, and 2045 for the Scoping Plan Scenario[155]



To achieve carbon neutrality, mechanical CDR will therefore need to be deployed. Because NWL management is not estimated to be a significant carbon removal path in the near term, additional CDR options will be needed. *Mechanical CDR* refers to a range of technologies that capture and concentrate ambient CO_2. Direct air capture (DAC) is one available option that is under development today and could be widely deployed. Note that, unlike CCS, DAC technologies are not designed to be attached to a specific source or smokestack. These technologies include chemical scrubbing processes that capture CO_2 through absorption or adsorption separation processes. Another carbon removal

[155] The High GWP sector includes high global warming potential gas emissions from releases of ozone depleting substance (ODS) substitutes, SF_6 emissions from the electricity transmission and distribution system, and gases that are emitted in the semiconductor manufacturing process. ODS substitutes, which are primarily hydrofluorocarbons (HFCs), are used in refrigeration and air conditioning equipment, solvent cleaning, foam production, fire retardants, and aerosols.

option that involves rapid mineralization of CO_2 at the Earth's surface is called *mineral carbonation.*[156] As is the case with CCS, mechanical CDR technologies will need governmental or other incentive support to overcome technology and market barriers. In the United States, the U.S. Department of Energy announced financing specifically for DAC in March 2020[157] and March 2021.[158] Additionally, almost $9 billion in CCS support was included in the $ 1 trillion Infrastructure Investment and Jobs Act of 2021.[159] This includes funding to establish four DAC hubs. The Inflation Reduction Act of 2022[160] increases the value of the 45Q tax credit to USD 85 per metric ton of CO_2 captured and stored in geologic formations from some industrial applications and USD 180 per metric ton for DAC with storage in geologic formations. In 2021, there were approximately 19 DAC facilities globally.[161]

Ultimately, the role for mechanical CDR will depend on the success of reducing emissions directly at the source in the AB 32 GHG Inventory sectors and the ability of the NWL to sequester carbon. However, mechanical CDR also provides an opportunity to not just achieve carbon neutrality, but also remove legacy GHG emissions from the atmosphere. As such, increased deployment of DAC can help achieve net negative emissions. This would further help avoid the most damaging impacts of climate change. While the federal incentives for DAC provide some support for this technology, the only California program that recognizes this technology is the LCFS program. Permitting must also happen across different levels of government and across multiple state agencies. Energy availability must also be addressed if DAC is to be implemented in remote areas. Additional information and next steps on DAC can be found in Chapter 4.

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[156] The National Academies Press. 2018. Direct Air Capture and Mineral Carbonation Approaches for Carbon Dioxide Removal and Reliable Sequestration: Proceedings of a Workshop–in Brief. *https://nap.nationalacademies.org/catalog/25132/direct-air-capture-and-mineral-carbonation-approaches-for-carbon-dioxide-removal-and-reliable-sequestration#:~:text=National%20Academies%20of%20Sciences%2C%20Engineering%2C%20and%20Medicine%3B%20Division,concentrate%20carbon%20dioxide%20%28CO%202%29%20from%20ambient%20air*.

[157] U.S. Department of Energy. 2020. Department of Energy to Provide $22 Million for Research on Capturing Carbon Dioxide from Air*. https://www.energy.gov/articles/department-energy-provide-22-million-research-capturing-carbon-dioxide-air*.

[158] U.S. Department of Energy. 2021. DOE Invests $24 Million to Advance Transformational Air Pollution Capture. *https://www.energy.gov/articles/doe-invests-24-million-advance-transformational-air-pollution-capture*.

[159] Pub.L. No. 117-58 (November 15, 2021). *https://www.congress.gov/bill/117th-congress/house-bill/3684/text*.

[160] Pub.L. No. 117-169 (August 16, 2022). *https://www.congress.gov/bill/117th-congress/house-bill/5376/text*.

[161] International Energy Agency (IEA). 2022. Direct Air Capture – Analysis. *https://www.iea.org/reports/direct-air-capture*.

Carbon Dioxide Removal and Capture Targets for 2030 and 2045

Recognizing the importance of CO_2 removal, Governor Newsom and the Legislature identified the need for targets to send policy and regulatory signals to pilot, deploy, and scale action for those efforts. Governor Newsom requested that CARB set a CO_2 removal and capture target of 20 MMT for 2030 and 100 MMT for 2045, first prioritizing sequestration in NWL. And while this Scoping Plan prioritizes and recommends significant increased climate-smart action on all NWL to support carbon neutrality and healthy and resilient lands, the modeling indicates that, across all NWL, lands will be a net source of emissions when accounting for both carbon sequestration and GHG (CO_2, CH_4, and N_2O) emissions from lands.

Some landscapes, however, are projected to have a net increase in carbon stocks under the Scoping Plan Scenario between 2025 and 2045 relative to the reference case, indicating that NWL actions can help California achieve Governor Newsom's CO_2 removal targets. Carbon stocks in urban forests and grasslands are projected to increase relative to historical levels from implementation of the 2022 Scoping Plan. To support the governor's CO_2 removal targets, CARB estimates that lands would contribute an average of 1.5 MMT of CO_2 removals each year between 2025 and 2045. Any carbon sequestration contributions from lands need to reflect both long-term storage and an overall net increase in carbon stocks over time to ensure these NWL actions are contributing toward California's achievement and maintenance of carbon neutrality over time.

CARB will work to update and revise these estimates as part of implementation of AB 1757, which was signed by the governor in September 2022 and requires that CARB and the California Natural Resources Agency (CNRA) work with an expert advisory committee to determine an ambitious range of carbon sequestration targets by January 1, 2024, for the years 2030, 2038, and 2045.

For the AB 32 GHG Inventory sectors, the Scoping Plan Scenario modeling indicates that the scenario would meet or exceed the 2030 SB 32 target through GHG reduction policies without the need for CDR. CDR will, however, be necessary to increase ambition for an accelerated 2030 target and in increasing amounts over the following decades to achieve carbon neutrality by 2045.[162] Given the likelihood of NWL to be a net source of emissions, and the need for CDR to compensate for residual emissions to achieve carbon neutrality

[162] The modeled scenarios assume that residual emissions will be compensated using DAC technologies by including the direct cost in terms of dollars per ton CO_2 removed. The energy source for DAC is not modeled, but renewable electricity and/or hydrogen produced from electrolysis are zero carbon options consistent with the carbon neutrality targets in this Scoping Plan.

by 2045, California will need increasing deployment of mechanical CDR over the coming decades. In the immediate future, scaling nature-based CDR approaches also can help to provide some CO_2 removal quickly while mechanical CDR is scaled up between now and 2045. Table 2-3 provides estimates of CO_2 removal and capture needed in 2030[163] and 2045.

[163] As identified in Chapter 1, SB 27 (Skinner, Chapter 237, Statues of 2021) directed CARB to "establish carbon dioxide removal targets for 2030 and beyond" as part of this Scoping Plan. CARB is establishing these targets to satisfy both the requirements of SB 27 and the directive from Governor Newsom to establish CO_2 removal targets for 2030 and 2045.

Table 2-3: GHG emissions and removals needed to achieve carbon neutrality and meet the 20 $MMTCO_2$ removal and capture target in 2030 and the 100 $MMTCO_2$ removal and capture target in 2045.[164]

	2030 ($MMTCO_2e$)	2045 ($MMTCO_2e$)
GHG Emissions	233	72
AB 32 GHG Inventory Sector Emissions	226	65
Net NWL GHG Emissions Across All Landscapes (annual average from 2025–2045)	7	7
Carbon Capture and Sequestration (CCS): Avoided GHG Emissions from Industry and Electric Sectors	(13)	(25)
Carbon Dioxide Removal (CDR) including natural and working lands carbon sequestration,[165] Direct Air Capture, and Bioenergy with CCS (BECCS).	(7)	(75)
Net Emissions (GHG Emissions + CDR)	226	(3)

In 2030, the CO_2 removal and capture target is 20 MMT, but because the SB 32 target only encompasses the AB 32 GHG Inventory sectors, only CCS that reduces GHG emissions on AB 32 sources count toward achieving more ambitious GHG emission reductions in 2030. In 2045, the CO_2 removal and capture must compensate for any residual emissions from the AB 32 Inventory sectors and NWL emissions to support achieving carbon neutrality while also totaling at least 100 MMT. It is important to note that NWL, particularly forests, need a natural wildfire cycle to remain healthy. While the modeling projected wildfires, and implementing the Scoping Plan will result in a reduction in future wildfire emissions, getting to zero wildfires in the sector is not the goal, nor the

[164] Modeled estimates from the Scoping Plan Scenario indicate the relative quantity of emissions and removals to achieve carbon neutrality and meet carbon removal and capture targets. These estimates are not intended to imply precision, as the required policies are yet to be implemented and all models have some uncertainty in their forecasts.

[165] For the purposes of quantifying how to achieve the governor's 20 MMT and 100 MMT CO_2 removal and capture target, CARB included 1.5 $MMTCO_2e$ sequestration from NWL, which is the sequestration from urban forests. This is included as CO_2 removal because it is this sequestration that CARB can consider as having some permanence. Permanence is necessary for incorporating NWL into carbon neutrality. The net NWL emissions of 7 $MMTCO_2e$, identified in the second row of Table 2-3, includes *all* emissions and sinks from all NWL landscapes, which is inclusive of the 1.5 $MMTCO_2e$ sequestration. CARB will develop an accounting framework to accommodate NWL carbon stocks.

right approach to a sustainable forestry sector. In contrast in 2045, the reductions from programs and policies are estimated to reduce emissions by 169 $MMTCO_2e$ from business as usual.

The 2030 target for engineered CDR also provides a near term milestone for California and can serve as an important marker for progress in deploying CDR to support California's carbon neutrality goal. Preliminary estimates indicate that, globally, capacity from already announced projects will range from about 2 million metric tons per year ($MMTCO_2/y$) to 8 $MMTCO_2/y$ from bioenergy paired with CCS, and from about 2,000 metric tons per year ($MTCO_2/y$) to 1 $MMTCO_2/y$ from DACs by 2027,[166] which indicates that California's 2030 target is an ambitious, but achievable, goal.

Scenario Uncertainty

Greenhouse Gas Emissions Modeling

Several types of uncertainty are important to understand in both forecasting future emissions and estimating the benefits of emission reduction actions. In developing this Scoping Plan we forecasted a reference scenario and estimated the GHG emissions outcome of the AB 32 GHG Inventory sectors using the PATHWAYS[167] model. Inherent in the reference scenario modeling is the expectation that many of the existing programs will continue in their current form, and that the expected drivers for GHG emissions, such as energy demand, population growth, and economic growth, will match our current projections.

However, there is also the expectation that each of the policies included and implemented to achieve the 2030 target in the 2017 Scoping Plan will deliver their exact outcomes. It is unlikely the future will precisely match our projections, and this will lead to uncertainty in the forecast. For example, we never could have foreseen and forecasted economic and emissions impacts related to the extended disruptions from the COVID-19 pandemic. Thus, the single "reference" or "forecast" line should be understood to represent one possible future in a range of possible predictions. For this Scoping Plan, PATHWAYS utilized inputs that reflect technically feasible levels of deployment or adoption of low- or zero-carbon fuels and technologies. Each of the input assumptions provided to PATHWAYS has some uncertainty, which also contributes to uncertainty in the resulting reference scenario.

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[166] IHS Markit. August 2021. Carbon Removal Potential. *https://ww2.arb.ca.gov/sites/default/files/2021-08/ihsmarkit_presentation_sp_engineeredcarbonremoval_august2021.pdf*.
[167] See Appendix H (AB 32 GHG Inventory Sector Modeling).

Similarly, for the NWL modeling, CARB used a mix of individual modeling tools[168] to estimate the carbon and other ecological, public health, and economic outcomes. The Reference scenario assumes that the level of land management actions that occurred between 2001 and 2014 for forests, shrublands, grasslands, croplands, developed lands, wetlands, and sparsely vegetated lands continues into the future. Alternative scenarios assessed the effect of increasing levels of management actions from the reference scenario beginning in 2025. There is a great deal of uncertainty about exactly how lands are currently managed, and a larger uncertainty about how they may be managed in the future. For NWL, it is unlikely that the future will precisely match the carbon stock outcomes CARB has projected, particularly given the uncertainties around current and future land management and the effects climate change will have on our lands. For any modeling exercise these uncertainties exist; however, this modeling effort brings together the best available science, data, and models to quantify the impact our actions may have on the landscape under an unknown future.

Implementation

As this Scoping Plan is designed to chart a path to achieving carbon neutrality, additional work will be required to fully design and implement any policies and actions identified in this plan. During the subsequent development of policies, the Legislature, CARB, and other state agencies will learn more about the technologies and their costs, as well as how each industry works, as a more comprehensive evaluation is conducted in coordination with stakeholders, including community engagement. Significant areas of uncertainty include permitting wait times[169] and local ordinances that might limit or slow the build-out of utility scale renewables.[170,171] In another example, times to reach commercial operations for solar projects after securing an interconnection agreement also have increased in recent years, to 3.5 to 5.5 years.[172]

The level of natural and working lands climate action identified in this Scoping Plan is ambitious. Achieving the level of action needed to result in the quantified carbon,

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[168] See Appendix I (Natural and Working Lands Technical Support Document).
[169] CEC. 2021. *SB 100 Joint Agency Report.* https://www.energy.ca.gov/sb100#anchor_report.
[170] Roth, Sammy. 2019. "California's San Bernardino County slams the brakes on big solar projects." *Los Angeles Times.* https://www.latimes.com/business/la-fi-san-bernardino-solar-renewable-energy-20190228-story.html?fbclid=IwAR2qHGq3bahHme6SFErLsnyFi9UPIfBHIhvnOh3dU3OM7kUTMcEqYfN3pQA.
[171] Chediak, Mark. 2021. "California NIMBYs Threaten Biden's Clean Energy Goals." *BNN Bloomberg.* https://www.bnnbloomberg.ca/california-nimbys-threaten-biden-s-clean-energy-goals-1.1634351?msclkid=668c9ae9c11311ec92e34035ea157ad4.
[172] Rand, Joseph, et al. 2022. Queued Up: Characteristics of Power Plants Seeking Transmission Interconnection as of the End of 2021. Power Point Presentation. Lawrence Berkeley National Laboratory. https://emp.lbl.gov/sites/default/files/queued_up_2021_04-13-2022.pdf.

emissions, health, and economic outcomes within this Scoping Plan requires coordination, investment, and partnerships across all levels of government and sectors of the economy. It is possible that not all of the actions at the identified level will begin in 2025. This uncertainty will result in diminished levels of beneficial outcomes quantified in the Scoping Plan Scenario. The levels of NWL action identified in this Scoping Plan represent CARB's assessment of the pace and scale of action needed to achieve the carbon stock targets and CO_2 removal targets identified in this Scoping Plan.

The Scoping Plan Scenario identifies that 2.3 million acres of forests, shrubland, and grassland management annually would achieve substantial levels of fire emissions reductions and the concomitant health and economics benefits. Currently, 1 million acres of forest treatment annually is the joint federal and state government goal (500,000 acres each). This target of one million acres annually by 2025 is for the purposes of increasing forest health and wildfire resilience in the near term, whereas the 2.3 million acre target is what the Scoping Plan modeling shows would be needed to realize the carbon stock target called for in this Scoping Plan by 2045. By identifying 2.3 million acres of climate action annually in forests, shrublands, and grasslands, this Scoping Plan emphasizes the importance of that 1 million acre annual goal as a milestone on the way to even more action and improved fire and air quality outcomes. The modeling indicates that substantial improvements to statewide fire emissions will occur at levels of action greater than 1 million acres per year. If these levels of action do not occur starting in 2025, the Scoping Plan has quantified climate benefits that will still occur, but to a lesser extent. In terms of fire emissions, compared to the Reference Scenario, 2.3 million acres of forest, shrubland and grassland management will result in a 10% reduction in wildfire emissions. At 1 million acres per year, this decreases to a 2.5% reduction. If 1 million acres per year is also not accomplished, then the emissions and health benefits are even lower.

Climate action in other NWL sectors also generates many co-benefits. Climate action identified in this Scoping Plan is aimed at not only fighting climate change but also improving air quality and public health. The climate action identified in the agricultural sector, for example, should result in decreased pesticide and synthetic fertilizer use. This decrease of synthetic chemical use in agriculture across California also should result in improved public health, especially for communities that work and live in and around agricultural lands. However, as with the forestry sector, the benefits of climate action in agricultural lands and in any other land are dependent on how much implementation takes place. Ramping up increased healthy soils practices and increasing organic agriculture in California will require continued and sustained implementation by private industry and public agencies. For example, achieving the carbon stock outcomes for the annual crops called for in this Scoping Plan would require deployment and maintenance of healthy soils practices on 80,000 additional acres of croplands in California every year between 2025 and 2045. For context, CDFA's Healthy Soils Program, which is an incentive program

supporting healthy soils practices, took almost four years of sustained funding to achieve approximately 50,000 acres total under healthy soils practices.[173]

Given the uncertainty around the modeling assumptions, and performance uncertainty as specific policies are fully designed and implemented, estimates associated with the Scoping Plan Scenario are certain to be different than what is ultimately implemented. One way to mitigate for this is to develop policies that can adapt and increase certainty in GHG emissions reductions. Periodic reviews of progress toward achieving the 2030 target and longer term deeper decarbonization, as well as performance of specific policies, also provide opportunities for the state to consider any changes to ensure we remain on course to achieve the 2030 target and carbon neutrality. The need for this periodic review process was anticipated in AB 32, as it calls for updates to the Scoping Plan at least once every five years. For this Scoping Plan, the metrics provided on the rate of deployment of clean fuels and technologies, along with the annual AB 32 GHG Inventory, provide additional information that can be used to assess progress on sectors and aggregate emissions. This is also true of CARB's NWL carbon inventory. An uncertainty analysis for achieving an accelerated 2030 target is provided toward the end of this chapter.

Targeted Evaluations for the Scoping Plan: Oil and Gas Extraction and Refining

To achieve California's air quality and climate goals, we must end our dependence on petroleum. This will not happen overnight. There are about 28 million combustion engine heavy- and light-duty trucks and passenger vehicles in California, and these are almost always replaced at their end of life. The ZEV Executive Order (EO N-79-20) calls for 100 percent new ZEV car sales beginning in 2035 and a 100 percent ZEV medium- and heavy-duty fleet sales by 2045 where feasible. The result is an ongoing, albeit shrinking, pool of vehicles that will continue to require petroleum fuels. To avoid leakage, as called for in AB 32, and to meet that remaining demand for petroleum fuel, a complete phaseout of oil and gas extraction and refining is not possible by 2045. This Scoping Plan assumes a phasedown in both oil and gas extraction as well as petroleum refining in line with the reduction in demand for in-state on-road petroleum fuel demand. Since the transportation sector is the largest source of GHG emissions and harmful local air pollution, we must continue to research and invest in efforts to deploy zero emissions technologies and clean fuels, and to reduce VMT. An assessment of ongoing progress and efforts to reduce

[173] California Department of Food and Agriculture. 2021. *Incentives Program 2017–2020 Summary by the Numbers.* https://www.cdfa.ca.gov/oefi/healthysoils/docs/HSP_Incentives_program_level_data_funded_projects.pdf.

demand for petroleum fuels and of opportunities to phase down oil and gas extraction and refining will be included in the next Scoping Plan update.

In addition to supplying in-state demand, California is a net exporter of gasoline, diesel, and jet fuel. California pipelines supply the Nevada and Arizona regions[174] with approximately 87 million barrels gasoline equivalent of refined products annually.[175] California pipelines deliver approximately 85% of Nevada's and 40% of Arizona's refined product. Most finished fuels flowing from California to Nevada and Arizona are currently produced by California refineries. To manage the phasedown of oil and gas extraction and petroleum refining in California, exports of finished fuels must be considered and factored into that process, in addition to the declining in-state demand. The authorities and considerations related to supply and demand of petroleum fuels span federal, state, and local agencies. If supply of fossil fuels is to decline along with demand, a multi-agency discussion is needed to systematically evaluate and plan for the transition to ensure that it is equitable.

This inter-agency work should also consider related topics, such as the following:

- Direct and indirect job and economic impacts
- Demand for other liquid fuel types such as renewable fuels, and expected volumes
- Legal considerations
- Public health benefits
- Demand and supply strategies for petroleum fuels, including how to avoid short term supply constraints that may impact low-income consumers

Some of these topics were also discussed as part of two studies[176] supported by the California Environmental Protection Agency, which can serve as a starting point for a working group to analyze these questions and develop policy recommendations.

Oil and Gas Extraction

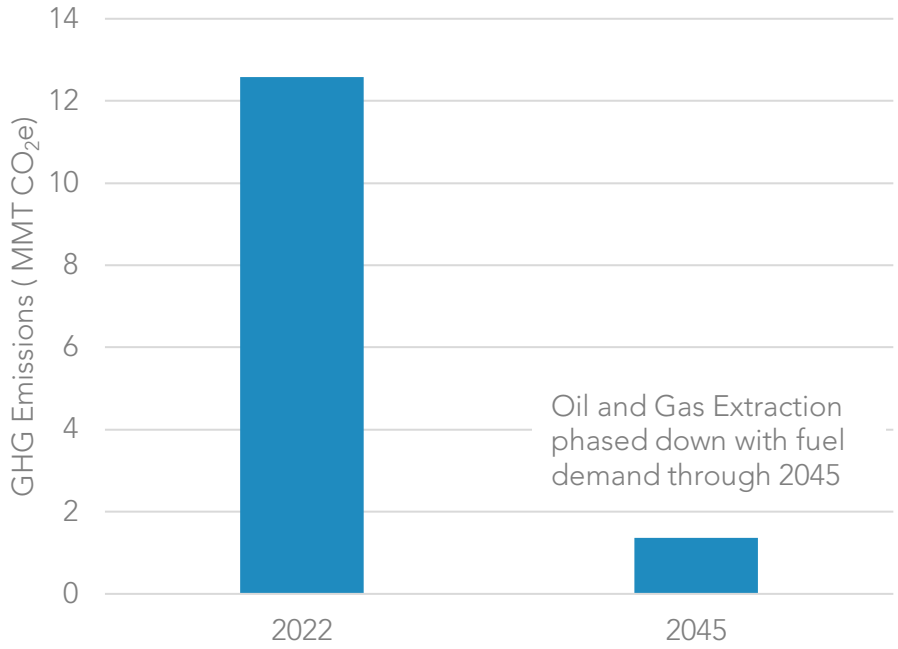
On April 23, 2021,[177] Governor Newsom directed CARB to evaluate the phaseout of oil and gas extraction no later than 2045 as part of this Scoping Plan. As noted above, this Scoping Plan still has some California demand for finished fossil fuels (gasoline, diesel,

[174] CEC. August 2021. A Primer on California's Pipeline Infrastructure. *Petroleum Watch.* https://www.energy.ca.gov/sites/default/files/2021-08/August_Petroleum_Watch_ADA.pdf.
[175] CEC. March 2020. *Petroleum Watch.* https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.
[176] CalEPA. 2021. Carbon Neutrality Studies: https://calepa.ca.gov/climate/carbon-neutrality-studies/.
[177] Governor Newsom. April 23, 2021. Governor Newsom Takes Action to Phase Out Oil Extraction in California. Press Release. https://www.gov.ca.gov/2021/04/23/governor-newsom-takes-action-to-phase-out-oil-extraction-in-california/.

and jet fuel) in 2045. This demand is primarily for transportation, including for sectors that are directly regulated by the state and some that are subject to federal jurisdiction, such as interstate locomotives, marine, and aviation. As discussed more fully below, while significant GHG reductions from oil and gas extraction could be achieved as demand for fossil fuels is reduced due to strategies in this Scoping Plan, it is not feasible to phase out oil and gas production fully by 2045 given this remaining demand.

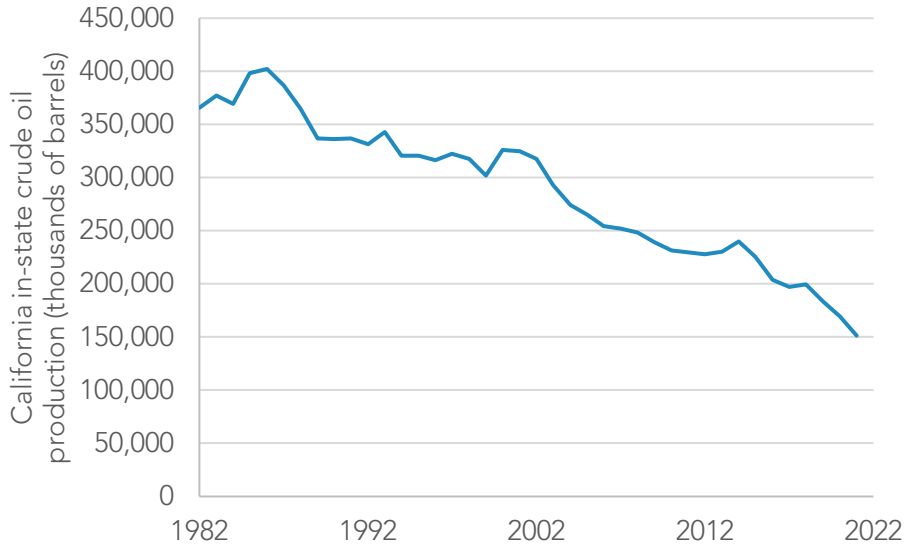
In the Scoping Plan Scenario, with successful deployment of zero carbon fuels and non-combustion technology to phase down petroleum demand, GHG emissions from oil and gas extraction could be reduced by approximately 89 percent in 2045 from 2022 levels if extraction decreases in line with in-state finished fuel demand. If in-state extraction were to be phased out fully, the future petroleum demand by in-state refineries would be met through increased crude imports to the state relative to the Scoping Plan Scenario. AB 32 defines leakage as, “a reduction in emissions in greenhouse gases within the state that is offset by an increase in emissions of greenhouse gases outside the state.” AB 32 also requires any actions undertaken to reduce GHGs to “minimize leakage.” Increases in imported crude could result in increased activity outside California to extract and transport crude into California. Therefore, our analysis indicates that a full phaseout of in-state extraction could result in GHG emissions leakage and in-state impacts to crude oil imported into the state. Figure 2-6 compares the 2022 emissions from this sector with the modeled results when the sector is phased down with in-state petroleum demand.

Figure 2-6: Oil and gas extraction sector GHG emissions in 2022 and 2045 when activity is phased down with in-state fuel demand



According to California Energy Commission (CEC) data used in Figure 2-7, the total oil extracted in California peaked at 402 million barrels in 1986. Since then, California crude oil production has decreased by an average of 6 million barrels per year, to about 200 million barrels in 2020. This steadily decreasing production of crude in California is expected to continue as the state's oil fields deplete.

Figure 2-7: California in-state crude oil production[178]



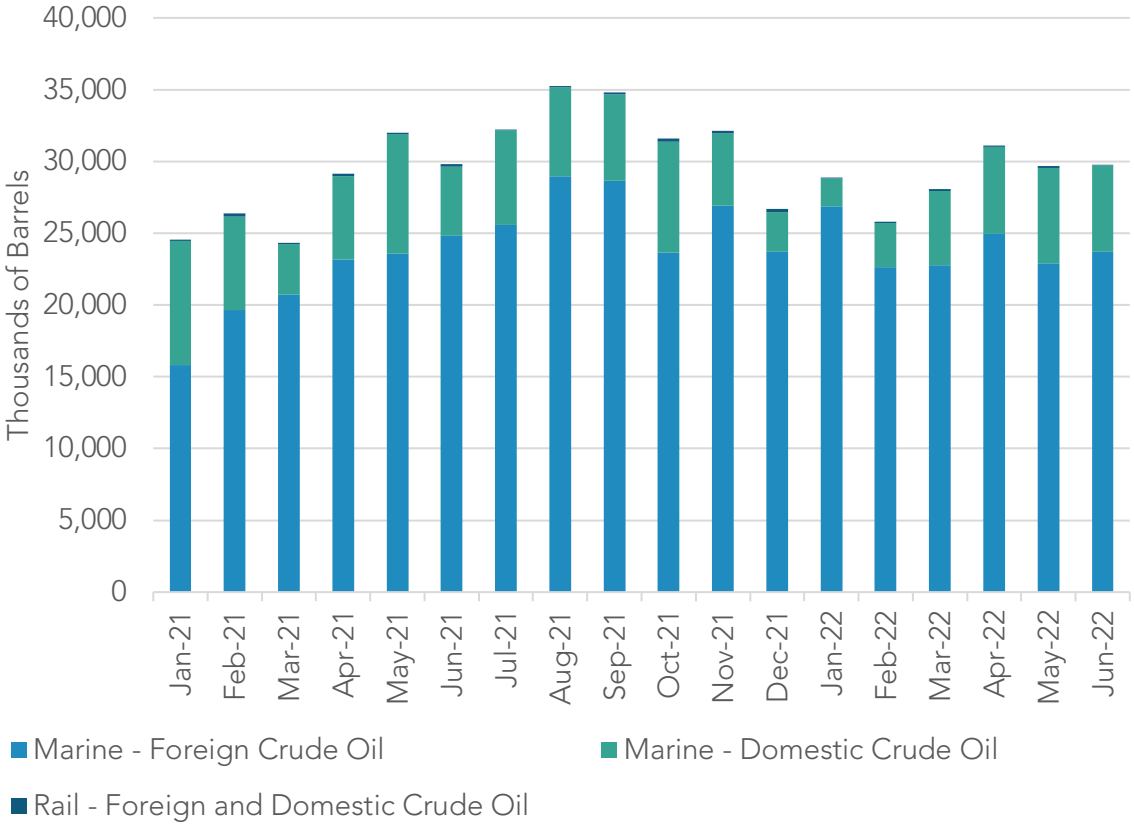
A UC Santa Barbara report estimated that, under business-as-usual conditions, California oil field production would decrease to 97 million barrels in 2045.[179] The business-as-usual model assumed no additional regulations limiting oil extraction in California.

Any crude oil demand by California refineries not met by California crude oil will be met by marine imports of Alaskan and foreign crude.[180] As shown in Figure 2-8, approximately 99 percent of crude imports into California are delivered by marine transportation. The

[178] CEC. No date. Oil Supply Sources to California Refineries. Accessed April 21, 2022. https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries.
[179] University of California, Santa Barbara. 2021. Enhancing Equity While Eliminating Emissions in California's Supply of Transportation Fuels.
[180] CEC. 2020. *Petroleum Watch: How Petroleum Products Move.* March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf, and CEC. 2020. *Petroleum Watch: What Types of Crude Oil Do California Refineries Process?* February. https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf.

remaining imports occur by rail.[181] There are no pipelines that bring crude oil into California from out of state.[182]

Figure 2-8: Crude oil imports by transportation type[183]



Crude oil delivered by marine tankers is delivered to onshore storage tanks and subsequently to refineries via pipeline. Most crude oil produced in California is delivered to California refineries by pipeline. Using historical trends, any increases in imported crude above historic levels would result in increased deliveries through the marine ports. This increased activity could require more infrastructure to store and move larger volumes of crude to the refineries in state.

[181] CEC. June 2021. Crude Oil Imports by Transportation Type. Accessed March 16, 2022. https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/crude-oil-imports-source.
[182] CEC. 2020. *Petroleum Watch: How Petroleum Products Move.* March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.
[183] CEC. June 2021. Crude Oil Imports. https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/crude-oil-imports-source.

California refineries import a variety of crude oils to meet refinery needs. California petroleum refineries are generally designed to process relatively heavy crude relative to other U.S. refineries. In 2018, crude inputs to California refineries had an average American Petroleum Institute (API) gravity of 26.18 and an average sulfur content of 1.64 percent. Processing significantly lighter or heavier crude blends would require significant changes to a refinery.[184] Most crude imported from Alaska and the Middle East is relatively light (API gravity > 30) compared to California crude (API gravity < 20).[185] If California crude production is insufficient to meet the demand at California refineries, then California refineries will need access to a similarly heavy source of crude so that the average API gravity of crude remains within their established operating window. South American crude oil imports into California are the heaviest relative to other regions, and therefore they may be the most likely to replace decreased California crude oil supply.[186]

In summary, the modeling indicates that demand for petroleum will persist due to legacy fleets that will not be replaced until end of life. The modeling also shows what the GHG emissions reductions would be if oil and gas extraction activities were phased down in line with the reduction of in-state petroleum demand. Trend data shows that oil and gas extraction already has been on the decline and will continue to decline. It is possible to anticipate the likely regions and types of crude that would be imported to meet in-state petroleum demand if in-state extraction was fully phased out by 2045. Importantly, activity at the ports would increase, and new infrastructure would be needed to store and deliver crude to in-state refineries. And while GHG emissions from this sector would go to zero in our AB 32 GHG Inventory with a full phaseout, emissions related to the production and transport of crude to California might increase elsewhere, resulting in emissions leakage.

As the state continues to reduce demand for petroleum, efforts to protect public health for communities located near oil and gas extraction sites must also continue. In October 2021, Governor Newsom directed action to prevent new oil drilling near communities and

[184] CEC. 2020. *Petroleum Watch: What Types of Crude?* February. *https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf*.
[185] CEC. 2020. *Petroleum Watch: What Types of Crude?* February. *https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf*.
[186] CEC. 2020. *Petroleum Watch: What Types of Crude?* February. *https://www.energy.ca.gov/sites/default/files/2020-02/2020-02_Petroleum_Watch_ADA_0.pdf*.

expand health protections.[187,188] In 2022, the Legislature passed, and the governor signed, SB 1137 to protect communities from existing and any new oil and gas extraction activities through 3,200 foot setbacks.

Petroleum Refining

In the Scoping Plan Scenario CARB modeled a phasedown of refining activity in line with petroleum demand. Meeting petroleum demand means sufficient availability of finished fuel (gasoline, diesel, and jet fuel). Crude is processed at in-state refineries to produce finished fuel. In response to stakeholder requests,[189] this evaluation focuses on the Scoping Plan Scenario, but with an evaluation of a complete phasedown of refinery operations in state.

The Scoping Plan Scenario results in California petroleum refining emissions of 4.5 $MMTCO_2e$ in 2045; a reduction of approximately 85 percent relative to 2022 levels, which is in line with the decline in in-state finished fuel demand.[190] Emissions from refining can be reduced further through the application of CCS technology, as shown in Figure 2-9. If in-state refining is phased down to zero and the demand for the finished fuels produced by that refining persists, imported finished fuels may be needed to meet the remaining in-state demand.[191] The current data shows unmet demand for liquid petroleum transportation fuels would most likely be met by marine imports. A CEC report notes, "The only way for California to receive large amounts of crude and refined products is by marine."[192]

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[187] Office of Governor Gavin Newsom. 2021. California Moves to Prevent New Oil Drilling Near Communities, Expand Health Protections. https://www.gov.ca.gov/2021/10/21/california-moves-to-prevent-new-oil-drilling-near-communities-expand-health-protections-2/?msclkid=6c0da86bc58e11ecb81cf596d4d8a735.

[188] California Department of Conservation Geologic Energy Management Division. October 2021. Draft Rule for Protection of Communities and Workers from Health and Safety Impacts from Oil and Gas Production Operations. https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx?msclkid=45660232cf2511ecb1c56119097e3b0c.

[189] California Environmental Justice Alliance. October 22, 2021. Comment on 2022 Scoping Plan Update - Scenario Inputs Technical Workshop. https://www.arb.ca.gov/lists/com-attach/68-sp22-inputs-ws-WzhdPlI5AjACW1Qx.pdf.

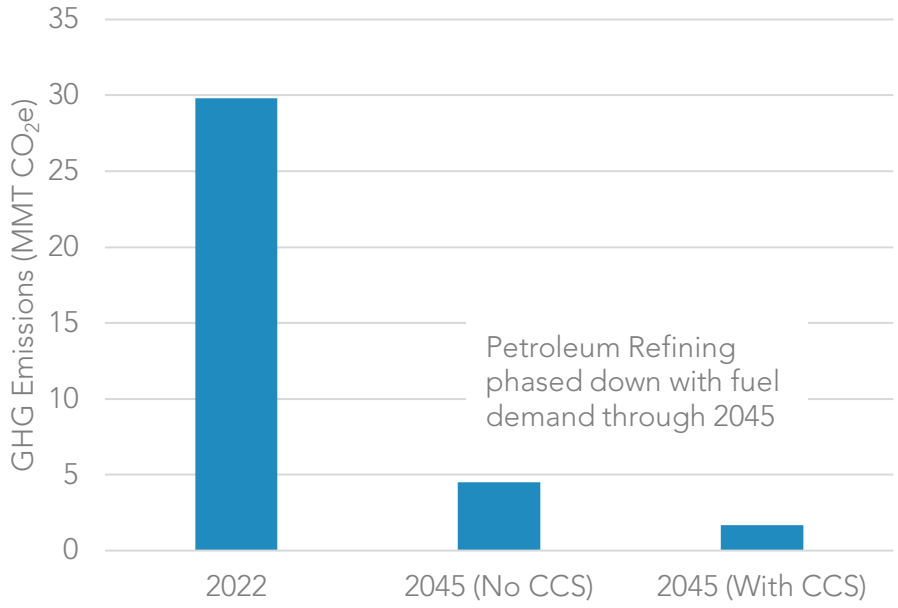
[190] This reduction in demand does not assume any need for ongoing operations to support exports to neighboring states.

[191] If demand assumes an ongoing need to support exports to neighboring states, the residual demand would require a five-fold increase in finished fuel imports.

[192] CEC. 2020. *Petroleum Watch: How Petroleum Products Move.* March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.

There are currently no pipelines capable of bringing refined products to the state, and rail imports of refined products have historically made up less than 1 percent of all imports.[193] Significant increases in marine imports would likely require significant reconfiguring, retrofitting, or replacement of crude pipelines and storage tanks at current marine terminals, and possible reconfiguring of existing finished fuel infrastructure to account for changes in volumes and locations of supply points.

Figure 2-9: Petroleum refining sector GHG emissions in 2022 and 2045 (with and without CCS) when activity is phased down with fuel demand



If California's finished fuel demand is not met by continued refining activity in California, the state would need to import finished fuels to meet the ongoing demand. This would likely result in a two- to five-fold increase in the number of finished fuel ship deliveries to marine terminals. Marine tankers delivering refined products are often much smaller than crude oil tankers, so changes in fuel use and emissions cannot be easily estimated from the change in both the type and the number of ship deliveries.[194]

[193] CEC. 2020. *Petroleum Watch: How Petroleum Products Move.* March. https://www.energy.ca.gov/sites/default/files/2020-03/March_2020_Petroleum_Watch.pdf.
[194] Personal communication with CEC staff, March 2022; U.S EIA. 2017. *World Oil Transit Chokepoints*. 3. https://www.eia.gov/beta/international/regions-topics.php?RegionTopicID=WOTC.

If refining ceased in California, the rail and marine deliveries currently needed to support both refining processes and the export of waste products, such as petroleum coke, would cease.

In summary, the modeling indicates that demand for petroleum will persist through 2045. The modeling also shows what the GHG emissions reductions would be if refining activities were phased down in line with the reduction in in-state petroleum demand. CCS can further reduce emissions for this sector. Importantly, activity at the ports would increase, and new infrastructure would be needed to store and deliver finished fuel across the state, if in-state refining were fully phased down by 2045. And while GHG emissions from this sector would go to zero in our AB 32 GHG Inventory with a full phaseout, emissions related to the refining and transport of finished fuel to California might increase elsewhere, resulting in emissions leakage.

Progress Toward Achieving the Accelerated 2030 Target

The 2017 Scoping Plan laid out a path to achieving the SB 32 target of at least a 40 percent reduction of GHG emissions below 1990 levels by 2030 that focused on reducing emissions in the state and was technologically feasible and cost-effective, reflecting statutory direction. Many of the programs to achieve the 2030 target increased in stringency beginning January 1, 2021. However, the 2030 target must be increased to help achieve the deeper reductions needed to meet the state's statutory carbon neutrality target specified in AB 1279 and Executive Order B-55-18.

Starting in 2020 and extending into 2022, the COVID-19 pandemic impacts reverberated across the globe in a multitude of ways, including the devastating loss of millions of lives. The pandemic also had a significant impact on GHG emissions by virtue of its impact on global economies and lifestyle changes for Californians, with extended work and school disruptions. Thus, assessing our progress toward meeting our SB 32 target is confounded by the unprecedented nature of the pandemic. Nevertheless, an assessment of progress toward the 2030 target is critical, in particular the accelerated 2030 target called for in this Scoping Plan, since achieving the accelerated 2030 target would make the state well positioned to achieve its carbon neutrality goals and bring critical near-term air quality benefits to address historical and ongoing disparities in access to healthy air. Because there is only one year of data available for this decade, the analysis takes a prospective look using projected emissions over the remainder of this decade.

Estimating GHG emissions in 2030 requires projecting the effect of policies or measures that are currently deployed and undergoing implementation. Table 2-4 shows three distinct estimates of GHG emissions in 2030 that were created at different times and used different modeling approaches.

Table 2-4: Estimates of 2030 GHG emissions

Scenario Description	2030 GHG Emissions ($MMTCO_2e$)
2017 Scoping Plan: the projected outcome from implementing policies identified in the 2017 Scoping Plan that was approved by the CARB Board in December 2017.	320
Reference Scenario: the assessment of current trends and expected performance of policies identified in the 2017 Scoping Plan, as of February 2022, using the PATHWAYS model (E3).	305
Reference Scenario (Rhodium): the analysis of projected emissions from 2021 to 2030 from state and federal policies implemented as of July 2022, including the estimated impact of the Inflation Reduction Act and Advanced Clean Cars II using RHG-NEMS and other Rhodium Taking Stock 2022 methods (https://rhg.com/wp-content/uploads/2022/07/Taking-Stock-2022_US-Emissions-Outlook.pdf).	324

These three estimates of 2030 GHG emissions differ, which is expected. The estimates reflect different outcomes of the current and future impact of policies and measures. They also vary due to fundamental differences in the way these models work. For example, PATHWAYS is an economy-wide, scenario-based GHG accounting tool that tracks energy demands and supplies in line with scenario assumptions and is benchmarked to historical values. RHG-NEMS optimizes both the supply and demand sides of the energy system while factoring in consumer constraints and dynamic economic and energy systemwide feedback. Importantly, while these point estimates give the appearance of certainty and accuracy, there is significant uncertainty in future emissions projections that is documented thoroughly in each of the three emissions scenarios described above. No model can predict the future given unforeseen factors such as notable economic swings and implementation delays for programs. However, the range of emissions estimates provides a useful indication of possible outcomes from successful implementation of policies and measures.

An important source of uncertainty is the impact of delayed implementation of policy measures and market actions. The successful rate of deployment of clean technology and fuels—including consumer adoption patterns, economic recovery from the pandemic, and the permitting and build-out of necessary new assets and reuse of existing assets to produce and deliver clean energy—is essential to reach GHG emission reduction targets. Any delays will only increase GHG emissions in 2030.

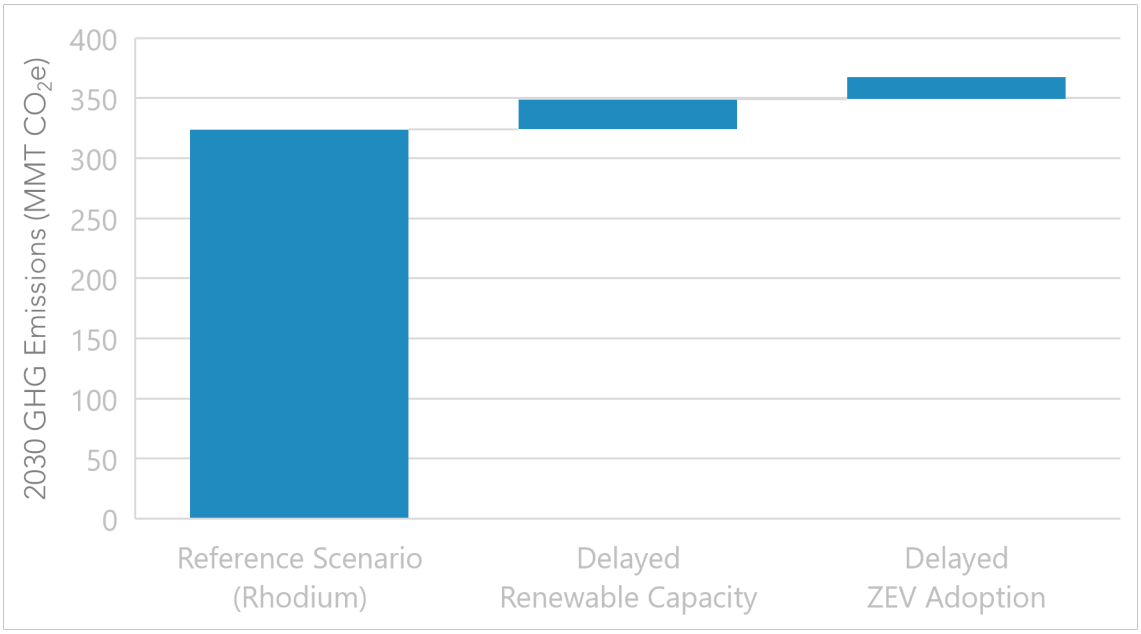
It is important to note that incentives, carbon pricing, and regulations all can result in similar types of responses including, but not limited to:

- Build-out of clean energy and infrastructure
- Deployment of clean technology
- Reduced demand for fossil energy
- Efficiency improvements

As such, the uncertainty analysis discussion focuses on implementation (technology and infrastructure deployment), and not any specific programs or policies. It is successful implementation that must ultimately happen for emissions reductions to be realized.

The uncertainty analysis described in Appendix J (Uncertainty Analysis) quantifies the impact of delayed permitting and building of renewable generation and transmission in the power sector and delayed adoption of ZEVs across all vehicle fleets in the transportation sector. The Reference Scenario (Rhodium) estimates emissions in 2030 to be 324 MMTCO2e. A five-year delay in renewable capacity would increase emissions by 8 percent in 2030 (25 MMTCO2e) relative to the Reference Scenario. If similar delays in clean energy production and deployment occur in other sectors, a larger increase in emissions relative to the reference scenario would be expected, jeopardizing the state's ability to achieve the 2030 target. Similarly, a delay in consumer adoption of zero emission vehicles (LDV, MDV, HDV) would increase emissions by 6 percent in 2030 (19 MMTCO2e) relative to the Reference Scenario. Delays in transitioning to electric equipment and appliances in homes and businesses would also lead to increased emissions in 2030. Figure 2-10 illustrates the impact on projected emissions in 2030 associated with delayed renewable capacity and delayed transportation vehicle electrification.

Figure 2-10: Impact of delayed implementation on 2030 GHG emissions[195]



Appendix J (Uncertainty Analysis) includes additional details on the assumptions and model used for the uncertainty analysis and the risks to achieve the emissions reductions from 2022 to 2030 that are anticipated in the Scoping Plan Reference Scenario. While the analysis focuses on renewable capacity and transportation, the analysis identifies a common set of themes that can impact emissions reductions across economic sectors, including permitting, technology availability, and consumer adoption. The impact of delayed emissions reductions will vary by sector and by the specific policy at risk of delay.

We give these quantitative examples of the impact implementation delays can have on GHG reductions, but almost every economic sector will have the need for permitting to enable at least a 40 percent reduction below 1990 levels. If we consider the increased ambition of the Scoping Plan Scenario, which identifies an accelerated 2030 target, the same types of uncertainty manifest themselves in successful implementation of the Scoping Plan Scenario, with the added need for CCS and CDR and a need to grow other energy sectors such as hydrogen.

[195] The implementation delay scenarios were modeled separately and do not necessarily reflect the combined impact of delayed renewable capacity and transportation vehicle electrification.

Cap-and-Trade Program Update

Since the adoption of the first Scoping Plan in 2008, carbon pricing in the form of a Cap-and-Trade Program has been part of the portfolio to achieve the state's GHG reduction targets, and it will remain critical as we work toward carbon neutrality. This section provides an update on the program and its role in achieving the 2030 target.

The Cap-and-Trade Program first came into effect in 2012, under AB 32, and included declining allowance caps through 2020. In 2017, AB 398[196] was passed by a supermajority in the Legislature and included prescriptive direction on the design of the program from 2021 through 2030. The AB 398 Cap-and-Trade Program came into effect on January 1, 2021, and it included the following changes:

- Doubling of stringency with an annual cap decline of 4 percent per year from 2021–2030
- AB 398 price ceiling
- AB 398 redesigned allowance price containment reserve with two tiers
- AB 398 100 percent leakage assistance factor for industry
- AB 398 lower offset limits: Usage limit cut from 8 percent to 4 percent, and half of offsets must provide direct benefits to California

The reduction in the role of offsets in the program was in recognition of ongoing concerns raised by environmental justice advocates regarding the ability of companies to use offsets for compliance instead of investing in actions on site to reduce GHG emissions that could also potentially reduce criteria or toxic emissions.[197,198] Note that data show the relationship between facility emissions of GHGs and co-pollutants is highly variable by sector and pollutant.[199] Changes to the allowance price containment reserve and the addition of the price ceiling were included to ensure protections against price spikes in the program, while the changes to the leakage assistance factors were to ensure the maximum protection against leakage in the program. The original design of the program included an auction floor price that increases by 5 percent plus inflation each year, and

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[196] Assembly Bill 398 (Garcia, Chapter 135, Stats. of 2017). California Global Warming Solutions Act of 2006: market-based compliance mechanisms: fire prevention fees: sales and use tax manufacturing exemption. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398.

[197] OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities*. https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf.

[198] The OEHHA report also found that companies that use the most offsets often own the facilities that contribute to local $PM_{2.5}$ exposure. However, there was no causal relationship found to indicate that implementation of the Cap-and-Trade Program was contributing to increases in local air pollution. Also see: CARB. FAQ Cap-and-Trade Program. https://ww2.arb.ca.gov/resources/documents/faq-cap-and-trade-program.

[199] OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities*. https://oehha.ca.gov/media/downloads/environmental-justice/impactsofghgpoliciesreport020322.pdf.

that escalation factor is retained in the post-2020 program and is also applied to the allowance price containment reserve and price ceiling. These features, combined with the self-ratcheting mechanism for unsold allowances at auctions,[200] help to ensure the program is able to handle periods of high and low demand for allowances while continuing to ensure a steadily increasing price signal for regulated entities to invest in GHG reduction technologies.

As a result of achieving the 2020 target several years earlier than mandated by law, there are unused allowances in circulation. CARB estimated the amount to be approximately 310 million allowances after the conclusion of the third compliance period (2018–2020).[201] AB 398 had also called for a similar analysis, which was completed in 2018.[202] This bank represents approximately 5 percent of the total number of vintage 2013–2030 allowances issued within the joint market. This bank of allowances can only remain banked if year-over-year the covered emissions are declining by 14 MMT. If the annual decline in actual emissions is less than 14 MMT, regulated entities will need to use the banked allowances to cover their compliance obligations. It is likely that the existing bank of 310 million allowances will be needed over the early part of this decade and will be exhausted by the end of the decade. During the same period, prices for allowances will continue to increase at least 5 percent plus inflation year-over-year, sending a steadily increasing price signal to spur investment in onsite reductions for covered entities.

With the passage of AB 1279, the state has a statutory target to achieve carbon neutrality no later than 2045. This Scoping Plan demonstrates that planning on a longer time frame for the new carbon neutrality target means we must accelerate our near-term ambition for 2030 in order to be on track to achieve our longer-term target. CARB will use the modeling for this Scoping Plan to assess what changes may be warranted to the Cap-and-Trade or other programs to ensure we are on track to achieve an accelerated 2030 target. Since the original adoption of the Cap-and-Trade regulation, the program has been amended eight times through a robust public process. Moreover, then-California Environmental Protection Agency Secretary Jared Blumenfeld testified at a Senate hearing in 2022 that CARB will report back to the Legislature by the end of 2023 on the status of the allowance supply with any suggestions on legislative changes to ensure the number of allowances

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[200] The self-ratcheting mechanism temporarily removes unsold allowances from the market until either sufficient demand manifests for two consecutive auctions and they are incrementally reintroduced at future auctions, or they are permanently removed from general circulation if demand remains low.
[201] CARB. 2022. BR 18-51 Cap-and-Trade Allowance Report. Attachment A. *https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/Allowance%20Report_Reso18_51.pdf*.
[202] CARB. 2018. Staff Report: Initial Statement of Reasons: Proposed Amendments to the Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. September 4. *https://www.arb.ca.gov/regact/2018/capandtrade18/ct18398.pdf?_ga=2.134288305.1735610122.1664813952-1100516233.1657841496*.

is appropriate to help the state achieve its 2030 target of at least 40% below 1990 levels. As part of that status update, CARB will also provide information on any potential program changes that may be needed to allowance supply to help achieve an accelerated target for 2030 identified in this Scoping Plan as necessary to achieve carbon neutrality no later than 2045. Engaging in this process in 2023 will allow for the consideration of this Scoping Plan, inclusion of additional data points for the second year of operation of the AB 398-designed program (which only came into force in January 2021), and an opportunity to hold public workshops.

It is also worth noting that the COVID-19 pandemic had significant impacts on economic activity in California and elsewhere.[203] Emissions were significantly lower in 2020 due to the impacts of the global pandemic. There is an expectation that emissions will increase as the economy recovers and behaviors continue to shift from the impacts of the ongoing pandemic. As a result, 2020 should be regarded as an outlier in the emissions trends. This scenario of increasing emissions is similar to what happened in the first compliance period for Cap-and-Trade, where the state economy was recovering from the Great Recession and does not correlate to a problem with the structure of this program or other programs that cover emissions related to the manufacturing or transportation sectors. In any assessment of this and other programs, it is essential to consider external factors such as economic activity and availability of zero carbon energy such as hydropower, among others.

To better understand the role of the Cap-and-Trade Program in achieving the 2030 target, Table 2-5 compares the 2030 GHG emissions estimates from the three reference scenarios described in Table 2-4. The 2017 Scoping Plan projection is from the PATHWAYS model for the Scoping Plan Scenario approved by the Board in late 2017. It excludes the contribution of the Cap-and-Trade Program, without any consideration of uncertainty factors (i.e., a characterization of the uncertainty that a given GHG reduction measure included in the 2017 Scoping Plan will actually achieve the GHG reductions it is projected to deliver). The Reference Scenario represents what GHG emissions would look like if we did nothing beyond the existing policies that are required and already in place to achieve the 2030 target; this scenario is based on the recent PATHWAYS modeling, excluding the contribution of the Cap-and-Trade Program, and without any consideration of uncertainty factors. It indicates that GHG emissions will be lower over this decade than originally projected when the 2017 Scoping Plan was approved. The

[203] CARB. November 4, 2021. Mandatory Greenhouse Gas Reporting - 2020 Emissions Year Frequently Asked Questions. https://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/2020mrrfaqs.pdf?_ga=2.264251343.1760432228.1650736660-1644197524.1577749754.

Reference Scenario (Rhodium) which also does not include uncertainty bounds, is the modeling used for the uncertainty analysis above.

Importantly, PATHWAYS is not able to explicitly model a carbon pricing policy, and therefore the Cap-and-Trade Program is not represented in the 2017 Scoping Plan or the Reference Scenario. Carbon pricing is included in RHG-NEMS, which reflects state and federal policies included in the U.S. Energy Information Administration (EIA) Annual Energy Outlook 2022 and the National Energy Systems Model (NEMS), which is the basis for RHG-NEMS.[204]

As detailed in EIA's documentation, California's Cap-and-Trade Program is represented through increased energy prices, which flow across economic sectors.[205] However, many of the emissions covered by the California Cap-and-Trade Program are not energy- and fuel-related emissions. Given that, the energy systems model RHG-NEMS was used to model the impact of California Cap-and-Trade on the energy system. However, RHG-NEMS does not explicitly model the entire program, which includes non-energy related emissions from the industrial, agricultural, waste, and transportation sectors.

[204] U.S. EIA. 2022. *Summary of Legislation and Regulations Included in the Annual Energy Outlook 2022.* March. *https://www.eia.gov/outlooks/aeo/assumptions/pdf/summary.pdf*.
[205] U.S. EIA. 2022. Electricity Market Module. *https://www.eia.gov/outlooks/aeo/assumptions/pdf/electricity.pdf*.

Table 2-5: Comparison of 2017 Scoping Plan and two Reference Scenarios

	2030 GHG Emissions ($MMTCO_2e$) (2017 Scoping Plan)	2030 GHG Emissions ($MMTCO_2e$) (Reference Scenario)	2030 GHG Emissions ($MMTCO_2e$) (Reference Scenario-Rhodium)
Reference Scenarios	320	305	324
Gap to Accelerated 2030 Target under the Scoping Plan Scenario (226)[206]	94	79	98

Under the Scoping Plan Scenario, in 2030 California emissions are anticipated to be 48% below 1990 levels. This represents an acceleration of the current SB 32 target of a 40% reduction below 1990 levels. Table 2-5 includes the gap between the different reference scenarios and the accelerated 2030 target achieved under the Scoping Plan Scenario. It also shows that depending on the modeling, there are a range of potential emissions levels in 2030 prior to accounting for the full impact of the Cap-and-Trade Program on emissions. That range is from 305 to 324 $MMTCO_2e$ in 2030. That represents a 19 $MMTCO_2e$ spread, or about 8.4 percent of the accelerated 2030 target of 226 $MMTCO_2e$. Importantly, none of these scenarios includes all of the actions identified in the Scoping Plan Scenario for this Scoping Plan; many of those actions, such as SB 596, CCS, and a more stringent LCFS program, will only begin to happen in this decade, and their contributions toward meeting the accelerated 2030 target are therefore not included in the reference scenarios. The actual emissions for the remainder of this decade will therefore likely be lower than in each of the scenarios in Table 2-5 once policies and regulations are in place to support an accelerated 2030 target. However, the degree of this difference between actual and projected emissions will differ across the modeled reference scenarios.

[206] Table 3 from the 2017 Scoping Plan included a range of 34 to 79 $MMTCO_2e$ for reductions needed from the Cap-and-Trade Program to achieve a 2030 target of 40 percent below 1990 levels.

Regardless of the uncertainty and differences in the models, it is clear additional GHG reductions must happen over this decade to achieve an accelerated 2030 target. This will require an evaluation of all major programs to assess the need to increase their stringency between now and 2030. As the actual reductions from non-Cap-and-Trade Program measures increase, California will be less reliant on the Cap-and-Trade Program to "fill the gap" to meet an accelerated 2030 reduction target. For example, CARB is developing a proposal to increase the stringency of the LCFS program for 2030, the recently adopted Advanced Clean Cars II regulation is more stringent than modeled for the 2030 40 percent target in the 2017 Scoping Plan, and SB 596 requires specific reductions in the cement sector over this decade and beyond. However, we also know we are not on track to achieve the VMT reduction called for in the 2017 Scoping Plan and will need to double down to achieve the even more ambitious target called for in the Scoping Plan Scenario. Also, we will need additional actions over the coming years to reduce short-lived climate pollutants to meet the emission reductions called for in SB 1383.

Collectively, any additional legislation or prescriptive policies for sectors, delays in successful implementation of non-Cap-and-Trade programs and policies, increases in incentive program funding, and delays in economic recovery from the pandemic will continue to affect the role the Cap-and-Trade Program will need to play over this decade to meet the state's GHG reduction obligations. In summary, the Cap-and-Trade Program must continue to be able to scale across a range of possibilities. With passage of AB 1279 and the need to accelerate the 2030 target, CARB will initiate a public process to utilize the modeling results from this Scoping Plan, specifically the Scoping Plan Scenario, to evaluate and potentially propose changes to the design of the Program, including the annual caps. This process will ensure that the Program supports an increased ambition for 2030 while retaining the ability to scale as other factors, such as changing economic conditions and implementation of non Cap-and-Trade programs, impact the actual emissions at the sources covered by the Program. Any changes to the Program must continue to support a well-designed system that continues to send a steadily increasing price signal, minimizes for leakage, reduces emissions in the covered sectors toward the state's targets, is cost-effective and technologically feasible, and avoids energy rate spikes. Importantly, the Program should support air quality benefits, especially in overly burdened communities, and not exacerbate existing air quality disparities.

Chapter 3: Economic and Health Evaluations

This chapter provides two approaches for quantifying the economic and health outcomes of the Scoping Plan Scenario. One approach is to consider the combined impact of all measures[207] in a scenario. The other approach is required by AB 197, where each measure within a scenario is evaluated independently. In addition to these two evaluation approaches, this chapter also includes a discussion of the Public Health implications for the Scoping Plan Scenario, an overview of the Climate Vulnerability Metric, and the Environmental Analysis conducted in accord with the California Environmental Quality Act (CEQA).

It is important to note that all of the analyses in this chapter use a variety of data sources, but because the modeling is economy-wide at the state level, none of them produce community specific detail outputs. The AB 32 GHG Inventory Sector analysis relies on PATHWAYS data at the state level that is proportionally applied across all regions of the state to translate changes in state level fuel combustion to local level changes. The NWL analysis similarly utilizes a variety of data sources and a suite of models that produce data that are scaled up to the statewide level. All of the models, except the Wildland Urban Interface (WUI) defensible space model, which is conducted at the county level, create aspatial projections that are not applicable at the community level.

Economic Analysis

As part of the process to develop this Scoping Plan, alternative scenarios that transition energy needs away from fossil fuels and achieve carbon neutrality no later than 2045 were developed. Alternative scenarios that assess the impact of different land management strategies on carbon stocks in NWL were also developed. These alternatives are described in Appendix C (AB 197 Measure Analysis). The following sections describe the Scoping Plan Scenario in terms of direct cost, the economy, employment, and health outcomes.[208]

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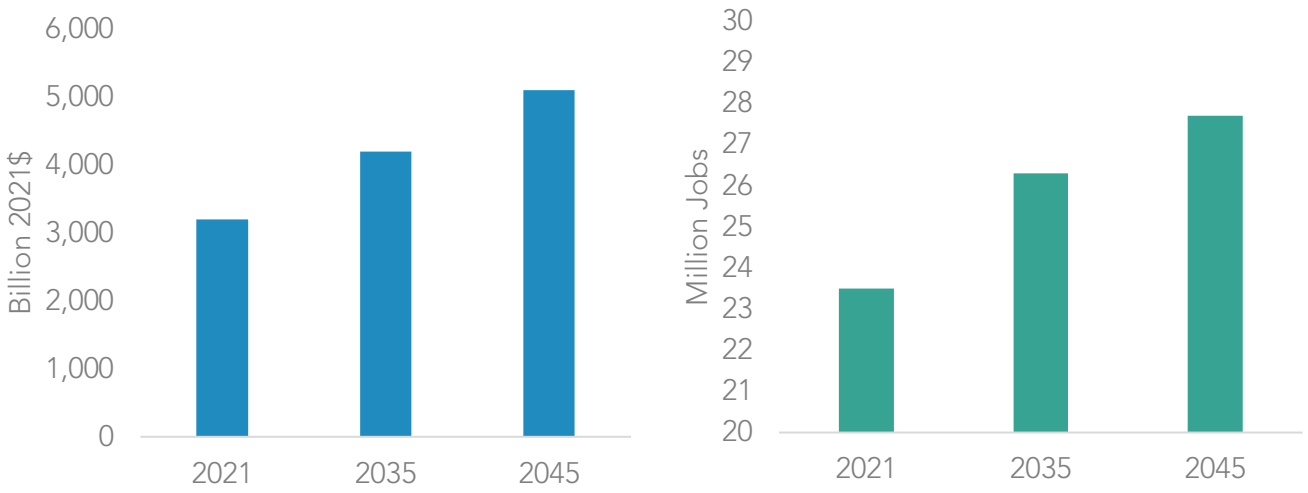
[207] AB 197 calls for the evaluation of "measures." This Scoping Plan treats each action and its variants on stringency as measures for the purposes of this chapter. Appendix C (AB 197 Measure Analysis) lists the measures and corresponding modeling assumptions for each alternative and the Scoping Plan Scenario. The modeling assumptions for the Scoping Plan Scenario are summarized in Table 2-1.

[208] For the Draft 2022 Scoping Plan Update, achieving carbon neutrality in 2035 and 2045 was evaluated. The AB 32 GHG Inventory sector direct cost, the economy, employment, and health outcomes were assessed in those years. Similarly, the Scoping Plan Scenario assessments that are presented in this chapter were made for years 2035 and 2045.

The California economy is growing, and it is projected to continue to grow about 2 percent each year, from $3.2 trillion in 2021 to $5.1 trillion in 2045, as shown in Figure 3-1. Similarly, employment in California is anticipated to grow 0.7 percent per year, from 23.5 million jobs in 2021 to 27.7 million jobs in 2045. It is in this context, termed the *Reference Scenario,* that CARB evaluates the Scoping Plan Scenario in terms of its impact on economic growth and employment. The projections shown in Figure 3-1 were produced by CARB to evaluate the incremental impact of regulations.

Figure 3-1: Projected California gross state product (left) and employment growth (right) from 2021 to 2035 and 2045



Source: California Air Resources Board

Transitioning away from fossil fuels to alternatives and increasing action on NWL will affect employment opportunities, household spending, businesses, and other economic aspects of our lives. Sectors expected to see growth include renewable electricity and hydrogen production, while other sectors may shrink. The deployment of clean technology may require higher upfront costs for things like heat pumps and induction stoves, but those could be offset by energy efficiency savings. Employment and economic development in NWL-related industries and sectors are expected to increase as land management actions increase, especially for the Forestry sector (in which a significant increase is called for under the Scoping Plan Scenario). The net impact of these actions on employment and jobs is presented in this chapter.

Estimated Direct Costs

One key metric is the direct cost, or net investment, reflecting any savings that result from actions. Similar approaches were used to estimate direct costs for the AB 32 GHG Inventory sectors and for the NWL, as described in this section.

AB 32 GHG Inventory Sectors

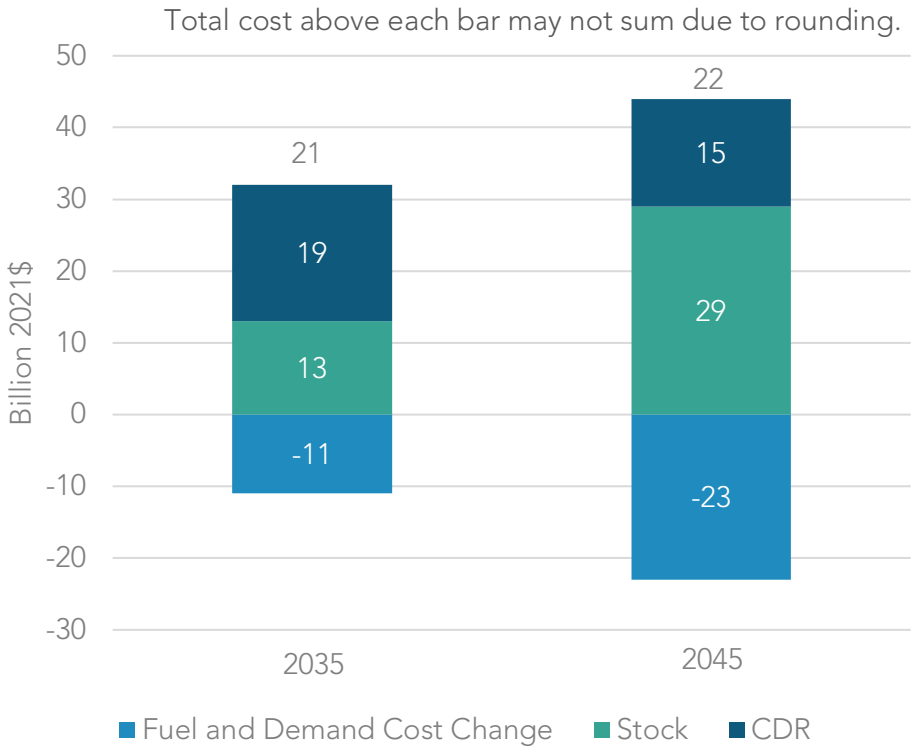
Transitioning away from fossil fuels requires investment in new equipment and infrastructure throughout the economy. It involves developing the capacity to produce fuels and electricity from renewable sources rather than producing fossil energy. This transition also takes time. One approach is to eliminate combustion of fossil fuels by replacing all equipment in a specified year. Another approach is to establish a future point at which all sales of new equipment rely on alternative energy sources and allow the transition to occur over time as equipment is replaced upon its end of life.

To evaluate the investment required through 2045, the PATHWAYS model was used to represent equipment stock and its turnover to non-fossil fuel alternatives over time. The annualized, incremental cost of infrastructure in excess of the annualized cost of the Reference Scenario[209] was computed for each year from 2022 through 2045. These costs were computed by first taking the absolute cost in each year—which includes both new equipment investment and also expenditures on energy, operations, and maintenance in each year—and then levelizing the costs (in the same way car or house payments are annualized or spread out over time) to arrive at an annualized cost. Fuel savings, and resulting cost savings, associated with changing energy demand—from gasoline to electricity for vehicles, for example—are included as a result of this methodology. Carbon dioxide removal includes DAC technology powered primarily by off-grid solar, BECCS to produce hydrogen or other fuels, and NWL sequestration, as discussed in Chapter 2.[210]

Figure 3-2 shows the stock investment cost, fuel/efficiency savings, and CDR cost. The Scoping Plan Scenario allows end-of-life transition of equipment. The cost of investing in new equipment is partially offset by savings associated with efficiency gains and reduced demand for fuels like gasoline. This is particularly relevant in the transportation sector, which leads to the majority of savings in 2045 in the Scoping Plan Scenario, which models near complete electrification of transport relying only on end-of-life replacement of vehicles. Appendix H (AB 32 GHG Inventory Sector Modeling) includes additional detail on direct costs in each sector and how costs change over time.

[209] The Reference Scenario described in Chapter 2 and in Appendix H (AB 32 GHG Inventory Sector Modeling) was the basis for the direct cost comparison.
[210] The energy source for DAC is not modeled, but renewable electricity and/or hydrogen produced from electrolysis are zero-carbon options consistent with the carbon neutrality targets in this Scoping Plan. The economic analysis associated the investment in DAC with the solar industry for consistency with the carbon neutrality targets.

Figure 3-2: Cost and savings relative to the growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors)



Natural and Working Lands

For NWL, the direct costs of each management strategy were estimated using available academic literature, monitoring and reporting data, survey data, and cost data from existing subsidy programs on the per acre cost of implementing the management strategy. These cost data, in combination with the acreage of each management strategy under the scenarios, provided estimates of the overall direct cost to either the government or the private sector. The direct costs are independent of the policy lever used to implement the action and do not include many important benefits and externalities of the actions. They are assumed to be constant for each scenario and into the future. Avoided or secondary costs, such as those from reductions in wildfire suppression expenses, are not included. Appendix I (NWL Technical Support Document) includes additional direct cost details.

Table 3-1 includes the direct cost estimates for the Scoping Plan Scenario compared to the Reference Scenario.[211] Direct costs for the NWL sector are expected to be significant due to the ambitious level of action for each land type.

Table 3-1: Cost and savings relative to a growing California economy for the Scoping Plan Scenario (NWL)

Measure	Scoping Plan Scenario: Average Direct Annual Cost, 2025–2045 (millions $/year)
Forests / Shrublands / Grasslands	1,780
Annual Croplands	284
Perennial Croplands	4
Urban Forest	4,230
Wildland Urban Interface (WUI)	114
Wetlands	28
Sparsely Vegetated Lands	4
Totals	6,460
Note: Table values may not add to total due to rounding.	

CARB estimates that all jurisdictions, including private landowners, currently spend approximately $4 billion dollars annually on planting, maintenance, sidewalk repair, tree removal, and other expenses related to urban forests, and that reaching the theoretical maximum tree cover would require increasing that spending by a factor of 20. The cost of the Scoping Plan Scenario is predominantly a mix of urban forests and forests, shrubland, and grasslands spending.

[211] The Reference Scenario described in Chapter 2 and in Appendix I (NWL Technical Support Document) was the basis for the direct cost comparison.

Economy and Employment

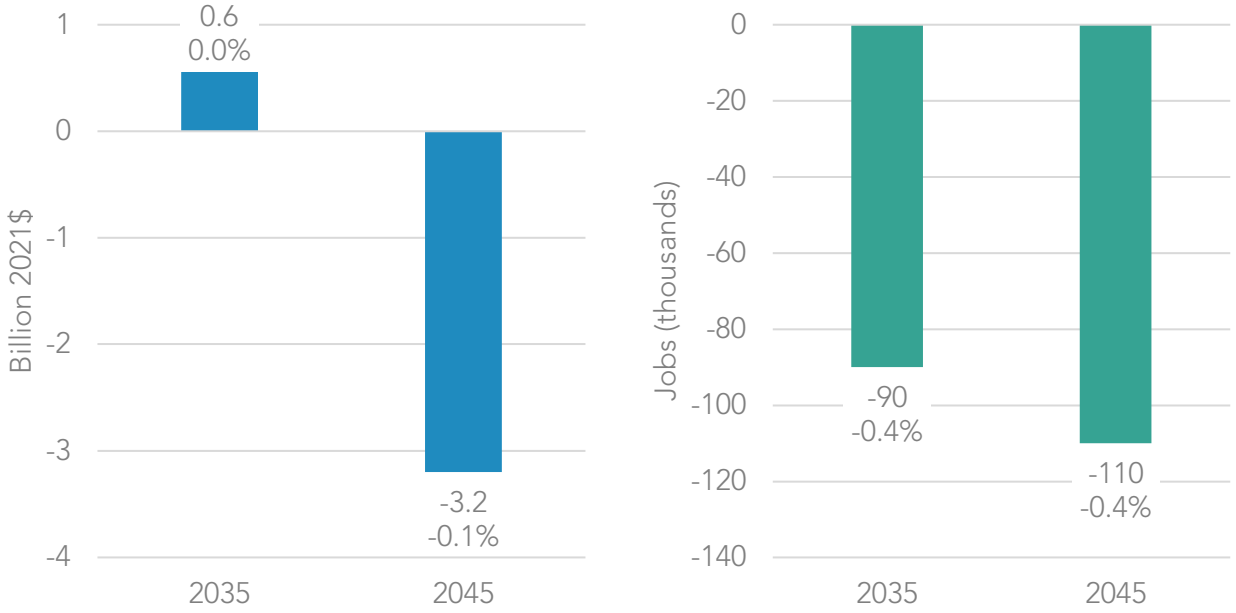
Two different models were used to estimate the overall impact that investing in a transition away from fossil fuels and in our NWL may have on the growing California economy. The transition away from fossil fuels was evaluated using the IMPLAN economic analysis model. The NWL investments were evaluated using the REMI PI+ economic model. These models provide similar outputs relative to the same economic and employment forecasts used to develop a Reference Scenario for use in each model.

AB 32 GHG Inventory Sectors

To estimate the overall impact that investing in a transition away from fossil fuels may have on the California economy, CARB used the IMPLAN model. Additional detail regarding the model, assumptions, and methodology are included in Appendix H (AB 32 GHG Inventory Sector Modeling). The IMPLAN model is a multisector representation of private industries in the U.S. economy that maps economic relationships across industries, households, and governments. This model translates direct costs and savings associated with transitioning away from fossil fuels with indirect effects such as wages, purchases of goods and services, business tax impacts, and supply chain effects. In addition, the induced effects of household purchases, local and import purchases, wages paid, and household tax impacts are estimated. This comprehensive assessment of the interactions between capital investment in fossil fuel alternatives and household purchases provides an indication of the response of the California economy to the Scoping Plan Scenario.

The Scoping Plan Scenario results in a small impact on the Gross State Product (GSP) and employment relative to the Reference Scenario, as shown in Figure 3-3. Economic growth is largely unaffected by the Scoping Plan Scenario in 2035 and slowed by 0.1 percent in 2045. Employment growth is also slowed a small amount, 0.4 percent in 2035 and in 2045, and employment still grows. Assuming annual growth rates of 0.7 percent means there would be more than 193,000 additional jobs in 2045.

Figure 3-3: Gross state product (left) and employment (right) relative to a growing California economy for the Scoping Plan Scenario in 2035 and 2045 (AB 32 GHG Inventory sectors)



California households will see increased costs from the purchase of new capital stock and savings from reduced spending on fuel, as shown in Figure 3-2. Households also will face increased costs associated with CDR, costs associated with energy efficiency measures, and commercial stock purchases—all of which are assumed to be passed directly to consumers. The impact to California households, however, is not limited to these direct costs, as changes in relative prices, employment, and wages can affect household well-being. Personal income, which captures the direct, indirect, and induced impacts, is a metric commonly used to evaluate the impact of policies on households.

Personal income in California is projected to grow from $2.7 trillion in 2021 to $3.6 trillion in 2035 and $4.4 trillion in 2045. Household projections are based on California Department of Finance population projections, which estimate the state's population to grow an average of 0.3 percent each year from 2021 to 2045.[212] California households are projected to increase from 13.3 million in 2020 to 14.6 million in 2035 and 15.0 million in 2045.

[212] California Department of Finance. Population Projections (Baseline 2019). https://dof.ca.gov/forecasting/demographics/projections/.

While the transition away from combustion of fossil fuels will improve air quality for all Californians (and even, more so in overly burdened communities), the economic impacts of the Scoping Plan Scenario are unlikely to be equal among Californians. Table 3-2 presents the change in income by household income group relative to the Reference Scenario in 2035 and 2045. While in 2035 there is a net decrease in personal income of $600 million, total income for households that make less than $100,000 per year is estimated to decline by $4.1 billion dollars, and the total income for households that make more than $100,000 per year will increase by $3.5 billion under the Scoping Plan Scenario. In 2045, although there is no net change in personal income across all California households, results vary by income level. Total income for households that make less than $100,000 per year are estimated to decline by $5.3 billion dollars, while the total income for households that make more than $100,000 per year will increase by $5.3 billion under the Scoping Plan Scenario.

Table 3-2: Income Impacts by California household income group in 2035 and 2045 for the Scoping Plan Scenario (AB 32 GHG Inventory Sectors)

Household Income Group ($2021)	Percentage of 2021 California Households[213]	Change in Income (Billion $2021)	
		2035	2045
Less than $50,000	30	-2.9	-3.9
$50,000 to $100,000	27	-1.2	-1.4
$100,000 to $200,000	28	2.5	4.0
More than $200,000	15	1.0	1.3
Total	100	-0.6	0.0

[213] U.S. Census Bureau. 2021. Household Income. California. https://data.census.gov/cedsci/table?q=california%20income.

In addition to income level, there is likely to be an impact to California personal income that varies based on race/ethnicity.[214] Table 3-3 shows the percentage of households within each income group based on eight race/ethnicity categories identified in the American Community Survey 2021. As shown in Table 3-2, households in lower income groups are anticipated to see negative impacts, while households in higher income groups are anticipated to see positive impacts from the Scoping Plan Scenario in both 2035 and 2045. Because more than 60% of households in the race/ethnicity categories of Hispanic, Black alone, Native Hawaiian (HI) or Pacific Islander, American Indian or Alaskan Native, Other, and Two or More make less than $100,000 per year, these populations generally are likely to experience reduced income. White and Asian households will generally experience both increased and decreased income because these households are distributed more evenly across all four income groups.

The state recognizes the need to ensure that accessibility to clean technology and energy do not further exacerbate health and opportunity gaps for low-income households and communities of color. The Climate Change Investments program exceeds the statutory minimums to invest in projects to benefit disadvantaged communities.[215] Utilities implement programs for reduced energy bills for qualifying low-income customers.[216] There are also resources for waste and water bills that leverage federal funds.[217] CARB also coordinated with the CPUC to ensure that the Climate Credit[218] funded from the sale of Cap-and-Trade allowances provided to utilities on behalf of ratepayers is credited equally to households and not based on how much energy is used. These are just a few examples of how the state is designing and implementing programs to avoid increasing existing disparities. The state must continue to find ways to relieve economic burdens on low-income households.

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[214] The number of households in each bracket and the race/ethnicity categories are from American Community Survey 2021 results. Population changes through 2035 and 2045 are not forecast. U.S. Census Bureau. 2021. Household Income. California. *https://data.census.gov/cedsci/table?q=california%20income*.
[215] CARB. Priority Populations — California Climate Investments. *https://www.caclimateinvestments.ca.gov/priority-populations*.
[216] CPUC. CARE/FERA Program. *https://www.cpuc.ca.gov/lowincomerates/*.
[217] California Department of Community Services and Development. Low Income Household Water Assistance Program. *https:/www.csd.ca.gov/lihwap*.
[218] CPUC. California Climate Credit - FAQ. *https://www.cpuc.ca.gov/industries-and-topics/natural-gas/greenhouse-gas-cap-and-trade-program/california-climate-credit/california-climate-credit---faq*.

Table 3-3: Percentage of households in each race/ethnicity category by household income group

Household Income Group ($2021)	Households in Income Group (%)							
	White Not Hispanic	Hispanic	Black Alone	Asian Alone	Native HI or Pacific Islander	American Indian or Alaskan Native	Other	Two or More
Less than $50,000	26	35	45	25	30	35	37	32
$50,000 to $100,000	25	32	27	21	31	33	33	30
$100,000 to $200,000	29	25	21	30	30	26	24	27
More than $200,000	19	7	7	24	9	7	5	11

Natural and Working Lands

The macroeconomic impact of the NWL scenario was evaluated separately in the REMI PI+ model. For the Scoping Plan Scenario, the macroeconomic impact was modeled by assuming that economic activity in the relevant industries grows in proportion to the proposed implementation spending in that industry. All funds for implementing the actions were assumed to be sourced from within the state. For urban forests, the funds were modeled as being sourced from a combination of state government and private property owners in proportion to the current estimated private/public spending ratio. For all other actions, funds were assumed to be sourced from the state government. In each modeled scenario, government spending and income to property owners were reduced relative to the Reference Scenario in proportion to the annual costs of implementation. None of the proposed spending was modeled as being sourced from increased taxes. Additional details on the methodology for evaluating macroeconomic impacts are in Appendix I (NWL Technical Support Document).

While the macroeconomic model does count the increased economic activity in the affected industries as part of GSP, it does not quantify many of the important economic, health, and environmental benefits that would occur if these actions were implemented. While these benefits—like the reduced use of pesticides, value of urban trees, and increased recreational opportunities—would be very significant, they are outside the scope of the macroeconomic model.

The macroeconomic model also makes projections about the total level of employment in the state. The model forecasts that the Scoping Plan Scenario, which greatly increases the level of NWL management actions, channels economic activity toward related industries and would lead to a slight increase in total employment. (Table 3-4). While the model does aim to accurately represent many labor market dynamics, including adjustments of wages and migration rates, it does not account for many costs that might be associated with dramatically scaling up employment in a particular industry, such as the cost of job training.

Table 3-4: Gross state product and employment relative to a growing California economy for the Scoping Plan Scenario in 2035 / 2045 (NWL)

	Scoping Plan Scenario (%)
Gross State Product	0.00 / 0.01
Employment	0.12 / 0.10
Personal Income	-0.04 / -0.04
Personal Income per Capita	-0.04 / -0.14

Health Analysis

Air quality is affected by pollutant emissions from various processes associated with energy systems, including the combustion of fossil fuels, as well as the combustion of vegetation biomass from NWL during wildfires. Pollutants that are important contributors to degraded air quality in California include nitrogen oxides (NO_x), particulate matter (PM), reactive organic gases (ROG), and others. Further, in the atmosphere these pollutants are transported away from the locations of the emissions by wind and other phenomena, and undergo chemical reactions that result in the formation of new pollutants such as ground-level ozone and fine particulate matter ($PM_{2.5}$). Both primary (emitted) and secondary (formed) pollutants are important from a public health standpoint and contribute to the incidence of air pollution-related mortality and disease within California populations. Measures focused on GHGs do not incorporate specific targets to reduce emissions of $PM_{2.5}$ or air toxics like benzene. These co-pollutants, which are emitted from many of the same pollution sources as GHGs, affect local air quality and pose known risks to public health, such as the risk of asthma and cardiovascular disease. Generally, for stationary sources, certain harmful pollutants are regulated via local rules and regulations that are reflected in permits for stationary sources and are enforced by local air districts, with CARB also regulating air toxics contaminants from stationary sources with the air districts.

AB 32 GHG Inventory Sectors

To assess health impacts for the AB 32 GHG Inventory sectors, an integrated modeling approach was used to quantify and value the air pollution-related public health benefits of the Scoping Plan Scenario relative to the Reference Scenario. Additional details about the models, assumptions, and methodology are included in Appendix H (AB 32 GHG Inventory Sector Modeling). Using output from the PATHWAYS model, projections of pollutant emissions to 2045 were developed for stationary, area, and mobile source emissions using a detailed base year CARB pollutant emissions inventory. Further, the emissions are processed, including for where and when they occur in California, using the Sparse Matrix Operator Kernels Emissions (SMOKE) model. For example, on-road vehicle emissions were allocated along existing roadways, and refining emissions were assigned to the locations of existing refineries. It should be noted that the emissions projections represent statewide average reductions associated with high-level assumptions about alternative fuels and technologies. For example, emissions occurring from refineries to produce liquid fuels are reduced in line with petroleum demand. This reduction is applied equally to all refineries in the Scoping Plan Scenario and does not specify individual facility responses to changing demand. Similarly, the Scoping Plan Scenario does not specify which refineries transition to biofuel production or where new electricity generation facilities are built.

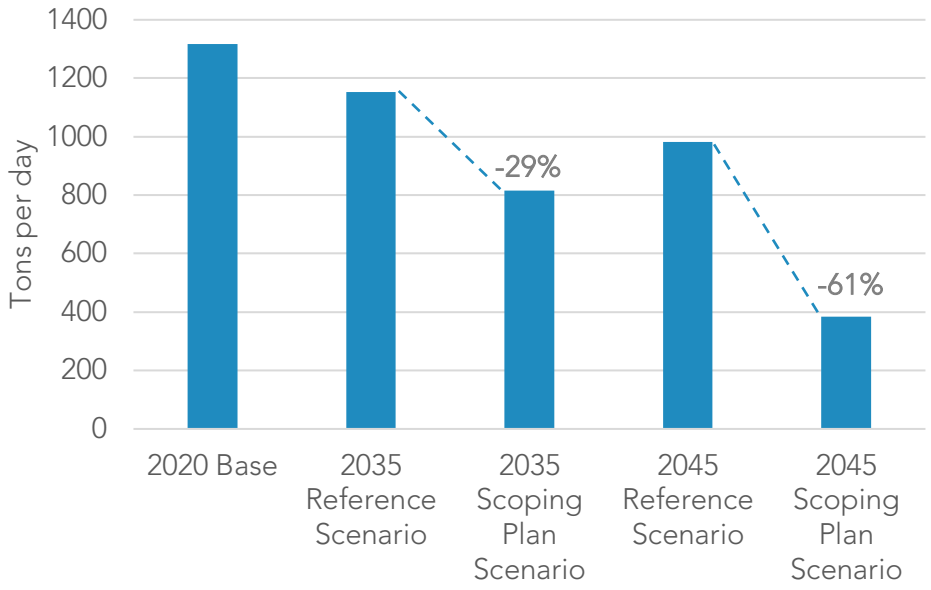
Next, emission changes were translated into impacts on atmospheric pollution levels, including ground-level ozone and $PM_{2.5}$, via an advanced photochemical air quality model called the Community Multiscale Air Quality (CMAQ) model, which accounts for atmospheric chemistry and transport. A comprehensive assessment of how pollutant concentrations are impacted throughout the year was achieved by simulating all months in 2035 and 2045 for the Scoping Plan Scenario.[219] Health benefits were estimated using the U.S. EPA's environmental Benefits Mapping and Analysis Program (BenMAP) model to translate pollutant changes into avoided incidence of mortality, hospital admissions, emergency room visits, and other outcomes as a result of reduced exposure to ozone and $PM_{2.5}$. These outcomes are associated with an economic value in order to aggregate health impacts.

The Scoping Plan Scenario shows a substantial reduction in pollutant emissions relative to the Reference Scenario, including NO_x, $PM_{2.5}$, and ROG. Reductions in NO_x are shown in Figure 3-4. Even under a business-as-usual trajectory, emissions are reduced from present levels by 26 percent in 2045 in the Reference Scenario, demonstrating the impact of current regulations and trends in energy sectors. The Scoping Plan Scenario further reduces NO_x

[219] This annual approach differs from the episodic modeling approach applied to the Proposed Scenario and Alternatives in the Draft 2022 Scoping Plan Update. Appendix H (AB 32 GHG Inventory Sector Modeling) describes both approaches.

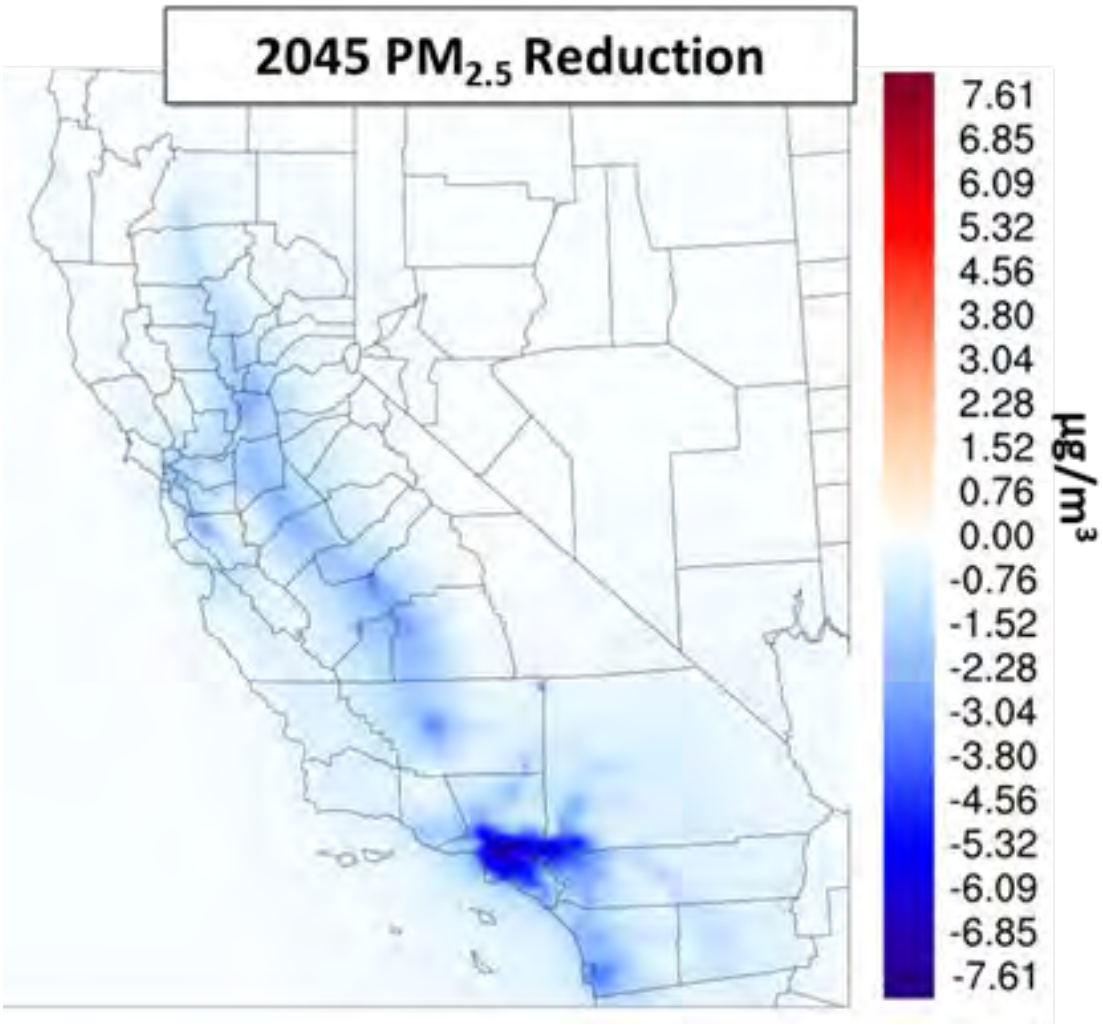
emissions from the Reference Scenario by 29% in 2035 and 61% in 2045. Emission reductions occur throughout the state with particular prominence in urban areas, including the South Coast Air Basin, due to the large presence and activity of emission sources. Appendix H (AB 32 GHG Inventory Sector Modeling) contains additional information about the pollutant emissions modeling and results.

Figure 3-4: Illustration of NOx emission reductions from current levels for the Reference Scenario and the Scoping Plan Scenario (AB 32 GHG Inventory sectors)



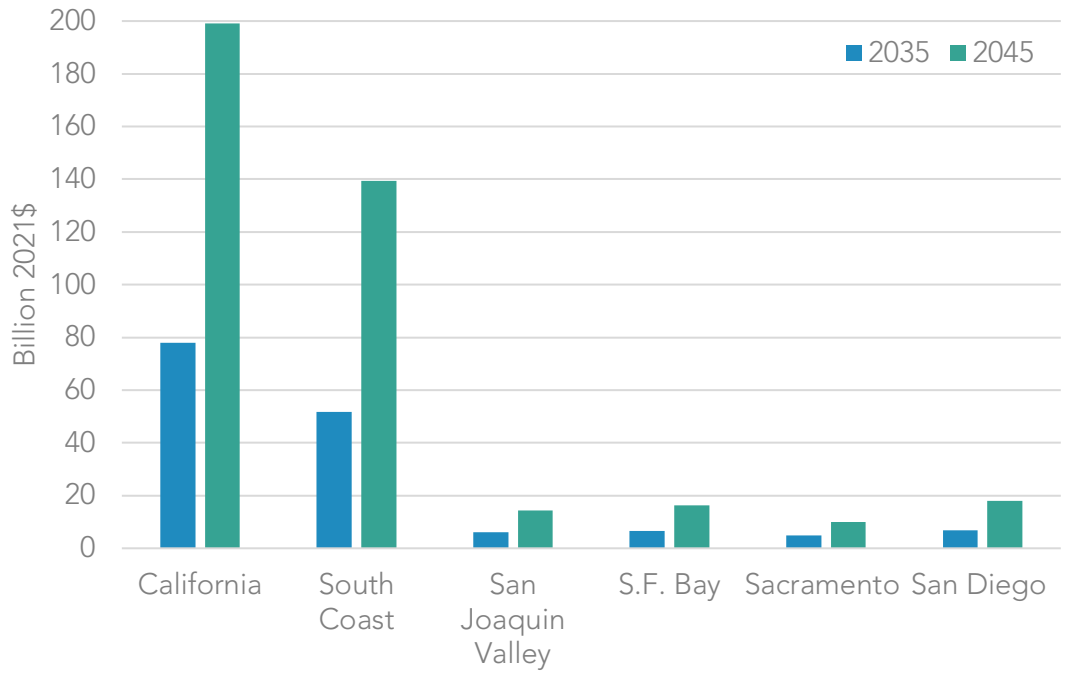
The emission reductions achieve important improvements in air quality throughout California, including reductions in the levels of ozone and $PM_{2.5}$. Reductions in annual $PM_{2.5}$ levels are shown in Figure 3-5. The greatest reductions are evident in Southern California, the San Joaquin Valley, the San Francisco Bay area, and the Greater Sacramento area due to the large presence and activity of emission sources, meteorology, topography, and others. To highlight the extent of the air quality improvements: reductions reach nearly 8 micrograms per cubic meter ($\mu g/m^3$) in 2045 and lead to 76% fewer exceedances of the health-based National Ambient Air Quality $PM_{2.5}$ standard of 12 $\mu g/m^3$. Similarly, ozone improvements reach 19 parts per billion (ppb) and yield 62% fewer exceedance events. Furthermore, the locations of improvements carry important implications for human health as these areas support large urban populations and generally experience the most degraded ozone and $PM_{2.5}$ pollution. Appendix H (AB 32 GHG Inventory Sector Modeling) provides details regarding the atmospheric modeling and results, including differences in ozone and $PM_{2.5}$.

Figure 3-5: Difference in annual average $PM_{2.5}$ ($\mu g/m^3$) in the Scoping Plan scenario relative to the Reference scenario in 2045 (AB 32 GHG Inventory sectors)



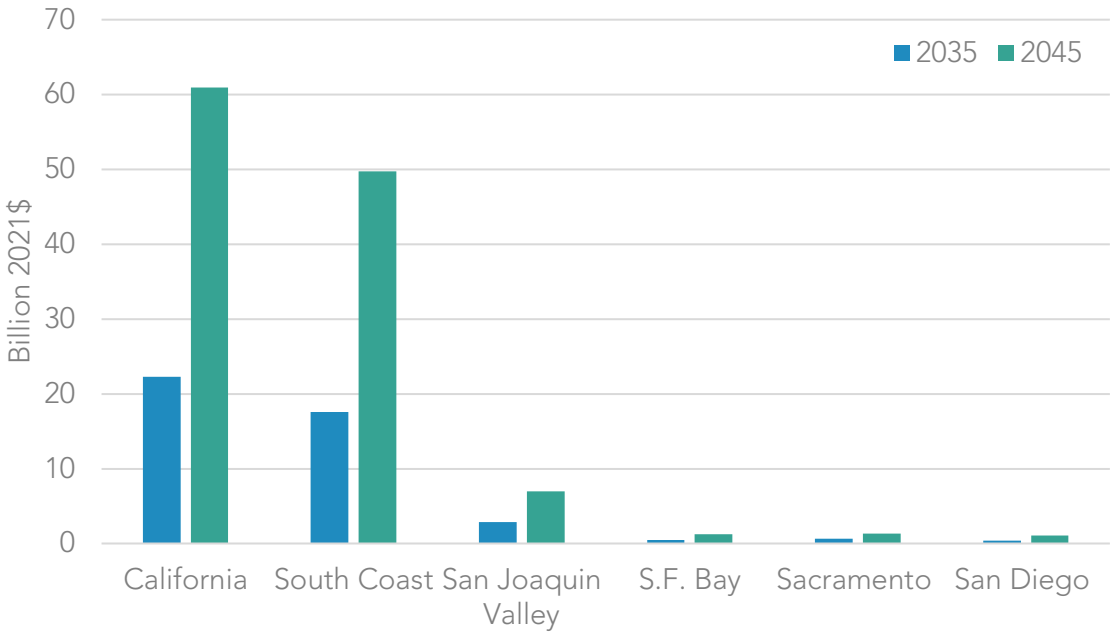
Notable health benefits representing the economic value of the avoided incidence of health effects are associated with the Scoping Plan Scenario. In total, the benefits reach $78 billion in 2035 and $199 billion in 2045, as shown in Figure 3-6. Populations in Southern California benefit the most due to preexisting air quality challenges, significant emission sources and activity, and the presence of a large, dense urban population. Additional details regarding the health impact assessment are provided in Appendix H (AB 32 GHG Inventory Sector Modeling).

Figure 3-6: Total health benefits estimated from air quality improvements in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)



Furthermore, these benefits accrue within socially and economically disadvantaged communities identified by CalEnviroScreen, where they are most needed. Total health benefits within census tracts identified as disadvantaged communities using CalEnviroScreen 4.0 reach $22 billion in 2035 and $61 billion in 2045, as shown in Figure 3-7. Similarly to the statewide health benefits, the largest share of benefits occurs within disadvantaged communities in Southern California. Additional information on the health benefits within disadvantaged communities can be found in Appendix H (AB 32 GHG Inventory Sector Modeling).

Figure 3-7: Disadvantaged community health benefits relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

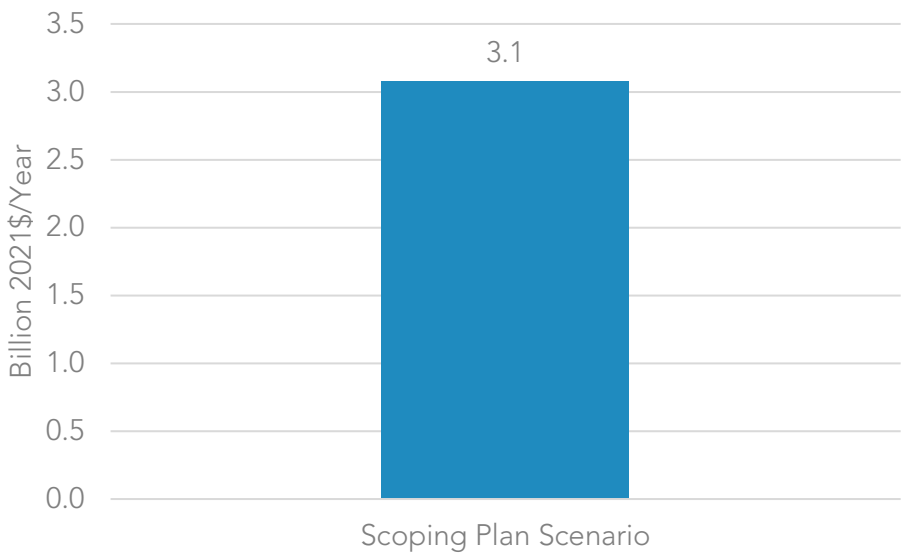


Natural and Working Lands

For NWL, health benefits were evaluated based on projected $PM_{2.5}$ wildfire emissions on forests, shrublands, and grasslands, discussed in the AB 197 Measure Analysis section of the chapter that follows.[220] The health endpoints for the Scoping Plan Scenario and in Appendix I (NWL Technical Support Document) for the alternative scenarios were the basis for the estimated health benefits shown in Figure 3-8. Health benefits were derived from the preliminary University of California, Los Angeles (UCLA) study that estimated annual health impacts and associated costs from California's wildfires from 2008–2018. Additional details are included in Appendix I (NWL Technical Support Document). These costs were applied to the health endpoints discussed in the AB 197 Measure Analysis section of the chapter.

[220] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11, N14. *finalejacrecs.pdf (arb.ca.gov)*.

Figure 3-8: Total average annual health benefits relative to the Reference Scenario for the Scoping Plan Scenario (NWL)



As health impacts analyzed here are driven by wildfire emissions, the health benefits for the Scoping Plan Scenario are directly related to the amount of forest, shrubland, and grassland management action. These management actions reduce vegetation fuels and, as a result, wildfire activity. The Scoping Plan Scenario increases the amount of these management actions, reducing wildfire emissions and avoiding incidence of emission-related health effects. The health benefits, or economic value of the avoided incidence of health effects, correspondingly increase with an increasing management implementation rate. Additional details are included in Appendix I (NWL Technical Support Document).

Estimated health benefits do not include the direct impact of wildfires on injuries, deaths, or mental health, nor the indirect costs of lost ecosystem benefits to wildfire. Additional direct health costs may result from wildfire that would likely increase the health benefits from increased forest, shrubland, and grassland management to reduce wildfire activity. Nonetheless, the conservative health benefits under the Scoping Plan Scenario are estimated to be $3.1 billion per year relative to the Reference Scenario for all NWL actions identified in the Scoping Plan Scenario.

AB 197 Measure Analysis

This section provides estimates for information associated with GHG emissions reduction measures evaluated in this Scoping Plan.[221] These estimates, which were developed as part of the process for meeting the requirements of AB 197 (E. Garcia, Chapter 250, Statutes of 2016), provide information on the relative impacts of the evaluated measures when compared to each other. To support the design of a suite of policies that result in GHG reductions, air quality co-benefits, and cost-effective measures, it is important to understand if a measure will increase or reduce criteria pollutants or toxic air contaminant emissions, or if increasing stringency at additional costs yields few additional GHG reductions. To this end, AB 197 requires the following for each potential emissions reduction measure evaluated in any Scoping Plan update:

- The range of projected GHG emissions reductions that result from the measure;
- The range of projected criteria pollutant emission reductions that result from the measure; and
- The cost-effectiveness, including avoided social costs, of the measure.

The following sections describe the evaluation of measures for the AB 32 GHG Inventory sectors and NWL. For the purposes of this Scoping Plan, the identified emissions reduction measures for the analysis required by AB 197 are actions grouped by sectors where several policies and programs are expected to overlap. This approach reflects the most granular feasible analysis given the modeling tools available,[222] the overlap and interaction effects among policies and incentive programs, the longer planning horizon used for this Scoping Plan compared to previous efforts, and the scale of transition needed to achieve carbon neutrality. To implement this Scoping Plan, dozens of individual regulations, policies, and incentive programs are anticipated that work together to drive down emissions across all economic sectors and support actions. Every specific policy or incentive program that could contribute to the deployment of clean technology and energy called for in this plan may overlap in ways that make it infeasible to tease out those policies and programs' individual effects with any reasonable degree of certainty. For example, in the transportation sector, deploying ZEVs and reducing driving demand may be achieved through a combination of the implementation of new or existing regulations, fuels programs, incentive programs, and VMT reduction initiatives that can each contribute to reductions in emissions for the sector. It is not feasible to isolate each sub action from each other at this time in terms of the share of contribution to total reductions. The estimated emission

[221] AB 197 calls for the evaluation of "emission reduction measures." This Scoping Plan treats each action and its variants on stringency as emission reduction measures for the purposes of this chapter. Appendix C (AB 197 Measure Analysis) lists the measures and corresponding modeling assumptions for each alternative.
[222] See Appendix H (AB 32 GHG Inventory Sector Modeling and Appendix I (NWL Technical Support Document).

reductions, health endpoints, and costs by measure for the Scoping Plan Scenario are presented in this chapter, and the corresponding estimates for the Proposed Scenario and Alternatives 1, 2, and 4 are included in Appendix C (AB 197 Measure Analysis).

Because many of the measures and underlying assumptions interact with each other, isolating the GHG emission reductions, corresponding changes to fuel combustion, and associated cost of an individual measure is analytically challenging. Each measure is evaluated by examining the change in fuel combustion, cost, and emissions associated with just that measure using the PATHWAYS model. The difference between the Scoping Plan Scenario and the Reference Scenario is estimated for each measure. Starting from the Scoping Plan Scenario, the modeling assumptions for an individual measure are reverted to the Reference Scenario values, resulting in GHG reductions, changes to fuel combustion, and costs (or savings). This approach does not reflect interactions between sectors in PATHWAYS that influence the results for each complete alternative, presented earlier. As such, the values associated with each measure should not be added to obtain an overall scenario estimate.

To arrive at the 2045 target for NWL, CARB modeled the ecological impact that climate smart land-based management strategies (suites of on-the-ground actions, or *treatments,* that are used across the landscape to manipulate an ecosystem) will have on ecosystem carbon; and whenever possible, additional co-benefits from those actions. The Scoping Plan Scenario incorporates a set of land management actions at varying scales of implementation for each land type to achieve the GHG emission reductions. Each land type, and its associated management actions, was considered a measure for this analysis. For modeling individual landscapes and management actions, CARB used a suite of models. The complexity of these models varies by land type, depending on the existing science, data, and availability of existing models to use. Appendix I (NWL Technical Support Document) provides detailed modeling assumptions for each NWL type. The estimated emission reductions, health endpoints, and costs by measure under the Scoping Plan Scenario for each NWL type are presented in this chapter, and the corresponding estimates for the Proposed Scenario and NWL Alternatives 1, 2, and 4 are included in Appendix C (AB 197 Measure Analysis).

Estimated Emissions Reductions

Both GHG emissions reductions and emissions of criteria air pollutants were evaluated for the AB 32 GHG Inventory sectors and for NWL. The methods and results are described in this section.

AB 32 GHG Inventory Sectors

In the absence of having direct modeling results for criteria pollutant estimates from PATHWAYS, CARB estimated criteria pollutant emissions impacts by using changes in fuel combustion in units of exajoules from PATHWAYS and emission factors in units of tons per exajoule to estimate the change in emissions in tons per year. Emission factors from a variety

of sources for each sector were utilized, including but not limited to CARB's mobile source emissions models,[223] U.S. EPA's AP 42 Emissions Factors,[224] and the South Coast Air Quality Management District's (AQMD's) District Rules.[225] These emission factors were applied to fuel burn change by fuel type, sector, equipment type, and process, where applicable. Statewide annual average emissions were estimated for three criteria pollutants: NO_x, $PM_{2.5}$, and ROG.

Table 3-5 provides the estimated GHG and criteria pollutant emission reductions for the measures in the Scoping Plan Scenario in 2035 and 2045. The other alternatives are presented in Appendix C (AB 197 Measure Analysis). Based on the estimates below, these measures are expected to provide air quality benefits. The estimates provided in this chapter and Appendix C (AB 197 Measure Analysis) are appropriate for comparing across alternatives considered for the development of this Scoping Plan, but they are not precise estimates.

[223] CARB. MSEI - Modeling Tools. *https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools*.
[224] U.S EPA. AP-42: Compilation of Air Emissions Factors. *https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors*.
[225] South Coast AQMD. South Coast AQMD Rule Book. *https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book*.

Table 3-5: Estimated GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario in 2035/2045 (AB 32 GHG Inventory sectors)

Measure	GHG Reductions ($MMTCO_2$)	NOx Reductions (Short Tons/Year)	$PM_{2.5}$ Reductions (Short Tons/ Year)	ROG Reductions (Short Tons/Year)
Deploy ZEVs and reduce driving demand	-46 / -84	-51,620 / -122,806	-2,008 / -6,506	-18,967 / -30,410
Coordinate supply of liquid fossil fuels with declining California fuel demand	-25 / -30	-1,601 / -2,707	-978 / -1,705	-747 / -1,323
Generate clean electricity	-8 / -31	-92 / -1,555	-177 / -1,382	-41 / -425
Measure	**GHG Reductions ($MMTCO_2$)**	**NOx Reductions (Short Tons/Year)**	**$PM_{2.5}$ Reductions (Short Tons/ Year)**	**ROG Reductions (Short Tons/Year)**
Decarbonize industrial energy supply	-9 / -22	-21,172 / -34,876	-1,188 / -2,527	-3,710 / -6,298
Decarbonize buildings	-14 / -35	-8,105 / -94,455	-826 / -6,877	-1,093 / -8,109
Reduce non-combustion emissions[a]	-0.41 / -0.52 ($MMTCH_4$)	N/A	N/A	N/A
Compensate for remaining emissions	-25 / -64	N/A	N/A	N/A

[a] Methane emissions reductions are reported for this measure.

The measures related to reducing non-combustion emissions and compensating for the remaining emissions do not include changes to fuel combustion, and therefore are not

associated with changes to air pollutants. Biomethane combustion is captured in measures that reduce combustion of fossil gas, such as decarbonizing industrial energy supply and buildings.

Natural and Working Lands

NWL ecosystems naturally vary between being a source and a sink for carbon over time. The NWL ecosystem carbon stock changes projected through mid-century by the suite of models were used to estimate net emissions or emissions reductions relative to the Reference Scenario. These changes in carbon stocks were affected by projected climate change, the implementation of management actions under the various scenarios, land conversion, and (for forests, shrublands, grasslands) wildfire. Each NWL type was evaluated, and an overview of all NWL is presented in Table 3-6. More detailed results for each NWL type can be found in Appendix C (AB 197 Measure Analysis).

Table 3-6: Estimated average annual GHG and criteria pollutant emission reductions relative to the Reference Scenario for the Scoping Plan Scenario from 2025–2045 (NWL)

Measure	GHG Reductions ($MMTCO_2e$/year)	$PM_{2.5}$ Reductions (MT/Year)
Forests/Shrublands/Grasslands	-0.12	-17,500
Annual Croplands	-0.25	N/A
Perennial Croplands	-0.01	N/A
Urban Forest	-1.29	N/A
Wildland Urban Interface (WUI)	0.75	N/A
Wetlands	-0.43	N/A
Sparsely Vegetated Lands	<-0.01	N/A

Fine particulate wildfire emissions were evaluated for forests, shrublands, and grasslands only. Wildfire emissions decreased under the Scoping Plan Scenario compared to the Reference Scenario. The Scoping Plan Scenario's higher level of management actions that reduce tree or shrub densities, protect large trees, reintroduce fire to the landscape, and diversify species and structures result in greater reductions in wildfire emissions.

Estimated Health Endpoints

Climate change mitigation will result in both environmental and health benefits. This section provides information about the potential health benefits of the Scoping Plan Scenario. Health benefits are primarily the result of reduced $PM_{2.5}$ pollution, both from stationary and mobile sources, as well as wildfire in forests, shrublands, and chaparral.

AB 32 GHG Inventory Sectors

CARB used the criteria pollutant emissions in Table 3-5 to understand potential health impacts. Similar to the air quality estimates, this information should be used to understand the relative health benefits of the various measures and should not be taken as absolute estimates of health outcomes. CARB used the incidence-per-ton (IPT) methodology to quantify the health benefits of emission reductions. The IPT methodology is based on a methodology developed by the U.S.

EPA.[226,227,228,229] Under the IPT methodology, changes in emissions are approximately proportional to the resulting changes in health outcomes. IPT factors are derived by calculating the number of health outcomes associated with exposure to $PM_{2.5}$ for a baseline scenario using measured ambient concentrations and dividing that number by the emissions of $PM_{2.5}$ or a precursor. To estimate the reduction in health outcomes, the emission reductions are multiplied by the IPT factor. For future years, the number of outcomes is adjusted to account for population growth. IPT factors were computed for the two types of $PM_{2.5}$: primary $PM_{2.5}$ and secondary $PM_{2.5}$ of ammonium nitrate aerosol formed from precursors.

For this AB 197 analysis, CARB calculated the health benefits associated with the five key measures that are represented by changes to fuel combustion. The health benefits associated with emission reductions for the Scoping Plan Scenario were estimated for each air basin and then aggregated for the entire state of California. CARB assumed that the statewide emission reductions distribution among the air basins is proportional to the baseline emissions in that air basin.

Calculated health endpoints include premature mortality, cardiovascular emergency department (ED) visits, acute myocardial infarction, respiratory ED visits, lung cancer incidence, asthma onset, asthma symptoms, work loss days, hospitalizations due to cardiopulmonary illnesses, hospitalizations due to respiratory illnesses, hospital admissions for Alzheimer's disease, and hospital admissions for Parkinson's disease.[230,231,232] These health endpoints were calculated using the IPT method for estimated emission reductions. Table 3-7 compares the health benefits of emission reductions associated with each measure for the Scoping Plan Scenario in the year

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[226] CARB. CARB's Methodology for Estimating the Health Effects of Air Pollution. Retrieved February 9, 2021. *https://ww2.arb.ca.gov/resources/documents/carbs-methodology-estimating-health-effects-air-pollution*.

[227] Fann, N., C. M. Fulcher, and B. J. Hubbell. 2019. "The influence of location, source, and emission type in estimates of the human health benefits of reducing a ton of air pollution." *Air Quality, Atmosphere & Health* 2:169–176. *https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2770129/*.

[228] Fann, N., K. R. Baker, and C. M. Fulcher. 2012. "Characterizing the $PM_{2.5}$-related health benefits of emission reductions for 17 industrial, area and mobile emission sectors across the U.S." *Environ Int*. 49:141–51. November 15. *https://www.sciencedirect.com/science/article/pii/S0160412012001985*.

[229] Fann, N., K. Baker, E. Chan, A. Eyth, A. Macpherson, E. Miller, and J. Snyder. 2018. "Assessing Human Health $PM_{2.5}$ and Ozone Impacts from U.S. Oil and Natural Gas Sector Emissions in 2025." *Environ. Sci. Technol.* 52 (15), 8095–8103. *https://pubs.acs.org/doi/abs/10.1021/acs.est.8b02050*.

[230] CARB. CARB's Methodology. *https://ww2.arb.ca.gov/resources/documents/carbs-methodology-estimating-health-effects-air-pollution*.

[231] CARB. 2022. Updated Health Endpoints in CARB's Health Benefits Methodology. *Evaluating New Health Endpoints for Use in CARB's Health Analyses*.

[232] Cardio-pulmonary mortality, hospitalizations due to cardiopulmonary illnesses, and hospital admissions due to respiratory illnesses endpoints utilize studies documented in CARB's methodology document. For future assessments, CARB will use more recent studies to estimate cardiovascular hospital admissions and respiratory hospital admissions, as documented in CARB's updated health endpoints memo.

specified (2035 or 2045). The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-7: Estimated avoided incidence of mortality, cardiovascular and respiratory disease onset, work loss days and hospital admissions relative to the Reference Scenario for the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Deploy ZEVs and reduce driving demand in 2035	635	170	70	400	45	1,475	128,930	92,510	95	115	245	40
Deploy ZEVs and reduce driving demand in 2045	1,820	475	200	1,115	135	3,995	343,095	255,800	295	350	745	125
Coordinate supply of liquid fossil fuels with declining CA fuel demand in 2035	115	30	15	70	10	275	23,530	16,880	20	20	50	10

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Coordinate supply of liquid fossil fuels with declining CA fuel demand in 2045	215	55	25	130	15	490	40,860	30,445	35	40	95	15
Generate clean electricity in 2035	20	5	0	10	0	45	3,930	2,820	5	5	10	0
Generate clean electricity in 2045	170	45	20	105	15	385	32,065	23,890	25	30	75	10
Decarbonize industrial energy supply in 2035	300	80	35	190	20	695	60,660	43,520	45	55	115	20
Decarbonize industrial energy supply in 2045	595	155	65	365	45	1,310	111,925	83,435	95	115	245	40

Measure	Mortality	Cardiovascular ED Visits	Acute Myocardial Infarction	Respiratory ED Visits	Lung Cancer Incidence	Asthma Onset	Asthma Symptoms	Work Loss Days	Hospital Admissions, Cardiovascular	Hospital Admissions, Respiratory	Hospital Admissions, Alzheimer's Disease	Hospital Admissions, Parkinson's Disease
Decarbonize buildings in 2035	155	40	15	95	10	360	31,130	22,335	25	30	60	10
Decarbonize buildings in 2045	1,610	420	175	985	120	3,550	303,830	226,500	260	310	665	115
Note: All values are rounded to the nearest 0 or 5.												

The measures related to reducing non-combustion emissions and compensating for remaining emissions do not include changes to fuel combustion and therefore are not associated with changes to air pollutants or health endpoints. Biomethane combustion is captured in measures that reduce combustion of fossil gas, such as decarbonizing industrial energy supply and buildings.

Although the estimated health outcomes presented are based on a well-established methodology, they are subject to uncertainty. For instance, future population estimates are subject to increasing uncertainty as they are projected further into the future, and baseline incidence rates can experience year-to-year variation. Also, the relationship between changes in pollutant concentrations and changes in pollutant or precursor emissions is assumed to be approximately proportional.

In addition, emissions are reported at an air basin level and do not capture local variations. These estimates also do not account for impacts from global climate change, such as temperature rise, and are only based on the scenarios in this Scoping Plan.

The fuel changes for each AB 197 measure are estimated based on the impact of each measure compared to the Reference Scenario for the years 2035 and 2045. Therefore, aggregating the effect of each measure would overestimate the impacts of the Scoping Plan Scenario because the implementation of each measure would affect the level of benefits of the other measures. This measure-by-measure analysis uses a different methodology for calculating health endpoints than does the health analysis for the complete Scoping Plan Scenario provided earlier.

Natural and Working Lands

Implementation of NWL management strategies to mitigate and adapt to climate change will result in both environmental and health benefits. This section provides information about the potential health benefits of measures evaluated for the Scoping Plan Scenario. For this analysis, health benefit estimates were focused on increases or decreases to $PM_{2.5}$ resulting from wildfire emissions on forests, shrublands, and grasslands.[233] Other health benefits resulting from NWL management actions in the Scoping Plan Scenario are not quantified here but are important for all Californians. This includes, but is not limited to, reductions in exposure to synthetic pesticides when switching to organic agricultural systems, improvements in shade availability and mental health with increasing urban forest cover, improved mental health from opportunities for recreation in resilient and healthy environments, and protection from floods and rising sea levels.

[233] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11, N14. finalejacrecs.pdf (arb.ca.gov).

These examples are by no means exhaustive, as our natural and working lands provide immense health benefits to everyone.

For this analysis, CARB used the $PM_{2.5}$ emissions in Table 3-6 to understand potential health impacts. This information should be used to understand the relative health endpoints of the various measures and should not be taken as absolute estimates of health outcomes of this Scoping Plan statewide or within a specific community. The IPT methodology was used to calculate health endpoints, similar to the AB 32 GHG Inventory Sector analysis. CARB calculated the annual health endpoints associated with the wildfire emissions changes resulting from the implementation of management strategies on forests, shrublands, and grasslands under each alternative. The annual health endpoints associated with emission reductions for the Scoping Plan Scenario were estimated for the entire state. Calculated health endpoints include emissions-caused mortality, hospital admittance, and emergency room visits from asthma; hospital admittance from chronic obstructive pulmonary disease; and emergency room visits from respiratory and cardiovascular outcomes. Table 3-8 compares the average annual health endpoints of wildfire emission reductions associated with the Scoping Plan Scenario over the period 2025–2045. The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-8: Estimated average annual avoided incidence of hospital admissions, emergency room visits, and mortality relative to the Reference Scenario for the Scoping Plan Scenario resulting from forest, shrubland, and grassland wildfire emissions (NWL)

Health Endpoints from Forest, Shrubland, and Grassland Wildfire Emissions	Average Annual Avoided Incidence
Hospital admissions from asthma	22
Hospital admissions from chronic obstructive pulmonary disease without asthma	19
Hospital admissions from all respiratory outcomes	63
Emergency room visits from asthma	155
Emergency room visits from all respiratory outcomes	419
Emergency room visits from all cardiovascular outcomes	156
All causes of mortality	394

Estimated Social Cost

Social costs are generally defined as the cost of an action on people, the environment, or society and are widely used to understand the impact of regulatory actions. One tool, the social cost of greenhouse gases (SC-GHG), is an estimate of the present value of the costs associated with the emission of GHGs in future years. It combines climate science and economics to help understand the benefits of reducing GHG emissions. The estimates of the social cost of carbon ($SC\text{-}CO_2$) and social cost of methane ($SC\text{-}CH_4$), two types of SC-GHGs presented here, estimate the value of the net harm to society associated with adding GHGs to the atmosphere in a given year; they do not represent the cost of actions taken to reduce GHG emissions (known as the *cost of abatement*) nor the cost of GHG emissions reductions. In principle, the SC-GHG includes the value of climate change impacts, including but not limited to, changes in net agricultural productivity, human health effects, property damage from increased flood risk and other natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. It reflects the societal value of reducing emissions

of the gas in question by one metric ton.[234] Many of these damages from GHG emissions today will affect economic outcomes throughout the next several centuries.

In 2008, federal agencies began incorporating SC-CO_2 estimates into the analysis of their regulatory actions. U.S. EPA has used various models and discount rates to determine the value of future impacts. Generally, these models begin with assumptions to predict economic activity over time, along with projected GHG emissions. The modeled emissions are input into a model of the global climate system, which then translates into estimates of surface temperature, sea level rise, and other impacts. These outputs are used to estimate economic damages per ton of GHG emitted in a given year in the future. Since the models are calculating the present value of future damages, a discount rate is applied. For example, the SC-CO_2 for the year 2045 represents the value of climate change damages from a release of CO_2 in 2045 discounted back to today. The present value is significantly affected by the discount rate used; a higher discount rate results in a lower present value. For example, in 2021 dollars the SC-CO_2 in 2045 is $31 using a 5 percent discount rate, $88 using a 3 percent discount rate, and $122 using a 2.5 percent discount rate. Additional detail is included in Appendix C (AB 197 Measure Analysis).

The 2017 Scoping Plan utilized SC-CO_2 and SC-CH_4 Obama Administration-era values developed by the Council of Economic Advisors and the Office of Management and Budget-convened Interagency Working Group on the Social Cost of Greenhouse Gases (IWG)[235] to consider the social costs of actions to reduce GHG emissions. The Biden Administration reinstated these values in February 2021,[236] after they had been rescinded and significantly revised by the Trump Administration. The reinstatement was considered an interim step, and the Biden Administration also reconvened the IWG to continue its work to evaluate and incorporate the latest climate science and economic research and

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[234] U.S. Government. Interagency Working Group on Social Cost of Greenhouse Gases. February 2021. Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide – Interim Estimates under Executive Order 13990. *https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf*

[235] Originally titled the "Interagency Working Group on the Social Cost of Carbon," the IWG was renamed in 2016. 82 Fed. Reg. 16093, 16095-96 (Mar. 28, 2017). *https://www.govinfo.gov/content/pkg/FR-2017-03-31/pdf/2017-06576.pdf*.

[236] Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis, Executive Order 13990 (Jan. 20, 2021), 86 Fed. Reg. 7037 (Jan. 25, 2021). *https://www.energy.gov/sites/default/files/2021/02/f83/eo-13990-protecting-public-health-environment-restoring.pdf*. IWG, Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates Under Executive Order 13990 (February 2021), *https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf* See also, The White House. 2021. A Return to Science: Evidence-Based Estimates of the Benefits of Reducing Climate Pollution. *https://www.whitehouse.gov/cea/written-materials/2021/02/26/a-return-to-science-evidence-based-estimates-of-the-benefits-of-reducing-climate-pollution/*.

respond to the National Academies' recommendations from 2017 as it develops a more complete revision of the estimates.

It is important to note that the models used to produce SC-GHG estimates do not include all of the important physical, ecological, and economic impacts of climate change recognized in the climate literature. There are additional costs to society, including the costs associated with changes in co-pollutants and costs that cannot be included due to modeling and data limitations. The IWG has stated that the range of the interim SC-GHG estimates likely underestimates societal damages from GHG emissions.[237] The revised estimates were originally slated to be released in early 2022 but were stalled.[238] CARB staff is applying the interim values presented in the IWG February 2021 Technical Support Document (TSD), which reflect the best available science in the estimation of the socioeconomic impacts of GHGs.[239] This Scoping Plan utilizes the TSD standardized range of discount rates, from 2.5 to 5 percent, to represent varying valuation of future damages.

AB 32 GHG Inventory Sectors

Table 3-9 presents the estimated social cost, in terms of avoided economic damages, for each measure of the Scoping Plan Scenario. For each measure, Table 3-9 includes the range of the SC-CO_2 and SC-CH_4 that results from the GHG emissions reductions in 2035 and 2045 at 2.5 and 5 percent discount rates. Additional background on the SC-GHG and methodology for calculating the SC-CO_2 and SC-CH_4 estimates in this Scoping Plan, as well as estimates for the alternatives, are provided in Appendix C (AB 197 Measure Analysis).

[237] Interagency Working Group on Social Cost of Greenhouse Gases. 2021. Technical Support Document. https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

[238] See *Louisiana v. Biden* (W.D. La. 2022) 585 F.Supp.3d 840, stayed pending review (5th Cir. Mar. 16, 2022) 2022 WL 866282. A federal district court ruling issued in early February 2022 had granted a preliminary injunction blocking the Biden Administration from using the interim IWG SC-GHG estimates. However, a federal appeals court overturned the lower court's preliminary injunction in March 2022, which allows the Biden Administration to continue using the policy as legal proceedings continue. CARB will continue to monitor the litigation. However, the federal action does not prohibit CARB from using social cost of carbon and CARB will use the best available science regardless of politics. A separate federal appeals court upheld the Biden administration's use of the IWG SC-GHG estimates in October 2022. *Missouri v. Biden* (8th Cir. 2022) ____ F.4th ____.

[239] Interagency Working Group on Social Cost of Greenhouse Gases. 2021. Technical Support Document. https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf

Table 3-9: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Social Cost of Carbon in 2035, 5%–2.5% Discount Rate Billion USD (2021 dollars)	Social Cost of Carbon in 2045, 5%–2.5% Discount Rate Billion USD (2021 dollars)
Deploy ZEVs and reduce driving demand	1.12–4.87	2.64–10.23
Coordinate supply of liquid fossil fuels with declining California fuel demand	0.61–2.63	0.95–3.67
Generate clean electricity	0.20-0.88	0.97–3.75
Decarbonize industrial energy supply	0.23–1.01	0.69–2.67
Decarbonize buildings	0.35–1.52	1.11–4.32
Reduce non-combustion emissions	0.51–1.29 (SC-CH_4)	0.86–2.01 (SC-CH_4)
Compensate for remaining emissions	0.61–2.66	2.03–7.84
Scoping Plan Scenario SC-CO_2	2.4–10.4	5.6–21.9
Scoping Plan Scenario SC-CH_4	0.51–1.3	0.86–2.0
Scoping Plan Scenario (Total)[a]	2.9–11.7	6.5–23.9

[a] CARB staff could not precisely separate some CO_2 and CH_4 from other GHGs from PATHWAYS outputs, but the contribution is believed to be small for purposes of calculating the social cost of carbon. The approach used to estimate GHG emissions reductions for individual measures in PATHWAYS does not reflect cross-sector interactions. Therefore, the GHG values for each measure do not sum to the overall scenario total. The total GHG emissions reduction used in this calculation is 97 $MMTCO_2e$ in 2035 and 180 $MMTCO_2e$ in 2045.

Natural and Working Lands

The SC-CO_2 estimates for the NWL measures shown in Table 3-10, in terms of avoided economic damages, reflect 2021 IWG interim values, updated for inflation, similar to the AB 32 GHG Inventory Sector analysis. This analysis utilizes the 2.5 percent and 5 percent

discount rate and the average annual emissions reductions from each NWL type from 2025–2045. Estimates for all alternatives are included in Appendix C (AB 197 Measure Analysis).

Table 3-10: Estimated social cost (avoided economic damages) of measures considered in the Scoping Plan Scenario (NWL)

Measure	Social Cost of Carbon in 2035, 5%–2.5% Discount Rate Billion USD (2021 dollars)	Social Cost of Carbon in 2045, 5%–2.5% Discount Rate Billion USD (2021 dollars)
Forests/Shrublands/Grasslands	0.003–0.012	0.004–0.014
Annual Croplands	0.006–0.027	0.008–0.031
Perennial Croplands	<0.001–0.001	0.000–0.001
Urban Forest	0.032–0.138	0.041–0.157
Wildland Urban Interface (WUI)	(0.018) – (0.080)[a]	(0.023) – (0.090)
Wetlands	0.011–0.046	0.014–0.053
Sparsely Vegetated Lands	<0.001	<0.001

[a] Parentheses indicate an increase in estimated social cost, i.e., an increase in economic damages. This is only the case for WUI measures where emissions are increased, shown in Table 3-6. The estimated social cost does not account for the decrease in wildfire risk or decrease in wildfire damages resulting from the WUI measures.

Social Costs of GHGs in Relation to Cost-Effectiveness

AB 32 includes a requirement that rules and regulations "achieve the maximum technologically feasible and cost-effective" greenhouse gas emissions reductions.[240] Under AB 32, *cost-effectiveness* means the relative cost per metric ton of various GHG reduction strategies,[241] which is the traditional cost metric associated with emission control. In contrast, the SC-CO_2, SC-CH_4, and social cost of nitrous oxide (SC-N_2O), because they are estimates of the cost to society of additional GHG emissions, can be used to estimate of the economic benefits of reducing emissions, but do not take into account the cost of the actions that must be taken to achieve those GHG emissions reductions.

There may be technologies or policies that do not appear to be cost-effective when compared to the SC-CO_2, SC-CH_4, and SC-N_2O associated with GHG reductions. However, these technologies or policies may result in other benefits that are not reflected in the IWG social costs. Examples include the evaluation of social diversification of the portfolio of transportation fuels (a goal outlined in the Low Carbon Fuel Standard) and reductions in criteria pollutant emissions from power plants (as in the Renewables Portfolio Standard). Additionally, costs for new technology may be higher early on in a technology's development cycle and may drop over time as use of the technology is scaled up.

Estimated Cost per Metric Ton

AB 197 requires an estimation of the cost-effectiveness of the measures evaluated for this Scoping Plan. The cost (or savings)[242] per metric ton of CO_2e reduced for each measure is one metric for comparing the performance of the measures. Additional factors beyond the cost per metric ton that could be considered include continuity with existing laws and policies, implementation feasibility, contribution to fuel diversity and technology transformation goals, and health and other benefits to California. These considerations are not reflected in the cost per metric ton estimates presented below. It is important to understand the relative cost-effectiveness of individual measures as presented in this section. However, the economic analysis presented earlier in this chapter, in Appendix H

[240] AB 32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. (AB 32, Nuñez, Chapter 488, Statutes of 2006). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32.
[241] Health & Saf. Code § 38505(d).
[242] Similarly, to the direct costs reported earlier, the cost per metric ton of a measure reflects the stock costs and any fuel or efficiency savings associated with a measure divided by the GHG emission reduction achieved by the measure. Costs are reported as positive values, and savings are reported as negative values.

(AB 32 GHG Inventory Sector Modeling), and in Appendix I (NWL Technical Support Document) provides a more comprehensive analysis of how the Scoping Plan Scenario and alternative scenarios affect the state's economy and jobs.

AB 32 GHG Inventory Sectors

The cost per metric ton for the AB 32 GHG Inventory sectors was computed for each measure independently relative to the Reference Scenario using the sensitivity calculations based on PATHWAYS and RESOLVE outputs. The difference in the annualized cost between the Scoping Plan Scenario and the Reference Scenario was computed for each measure in 2035 and in 2045. The incremental cost was divided by the incremental GHG emissions impact to calculate the cost per metric ton in each year. To capture the fuel and GHG impacts of investments made from 2022 through 2035, or from 2022 through 2045, CARB computed an average annual cost per metric ton. The incremental cost in each year was averaged over the period. This value is divided by the corresponding annual, incremental GHG impact averaged over the same period.

The cost metric includes the annualized incremental cost of energy infrastructure, such as zero-emission vehicles, electric appliances, and required revenue to support all electric assets. A residual value for equipment such as vehicles or appliances that are retired early is included. The annual fuel cost or avoided fuel cost that results from efficiency improvements or changes to demand for fuels associated with transitioning to alternative fuels is included. Not included in this cost metric are costs that represent transfers within the state, such as incentive payments for early retirement of equipment.

It is important to note that this cost per metric ton does not represent an expected market price value for carbon mitigation associated with these measures. In addition, the values do not capture fuel savings or GHG reductions associated with the full economic lifetime of measures that have been implemented by the target date of 2035 or 2045 but whose impacts extend beyond the target date.

Table 3-11 includes the cost per metric ton and annual average cost per metric ton estimates for the Scoping Plan Scenario. The other alternatives are presented in Appendix C (AB 197 Measure Analysis). Measures that are relatively less costly in 2035 or 2045 are also less costly over the extended period. As noted earlier, incremental costs of new vehicles are generally offset by gains in efficiency and avoided fuel consumption resulting in negative cost per metric ton.

Table 3-11: Estimated cost per metric ton of reduced CO_2e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (AB 32 GHG Inventory sectors)

Measure	Annual Cost, 2035 ($/ton)	Average Annual Cost, 2022–2035 ($/ton)	Annual Cost, 2045 ($/ton)	Average Annual Cost, 2022–2045 ($/ton)
Deploy ZEVs and reduce driving demand	-171	-99	-103	-122
Coordinate supply of liquid fossil fuels with declining CA fuel demand	60	109	-50	39
Generate clean electricity[a]	101	156	145	161
Decarbonize industrial energy supply	290	217	257	274
Decarbonize buildings	235	230	112	213
Reduce non-combustion emissions	93	94	106	99
Compensate for remaining emissions	745	823	236	485

[a] Note: The denominator of this calculation (2045) does not include GHG reductions occurring outside of California resulting from SB 100. If these reductions were included, this number would be lower.

Natural and Working Lands

The cost per metric ton for NWL measures were computed for the Scoping Plan Scenario relative to the Reference Scenario using the projected carbon stock/sequestration data from the NWL modeling and the direct cost estimates for each management action, described earlier. Direct costs represent the cost of implementing a certain management action. The projected emissions reductions take into account the loss of carbon that results from the management action, such as fuels reduction treatments in forests, as well as climate change effects on growth. The direct cost for each NWL measure was divided by the average annual emission reductions presented in Table 3-6 to produce the cost

per metric ton. The increasing effect of climate change on diminished future growth reduces the ability of the land to sequester or store carbon, driving up the cost per ton.

It is important to note that this cost per metric ton does not represent an expected market price value for carbon mitigation associated with these measures. In addition, emissions benefits of NWL management actions often take longer time periods to accrue, and these values only capture GHG reductions up to 2045.

Table 3-12 includes the average cost per metric ton estimates for the average annual CO_2e reductions from 2025 through 2045 for the Scoping Plan Scenario. The other alternatives are presented in Appendix C (AB 197 Measure Analysis).

Table 3-12: Estimated average cost per metric ton of reduced CO_2e relative to the Reference Scenario for measures considered in the Scoping Plan Scenario (NWL)

Measure	Average Cost per Reduced Ton CO_2e ($/Ton)
Forests/Shrublands/Grasslands	15,500
Annual Croplands	1,100
Perennial Croplands	412
Urban Forest	3,270
Wildland Urban Interface (WUI)	N/A
Wetlands	64
Sparsely Vegetated Lands	451,000

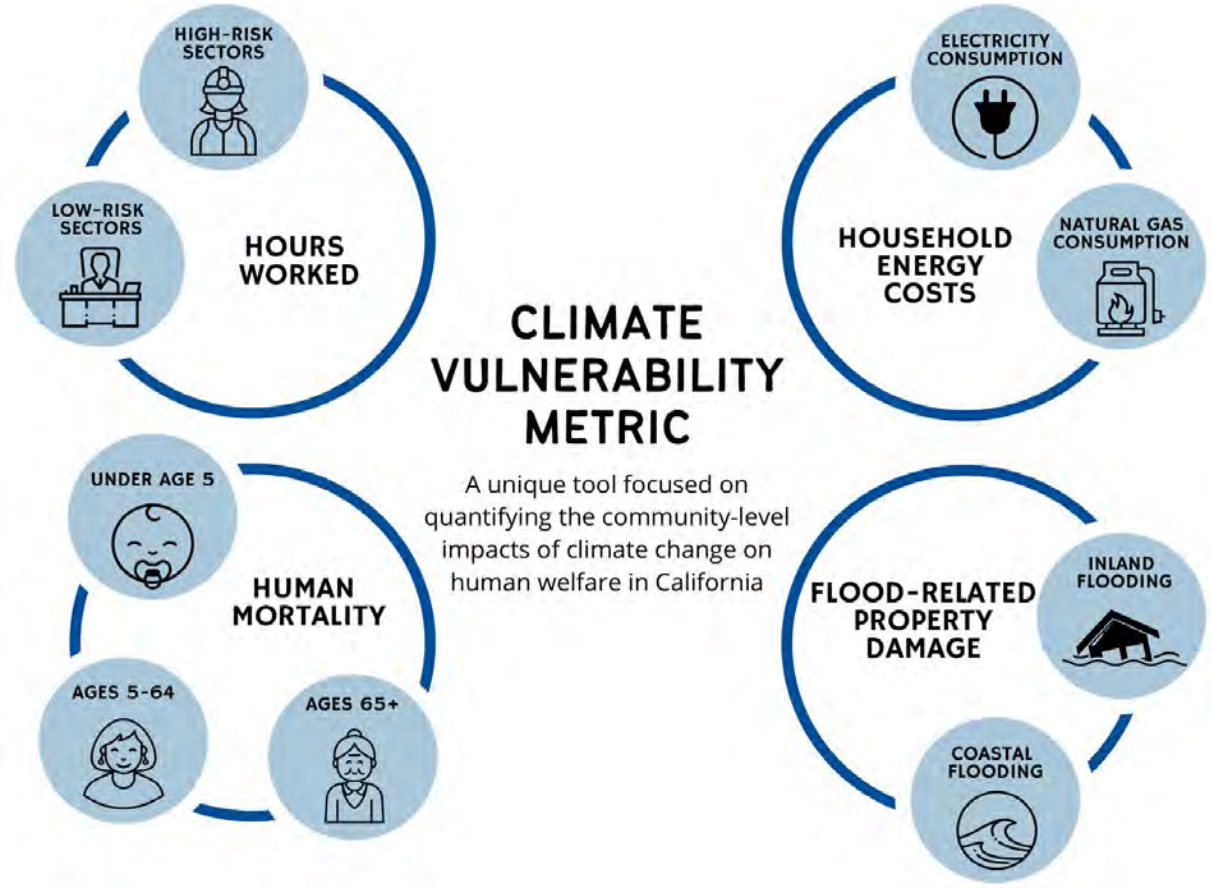
Climate Vulnerability Metric

As California invests in climate mitigation and adaptation, it is essential to understand that the relative impact of climate change will vary across the state's communities. Due to persisting health and opportunity gaps, not all communities are equally resilient in the face of climate impacts. A global metric such as the Social Cost of Carbon cannot adequately capture the incremental additional economic impact faced by overly burdened communities. The Climate Vulnerability Metric (CVM) is specifically focused on quantifying the community-level impacts of a warming climate on human welfare and the additional costs. Additional details and results are included in Appendix K (Climate Vulnerability Metric).

The CVM aggregates the impacts of climate change that can be quantified at the census tract level using robust and currently available research. The CVM includes the projected impacts of climate change on human welfare across four categories (hours worked, household energy costs, human mortality, and flood-related property damage) through midcentury. The CVM identifies nine components of the four climate impacts as shown in Figure 3-9 and aggregates the data to generate a total CVM result for each census tract. To ensure that the CVM represents the diversity of California communities, it is reported as the aggregate monetized impact of climate change as a percentage of census tract-specific incomes.[243] For example, a CVM value of 3 implies that by 2050, a census tract is projected to experience human welfare impacts of climate change that amount to 3% of annual income in that tract.

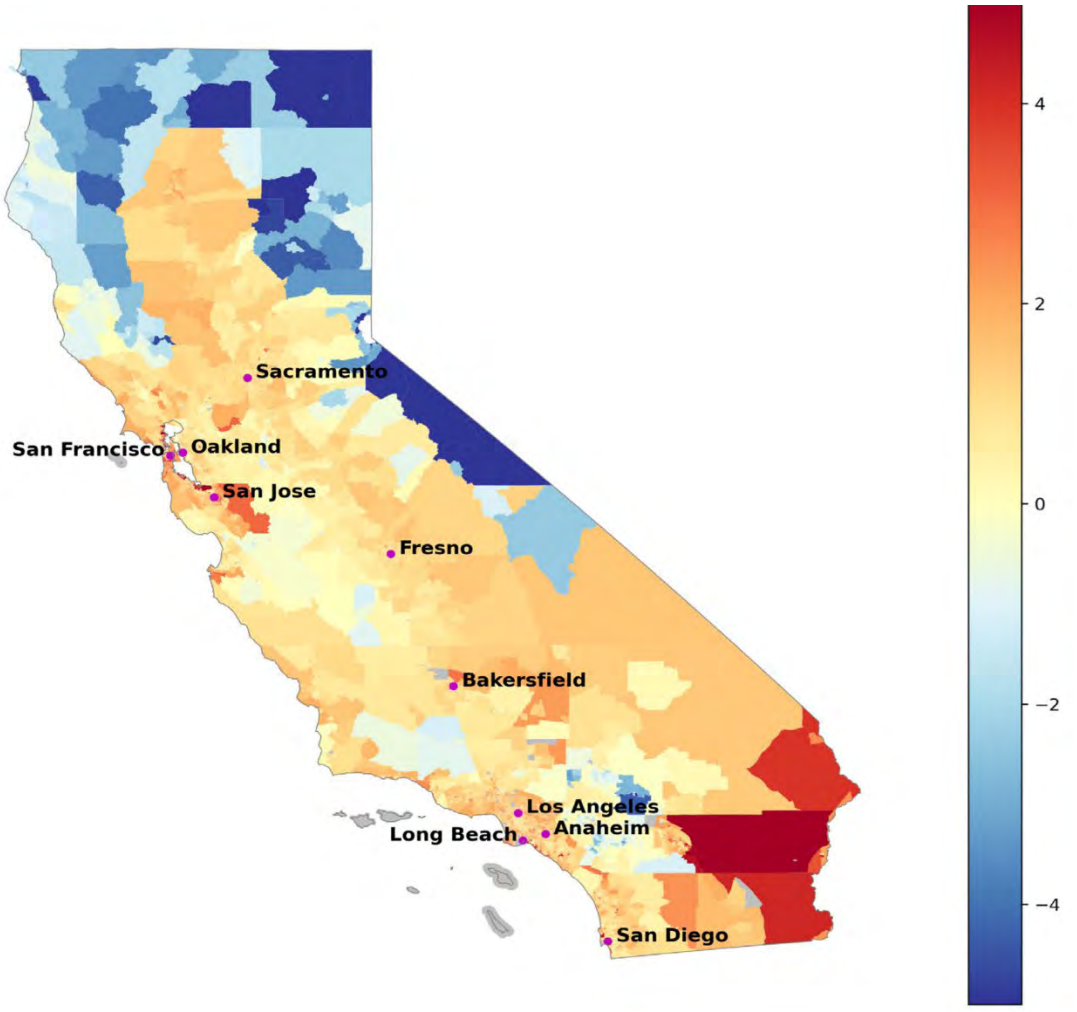
[243] Per capita income in 2019 for census tracts across California ranges from $633 to $176,388, with a median of $32,181 ($2019). Source: American Community Survey.

Figure 3-9: Categories of climate change impacts on human welfare included in the Climate Vulnerability Metric.



The CVM shows that climate change will have highly unequal impacts across California. While some southeastern regions of California are estimated to suffer damages that exceed 5% of annual income, other high-elevation northeastern regions of California are estimated to see benefits of up to 10%. Some low-lying urban areas, such as the San Francisco Bay Area, are estimated to be particularly vulnerable, while much of the Central Valley is estimated to suffer at least moderate economic damages relative to the rest of the state. It is important to note that the CVM does not set a threshold for vulnerability. Instead, it shows relative impacts across census tracts. The CVM is limited to the impacts that can currently be quantified at the census tract level.

Figure 3-10: Combined impacts of climate change in 2050 under a moderate emissions scenario; damages as share of 2019 tract income (%)



The map shows combined impacts of climate change in 2050 under a moderate emissions scenario (RCP 4.5), reported as a share of 2019 census tract income. For example, a CVM value of 3 implies that by 2050, a census tract is projected to experience human welfare impacts of climate change that amount to 3% of annual income. Impacts are combined across the categories shown in Figure 3-9. The higher the CVM for a given census tract, the more damaging the projected impacts of climate change on human welfare. Census tracts with high CVMs are represented by positive percentages in orange and red. A lower CVM is associated with lower projected impacts of climate change, shown in yellow, while a negative CVM value represents a projected beneficial impact of climate change (e.g., through reductions in deaths caused by extremely cold winter weather). Negative CVMs are represented by negative percentages in blue.

By providing information about how climate vulnerability varies across California (Figure 3-10), the CVM results can be used to direct resources to enhance resiliency in the state's

most vulnerable communities based on the specific impacts, such as heat or flooding, they are experiencing. The CVM may be used in combination with existing screening tools, such as CalEnviroScreen 4.0, to identify communities that face environmental and health hazards that contribute to disproportionate economic impacts in addition to climate vulnerability. The CVM can become an essential source of information to implement this Scoping Plan and build a more resilient, just, and equitable future for all communities.

Public Health

Health Analysis Overview

This section focuses on a broader evaluation of public health and climate change. Science demonstrates that taking action to address climate change presents one of the most significant opportunities to improve public health outcomes.[244] Transitioning to clean energy and technology and improving land and ecosystem management will lead to a much healthier future. Many actions to reduce GHG emissions also have health co-benefits that can improve the health and well-being of populations across the state, as well as address climate change. This section and the accompanying Appendix G (Public Health) provide a qualitative analysis of health benefits to accompany the quantitative health analysis included in this chapter, in Appendix C (AB 197 Measure Analysis), and in Appendix H (AB 32 GHG Inventory Sector Modeling). Together the qualitative and quantitative analyses of benefits are demonstrating the many ways that climate action and health improvements go hand in hand.

Climate change can lead to a wide range of direct health impacts such as increased heat-related illnesses (i.e., heat exhaustion and heat stroke), and injuries and deaths from extreme weather events or disasters (e.g., severe storms, flooding, wildfires). Indirect impacts include:

- more air pollution-related exacerbations of cardiovascular and respiratory diseases (e.g., due to increased smog, wildfire smoke)
- increased vector-borne and fungal diseases due to changes in the distribution and geographic range of disease-carrying species (e.g., mosquitoes, ticks, fungi in dust)
- negative nutritional consequences related to decreases in agricultural food yields
- stress and mental trauma due to extreme weather-related catastrophes
- anxiety, depression, and other mental health impacts associated with gradual changes in the climate (e.g., prolonged drought or temperature shifts affecting jobs and industries) that result in unemployment and income loss

[244] Watts, N., W. N. Adger, P. Agnolucci, et al. 2015. “Health and climate change: Policy responses to protect public health.” *Lancet* 386, 1861–1914.

- residential displacement and home loss (e.g., sea level rise impacting coastal communities)

Wildfires and wildfire smoke are one area where we have already seen and expect to see even further drastic impacts on the health of Californians. According to CalFire, since 1932 the top eight largest wildfires in California have occurred in the past five years (2017–2022), with 151 deaths due directly to fires during that period.[245] Researchers estimate that wildfire smoke during fall 2020 may have led to as many as 3,000 excess deaths, with at least 95% of Californians suffering unhealthy levels of particle pollution due to wildfires in 2020.[246] Continued climate change is projected to further increase smoke exposure from wildfires through the end of the century.[247] Wildfires also create a high-risk environment for outdoor workers, including agricultural workers. While the direct medical and physical health impacts are often most noticeable, the psychological impacts can develop and persist well after the event. Estimates indicate that 20%–65% of survivors of extreme weather events have mental health issues following the event.[248]

Extreme heat, drought, and associated worsened air quality impacts are among the most serious climate-related exposures affecting the health of Californians. Numerous studies find a wide range of adverse health effects accompanying extreme heat, including heat stroke and adverse birth outcomes, and find that extreme heat can harm most body systems. Climate change exacerbates air pollution problems that cause difficulty breathing and can lead to serious illness and death in many parts of California. Increasing temperatures cause increases in ozone and other pollution concentrations, including for California's most polluted regions, and heighten health risks for the vulnerable and marginalized populations living in these areas.[249] In 2020, there were 157 ozone polluted days across Los Angeles, Orange, Riverside, and San Bernardino Counties—the most days since 1997. In addition, particulate matter exposure is a heightened problem during

[245] California Department of Forestry and Fire Protection (CAL FIRE). "Stats and Events." *Cal Fire Department of Forestry and Fire Protection*, https://www.fire.ca.gov/stats-events/.
[246] G-FEED. 2020. Indirect mortality from recent wildfires in CA. http://www.g-feed.com/2020/09/indirect-mortality-from-recent.html.
[247] M. D. Hurteau, A. L. Westerling, C. Wiedinmyer, and B. P. Bryant. 2014. "Projected effects of climate and development on California wildfire emissions through 2100." *Environ. Sci. Technol.* 48, 2298–2304.
[248] American Public Health Association. 2019. Addressing the Impacts of Climate Change on Mental Health and Well-Being. Policy No: 20196. https://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2020/01/13/addressing-the-impacts-of-climate-change-on-mental-health-and-well-being.
[249] American Lung Association. State of the Air 2021. https://www.lung.org/research/sota.

droughts, which are expected to increase over this century.[250,251] Worse air quality leads to illnesses, emergency room visits, and hospitalizations for chronic health conditions, including chronic obstructive pulmonary disease (COPD), asthma, chronic bronchitis, and other respiratory and cardiovascular conditions, as well as increased risk for respiratory infections, which all result in greater health costs to the state.[252,253,254] These and other climate-related health impacts are discussed in more detail in Appendix G (Public Health).

Health Analysis Components

This Scoping Plan health analysis focuses on the contrast between a California that is still dependent on a fossil fuel-based economy and a California that is transitioned to a carbon-neutral, clean energy future. This qualitative analysis evaluates and demonstrates the broad range of benefits of a dramatic reduction in fossil fuels by 2045 combined with healthier ecosystem management, comparing health outcomes for a "no-action" scenario (Reference) to a "take-action" decarbonization scenario. As this is a qualitative analysis, it looks more broadly at the public health benefits of a drastic reduction in fossil fuel combustion. While this analysis provides scientific evidence for Scoping Plan benefits based on achieving carbon neutrality by 2045, it does not analyze a specific scenario.

The key areas of focus for the analysis are: heat impacts, children's health and development, economic security, food security, mobility and physical activity, urban greening, wildfires and smoke impacts, and housing affordability. For each area of focus, the analysis covers the scientific evidence and compares expected health effects between the Reference and decarbonization scenarios. This analysis looks at the major health outcomes, provides directional effects for each health outcome, and where possible provides information on the strength and scale of health impacts. Some areas include quantitative information where tools are available to measure health outcomes. While the analysis is focused on health outcomes statewide, it also includes discussion

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[250] Cvijanovic, I., B. D. Santer, C. Bonfils, et al. 2017. "Future Loss of Arctic Sea-ice Cover Could Drive a Substantial Decrease in California's Rainfall." 8 *Nat. Commun.* 1947. https://doi.org/10.1038/s41467-017-01907-4.

[251] Williams, A. P., R. Seager, J. T. Abatzoglou, B. I. Cook, J. E. Smerdon, and E. R. Cook. 2015. "Contribution of anthropogenic warming to California drought during 2012–2014." *Geophysical Research Letters* 42(16), 6819–6828.

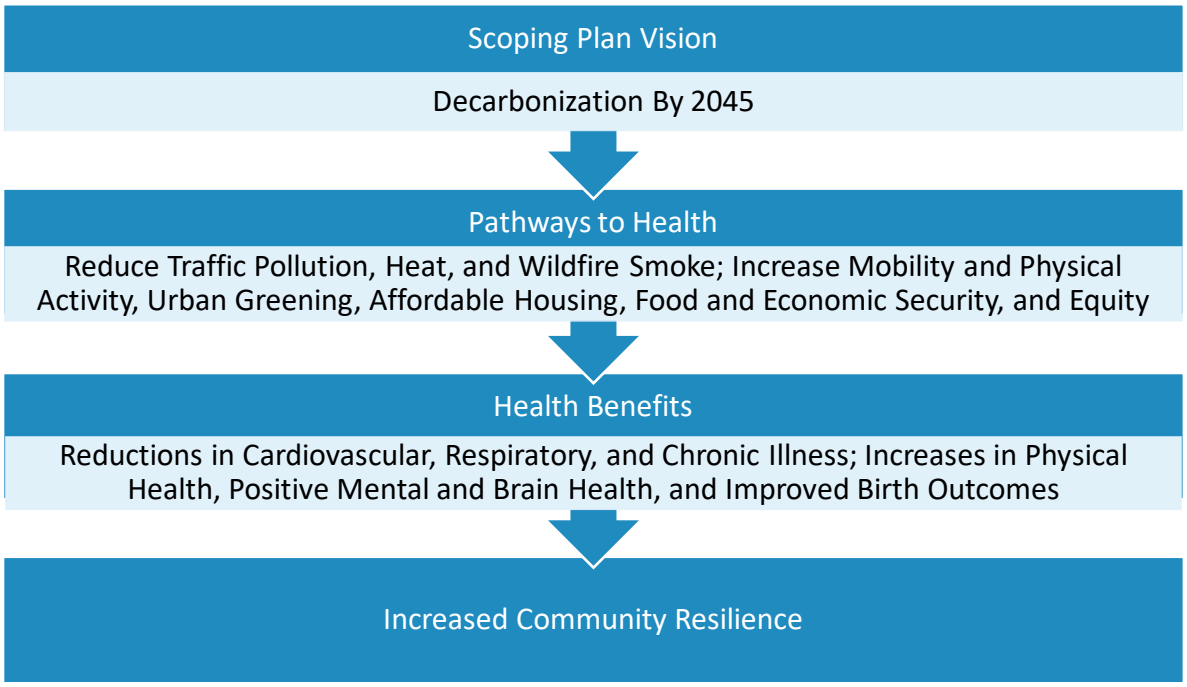
[252] Romley, J. A., A. Hackbarth, and D. P. Goldman. 2010. Cost and Health Consequences of Air Pollution in California. Santa Monica, California. RAND Corp. https://www.rand.org/pubs/research_briefs/RB9501.html.

[253] Wang, M., C. P. Aaron, J. Madrigano, E. A. Hoffman, E. Angelini, J. Yang, A. Laine, et al. 2019. "Association between long-term exposure to ambient air pollution and change in quantitatively assessed emphysema and lung function." *JAMA* 322(6), 546–556.

[254] Inserro, A. 2018."Air Pollution Linked to Lung Infections, Especially in Young Children." *Am. J. Managed Care* (May 6). https://www.ajmc.com/view/air-pollution-linked-to-lung-infections-especially-in-young-children.

of benefits to community health and climate resilience, as well as potential inequities experienced at a community level. Figure 3-11 shows the co-benefit areas covered in this Scoping Plan and the path to health improvements and increased community resilience.

Figure 3-11: Scoping Plan outcome and the path to health improvements

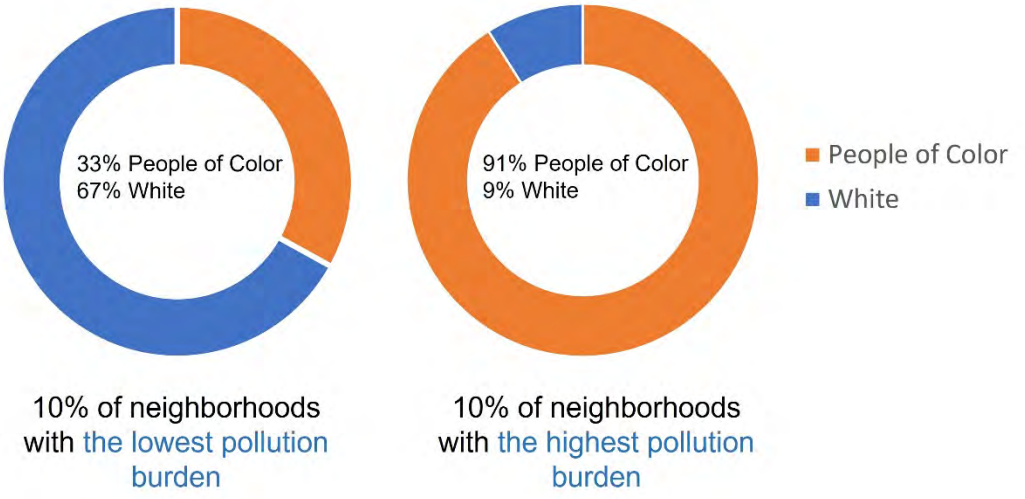


Social and Environmental Determinants of Health Inequities

Communities across the state do not experience exposure to pollution sources and the resulting effects equally. Low-income communities and communities of color (including Black, Latino and Indigenous communities) consistently experience significantly higher rates of pollution and adverse health conditions than others due to factors including historic marginalization rooted in systemic racism. As shown in Figure 3-12, the most impacted neighborhoods according to CalEnviroScreen (CES) are home to very high percentages of people of color while the least impacted neighborhoods are predominantly white. Recent findings show that Black Californians have 19% higher $PM_{2.5}$ exposure from vehicle emissions than the state average, and the census tracts with the highest $PM_{2.5}$ pollution burden from vehicle emissions have a high proportion of people of color.[255] Air pollutant emissions from mobile sources have disproportionate impacts on low-income communities and communities of color due to their proximity.[256] Diesel-fueled vehicles traveling on California's freeways and major roads expose nearby residents to pollution that is linked to lung cancer, hospitalizations and emergency department visits for chronic heart and lung disease, and premature death.[257,258] A combination of historical and social inequities are evident in communities of color disproportionately living close to freeways and other major sources of vehicle pollution. Environmental exposures and contaminants are one component of a broader set of social, economic, and environmental factors that can amplify health conditions, and the combination of all these factors can compound the health effects of individual exposures. This broader set of community factors can be referred to as "cumulative impacts." In addition, specific populations are more sensitive to pollution and face greater susceptibility. This includes young children, older adults, and individuals with existing health conditions.

[255] Reichmuth, D. 2019. *Inequitable exposure to air pollution from vehicles in California.* https://www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019.
[256] CARB. 2017. *California's 2017 climate change scoping plan.* https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.
[257] CARB. 2020. Overview: Diesel exhaust & health. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.
[258] Kagawa, J. 2002. "Health effects of diesel exhaust emissions—a mixture of air pollutants of worldwide concern." *Toxicology* 181–182:349–353.

Figure 3-12: Least and most impacted neighborhoods from CalEnviroScreen[259]



Social Determinants of Health Inequities

The physical and mental health of individuals and communities is shaped, to a great extent, by the social, economic, and environmental circumstances in which people live, work, play, and learn. According to the World Health Organization, these same circumstances—or social determinants of health—are "mostly responsible for health inequities: the unfair and avoidable differences in health status seen within and between countries." In fact, a strong body of research demonstrates that more than 50 percent of long-term health outcomes are the result of social determinants affecting an individual.[260] Race/ethnicity and socioeconomic status, for example, have been found to amplify impacts from long- and short-term environmental exposures for several health outcomes,

[259] The figure represents the top and bottom decile scoring of CalEnviroScreen census tracts for pollution burden. This chart is modified from Figure 2. Race in the Least and Most Impacted Census Tracts of CalEnviroScreen 4.0 in the Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. Analysis of Race/Ethnicity and CalEnviroScreen 4.0 Scores. 2021. *https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40raceanalysisf2021.pdf*.

[260] California Department of Public Health (CDPH). 2015. *The Portrait of Promise: The California Statewide Plan to Promote Health and Mental Health Equity.* A Report to the Legislature and the People of California by the Office of Health Equity. Sacramento, California. California Department of Public Health, Office of Health Equity.

such as mortality and birth outcomes.[261,262,263,264] Social factors combine in low-income communities and communities of color to create levels of toxic chronic stress and limit opportunities for healthy food and healthy lifestyles. Social factors also can cause health disparities through psychosocial pathways such as discrimination and social exclusion.[265] While the importance of social determinants is well known, measuring the specific and cumulative impacts of social determinants is challenging.

There are several important tools to evaluate and map cumulative impacts and factors contributing to the results of historical practices such as redlining, and these tools have been used for air quality and climate planning, community protection, and investments. CalEnviroScreen is a tool that maps cumulative pollution burdens and vulnerabilities on a statewide basis and ranks census tracts based on environmental, exposure, population, and socioeconomic indicators. An analysis using CES shows a direct, persistent relationship between exposure to environmental burdens and socioeconomic and health vulnerabilities affecting communities of color and historical redlining practices. OEHHA has evaluated health impacts of certain climate change policies on disadvantaged communities and communities of color utilizing CES rankings.[266] The Healthy Places Index (HPI) maps indicators that affect life expectancy on a statewide basis. In the future, these and other tools can be helpful to prioritizing investments and informing implementation efforts for GHG emission reductions policies.

Environmental Determinants of Health Inequities

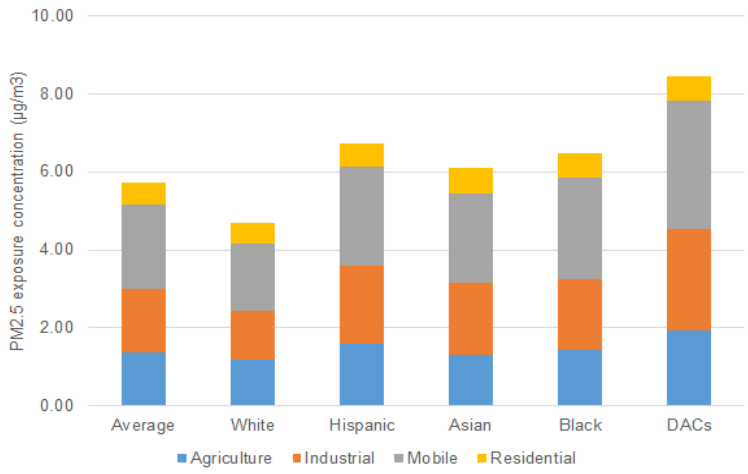
Communities with large percentages of Black and other socially vulnerable and marginalized groups are disproportionately located near pollution sources, such as traffic

[261] O'Neill, M. S., M. Jerrett, I. Kawachi, J. I. Levy, A. J. Cohen, N. Gouveia, et al. 2003. "Health, wealth, and air pollution: Advancing theory and methods." *Environ Health Perspect.* 111 (16): 1861–70.
[262] Ponce, N. A., K. J. Hoggatt, M. Wilhelm, and B. Ritz. 2005. "Preterm birth: The interaction of traffic-related air pollution with economic hardship in Los Angeles neighborhoods." *Am J Epidemiol.* 162 (2): 140–8.
[263] Morello-Frosch, R., B. Jesdale, J. Sadd, and M. Pastor. 2010. "Ambient air pollution exposure and full-term birth weight in California." *Environ Health.* 9: 44.
[264] Finkelstein, M. M., M. Jerrett, P. DeLuca, N. Finkelstein, D. K. Verma, K. Chapman, et al. 2003. "Relation between income, air pollution, and mortality: A cohort study." *CMAJ.* 169 (5): 397–402.
[265] Clougherty, J., and L. Kubzansky. 2009. "A framework for examining social stress and susceptibility in air pollution and respiratory health." *Environ Health Perspect.* 117 (9): 1351–8.
[266] OEHHA. 2022. *Impacts of Greenhouse Gas Emission Limits Within Disadvantaged Communities.* https://oehha.ca.gov/media/downloads/environmental-justice//impactsofghgpoliciesreport020322.pdf.

and freight facilities, industrial facilities, and hazardous waste sites.[267,268,269,270] Research shows large disparities in exposure to pollution between white and non-white populations in California, and between low-income and communities of color (Figure 3-13). The research also shows Black and Latino populations experience significantly greater air pollution impacts than white populations in California.[271] Additionally, Native Americans are disproportionately impacted by air pollution with high rates of exposure to industrial, diesel, and residential pollution sources and higher rates of diseases linked to air pollution.[272, 273]

[267] Mohai. P., P. M. Lanz, J. Morenoff, J. S. House, and R. P. Mero. 2009. "Racial and socioeconomic disparities in residential proximity to polluting industrial facilities: Evidence from the Americans' Changing Lives Study." *Am J Public Health.* 99 (Suppl 3): S649–56.
[268] Mohai, P., and R. Saha. 2007. "Racial inequality in the distribution of hazardous waste: A national-level reassessment." *Soc Probl.* 54 (3): 343–70.
[269] Morello-Frosch, R., M. Pastor, C. Porras, and J. Sadd. 2002. "Environmental justice and regional inequality in southern California: Implications for future research." *Environ Health Perspect.* 110 (Suppl 2): 149–54.
[270] Gunier, R. B., A. Hertz, J. von Behren, and P. Reynolds. 2003. "Traffic density in California: Socioeconomic and ethnic differences among potentially exposed children. *J Expo Anal Environ Epidemiol.* 13 (3): 240–6.
[271] Apte, J. S., S. E. Chambliss, C. W. Tessum, and J. D. Marshall. 2019. *A Method to Prioritize Sources for Reducing High $PM_{2.5}$ Exposures in Environmental Justice Communities in California.* CARB Research Contract Number 17RD006.
[272] Indigenous People and Air Pollution in the United States. A Report from the National Tribal Air Association and Moms Clean Air Force. 2021. *https://7vv611.a2cdn1.secureserver.net/wp-content/uploads/2021/04/indigenousairpollution_041421.pdf*
[273] National Tribal Air Association. 2022. Status of Tribal Air Report. Pg. 66. *https://7vv611.a2cdn1.secureserver.net/wp-content/uploads/2022/10/2022-NTAA-Status-of-Tribal-Air-Report.pdf*.

Figure 3-13: Top sources of $PM_{2.5}$ and their contribution to $PM_{2.5}$ exposures by race and in disadvantaged communities



These disparities in exposure to pollution sources generate health inequities. Communities located near major roadways are at increased risk of asthma attacks and other respiratory and cardiac effects. Studies consistently show that mobile source pollution exposure near major roadways or freight sources contributes to and exacerbates asthma, impairs lung function, and increases cardiovascular mortality.[274] The exposure to mixtures of gaseous and particulate pollutants in mobile sources (including PM, NO_x, and benzene) is associated with higher rates of heart attacks, strokes, lung cancer, autism, and dementia.[275]

Environmental hazards found in communities also can include exposures to toxic substances and emissions, as well as occupational exposures. Due to historical inequities, under-resourced communities and communities of color are often located close to sources of toxic pollution, including chrome platers; metal recycling facilities; oil and gas operations; agricultural burning; railyards; facilities transporting, managing, or disposing of hazardous waste; and areas impacted by pesticides, among others. Some populations may be at increased risk of exposure to pollutants, both at work and home.

Children are more susceptible to environmental pollutants for many reasons, including the ongoing development of their nervous, immune, digestive, and other bodily systems. Moreover, children eat more food, drink more fluids, and breathe more air relative to their

[274] U.S. Environmental Protection Agency website. How Mobile Source Pollution Effects Your Health. https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health.
[275] USC Environmental Health Centers. 2018. Living Near Busy Roads or Traffic Pollution. https://envhealthcenters.usc.edu/wp-content/uploads/2016/10/living-near-bus_19696172.pdf.

body weight, as compared to adults.[276] Exposure to high levels of air pollutants, including indoor air pollutants, increases the risk of respiratory infections, heart disease, and asthma.[277] Children living in low-income communities near industrial operations, rail yards, and heavily trafficked freeways and streets in urban areas are at especially high risk of chronic respiratory conditions. Black children are four times more likely to be hospitalized for asthma compared with white children, and urban Black and Latino children are two to six times more likely to die from asthma than white children.[278] Native American children also experience more impacts from asthma and Native American children, along with Black children, have the highest prevalence of asthma.[279]

For older adults, increased vulnerability is linked to respiratory, cardiovascular, and immune systems weakened by aging.[280] Preexisting health conditions interact with environmental pollutants to enhance risks of adverse health outcomes.[281,282] The recent COVID-19 pandemic has highlighted the heightened vulnerability of older adults as well as communities of color to respiratory disease, as hospital admissions and mortality data linked to COVID-19 cases for these groups have been higher than other groups. Research has also underscored the important link between COVID-19 mortality and morbidity and air pollution, demonstrating significantly higher mortality and morbidity for COVID-19 in areas of elevated $PM_{2.5}$ pollution.

Climate Vulnerabilities

Climate change is expected to exacerbate the existing disparities of health conditions and worsen climate vulnerability, which is the degree to which natural systems and people or

[276] Blaisdell, R. J. Air Toxics Hot Spots Program Risk Assessment Guidelines. 2012. Technical Support Document for Exposure Assessment and Stochastic Analysis. Oakland, California: California Environmental Protection Agency, Office of Environmental Health Hazard Assessment. August.
[277] Woodruff, T. J., D. A. Axelrad, A. D. Kyle, O. Nweke, and G. G. Miller. 2003. *America's Children and the Environment: Measures of Contaminants, Body Burdens, and Illness.* 2nd ed. Washington, D.C.: United States Environmental Protection Agency. February.
[278] California Department of Public Health. Asthma Inequities in California Children. 2021. https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHIB/CPE/CDPH%20Document%20Library/CA_Asthma_Inequities_Children_2021-Infographic.pdf.
[279] Meng, Y., S. H. Babey, T. A. Hastert, and E. Brown. 2007. California's Racial and Ethnic Minorities More Adversely Affected by Asthma. UCLA: Center for Health Policy Research. Retrieved from https://escholarship.org/uc/item/4k45v3xt.
[280] Sandström, T., A. J. Frew, M. Svartengren, and G. Viegi. 2003. "The need for a focus on air pollution research in the elderly." *Eur Respir J Suppl.* 40: 92s–5s.
[281] Zanobetti, A., and J. Schwartz. 2001. "Are diabetics more susceptible to the health effects of airborne particles?" *Am J Respir Crit Care Med.* 164 (5): 831–3. https://www.atsjournals.org/doi/pdf/10.1164/ajrccm.164.5.2012039.
[282] Zanobetti, A., J. Schwartz, and D. Gold. 2000. "Are there sensitive subgroups for the effects of airborne particles?" *Environ Health Perspect.* 108 (9): 841–5.

communities are at risk of experiencing the negative impacts of climate change.[283] A report from the California Climate Change Center warned that the impacts of climate change will likely create especially heavy burdens on low-income and other vulnerable populations: "*Without proactive policies to address these equity concerns, climate change will likely reinforce and amplify current as well as future socioeconomic disparities, leaving low-income, minority, and politically marginalized groups with fewer economic opportunities and more environmental and health burdens*."[284]

In the U.S. Environmental Protection Agency's "Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts,"[285] investigators analyzed risks of six primary climate change impacts disproportionately affecting communities across income, educational attainment, race/ethnicity, and age groups. Four socially vulnerable populations—low income, communities of color, no high school diploma, and age 65 and older—were identified as having a higher likelihood of experiencing the greatest impacts of a changing climate (according to the projected 2°C of global warming or 50 centimeters of global sea level rise). Disproportionate impacts were projected for climate events, including air quality, extreme temperature, coastal flooding, and other impacts, leading to increased risk of health and other adverse outcomes. The study projected significant health impacts for low-income communities, certain racial and ethnic subgroups, and those with lower educational attainment.

Several climate vulnerability tools have been developed or are under development to better understand and map areas at higher risk of climate impacts. The Climate Change and Health Vulnerability Indicators (CCHVIs) for California helps state and local health officials prepare for and reduce adverse health impacts due to a changing climate.[286] For example, Los Angeles County shows higher than state average climate vulnerability overall, particularly for those who are linguistically isolated (more than twice the state average).

In summary, there are many environmental, social, individual, and economic factors affecting health and equity in California and contributing to worsening health outcomes from climate change impacts. This section and Appendix G (Public Health) reference a substantial and growing body of research documenting the different social and

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[283] OPR. 2018. Defining Vulnerable Communities in the Context of Climate Adaptation. https://opr.ca.gov/docs/20180723-Vulnerable_Communities.pdf.

[284] Shonkoff, S., R. Morello-Frosch, M. Pastor, and J. Sadd. 2011. "The climate gap: environmental health and equity implications of climate change and mitigation policies in California—A review of the literature." *Climatic Change* 109 (Suppl 1): S485–S503.

[285] U.S. EPA. 2021. Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts. U.S. Environmental Protection Agency. EPA 430-R-21-003.

[286] CDPH. 2022. Climate Change and Health Vulnerability Indicators for California. California Department of Public Health. https://www.cdph.ca.gov/Programs/OHE/Pages/CC-Health-Vulnerability-Indicators.aspx.

environmental factors affecting health outcomes and the many groups that are vulnerable to increased effects or that experience health inequities in California (see Table 3-13).

Table 3-13: Examples of vulnerable groups due to socioeconomic, environmental, developmental, and climate change factors

Examples of Vulnerable Groups Due to Socioeconomic, Environmental, Developmental, and Climate Change Factors		
Older People	People with Existing Chronic Illness	People Impacted Due to Working Conditions
Tribal Groups	Infants and Children	Low-Income People
People with Disabilities	People Experiencing Homelessness	Pregnant People
Communities of Color	Marginalized People	Immigrants/Refugees
People with Less Educational Options	Linguistically Isolated Households	People Impacted Due to Poor Housing Conditions

Summary of the Qualitative Health Analysis

CARB has developed a detailed health analysis that covers eight social and environmental co-benefit areas that impact public health (listed below). These co-benefit areas were selected due to ongoing research in these areas as well as discussion in a public workshop on climate change and health impacts held in summer 2018. For each social and environmental area, the analysis includes:

- a discussion of health impacts and disparities,
- key health metrics or epidemiological research on this topic,
- a discussion of how these areas would be affected by “no-action” (i.e., Reference) scenario compared to a “take-action” (i.e., Scoping Plan) scenario
- a discussion of where there are actions to consider for further success, and
- the types of mitigation actions that can help reduce or eliminate disparities and promote greater health equity and resilience.

All co-benefit areas are interconnected, and pursuing benefits in all areas has the potential to multiply positive results and further support building community resilience. *Community resilience* is the ability of a community to reduce harm and maintain an acceptable quality of life in the face of climate-induced stresses, which vary depending on that community’s circumstances and location. Below is a brief description of the areas evaluated for public health co-benefits. The specific health outcomes impacted by each

area, as well as the directional health benefits, are included in the Summary of Health Benefits section of the chapter and covered in more detail in Appendix G (Public Health).

Heat Impacts

Globally, increased GHG concentrations in the atmosphere are causing a continuing increase of the planet's average temperature. California temperatures have risen since records began in 1895, and the rate of increase is accelerating. Recent heat waves have broken heat records and caused serious illness across the state, and these events are becoming more frequent. Heat waves have a particularly high impact in Southern California, where they have become more intense and longer lasting. In the past two years, Los Angeles recorded 121°F, and the Coachella Valley had its hottest year ever, with temperatures reaching 123°F. Heat island effects in urbanized areas can elevate heat effects and disproportionately affect low-income communities and communities of color. Heat events exacerbate respiratory and cardiac illness and cause emergency room visits to soar. Strategies that reduce the impacts of heat exposure promote improved health outcomes.

Wildfires and Smoke

California's NWL cover more than 90 percent of California and include rangeland, forests, woodlands, grasslands, and urban green space. They provide biodiversity and ecosystem benefits, including their ability to sequester carbon from the atmosphere. Protecting and managing California's forests and other natural lands and maintaining their ecosystem health are key practices for maximizing GHG benefits and minimizing negative climate change impacts. Vegetation plays an important role in storing carbon; however, it can also release CO_2 back into the atmosphere when it dies or is burned by fires. California's wildfires are getting worse with increased fire risks, higher frequency of occurrence, larger burn areas, more costly damage, and a longer fire season due to climate change. Strategies that promote healthy ecosystem management of natural and working lands and increased urban greening promote improved health outcomes. Healthy ecosystems provide many health and environmental benefits and can maximize carbon sequestration.

Children's Health and Development

There are a wide range of interconnected environmental, social, biological, and community factors associated with climate change that are adversely affecting children's health. This section focuses on air pollution and near-roadway or traffic pollution as environmental impacts that have a profound effect on children's health. Children's bodies and lungs are still developing, and they take in more air per body weight than adults do. Many low-income communities and communities of color in California experience disproportionately high levels of air pollution, as well as high levels of traffic and freight that impact children. This excess exposure harms children's development and

predisposes them to increased risk of illness throughout their lives. Strategies that reduce air pollution and traffic emissions promote improved health outcomes for children.

Economic Security

Climate change is expected to result in serious adverse socioeconomic effects across many sectors. Economic factors, such as income inequality (among geographic regions), poverty, wealth, debt, unemployment rate, and job security are among the strongest determinants of health. Along the entire income spectrum, higher income is associated with increased life expectancy and improved health outcomes in the United States. Additionally, economic insecurity and negative health impacts are more pronounced in low-income communities and communities of color. Economic strategies, such as the promotion of clean energy and other green jobs and investments in low-income communities and communities of color, and promoting a transition to high road jobs in economic sectors tied to the current fossil fuel economy, can promote improved health outcomes.[287]

Food Security

The food system is under pressure from numerous factors, and climate change is a key concern. Climate change can affect food production and agricultural yield, impact culturally significant plants and animals for Native American tribes, and exacerbate factors that limit food availability, such as supply chain disruption. Food security is defined as stable access to affordable, sufficient food for an active, healthy life. Many Californians routinely experience food insecurity, and while that impacts Californians of all races and groups, low-income communities and communities of color and children are disproportionately affected by food insecurity. Many Native Americans depend on resources from the land, such as animals and plants for consumption and cultural practices. Strategies that promote sustainable agriculture, access to healthy foods, and reduced organic food waste promote improved health outcomes.

Mobility and Physical Activity

Physical activity is one of the most important factors for a healthy lifestyle, and lack of activity increases the risk of chronic illness and premature death. Research shows that regular physical activity improves health in people of all ages by improving heart and lung

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[287] According to the California Labor and Workforce Development Agency's High Road Training Partnership program, high road jobs are considered "Quality jobs [that] provide family-sustaining wages, health benefits, a pension, worker advancement opportunities, and collective worker input and are stable, predictable, safe and free of discrimination." *https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/08/OneSheet_Job-Quality_ACCESSIBLE.pdf*.

function, muscle fitness, mental health and brain function, and sleep quality. A sedentary lifestyle contributes to chronic illnesses, including obesity, heart disease, and Type 2 diabetes among other chronic illnesses. Promoting community design that supports sustainable patterns of land use and transportation enables active transportation choices like walking, biking, and public transit over driving, and can significantly increase physical activity, leading to many valuable health benefits.

Affordable Housing

Housing is an important social determinant of health. The stability of housing, housing quality, conditions inside and outside the home, the cost of housing, and the environmental and social characteristics of the places people live all affect health (including energy efficiency and insulation, cooler building material, tree canopy, home size). Housing affordability is a key factor, and this section highlights how housing affordability supports not only improved health but also more sustainable land use and transportation patterns. A lack of affordable housing is increasing commute distances for low-income renters and creating health burdens. Strategies that support sustainable transportation and housing patterns, together with increased housing affordability, promote improved health outcomes.

Urban Greening

Urban Greening is well recognized as an important amenity, but the inherent health benefits are not always well understood. Under-resourced and vulnerable areas consistently show a lack of urban greening and higher percentages of concrete, asphalt, and impervious surfaces. Under-resourced communities have a greater proportion of concrete and heat-trapping surfaces and a lower amount of tree cover in the neighborhoods in which they live. Areas with reduced urban greening have the potential to create areas of higher temperatures as heat is reflected from pavements and buildings. By contrast, increasing urban greening can provide air pollution buffers and promote physical activity. Strategies that preserve and create urban parks, green space, natural infrastructure, and sustainable agricultural practices support improved physical and mental health outcomes.

No Action Scenario (Reference)

In a no-action scenario, California would remain dependent on fossil fuels and other GHG emitting technologies. Fossil-fuel powered mobile sources including cars, trucks, trains, tractors, and a myriad of other on-road and off-road vehicles and equipment are the largest source of criteria pollutants and toxic air contaminants that directly affect

community health and contribute the largest portion of GHG emissions.[288] Other key GHG emission sources include buildings, natural and working lands, and power production and industry. The no-action scenario reflects a continued reliance on fossil fuels in mobile and stationary sectors, including buildings. The continued production and use of fossil fuels; ongoing dependence on gasoline and diesel cars, trucks, buses, and equipment; continued releases of short-lived climate pollutants; and decreased emphasis on forest and ecosystem health will impact communities by reducing climate resilience and health benefits. Green space will likely remain at the same levels or degrade, and urban heat islands will likely increase. With continued growth of vehicle miles traveled, physical activity and the accompanying health benefits will not increase.

Exposure to wildfire smoke will increase, and air quality is expected to worsen as rising temperatures will increase levels of harmful air pollution. Jobs and economic security will be affected by the continuing potential for price spikes in fossil fuels, impacts to the economy from climate change, and fewer job opportunities in green technologies such as solar and electric vehicles. Food security in California will decrease due to the effects of accelerating climate impacts to agriculture; and without increased recovery of organic waste, including food products, food security will continue to decline under a no action scenario. All these impacts can be linked to worse health outcomes. Adverse health impacts are often most felt by Black, Latino, Native American, and other people of color and in low-income communities. These groups are affected more intensely by the physical stress of environmental pollution, social inequities, and the psychological stress of extreme weather events and food and economic insecurity.

Take Action Scenario

In the Take Action scenario, California will drastically reduce reliance on fossil fuels for motor vehicles, freight, buildings, electricity, or other sectors. This scenario is not a specific scenario within this Scoping Plan but examines the broad outcomes of actions to achieve carbon neutrality in 2045. Implementation of this Scoping Plan would achieve a transition to ZEVs, with 100% sales of light-duty ZEVs by 2035 and 100% sales of zero emission trucks by 2040, along with 30% VMT reductions below 2019 levels by 2045. State and local action that supports sustainable land use and transportation patterns and enables more transit and active transportation will lead to substantial health benefits from physical activity, including reduced illness and deaths.

[288] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

The economic benefits of improved health through active transportation can be modeled using the Healthy Mobility Options Tool (HMOT).[289] In order to demonstrate the important health and economic benefits of VMT reduction, CARB and CDPH used the HMOT to analyze an illustrative trip reduction scenario for 2050 from the California Transportation Plan (CTP). The CTP has a goal of increasing active modes of travel and transit from the current level of 13 percent to a level of 23 percent of all travel trips. While the CTP goal of 23 percent for active modes of travel is not a VMT reduction target, the scenario increases active transportation through a mix of changes in land use planning for increased transportation options, including increases in biking, walking, and transit use, and it helps to show the health benefits of increased active transportation. By achieving the CTP 2050 goals, nearly 8,000 deaths would be avoided in 2050 alone (see Figure 3-14), along with significant reductions in chronic diseases. Achieving this would rank among the top public health accomplishments (see Appendix G [Public Health] for additional modeling results and detailed discussion).

The dramatic reduction in fossil fuel combustion, combined with reductions in VMT and freight and traffic emissions projected in this Scoping Plan will significantly reduce air pollution and its associated health impacts on a statewide basis and in communities near freight sources. Coordinated action strategies will emphasize natural and working lands management changes, including healthy forests, increased vegetative cover, and increased organic farming. Wildfire smoke exposure will reduce significantly with healthy ecosystem management strategies. Since many communities in California are disproportionately impacted by high levels of traffic pollution, the reduction in petroleum fueled vehicles will reduce the additional impacts of living or going to school near historically highly polluting sources. Indoor air quality is also likely to improve through a shift to non-fossil fuel appliances. Concerted state and local action to support sustainable land use and transportation patterns can enable more active transportation with health benefits from physical activity.

[289] ITHIM California. 2020. Transportation Planning for Health, Equity, and Climate Change. https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/.

Figure 3-14: Quantified health benefits of active transportation from increased physical activity

*Calculated by the Healthy Mobility Options Tool, active transportation (including walking, rolling, cycling, and taking public transit) from the California Transportation Plan 2050 compared to business as usual for 2050.

Overall community resilience is expected to increase as physical activity and green space increases—potentially decreasing urban heat islands. Efforts to support VMT reduction will include coordination across state agencies on affordable housing measures. Reduced fossil fuel dependence will reduce economic pressure from wildfires, droughts, and price spikes in fossil fuels, especially as more jurisdictions implement plans with similar actions. Investment in sustainable agriculture, healthy forests, urban greening, and clean energy technologies will add sustainable jobs and further promote economic security. More sustainable agriculture and food recovery efforts will add to food security. All these impacts can be linked to wide ranging health benefits, including positive respiratory and cardiovascular effects, healthier birth and brain outcomes, improved mental health indicators, improved life expectancy, reductions in chronic illness and cancers, improved children's health and development, reduced depression, and other benefits. The magnitude of the possible co-benefits is extremely large, especially in areas that are currently the most affected.

Summary of Health Benefits

Below, Tables 3-14 and 3-15 show overall summaries of the directional benefits by co-benefit area estimated for this Scoping Plan. The supporting epidemiological studies used for qualitative or quantitative analysis of each co-benefit area are included in Appendix G (Public Health). Another section of Chapter 3, together with Appendix C (AB 197 Measure Analysis) and Appendix H (AB 32 GHG Inventory Sector Modeling), also includes the quantitative analysis of air pollution related health impacts, including recently added health endpoints for CARB's ongoing analysis.

Table 3-14: Scoping Plan directional benefits for health co-benefit areas (heat, affordable housing, food security, economic security, and urban greening)

Health Co-benefit Areas*					
Quantitative vs. Qualitative	**Reduced Heat Impacts**	**Increased Affordable Housing**	**Increased Food Security**	**Increased Economic Security**	**Increased Urban Greening**
Research was used for Qualitative Analysis	↓ Mortality ↓ Emergency Room Visits for cardiovascular and respiratory causes and intestinal infections ↓Hospitalization for cardiovascular, respiratory causes ↓ Preterm Birth ↓ Mental Illness	↓ Infectious Disease ↓ Chronic Illness ↓ Asthma ↓ Injuries ↓ Mental Illness ↑ Children's Performance in Schools ↑ Children's Health ↓ Children's Behavioral Problems	↓ Mental Illness ↓ Iron Deficiency ↓ Chronic Diseases ↑ Life Expectancy ↓ Children's Mental Illness ↓ Children's Cognitive Problems ↓ Children's Behavioral Health Problems ↓ Children's Iron Deficiency ↓ Children's Oral Health Problems	↑ Life Expectancy ↑ Health Status ↑ Mental Health	↓ Mortality ↓ Asthma Prevalence ↓ Depression ↓ Adverse Birth Outcomes including low birth weight and small for gestational age ↑ Life Expectancy

*See Appendix G (Public Health) for a table with references to research for each health outcome listed.

Table 3-15: Scoping Plan directional benefits for health co-benefit areas (traffic pollution, wildfire, and active transportation)

Health Co-benefit Areas*			
Quantitative vs. Qualitative	**Reduced Traffic Pollution**	**Reduced Wildfire Smoke**	**Increased Active Transportation**
Research was used for Quantitative Analysis	↓ Children's Respiratory Outcomes, Hospital Admissions ↓ Children's Respiratory Outcomes, Emergency Room Visits ↓ Children's Asthma Onset ↓ Children's Asthma Symptoms	↓ All-Cause Mortality ↓ Asthma, Hospital Admissions ↓ COPD, Hospital Admissions ↓ All Respiratory Outcomes, Hospital Admissions ↓ Asthma, Emergency Room Visits ↓ All Respiratory Outcomes, Emergency Room Visits ↓ All Cardiac Outcomes, Emergency Room Visits	↓ Cardiovascular Diseases ↓ Colon Cancer ↓ Breast Cancer ↓ Diabetes ↓ Dementia ↓ Lung Cancer ↓ Respiratory Disease ↓ Depression ↑ Traffic Accidents
Research was used for Qualitative Analysis	↑ Children's Lung Function Growth ↓ Children's Bronchitic Symptoms ↓ Children's Impaired Cognitive Development ↓ Children's Adverse Birth Outcomes, including low birth weight and preterm birth		

*See Appendix G (Public Health) for a table with references to research for each health outcome listed.

In summary, the qualitative health analysis of the No-Action versus Take-Action scenarios for this Scoping Plan shows an overwhelming benefit for the state by taking action to move forward to carbon neutrality while continuing efforts to increase health equity and resilience in individual communities. Taking action can improve physical and mental health for adults and children, reduce a range of chronic illnesses, and promote improvements in life expectancy. Development and implementation of actions to achieve the outcomes called for in this Scoping Plan should consider how to engage affected communities in implementation, address the existing health and opportunity gaps, and pursue equitable implementation statewide and locally. This Scoping Plan deployment of clean technology and fuels, together with improved land management, will reduce GHGs and air pollution and create more resilient communities that are better able to prepare for and recover from extreme climate events.

Environmental Analysis

In May 2022, CARB, as the lead agency for the Scoping Plan, released for public review the Draft Environmental Analysis (Draft EA) for this Scoping Plan; it assessed the potential environmental impacts of implementing the Scoping Plan. CARB circulated the Draft EA for public review and comment for a period of 45 days that began on May 10, 2022, and ended on June 24, 2022. CARB held a public hearing on June 23, 2022 to provide the opportunity for public comment. During the review period, written and oral comments were received on the Draft EA. CARB reviewed the comments to identify environmental topics and began preparation of responses to those comments.

After the end of the Draft EA public review period, CARB identified potential revisions to certain aspects of this Scoping Plan that merit revisions to the project description. This new information results from, among other things, revisions to the project description regarding energy sector goals (including offshore wind), revised carbon removal targets, and additional strategies for natural and working lands. CARB released a Recirculated Draft EA for a written public comment period that started September 9, 2022, and ended on October 24, 2022. See Chapter 2 of the Recirculated Draft EA[290] for further information regarding the changes. The Recirculated Draft EA assesses the potential for significant adverse and beneficial environmental impacts associated with all proposed actions in this Scoping Plan, and provides a programmatic environmental analysis of the reasonably foreseeable compliance responses that could result from implementation of the Scoping

[290] CARB. 2022. Recirculated Draft EA. *https://ww2.arb.ca.gov/sites/default/files/2022-09/2022-draft-sp-appendix-b-draft-ea-recirc.pdf*.

Plan.[291] The Recirculated Draft EA concluded implementation of this Scoping Plan could result in the following:

- Beneficial impacts to: air quality (long-term operational-related) and GHG emissions (short-term construction-related and long-term operational-related)
- Less than significant impacts to: energy demand, mineral resources, population and housing, public services, recreation (short-term construction-related), and wildfire (short-term construction-related)
- Potentially significant and unavoidable adverse impacts to: aesthetics, agriculture and forest resources, air quality (construction-related and operational odors), biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, recreation (long-term operational-related), transportation and traffic, tribal cultural resources, utilities and service systems, and wildfire (long-term operational-related

Before the public meeting at which the Board will consider this Scoping Plan Update, CARB will publish the Final EA as Appendix B (Final Environmental Analysis) to this Scoping Plan, along with written responses to timely submitted comments raising significant environmental issues received on the Draft EA and the Recirculated Draft EA, which will be presented to the Board for consideration.

[291] The Recirculated Draft EA is available at *https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents*.

Chapter 4: Key Sectors

Chapter 4 provides an overview of the major energy sources and technology in use today, and of alternative clean technology and fuels to support decarbonization based on the latest information available. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. AB 32 requires climate change mitigation policies to be considered in the context of the sector's contribution to the state's total GHG emissions. The transportation, electricity (in-state and imported), and industrial sectors are the largest contributors of GHGs in the state and present the largest opportunities for GHG reductions. Actions to reduce fossil fuel combustion in these sectors also can provide critical air pollution reductions in low-income communities and communities of color, which are often located adjacent to these sources. A carbon neutrality framework also elevates the role of CO_2 removal through natural and working lands and mechanical capture and storage. Actions that support energy efficiency, reduced VMT, alternative fuels, and renewable power also can provide benefits by reducing both criteria and toxic air pollutants.

What sets this plan apart from previous Scoping Plans is the focus on the accelerated rate of deployment of clean technology and energy within every sector. As a result, specific actions, including accelerated rates of deployment of clean technology and fuels identified within this Scoping Plan, will need to be translated into both new and amended regulations, policies, and incentive programs. State agencies will need to evaluate current authority to align existing policies or develop new ones to achieve outcomes called for in this Scoping Plan. Legislative support may be needed in some cases to ensure authority and funding is sufficient to ensure this Scoping Plan is translatable to action on the ground. Most regulations, or change to existing regulations, ultimately considered by the Board or other state agencies for adoption will be subject to administrative procedure requirements. Accordingly, they must rely on specific subsequent supporting analysis and extensive public processes and consultations with interested tribes to develop and identify appropriate proposals for effective implementation. For example, any proposal to strengthen the LCFS regulations through amendments increasing the stringency of the carbon intensity (CI) targets would be considered on the basis of a public process, including workshops, and focused environmental, economic, and public health analyses.

Policies that ensure economy-wide investment or program decisions that incorporate consideration of GHG emissions are particularly important. As we pursue GHG reduction targets, we must acknowledge the manner in which built and natural environments are connected, how changes in one may impact the other, and how policy choices in one sector can and do impact other sectors. For example, fostering more compact, transportation-efficient development in infill areas and increasing transportation choices with the goal of reducing VMT not only reduces demand for transportation fuel but also requires less energy for buildings and helps to conserve natural and working lands that

sequester carbon. Therefore, the multiple and often interwoven actions that reduce VMT both reduce emissions from the transportation sector and support reductions needed in other sectors.

Legislation, such as SB 350[292] (De León and Leno, Chapter 457, Statutes of 2015), has recognized the need for CARB, the CEC, and the CPUC to work together to ensure the state's energy and climate goals are integrated in procurement decisions by load serving entities as part of Integrated Resource Plans. Moving forward, it is especially critical that similar approaches are adopted to break down silos across state agencies to ensure policies and programs are aligned with multiple state priorities outlined in this plan. Finally, supportive legislative direction, such as SB 905 that requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program, may also benefit emerging areas of policy to provide express agency authority and roles for these nascent efforts, including streamlining of permitting, while ensuring that protections for communities are in place.

Unlike previous Scoping Plans that separated out individual economic sectors, this Scoping Plan approaches decarbonization from two perspectives: (1) managing a phasedown of existing energy sources and technology and (2) ramping up, developing, and deploying alternative clean energy sources and technology over time. This approach supports a more comprehensive consideration of our energy infrastructure, the ability to repurpose existing assets, and the need to build new assets. It also provides multiple metrics beyond just the annual AB 32 GHG Inventory to better enable tracking progress. For example, it clearly demonstrates the production and distribution rates of specific types of clean energy, such as adding 4.3 GW of utility solar and 2.5 GW of storage year-over-year between now and 2035 to be on track to achieve carbon neutrality no later than 2045, and does the same for technology deployment, such as 11 million ZEVs in 2035.

The sections below include key actions to support success in the necessary transition away from fossil combustion, which is an overriding goal of this plan. The wide array of complementary and supporting actions being contemplated or to be undertaken across state government are detailed here. The broad view of actions described in this chapter thus provides context for the specific deployment of clean technology and fuels identified in the Scoping Plan Scenario described in Chapter 2. Actions identified in this Scoping Plan are based on currently known options and the latest science. As part of future Scoping Plan updates, additional clean technology and fuels may be identified and added to the mix of needed tools to continue to reduce the state's GHG emissions, support air quality co-benefits, and remove carbon from the atmosphere.

[292] California Air Resources Board. SB 350 Electricity Sector Greenhouse Gas Planning Targets. https://ww2.arb.ca.gov/our-work/programs/sb350.

Transportation Sustainability

The transportation sector has long relied on liquid petroleum fuels as the primary energy source for internal combustion engine (ICE) vehicles, including cars, trucks, locomotives, marine equipment, and aircraft. Combustion of fossil fuels in vehicles emits significant amounts of GHGs, criteria pollutants, and toxic air contaminants. In 2019,[293] the transportation sector accounted for approximately 50 percent of statewide GHG emissions[294] and thus was by far the single largest source of carbon pollution in the state. In addition, the transportation sector accounted for over 80 percent of statewide NOx emissions and 30% of fine particulate matter emissions, including toxic diesel particulate matter.[295]

Communities adjacent to congested roadways, including ports and distribution centers, are exposed to the highest concentration of toxic pollutants from vehicles and equipment consuming fossil fuels, leading to a number of demonstrated health impacts such as respiratory illnesses, higher likelihood of cancer development, and premature death. In addition, communities located near oil extraction operations or crude oil refineries often experience higher exposure to poor air quality. While CARB's programs, along with local action, have made substantial progress over the past few decades, it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed and pursue policies that result in less driving, in order to meet our GHG and air quality targets.

The transportation sector can be divided into three general categories: Technology, Fuels, and Vehicle Miles Traveled.

- *Technology* refers to the vehicles themselves, as well as the associated refueling infrastructure for those vehicles.
- *Fuels* refers to the energy source used to power vehicles and the facilities that produce them.
- Vehicle travel is measured as *vehicle miles traveled* (VMT), and is a product of development patterns and available transportation options.

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[293] In 2020 the state experienced shelter-in-place orders in response to the COVID-19 pandemic. The orders, and the effects of the pandemic, led to a significant year-over-year decline in transportation emissions in 2020. This means 2019 is likely a more representative year for overall transportation emissions and 2020 a likely outlier in the historical transportation emissions trend data.
[294] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020.* *https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf*. This includes upstream oil extraction and refining emissions.
[295] CARB. California Greenhouse Gas Emission Inventory Program. *https://ww2.arb.ca.gov/our-work/programs/ghg-inventory-program*.

Sector Transition

Technology

Vehicles must transition to zero emission technology to decarbonize the transportation sector. Executive Order N-79-20[296] reflects the urgency of transitioning to zero emission vehicles (ZEVs) by establishing target dates for reaching 100 percent ZEV sales or fleet transitions to ZEV technology. The primary ZEV technologies available today are battery-electric and hydrogen fuel cell electric vehicles (FCEVs), both of which emit zero tailpipe GHGs, criteria pollutants, and toxic air contaminants, as they do not burn fuel. These vehicles are rapidly growing in performance, affordability, and popularity.[297] Plug-in hybrid electric vehicles also offer a limited but increasing range of zero emission operation and will play a role in the transition to ZEVs.

Light-duty passenger vehicles consume the majority of gasoline in the state—12.9 billion gallons in 2019[298]—and are well-suited for transitioning to ZEVs. EO N-79-20 calls for 100 percent ZEV sales of new light-duty vehicles by 2035, and this target is reflected in this Scoping Plan.[299] The Advanced Clean Cars II regulation fulfills the goal in the Executive Order and serves as the primary mechanism to help deploy ZEVs. A number of existing incentive programs also support this transition, including the Clean Cars 4 All Program.[300] Heavy-duty trucks are the largest source of diesel particulate matter, a toxic air contaminant that is directly linked to a number of adverse health impacts, and EO N-79-20 also sets targets for transitioning the medium- and heavy-duty fleet to zero emissions: by 2035 for drayage trucks and by 2045 for buses and heavy-duty long-haul trucks where feasible. Replacing heavy-duty vehicles with ZEV technology will significantly reduce GHG emissions and diesel PM emissions in low-income communities and communities of color adjacent to ports, distribution centers, and highways. The existing Advanced Clean Trucks regulation, paired with the proposed Advanced Clean Fleets regulation, are designed to transition a significant amount of the

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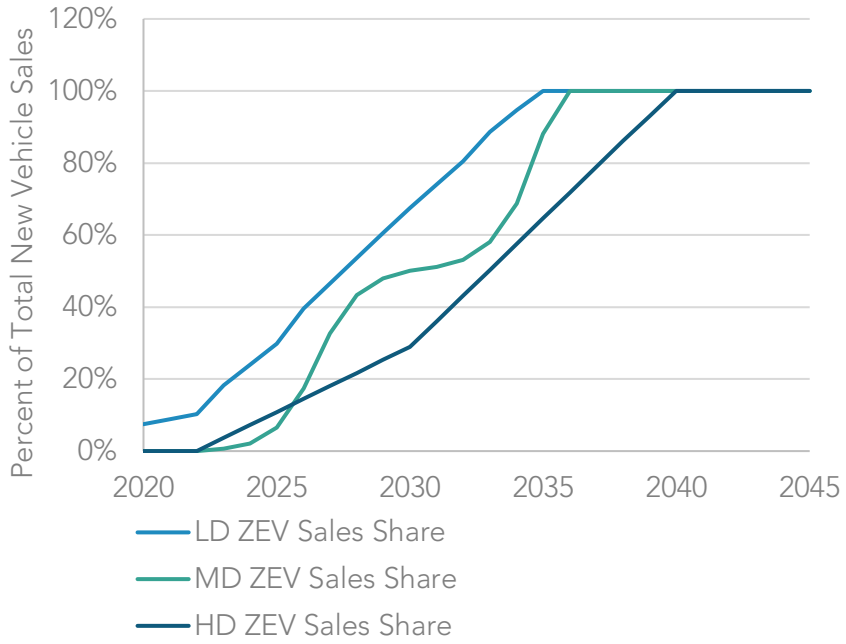
[296] Executive Department. State of California. Executive Order N-79-20. https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf.
[297] CARB. 2021. Public Workshop for Advanced Clean Cars II. May 6. https://ww2.arb.ca.gov/sites/default/files/2021-05/acc2_workshop_slides_may062021_ac.pdf.
[298] CARB. 2022. *Fuel Activity for California's Greenhouse Gas Inventory by Sector and Activity.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/fuel_activity_inventory_by_sector_all_00-20.xlsx.
[299] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A, with reference to the date at which all new vehicle sales are ZEVs. finalejacrecs.pdf (arb.ca.gov).
[300] CARB. Clean Cars 4 All. https://ww2.arb.ca.gov/our-work/programs/clean-cars-4-all. The Clean Vehicle Rebate Project (CVRP) also supports the transition to ZEVs. https://cleanvehiclerebate.org/en.

California truck fleet to ZEV technology. As with the LDV sector, a number of incentive programs support this transition, such as the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP).[301]

Figure 4-1 below illustrates the pace of transition in vehicle technology needed to drastically reduce GHG emissions from vehicles. All vehicle classes reach 100 percent ZEV sales before 2045, with some achieving this well before. The ZEV technology across the vehicle classes is assumed to be primarily battery electric and hydrogen fuel cell (reflecting the primary ZEV technologies available today).[302]

Figure 4-1: Transition of on-road vehicle sales to ZEV technology in the Scoping Plan Scenario



Today, off-road vehicles also rely heavily on ICE technology. Executive Order N-79-20 sets an off-road equipment target of transitioning the entire fleet to ZEV technology by 2035, where feasible. There is a great need for both investment and innovation in the off-road space in order to develop and commercialize zero emission equipment types that meet or exceed the performance of existing equipment. A number of funding sources currently support this transition, including programs such as FARMER, Carl Moyer, and

[301] California HVIP. Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project. https://californiahvip.org/?msclkid=efaf65f2c26f11eca6bdd08ecc323864.
[302] The light-duty fleet includes more than 11 million battery electric and hydrogen fuel cell vehicles in 2035 and over 23 million battery electric and hydrogen fuel cell vehicles in 2045.

the Community Air Protection Incentives—as well as Low Carbon Transportation Incentives, including the Clean Off-Road Equipment (CORE) program. In addition, the 2021–22 California budget provided record-high allocations for funding ZEVs, including off-road equipment, and the 2022–23 budget is similarly ambitious.[303] Several regulations focused on transitioning to zero emission off-road equipment have recently been adopted or are in the works, and apply to locomotives,[304] forklifts, ocean-going vessels at berth,[305] commercial harbor craft,[306] small off-road engines,[307] and more.

Intrastate aviation relies on ICE technology today, but battery-electric and hydrogen fuel cell aviation applications are in development, along with sustainable aviation fuel. The Scoping Plan Scenario includes a transition of 20% of aviation fuel demand to ZEV technologies by 2045 and sustainable aviation fuel for the rest.

Refueling infrastructure is a crucial component of transforming transportation technology. Electric vehicle chargers and hydrogen refueling stations must become easily accessible for all drivers to support a wholesale transition to ZEV technology. Deployment of ZEV refueling infrastructure is currently supported by a number of existing local and state public funding mechanisms, the new National Electric Vehicle Infrastructure (NEVI) federal funding mechanism, California's electric utilities, the Electrify America initiative that was established in response the Volkswagen ZEV commitment, and by numerous companies, such as EVgo, ChargePoint, Tesla, Ford, FirstElement Fuel, Chevron, Shell, and Iwatani, who are investing substantial private resources into developing these networks. Private investment in reliable, affordable and ubiquitous refueling infrastructure must drive the transition as the business case for ZEVs continues to strengthen.

Strategies for Achieving Success

- Achieve 100 percent ZEV sales of light-duty vehicles by 2035[308] and medium-heavy-duty vehicles by 2040.
- Achieve a 20% zero emission target for the aviation sector.

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[303] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1C. CARB and the Administration are committed to increasing focus on transportation equity investment as was reflected in the governor's 2022–23 budget. *finalejacrecs.pdf (arb.ca.gov)*.
[304] CARB. Reducing Rail Emissions in California. *https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california*.
[305] CARB. Ocean-Going Vessels At Berth Regulation. *https://ww2.arb.ca.gov/our-work/programs/ocean-going-vessels-berth-regulation*.
[306] CARB. CARB passes amendments to commercial harbor craft regulation. *https://ww2.arb.ca.gov/news/carb-passes-amendments-commercial-harbor-craft-regulation*.
[307] CARB. Small Off-Road Engines (SORE). *https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore*.
[308] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A. *finalejacrecs.pdf (arb.ca.gov)*.

- Develop a rapid and robust network of ZEV refueling infrastructure to support the needed transition to ZEVs.
- Ensure that the transition to ZEV technology is affordable for low-income households and communities of color, and meets the needs of communities and small businesses.[309]
- Prioritize incentive funding for heavy-duty ZEV technology deployment in regions of the state with the highest concentrations of harmful criteria and toxic air contaminant emissions.[310]
- Promote private investment in the transition to ZEV technology, undergirded by regulatory certainty such as infrastructure credits in the Low Carbon Fuel Standard for hydrogen and electricity[311] and hydrogen station grants from the CEC's Clean Transportation Program[312] pursuant to Executive Order B-48-18.[313]
- Evaluate and continue to offer incentives similar to those through FARMER,[314] Carl Moyer,[315] the Clean Fuel Reward Program,[316] the Community Air Protection Program,[317] and Low Carbon Transportation,[318] including CORE.[319] Where feasible, prioritize and increase funding for clean transportation equity programs.[320]
- Continue and accelerate funding support for zero emission vehicles and refueling infrastructure through 2030 to ensure the rapid transformation of the transportation sector.

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[309] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF6, in the context of communities. *finalejacrecs.pdf (arb.ca.gov)*.
[310] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF7. *finalejacrecs.pdf (arb.ca.gov)*.
[311] CARB. LCFS ZEV Infrastructure Crediting. *https://ww2.arb.ca.gov/resources/documents/lcfs-zev-infrastructure-crediting*.
[312] CEC. Clean Transportation Program. *https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program*.
[313] EO B-48-18 calls for 200 hydrogen refueling stations by 2025. *https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/39-B-48-18.pdf*.
[314] CARB. FARMER program. *https://ww2.arb.ca.gov/our-work/programs/farmer-program*.
[315] CARB. Carl Moyer program. *https://ww2.arb.ca.gov/our-work/programs/carl-moyer-memorial-air-quality-standards-attainment-program*.
[316] California Clean Fuel Reward Program. *https://cleanfuelreward.com/*.
[317] CARB. Community Air Protection Program. *https://ww2.arb.ca.gov/capp*.
[318] CARB. Low Carbon Transportation Investments and Air Quality Improvement Program. *https://ww2.arb.ca.gov/our-work/programs/low-carbon-transportation-investments-and-air-quality-improvement-program*.
[319] Clean Off-Road Equipment (CORE) Voucher Incentive Program. *https://californiacore.org/*.
[320] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1C. *finalejacrecs.pdf (arb.ca.gov)*.

- Evaluate and align with this Scoping Plan relevant CARB policies such as Advanced Clean Cars II,[321] Innovative Clean Transit,[322] Zero Emission Airport Shuttle,[323] California Phase 2 GHG Standards,[324] Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts,[325] In-use Locomotives,[326] the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation,[327] Commercial Harbor Craft,[328] Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation,[329] carbon pricing through the Cap-and-Trade Program,[330] and the Low Carbon Fuel Standard.[331]
- Identify and address permitting and market barriers to successful rapid ZEV technology deployment while protecting public health and the environment.

Fuels

Transitioning away from conventional ICE vehicles is part of the solution, but we must ensure that an adequate supply of zero-carbon alternative fuel and distribution is available to power these vehicles. Electricity and hydrogen are currently the primary fuels for ZEVs,

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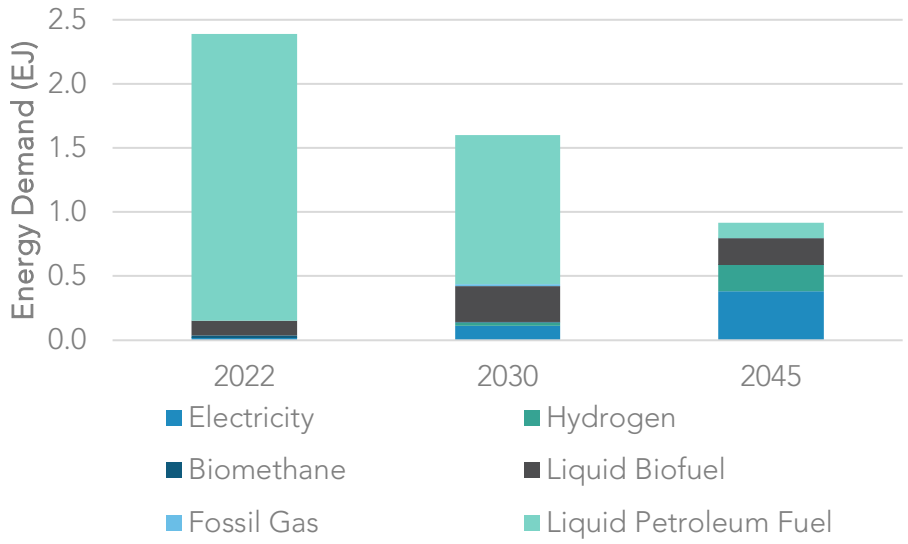
[321] CARB. Advanced Clean Cars Program. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program. Cal. Code Regs., tit. 13, §§ 1900, 1961.2, 1961.3, 1961.4, 1962.2, 1962.3, 1962.4, 1962.5, 1962.6, 1962.7, 1962.8, 1965, 1968.2, 1969, 1976, 1978, 2037, 2038, 2112, 2139, 2140, 2147, 2317, 2903.
[322] CARB. Innovative Clean Transit. https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit. Cal. Code Regs., tit. 13, §§ 2023—2023.11.
[323] CARB. Zero-Emission Airport Shuttle. https://ww2.arb.ca.gov/our-work/programs/zero-emission-airport-shuttle. Cal. Code Regs., tit. 17, §§ 95690.1—95690.8.
[324] CARB. California Phase 2 Greenhouse Gas Standards. https://ww2.arb.ca.gov/our-work/programs/greenhouse-gas-standards-medium-and-heavy-duty-engines-and-vehicles/phase2. Cal. Code Regs., tit. 13, §§ 1956.8 and 2036; and Cal. Code Regs., tit. 17, §§ 95301, 95302, 95303, and 95663.
[325] CARB. Zero-Emission Forklifts. https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts. Cal. Code Regs., tit. 17, §§ 95690.1—95690.8.
[326] CARB. Reducing Rail Emissions. https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california. Proposed Cal. Code Regs., tit. 13, §§ 2478—2478.16.
[327] CARB. In-use Off-Road Diesel-Fueled Fleets Regulation. https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation. Cal. Code Regs., tit. 13, §§ 2449, 2449.1, 2449.2.
[328] CARB. Commercial Harbor Craft. https://ww2.arb.ca.gov/our-work/programs/commercial-harbor-craft. Cal. Code Regs., tit. 13, § 2299.5.
[329] CARB. In-use Off-Road Diesel-Fueled Fleets Regulation. https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation.
[330] CARB. Cap-and-Trade Program. https://ww2.arb.ca.gov/our-work/programs/cap-and-trade-program. Cal. Code Regs., tit. 17, §§ 95801 et seq.
[331] CARB. Low Carbon Fuel Standard. https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard. Cal. Code Regs., tit. 17, §§ 95480 et seq.

and both fuels must be produced using low-carbon technology and feedstocks to minimize upstream emissions.

The transition to complete ZEV technology will not happen overnight. Conventional ICE vehicles from legacy fleets will remain on the road for some time, even after all new vehicle sales have transitioned to ZEV technology. In addition, some equipment types are only now in the initial stages of development of ZEV technology for propulsion, such as commercial aircraft or ocean-going vessels. In addition to building the production and distribution infrastructure for zero-carbon fuels, the state must continue to support low-carbon liquid fuels during this period of transition and for much harder sectors for ZEV technology such as aviation, locomotives, and marine applications. Biomethane currently displaces fossil fuels in transportation and will largely be needed for hard-to-decarbonize sectors but will likely continue to play a targeted role in some fleets while the transportation sector transitions to ZEVs. Figure 4-2 provides the detail on fuels used in 2020 and the fuel mix under the Scoping Plan Scenario for 2035 and 2045.

Figure 4-2: Transportation fuel mix in 2022, 2030, and 2045 in the Scoping Plan Scenario[332]



Private investment in alternative fuels will play a key role in diversifying the transportation fuel supply away from fossil fuels. The Low Carbon Fuel Standard is the primary mechanism for transforming California's transportation fuel pool with low-carbon

[332] See https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx for transportation fuels by year.

alternatives and has fostered a growing alternative fuel market. Partially as a result of the powerful market signals from the LCFS, fuels like renewable diesel, sustainable aviation fuel, biomethane, and electricity have all gained significant market shares and continue to displace gasoline and diesel in both on- and off-road vehicles. In addition, Executive Order N-79-20 calls on state agencies to support the transition of existing fuel production facilities away from fossil fuels and directs that this transition also protect and support workers, public health, safety, and the environment. In line with this direction, existing refineries could be repurposed to produce sustainable aviation fuel, renewable diesel, and hydrogen. This trend has already begun, and continuing to develop fuel production capacity in-state to support the energy transition while making the most efficient use of existing assets is critical to avoiding emissions leakage. If fuel demand persists after fuel production facilities have ceased operations, fuel demand will have to be met through imports.

As we transition or build new energy production facilities and infrastructure, it will be important to ensure low-income communities, tribes, and communities of color do not experience increases in existing air pollution disparities and continue to experience a reduction in the air pollution disparities that exist today. California must use the best available science to ensure that raw materials used to produce transportation fuels do not incentivize feedstocks with little to no GHG reductions from a life cycle perspective. A dramatic increase in alternative fuel production must not come at the expense of global deforestation, unsustainable land conversion, or adverse food supply impacts, to name a few examples. CARB will continue to monitor scientific findings on these topics to ensure that California policies, such as the LCFS, send the appropriate market signals and do not result in unintended consequences.[333]

Strategies for Achieving Success

- Accelerate the reduction and replacement of fossil fuel production and consumption in California.[334]
- Incentivize private investment in new zero-carbon fuel production in California.
- Incentivize the transition of existing fuel production and distribution assets to support deployment of low- and zero-carbon fuels while protecting public health and the environment.
- Invest in the infrastructure to support reliable refueling for transportation such as electricity and hydrogen refueling.

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[333] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1E. *finalejacrecs.pdf (arb.ca.gov)*.
[334] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F3. *finalejacrecs.pdf (arb.ca.gov)*.

- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Initiate a public process focused on options to increase the stringency and scope of the LCFS:
    - Evaluate and propose accelerated carbon intensity targets pre-2030 for LCFS.
    - Evaluate and propose further declines in LCFS post-2030 carbon intensity targets to align with this 2022 Scoping Plan.
    - Consider integrating opt-in sectors into the program.
    - Provide capacity credits for hydrogen and electricity for heavy-duty fueling.
- Monitor for and ensure that raw materials used to produce low-carbon fuels or technologies do not result in unintended consequences.[335]

Vehicle Miles Traveled

Transforming the transportation sector goes beyond phasing out combustion technology and producing cleaner fuels. Managing total demand for transportation energy by reducing the miles people need to drive on a daily basis is also critical as the state aims for a sustainable transportation sector in a carbon neutral economy. Though GHG emissions are declining due to cleaner vehicles and fuels, rising VMT can offset the effective benefits of adopted regulations.

Even under full implementation of Executive Order N-79-20 and CARB's Advanced Clean Cars II Regulations, with 100 percent ZEV sales in the light-duty vehicle sector by 2035, a significant portion of passenger vehicles will still rely on ICE technology, as demonstrated in Figure 4-2 above. Accordingly, VMT reductions will play an indispensable role in reducing overall transportation energy demand and achieving the state's climate, air quality, and equity goals. After a significant pandemic-induced reduction in VMT during 2020, passenger VMT has steadily climbed back up and is now closing in on pre-pandemic levels.[336] Driving alone with no passengers remains the primary mode of travel in California, amounting to 75 percent of the mode share for daily commute trips. Conversely, the transit industry, which was significantly impacted during

[335] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1E. *finalejacrecs.pdf (arb.ca.gov)*.
[336] U.S. Department of Transportation. 2021. December 2021 Traffic Volume Trends. Figure 3 - Seasonally Adjusted Vehicle Miles Traveled by Month. *https://www.fhwa.dot.gov/policyinformation/travel_monitoring/21dectvt/figure3.cfm*.

the lockdown months, and has struggled to recover; ridership only averages two-thirds of pre-pandemic levels,[337] [338] and service levels also lag behind.

Sustained VMT reductions have been difficult to achieve for much of the past decade, in large part due to entrenched transportation, land use, and housing policies and practices. Specifically, historic decision-making favoring single-occupancy vehicle travel has shaped development patterns and transportation policy, generating further growth in driving (and making transit, biking and walking less viable alternatives). These policies have also reinforced long-standing racial and economic injustices that leave people with little choice but to spend significant time and money commuting long distances, placing a disproportionate burden on low-income Californians, who pay the highest proportion of their wages on housing and transportation. While CARB has included VMT reduction targets and strategies in the Scoping Plan and appendices, these targets are not regulatory requirements, but would inform future planning processes. CARB is not setting regulatory limits on VMT in the 2022 Scoping Plan; the authority to reduce VMT largely lies with state, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices.

Appendix E (Sustainable and Equitable Communities) elaborates on reasons for reducing VMT and identifies a series of policies that, if implemented by various responsible authorities, could help to achieve the recommended VMT reduction trajectory included in this Scoping Plan (and related mode share increases for transit and active transportation). These policies aim to advance four strategic objectives:

1. Align current and future funding for transportation infrastructure with the state's climate goals, preventing new state-funded projects from inducing significant VMT growth and supporting an ambitious expansion of transit service and other multimodal alternatives.
2. Move funding for transportation beyond the gasoline and diesel taxes and implement fuel-agnostic pricing strategies that accomplish more productive uses of the roadway network and generate revenues to further improve transit and other multimodal alternatives.
3. Deploy autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
4. Encourage future housing production and multi-use development in infill locations and other areas in ways that make future trip origins and destinations

[337] U.S. Government Accountability Office. January 25, 2022. During COVID-19, Road Fatalities Increased and Transit Ridership Dipped. *https://www.gao.gov/blog/during-covid-19-road-fatalities-increased-and-transit-ridership-dipped*.
[338] American Public Transportation Association. APTA - Ridership Trends. *https://transitapp.com/APTA*.

closer together and create more viable environments for transit, walking, and biking.

The pace of change to reduce VMT must be accelerated. Certainly, structural reform will be challenging, but California has demonstrated time and again that it possesses the collective leadership and commitment to break away from ideas that no longer represent Californians' values and their aspirations for the many generations to come.

Strategies for Achieving Success

- Achieve a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045. [339]
- Reimagine new roadway projects that decrease VMT in a way that meets community needs and reduces the need to drive.
- Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.[340]
- Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices.[341]
- Expand and complete planned networks of high-quality active transportation infrastructure.[342]
- Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger-occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
- Streamline access to public transportation through programs such as the California Integrated Travel Project.
- Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP)/ sustainable communities strategies (SCS), regional housing needs assessments (RHNA), and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support implementation of these plans.

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[339] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. finalejacrecs.pdf (arb.ca.gov).
[340] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. finalejacrecs.pdf (arb.ca.gov).
[341] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1D. finalejacrecs.pdf (arb.ca.gov).
[342] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1F. finalejacrecs.pdf (arb.ca.gov).

- Accelerate infill development and housing production at all affordability levels in transportation-efficient places, with a focus on housing for lower-income residents.

Clean Electricity Grid

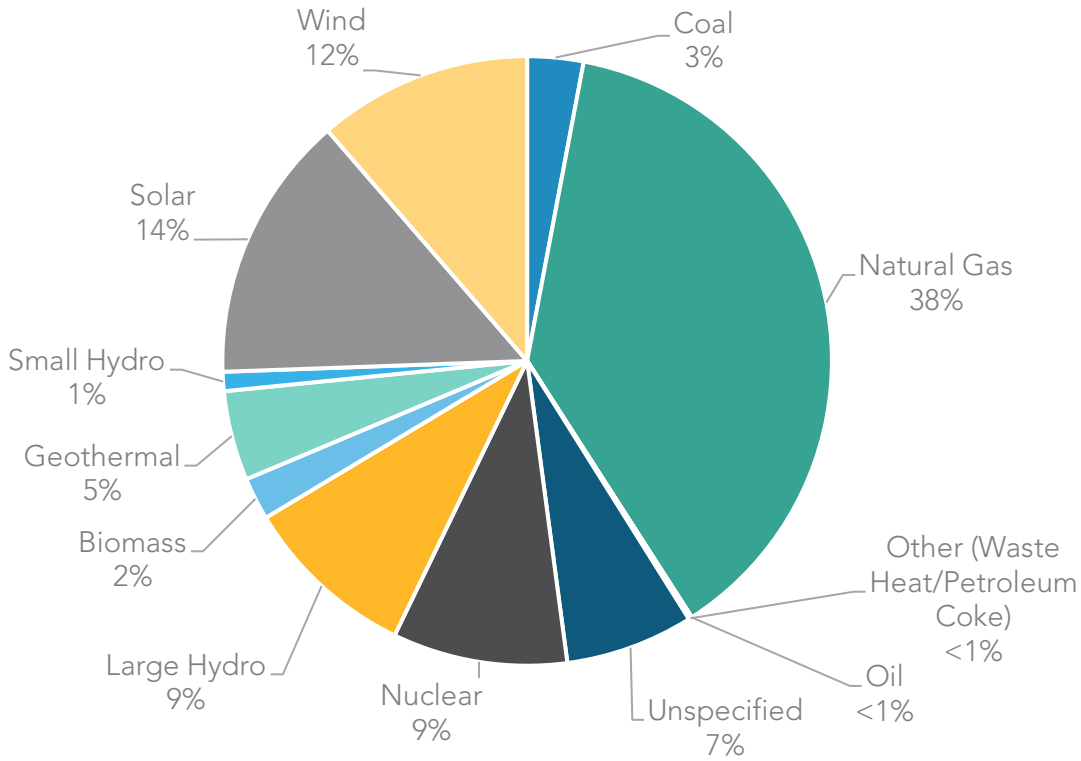
Much of the state's success to date in reducing GHGs is due to decarbonization of the electricity sector as a result of the RPS, SB 100 implementation, and the Cap-and-Trade Program. Moving forward, a clean, affordable, and reliable electricity grid will serve as a backbone to support deep decarbonization across California's economy. Under this Scoping Plan, the role of electricity in powering the economy will grow in almost every sector.

In 2021, 70 percent of California electricity demand was served by in-state power plants totaling about 82 GW, with the rest coming from out-of-state imports.[343] Additionally, approximately 8 GW of customer solar photovoltaic capacity has been installed to date to help with in-state demand.[344] Figure 4-3 shows the breakdown of in-state and imported sources of electricity.

[343] CEC. 2021. Electric Generation Capacity and Energy. Data available at: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-generation-capacity-and-energy and CEC. 2021. Total System Electric Generation. Data available at: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation. Capacity values are nameplate capacity from sources 1 MW and larger.

[344] CEC. 2021. *SB 100 Joint Agency Report Summary: Achieving 100% Clean Electricity in California, An Initial Assessment.* 10. https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity.

Figure 4-3: 2021 total system electric generation (based on GWh)[345]



Note: Imports contributing to total system generation are comprised of 58% zero-carbon energy and 42% non-renewable and unspecified energy. Percentages do not add to exactly 100 due to rounding.

In 2021, about 48 percent of electricity generation serving California came from non-renewable and unspecified[346] resources, while 52 percent came from renewable and zero-carbon resources. The state's Strategic Reliability Reserve, established in AB 205 to provide additional reliability insurance during extreme events, may make three of the fossil gas-fired OTC plants planned for retirement available to support the grid on a limited basis after 2023. The state also adopted legislation to facilitate extension of the Diablo Canyon Nuclear Power Plant for five years beyond its 2025 planned closure.[347] At the

[345] *Total system generation* is the sum of all utility-scale, in-state generation, plus net electricity imports. CEC. 2021 Total System Electricity Generation. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation.
[346] *Unspecified power* refers to electricity that is not traceable to a specific generating facility, such as electricity traded through open market transactions. It typically consists of a mix of resources and may include renewables.
[347] In accordance with SB 846 (Dodd, Chapter 239, Statutes of 2022).

same time, the state continues to rapidly expand deployment of clean energy generation and storage resources and plan for increased electrification.[348] This is critical to reducing GHG emissions and addressing the long-term impacts of climate change.

Climate change is causing unprecedented stress on California's energy system—driving high demand and constraining supply. Heat, drought, and wildfires can both reduce electricity supply from reductions in hydropower generation and impacts on generation and transmission performance, and increase demand, especially in the evening hours when solar generation is declining.

California has experienced three straight years of energy reliability challenges, including a multi-day extreme heat event across the western United States with temperatures up to 20 degrees above normal in California, resulting in rotating outages in August 2020. In 2021, heat waves in June prompted a Grid Warning and the onset of emergency conditions, and the Bootleg Fire caused the loss of one transmission line, reducing import capability by 3,000 megawatts into the California Independent System Operator (CAISO) balancing authority area. And from August 31–September 9, 2022, a 10-day extreme heat event resulted in an unprecedented, sustained period of high peak loads in the CAISO system, averaging 47,000 MW and maxing at an all-time record of over 52,000 MW on September 6. The Western region also hit its record peak load on September 6, at 167.5 GW.

Reliable electricity service was maintained throughout the 10-day September 2022 heat wave in spite of the record breaking load levels. Factors that contributed to this outcome include the installation of over 3,500 MW of lithium-ion battery storage since summer 2020, enhanced coordination and communication within and outside of California, engagement with customer groups and other stakeholders, state actions to reduce load during critical times, and the additional capacity provided through the Strategic Reliability Reserve and other new state programs authorized in the 2022 Budget to provide load reduction and support the grid in extreme events. CEC, CPUC, CAISO, and the California Department of Water Resources will continue to build out strategies to enhance reliability in light of the increasing and compounding impacts of climate change on the electricity system.

[348] In June 2021, the CPUC adopted D.21-06-035 directing procurement of 11,500 MW of new capacity between 2023 and 2026 to ensure systemwide electric reliability as Diablo Canyon and several OTC facilities retire. It requires that, out of the 11,500 MW, 2,500 MW must be from zero-emission resources. Additionally, 2,000 MW must be long lead-time resources, with at least 1,000 MW of long-duration storage and 1,000 MW of firm capacity with zero on-site emissions or that qualifies under the RPS eligibility requirements.

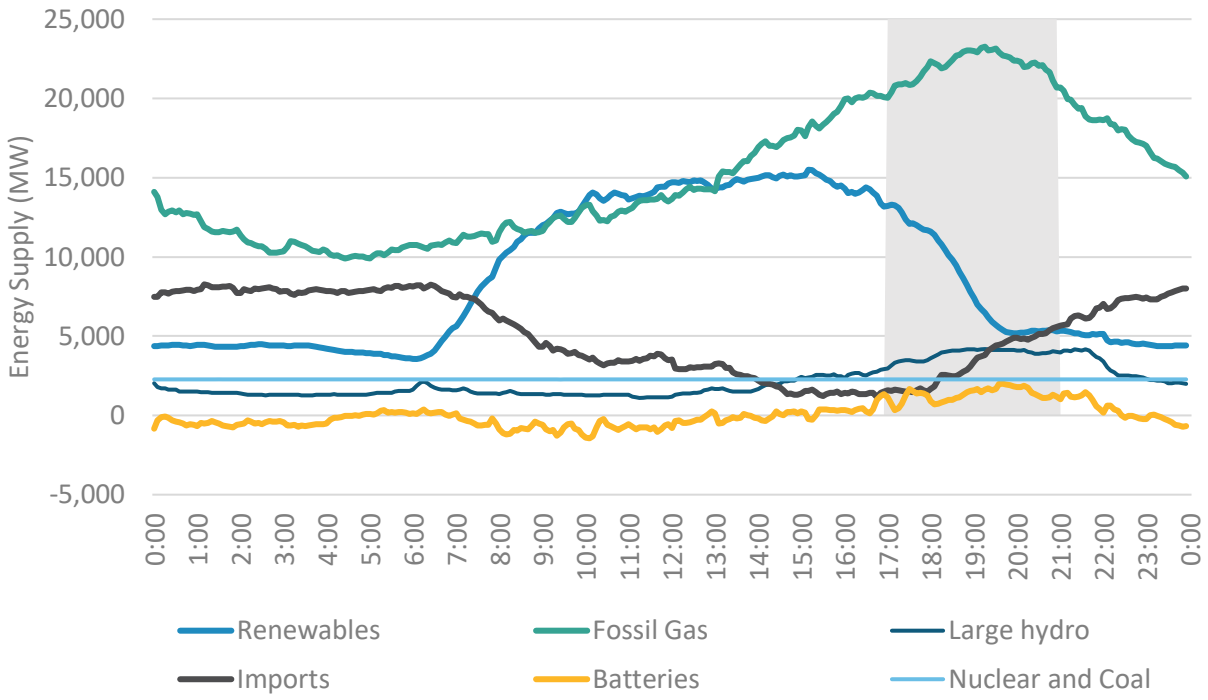
While the electricity sector is using less fossil fuel due to increasing amounts of renewables,[349] existing fossil gas generation will continue to play a critical role in grid reliability until other clean, dispatchable alternatives can be deployed at scale. The integration of greater amounts of variable renewable generation resources[350] is changing power system planning and operations, and system operators need resources with flexible attributes to balance shifting supply and demand.

High levels of solar generation can lead to instances of oversupply during the middle of the day, when the sun is brightest.[351] In the evening hours, as the sun is setting, solar generation declines to zero and customers with solar generation shift back to the electric grid. In hot weather, customer demand remains high well into the summer evening period to power air conditioning, which can lead to reliability challenges.[352]

Figure 4-4 shows the energy sources used throughout one summer day in July. Renewable energy is consistent during the middle of the day, but it cannot meet all of the evening demand in the gray area. As illustrated in the figure, fossil gas generation is currently a resource that is typically ramped up to meet this evening demand as solar production begins to drop and electrical loads increase To help address this challenge, resource installations that pair solar with batteries, as well as a greater amount of battery build-out, are coming online currently and over the next five years. Nevertheless, the state's electricity grid is expected to be stressed further in the coming years by heat waves, drought, wildfires, and the growing intermittent power supply from renewables. California must accelerate deployment of diverse clean energy resources to maintain reliability and affordability in the face of climate change.

[349] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.
[350] A *variable renewable generation resource* is a renewable source of electricity that is non-dispatchable due to its fluctuating nature and only produces electricity when weather conditions are right, such as when the sun is shining or the wind is blowing. Renewable resources that can be controlled and are dispatchable include geothermal, biomass, and dam-based hydroelectric power.
[351] *Brightness* is used colloquially here; solar energy depends on insolation (e.g., sun-hours), which is the measurement of cumulative solar energy that reaches an area over a period of time.
[352] CAISO, CPUC, and CEC. 2021. *Final Root Cause Analysis: Mid-August 2020 Extreme Heat Wave.* http://www.caiso.com/Documents/Final-Root-Cause-Analysis-Mid-August-2020-Extreme-Heat-Wave.pdf.

Figure 4-4: Electricity supply trend by resource for a California summer day, July 2022



Sector Transition

Decarbonizing the electricity sector is a crucial pillar of this Scoping Plan. It depends on both using energy more efficiently and replacing fossil-fueled generation with renewable and zero carbon resources, including solar, wind, energy storage,[353] geothermal, biomass, and hydroelectric power. The RPS Program[354] and the Cap-and-Trade Program continue to incentivize dispatch of renewables over fossil generation to serve state demand. SB 100 increased RPS stringency to require 60 percent renewables by 2030 and for California to provide 100 percent of its retail sales[355] of electricity from renewable and zero-carbon resources by 2045. Furthermore, SB 1020 has added interim targets to

[353] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, NF2. *finalejacrecs.pdf (arb.ca.gov)*.
[354] The CEC estimates that 36 percent of California's 2019 retail electricity sales was served by RPS-eligible renewable resources (see CPUC. 2021. CPUC Perspectives on Electric Sector Decarbonization. *https://ww2.arb.ca.gov/sites/default/files/2021-11/CPUC-sp22-electricity-ws-11-02-21.pdf*).
[355] SB 100 speaks only to retail sales and state agency procurement of electricity. The *2021 SB 100 Joint Agency Report* interprets this to mean that other loads—wholesale or non-retail sales and losses from storage and transmission and distribution lines—are not subject to the law.

SB 100's policy framework to require renewable and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all electricity retail sales by 2040; the governor has asked the CEC to establish a planning goal of at least 20 GW of offshore wind by 2045; and the governor directed that state agencies plan for an energy transition that avoids the need for new fossil gas capacity to meet California's long-term energy goals.[356] In addition to grid-level resources, state efforts have supported rapid growth of the distributed solar industry through key actions like the California Solar Initiative (SB 1, Murray, Chapter 132, Statues of 2006).[357] Steps to commercialize microgrids powered by clean resources[358] are also being examined as part of SB 1339 (Stern, Chapter 566, Statutes of 2018).[359]

California also continues to advance its appliance and building energy efficiency standards to reduce growth in electricity consumption and meet the SB 350 goal to double statewide energy efficiency savings in electricity and fossil gas end uses[360] by 2030. In 2018, the CEC adopted a building energy efficiency code requiring most new homes to have solar photovoltaic systems[361] (or be powered by a solar array nearby) starting January 1, 2020. In 2019, California reached the milestone of 1 million solar rooftop installations.

Increased transportation and building electrification and continued policy commitment to behind-the-meter solar and storage will continue to drive growth of microgrids and other distributed energy resources (DER).[362] The CPUC's High-DER proceeding is examining how to prepare the electric grid for a high DER future by determining how to integrate

[356] Newsom, Gavin. July 22, 2022. Letter from Governor Newsom to CARB Chair Liane Randolph. *https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf*.
[357] More information on the program, which closed in 2016, can be found on the CPUC website, including annual program assessment reports, at: *https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/california-solar-initiative*.
[358] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, In part (NF2, NF13). *finalejacrecs.pdf (arb.ca.gov)*.
[359] CPUC. Resiliency and Microgrids. *https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/resiliency-and-microgrids*.
[360] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, ES1. *finalejacrecs.pdf (arb.ca.gov)*.
[361] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF2. *finalejacrecs.pdf (arb.ca.gov)*.
[362] Distributed energy resources include rooftop solar and other distributed renewable generation resources, energy storage, electric vehicles, time variant and dynamic electric rates, flexible load management, demand response, and energy efficiency technologies.

millions of DERs within the distribution grid to maximize societal and ratepayer benefits from DERs while ensuring grid reliability and affordable rates.[363]

SB 350 also aims to connect long-term planning for electricity needs with the state's climate targets. This is primarily accomplished through CARB's establishment of 2030 GHG emissions targets for the electricity sector in general and for each electricity provider, which inform the CPUC and publicly owned utilities' integrated resource planning. A GHG planning target range of 30 to 53 MMTCO_2e—informed by the 2017 Scoping Plan—was originally developed and adopted by CARB in 2018. In its 2021 IRP planning cycle, the CPUC adopted a 38 MMT GHG target for the electricity sector in 2030, which drops to 35 MMT in 2032.[364]

The Scoping Plan Scenario incorporates SB 350's energy efficiency doubling goal, aligns with the CPUC's IRP 2030 GHG target and latest GHG emissions benchmarks through 2035,[365] the governor's 20 GW offshore wind and no new gas generation[366] goals, and SB 100's 2030 RPS and 2045 zero-carbon retail sales targets to reduce dependence on fossil fuels in the electricity sector by transitioning substantial energy demand to renewable and zero-carbon resources.[367] As described in Chapter 2, CCS is applied in limited sectors, including on 16.7 MMT of CO_2 from existing fossil gas electricity generation in 2045, to ensure the state achieves the 85 percent reduction in anthropogenic emissions required by AB 1279. Continued transition to renewable and

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[363] The High-DER proceeding is one of four "anchor" proceedings in the CPUC's DER Action Plan 2.0 and is within the Action Plan's infrastructure track. Information on the High-DER proceeding is available at: *https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/distribution-planning*. The Action Plan can be accessed at: *https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division/der-action-plan*.

[364] The February 10, 2022, Decision 22-02-004 by the CPUC adopts the 2021 Preferred System Plan, completing the 2019–21 IRP cycle. *https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M451/K412/451412947.PDF*. The Decision requires load serving entities to submit plans in the next IRP cycle detailing how they will meet their proportionate share of a 30 MMT electric sector target, as well as a 38 MMT GHG target.

[365] June 15, 2022, Administrative Law Judge's Ruling for 2022 integrated resource plan filings specifies the need for GHG targets to plan for in 2035 to continue progress toward the 2045 goal. The ruling proposes a straight-line projection from the GHG planning target for 2030. Corresponding to the adopted Preferred System Plan in D.22-02-004, 38 MMT in 2030 leads to a target of 30 MMT in 2035. *https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M485/K625/485625915.PDF*.

[366] The governor's July 22, 2022, letter specifies no new gas generation but does not place any constraints on existing gas resources. Therefore, for purposes of RESOLVE electricity sector modeling, existing gas capacity is an available resource that is able to be reduced over time based on announced retirements or if selected for retirement by the model.

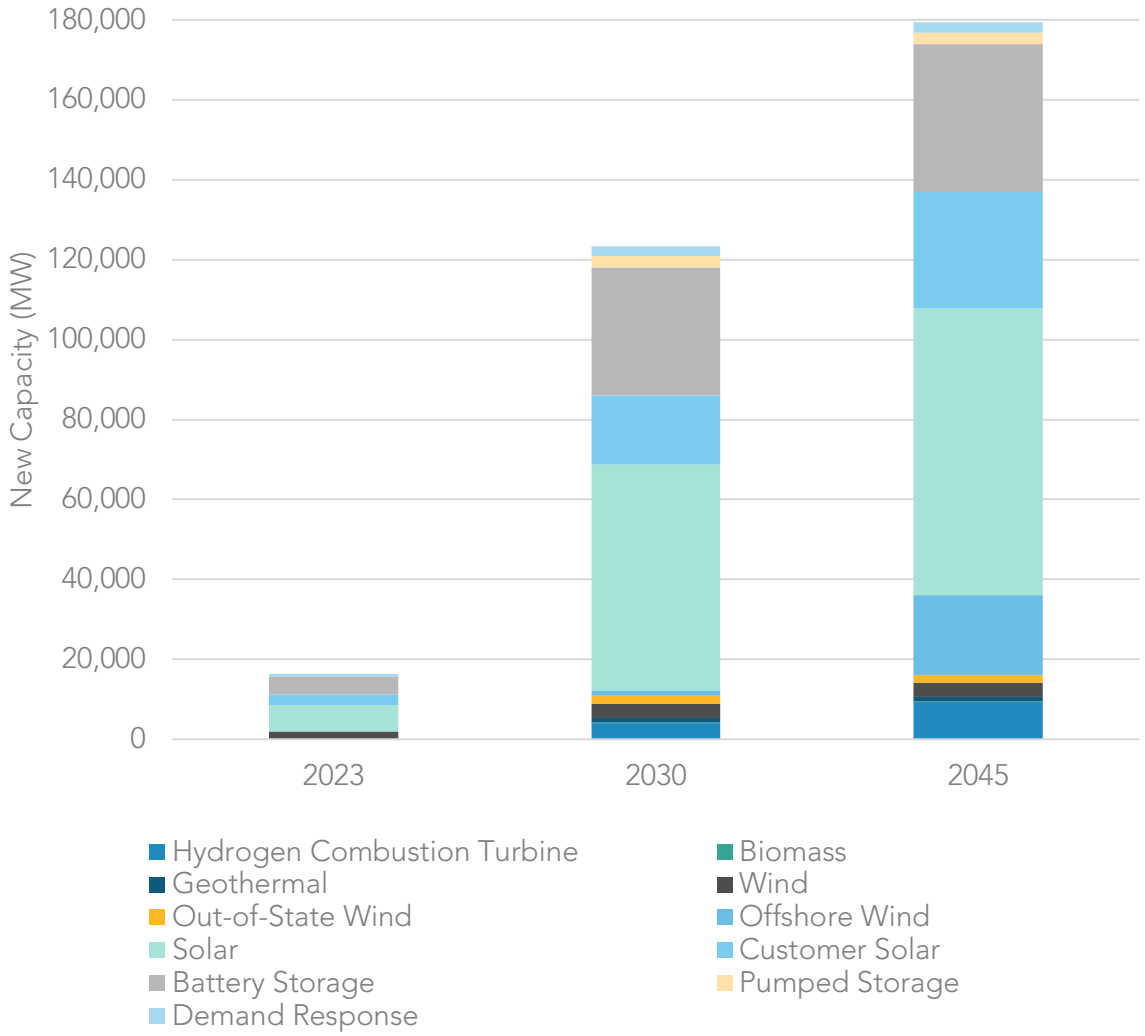
[367] CARB. 2021. PATHWAYS Scenario Modeling: 2022 Scoping Plan Update – Attachment B: Generation Technologies to be included in Modeling. *https://ww2.arb.ca.gov/sites/default/files/2021-12/Revised_2022SP_ScenarioAssumptions_15Dec.pdf*.

zero-carbon electricity resources will enable electricity to become a zero-carbon substitute for fossil fuels across the economy.

Figure 4-5 shows the modeled resource capacity to meet the SB 100 retail sales target.[368] Energy efficiency moderates some of the need for additional electricity generation. However, that is quickly surpassed by growing electricity demand of 26 percent by 2030 and 76 percent by 2045 compared to today (2022) from increased population and electrification of other sectors, as shown in Figure 4-6. The estimated resource build needed to meet this level of demand amounts to approximately 72 GW of utility solar[369] and 37 GW of battery storage by 2045. Annual build rates (over the 2022–2035 period) for the Scoping Plan Scenario will need to increase by about 60 percent and over 700 percent for utility solar and battery storage, respectively, compared to historic maximum rates.[370] To reach the 2045 target, the state will need to quadruple its current level of wind and solar capacity. This does not include capacity associated with hydrogen production nor mechanical CDR, which was modeled off-grid; assuming hydrogen production via electrolysis, this would roughly be equivalent to an additional 10 GW[371] of solar generation needed in 2045, and an additional 64 GW of solar generation for direct air capture in 2045. The scale of solar and battery build rates needed could be reduced through the commercialization of new zero-carbon technologies.

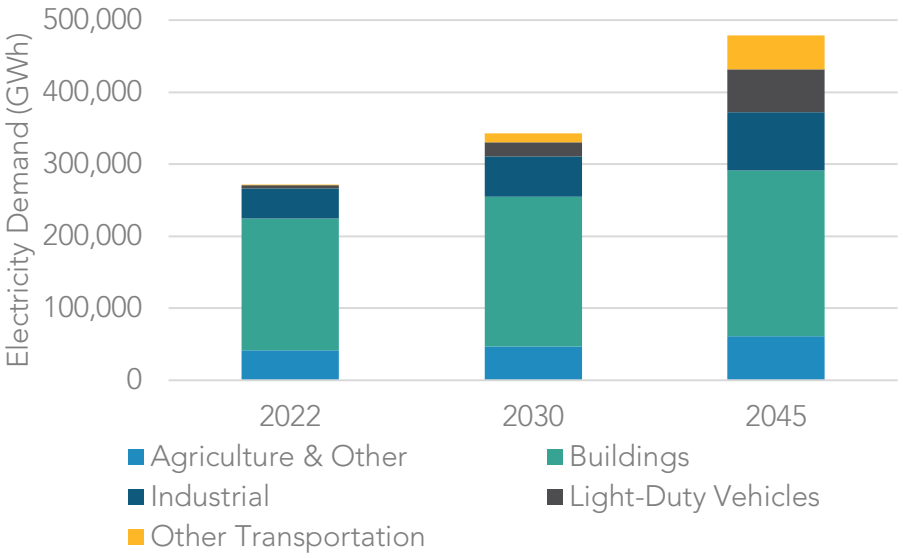
[368] SB 846 requires that load-serving entities exclude energy, capacity, or any attribute from the Diablo Canyon power plant in their resource plans. The Scoping Plan Scenario excludes energy, capacity, or any attribute from the Diablo Canyon power plant after the prior planned retirement date of 2025.
[369] The amount of additional customer solar included in the Scoping Plan Scenario is 29,208 MW by 2045.
[370] E3. 2022. CARB Scoping Plan: AB32 Source Emissions Final Modeling Results. PowerPoint. *https://ww2.arb.ca.gov/sites/default/files/2022-11/SP22-MODELING-RESULTS-E3-PPT.pdf*. Build rates are from EIA data historical builds in the 2011–2021 time frame.
[371] The estimate does not include hydrogen production assumed to be produced with bioenergy with carbon capture and storage (BECCS) and steam methane reforming (SMR).

Figure 4-5: Projected new electricity resources needed by 2045 in the Scoping Plan Scenario[372]



[372] See https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3.xlsx for the capacity build-out by resource type.

Figure 4-6: Electric loads in 2022, 2030 and 2045 for the Scoping Plan Scenario[373]



This transformation will drive investments in a large fleet of generation and storage resources but will also require significant transmission to accommodate these new capacity additions. Transmission needs include high-voltage lines to access out-of-state resources and major in-state generation pockets. In consideration of typical 8- to 10-year lead times for many projects, the CAISO published its first 20-Year Transmission Outlook to inform transmission planning focused on meeting the needs identified through the 2021 SB 100 Joint Agency Report process. The outlook calls for significant transmission development to access offshore wind and out-of-state wind and reinforce the existing CAISO footprint at an estimated cost of $30.5 billion.[374]

Presently, fossil gas power plants provide about 75 percent of the flexible capacity for grid reliability as more renewable power enters the system. Moving forward, other resources such as storage and demand-side management are essential to maintain reliability with high concentrations of renewables. Hydrogen produced from renewable resources and renewable feedstocks can serve a dual role as a low-carbon fuel for existing combustion turbines or fuel cells, and as energy storage for later use. Reliability

[373] *Other Transportation* includes all non-light-duty vehicles and reflects electrification of modes like passenger and freight rail, aviation, and ocean-going vessels.
[374] CAISO. 2022. *20 Year Transmission Outlook.* http://www.caiso.com/InitiativeDocuments/20-YearTransmissionOutlook-May2022.pdf.

also can be supported through increased coordination and markets in the interconnected western power grid; this is already helping to better integrate renewables.[375]

Strategies for Achieving Success

- Use long-term planning processes (Integrated Energy Policy Report, IRP, CAISO Transmission Planning Process, AB 32 Climate Change Scoping Plan) to support grid reliability and expansion of renewable and zero-carbon resource and infrastructure deployment.
- Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, statewide and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets.
- Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state's decarbonization roadmap for adjustments as may be needed.
- Facilitate long lead-time resource development through the IRP and the SB 100 interagency process and through technology development and demonstration funding[376] that includes resources such as long-duration energy storage and hydrogen production.
- Continue coordination between energy agencies and energy proceedings to maximize opportunities for demand response.
- Continue to explore the benefits of regional markets to enhance decarbonization, reliability, and affordability.
- Address resource build-out challenges, including permitting, interconnection, and transmission network upgrades.
- Explore new financing mechanisms and rate designs to address affordability.[377]
- Per SB 350, double statewide energy efficiency savings in electricity and fossil gas end uses by 2030, through a combination of energy efficiency and fuel substitution actions.[378]
- Per SB 100 and SB 1020, achieve 90 percent, 95 percent, and 100 percent

[375] CEC. 2021. *2021 SB 100 Joint Agency Report – Achieving 100 Percent Clean Electricity in California: An Initial Assessment.* Publication Number: CEC-200-2021-001.
[376] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, ES2. The committee recommendation speaks specifically to offshore wind production. *finalejacrecs.pdf (arb.ca.gov)*.
[377] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF30. *finalejacrecs.pdf (arb.ca.gov)*.
[378] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF1, NF2. *finalejacrecs.pdf (arb.ca.gov)*.

renewable and zero-carbon retail sales by 2035, 2040, and 2045, respectively.

- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Target programs and incentives to support and improve access to renewable and zero-carbon energy projects (e.g., rooftop solar, community owned or controlled solar or wind, battery storage, and microgrids) for communities most at need, including frontline, low-income, rural, and indigenous communities.[379]
- Prioritize public investments in zero-carbon energy projects to first benefit the most overly burdened communities affected by pollution, climate impacts, and poverty.[380]

Sustainable Manufacturing and Buildings

Fossil gas is the primary gaseous fossil fuel used to produce heat at industrial facilities, as well as in residential and commercial buildings. In buildings, space and water heating, cooking, and clothes drying all rely on gaseous fuels today. Industrial processes that require heat for conventional boilers and other processes also rely on gaseous fuels. Refineries rely on fossil gas and other gaseous fossil fuels, like liquefied petroleum gas and refinery fuel gas, and fossil gas is also used to generate electricity, as discussed earlier.

Gaseous fossil fuel use can be displaced by four primary alternatives: zero-carbon electricity, solar thermal heat, hydrogen, and biogas/biomethane. Displacing gaseous fossil fuel use can yield indoor air quality benefits, protect public health and property from unexpected fossil gas leaks, and reduce short-lived climate pollutants, which are many times more potent in affecting climate change than CO_2. The Scoping Plan Scenario reduces dependence on fossil gas in the industrial and building sectors by transitioning substantial energy demand to alternative fuels. Reducing fossil gas combustion also will help toward achieving our air quality and equity goals by reducing pollution in neighboring areas and communities. In addition, reduced dependence on gasoline and diesel in the transportation sector diminishes the need for gaseous fossil fuels to support oil and gas production and petroleum refining operations as those are phased down relative to the demand.

[379] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF2, NF9, NF11, NF12, NF13. finalejacrecs.pdf (arb.ca.gov).
[380] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF14. finalejacrecs.pdf (arb.ca.gov).

Sector Transition

Industry

California's industrial sector contributes significantly to the state's economy, with a total output from manufacturing in 2019 of $324 billion (10.4 percent of the state total)[381] and employment of 1,222,000 manufacturing jobs (7.6 percent of the total state workforce).[382] California industry includes a diverse range of facilities, including cement plants, refineries, glass manufacturers, oil and gas producers, paper manufacturers, mining operations, metal processors, and food processors. Combustion of fossil gas, other gaseous fossil fuels, and solid fossil fuels provide energy to meet three broad industry needs: electricity, steam, and process heat. Non-combustion emissions result from fugitive emissions and from the chemical transformations inherent to some manufacturing processes. About 20 percent of the GHG emissions from the industrial sector are non-combustion emissions.

Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions. Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion CO_2 emissions can be captured and sequestered. The strategy employed will depend on the industrial subsector and the specific processes utilized in production. The left side of Figure 4-7 illustrates the fuels used to meet industrial manufacturing energy demand in 2020. Industrial manufacturing energy demand needs to transition to the fuel mix shown for 2035 and 2045. The right side of Figure 4-7 illustrates the fuel mix needed to meet the energy demand of oil and gas extraction and petroleum refining operations for the same years. Energy demand in this portion of the industrial sector declines along with decreased demand for gasoline and diesel in the transportation sector. In both figures there is a continuing demand for fossil gas due to lack of non-combustion technologically feasible or cost-effective alternatives for certain industrial sectors. Policies that support decarbonization strategies like electrification, use of renewable energy, and transition to alternative fuels are needed.

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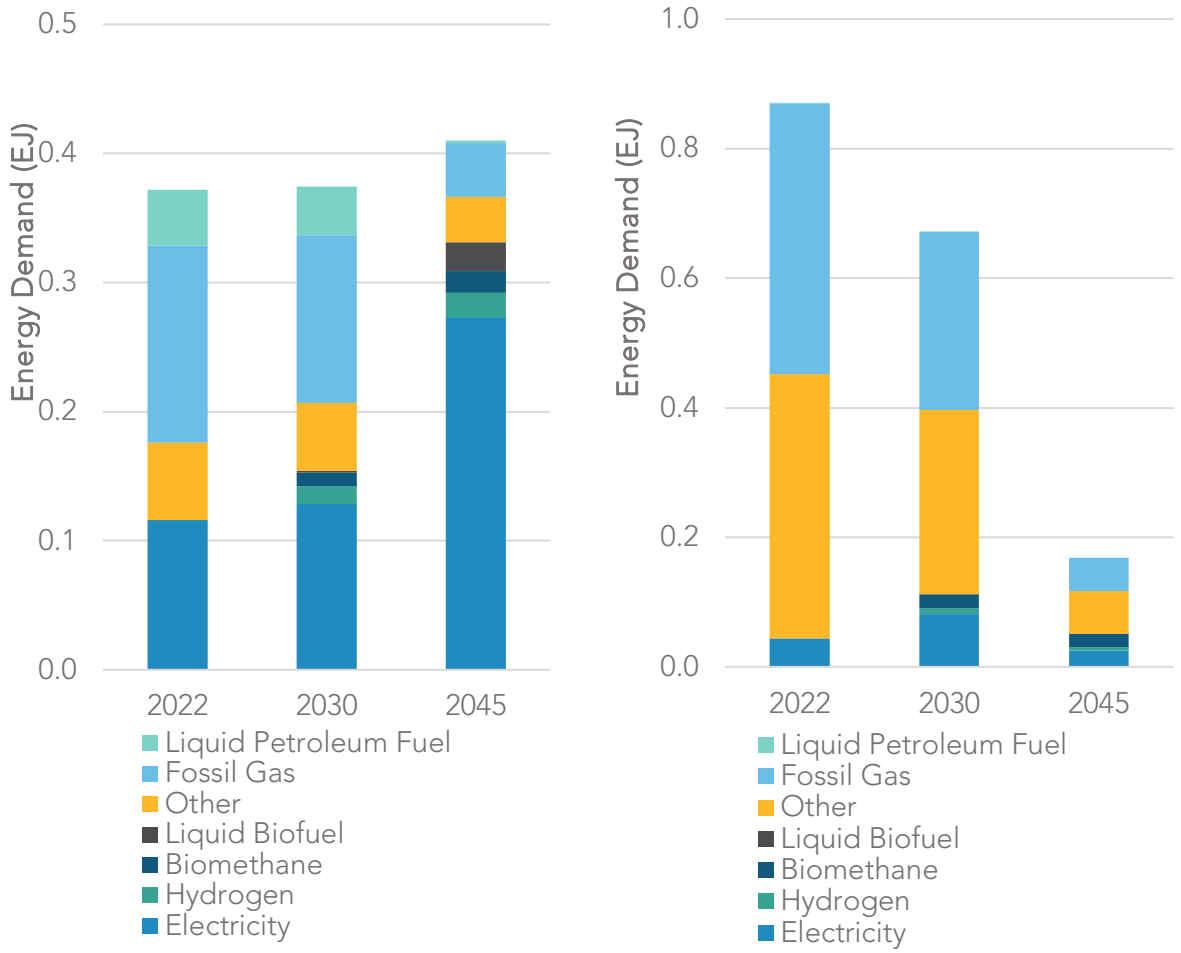
[381] National Association of Manufacturers (NAM). 2021 California Manufacturing Facts. *https://www.nam.org/state-manufacturing-data/2021-california-manufacturing-facts/*.
[382] NAM. 2021 California Manufacturing Facts. *https://www.nam.org/state-manufacturing-data/2021-california-manufacturing-facts/*.

Figure 4-7: Final energy demand in industrial manufacturing (left) and in oil and gas extraction and petroleum refining (right) in 2022, 2030, and 2045 in the Scoping Plan Scenario[383]



Electrification and solar thermal heat are best-suited to industrial processes that have relatively low heat requirements, such as food processors, paper mills, and industries that use low-pressure steam in their processes. Approaches could include replacing fossil gas boilers with electric boilers, process heaters with industrial electric heat pumps, steel forging furnaces with induction heaters, and implementing other sector-specific process electrification. Under current rate structures for industrial electricity and fossil gas in

[383] *Other* fuel in the industrial manufacturing sector is primarily coke and coal for cement production. *Other* fuel in the petroleum refining sector is primarily fossil gas associated with refining petroleum products.

California, most projects to electrify a fossil gas-powered industrial process will face operating cost barriers and potential reliability concerns. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities.

There are fewer commercially available and economically viable electrification options to replace industrial processes that require higher-temperature heat. For these processes, onsite combustion may continue to be needed, and decarbonization will require fuel substitution to hydrogen,[384] biomethane, or other low-carbon fuels. Fuel substitution and continued combustion will require monitoring and mitigation of any potential air quality impacts, especially in low-income and communities of color which already face disproportionate air pollution burdens. Industries in California with high heat needs include steel forging, glass manufacturing, and industries with calcination processes, such as manufacturing lime and cement.

Onsite emissions from cement manufacturing derive from two main sources: (1) fuel combustion to heat the kiln to a very high temperature and (2) process CO_2 emissions from the chemical transformation of limestone. Over 60 percent of emissions from the sector are process emissions unrelated to fuel use, and most emissions related to fuel use are from coal and petroleum coke combustion. Process emissions from cement manufacturing are significant and will continue even if the sector were to operate using only zero-carbon fuels; thus carbon capture and use/sequestration will be a likely component of any strategy to fully decarbonize cement manufacturing. There are additional opportunities to reduce GHG emissions from cement manufacturing via the combination of fuel-switching to low-carbon fuels (e.g., biomethane, municipal solid waste, biochar), increased blending of non-clinker materials, and efficiency improvements. High technological and economic barriers exist to electrifying kiln process heat at cement plants, as clinker production requires temperatures in excess of 1,500°C. There are potential decarbonization opportunities throughout the value chain of cement use, including in cement manufacturing, concrete mixing, and construction practices.[385] SB 596 (Becker, Chapter 246, Statutes of 2021), which was signed by Governor Newsom in September 2021, requires CARB to develop a comprehensive strategy for cement use in California to achieve a GHG intensity 40 percent below 2019 levels by 2035, and net-zero emissions by 2045.

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[384] Griffiths, Steve, Benjamin K. Sovacool, Jinsoo Kim, Morgan Bazilian, and Joao M. Uratani. 2021. "Industrial decarbonization via hydrogen: A critical and systematic review of developments, socio-technical systems and policy options." *Energy Research & Social Science* 80. 102208, ISSN 2214-6296. https://doi.org/10.1016/j.erss.2021.102208.

[385] California Nevada Cement Association. Achieving Carbon Neutrality in the California Cement Industry. https://cncement.org/attaining-carbon-neutrality.

Oil and gas extraction and refining make up over half of California's industrial GHG emissions. Reduced demand for transportation fossil fuels corresponds to reduced supply of fossil gas and other gaseous fossil fuels for refineries to produce these fuels. Some refining operations will continue to operate to produce fossil fuel for the remaining transportation energy demands, along with renewable diesel and sustainable aviation fuel, as discussed in the Transportation Sustainability section of this chapter.

Across industrial subsectors and processes, California facilities also could realize significant reductions in GHG emissions and energy-related costs by implementing advanced energy efficiency projects and tools.[386] While enhanced operation and maintenance practices are typical at industrial facilities, additional strategic energy management practices offer greater efficiency gains by focusing on setting goals, tracking progress, and reporting results.

Strategies for Achieving Success

- Maximize air quality benefits using the best available control technologies for stationary sources in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities.[387]
- Prioritize alternative fuel transitions first in communities most in need, including frontline, low-income, disadvantaged, rural, and tribal communities.[388]
- Invest in research and development and pilot projects to identify options to reduce materials and process emissions along with energy emissions in California's industrial manufacturing facilities, leveraging programs like the CEC's Electric Program Investment Charge (EPIC).[389]
- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Support electrification with changes to industrial rate structures.
- Develop infrastructure for CCS and hydrogen production to reduce GHG emissions where cost-effective and technologically feasible non-combustion alternatives are not available.
- Implement SB 905.

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[386] Therkelsen, Peter, Aimee McKane, Ridah Sabouini, and Tracy Evans. 2013. *Assessing the Costs and Benefits of the Superior Energy Performance Program.* U.S Department of Energy. https://www.osti.gov/servlets/purl/1165470.

[387] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT14. finalejacrecs.pdf (arb.ca.gov).

[388] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT15. finalejacrecs.pdf (arb.ca.gov).

[389] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, M20. finalejacrecs.pdf (arb.ca.gov).

- Establish markets for low-carbon products and recycled materials using Buy Clean California Act and other mechanisms relying on robust data
- Develop a net-zero cement strategy to meet SB 596 targets for the GHG intensity of cement use in California.
- Continue to leverage energy-efficiency programs, including the U.S. DOE's ENERGY STAR program,[390] U.S. DOE's Superior Energy Performance program,[391] and ISO 50001.[392]
- Evaluate and continue to offer incentives to install energy efficiency and renewable energy technologies through programs such as CPUC decisions as part of rulemaking R.19-09-009[393] and the CEC's Food Production Investment Program (FPIP) and EPIC programs.[394]
- Leverage low-carbon hydrogen programs, including the Bipartisan Infrastructure Law, for regional hydrogen hubs, hydrogen electrolysis, and hydrogen manufacturing and recycling.
- Evaluate the role of hydrogen in meeting GHG emission reductions, including policy recommendations regarding the use of hydrogen in California as required by SB 1075.
- Address cost barriers to promote low-carbon fuels for hard-to-electrify industrial applications.

Buildings

Buildings have cross-sector interactions that influence our public health and well-being and affect land use and transportation patterns, energy use, water use, and indoor and outdoor environments.[395] There are about 14 million existing homes and over 7.5 billion square feet of existing commercial buildings[396] in California. Fossil gas supplies about half of the energy consumed by end uses in these buildings. In addition to GHG emissions, fossil gas usage in buildings also produces CO_2, NOx, $PM_{2.5}$, and

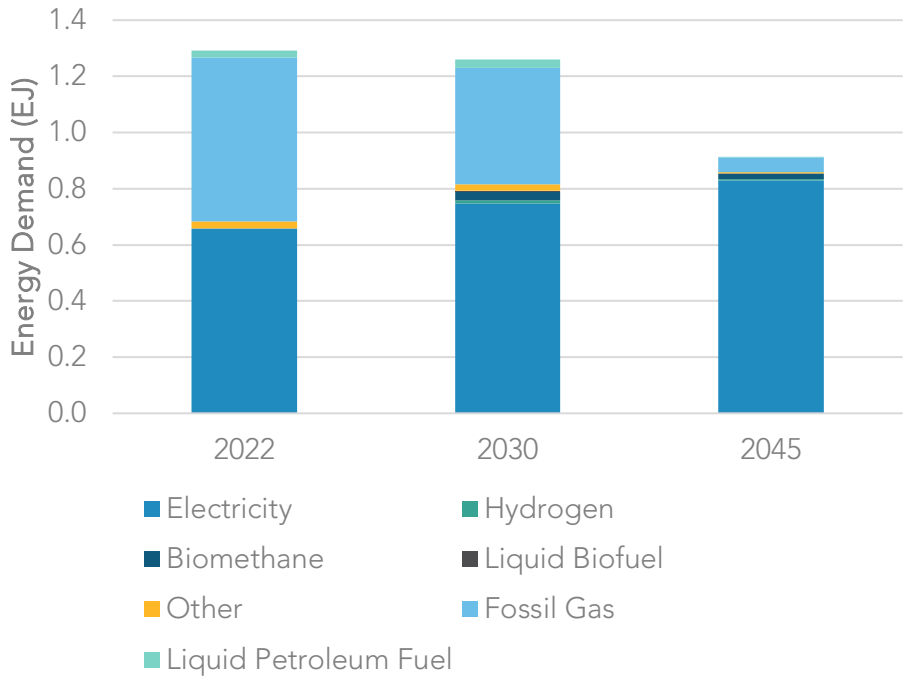
[390] ENERGY STAR. ENERGY STAR Guidelines for Energy Management. https://www.energystar.gov/buildings/tools-and-resources/energy-star-guidelines-energy-management.
[391] Energy.gov. Superior Energy Performance 50001. https://www.energy.gov/eere/amo/superior-energy-performance.
[392] ISO. ISO 50001 Energy Management. https://www.iso.org/iso-50001-energy-management.html.
[393] CPUC. January 14, 2021. CPUC Adopts Strategies to Help Facilitate Commercialization of Microgrids Statewide. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M360/K370/360370887.PDF.
[394] Bailey, Stephanie, David Erne, and Michael Gravely. 2021. *Final 2020 Integrated Energy Policy Report Update, Volume II: The Role of Microgrids in California's Clean and Resilient Energy Future, Lessons Learned From the California Energy Commission's Research.* California Energy Commission. Publication Number: CEC-100-2020-001-V2-CMF.
[395] See Appendix F (Building Decarbonization).
[396] CEC. 2021. California Building Decarbonization Assessment. https://efiling.energy.ca.gov/GetDocument.aspx?tn=239311&DocumentContentId=72767.

formaldehyde.[397] Each year, about 120,000 new homes[398] and more than 100 million-square feet[399] of commercial buildings are newly constructed across California. These new buildings will represent between a third to half of the total building stock by mid-century.

Achieving carbon neutrality must include transitioning away from fossil gas in residential and commercial buildings, and will rely primarily on advancing energy efficiency while replacing gas appliances with non-combustion alternatives. This transition must include the goal of trimming back the existing gas infrastructure so pockets of gas-fueled residential and commercial buildings do not require ongoing maintenance of the entire limb for gas delivery. Blending low-carbon fuels such as hydrogen and biomethane into the pipeline further displaces fossil gas. Pipeline safety and reliability must be evaluated to accommodate low-carbon fuels. Figure 4-8 illustrates the energy Californians use in buildings at present compared with the Scoping Plan Scenario, which introduces alternatives to fossil gas. In that scenario almost 90 percent of energy demand is electrified by 2045, and the remaining energy demand is met with combustion of hydrogen, biomethane, and fossil gas.

[397] Zhu, Yifang, et al. 2020. *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California.* UCLA Fielding School of Public Health Department of Environmental Health Sciences.
[398] Construction Industry Research Board. 2018. Annual Building Permit Summary. *http://www.cirbreport.org*.
[399] Delforge, Pierre. August 11, 2021. California Forging Ahead on Zero Emission Buildings. Blog. NRDC. *https://www.nrdc.org/experts/pierre-delforge/california-forging-ahead-zero-emission-buildings*.

Figure 4-8: Final energy demand in buildings in 2022, 2030, and 2045 in the Scoping Plan Scenario[400]

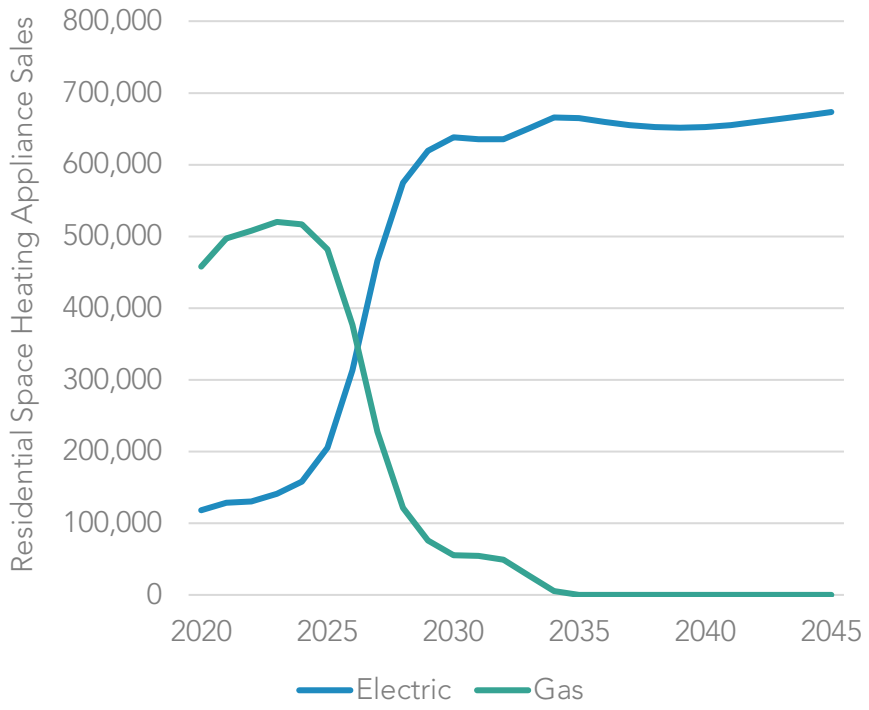


This transition is achieved when all new buildings constructed include non-combustion appliances, and appliances in existing buildings are replaced at the end of their useful life with non-combustion alternatives. Currently, electric alternatives, combined with the decarbonizing of California's grid, are the most effective alternatives, and the Scoping Plan Scenario modeled these alternatives. The Scoping Plan Scenario assumes three million all-electric and electric-ready homes by 2030 and seven million by 2035. Figure 4-9 illustrates the pace at which electric space heating appliance sales increase and gas space heating appliance sales decrease in residences in the Scoping Plan Scenario, such that by 2035 100 percent of residential home appliance sales are electric. By 2030 over six million electric heat pumps are installed statewide. The residential electric space heating appliance sales increases rapidly in the near term as new all-electric buildings are constructed and as existing buildings are renovated to utilize electric appliances. A similar transition is envisioned for other home appliances. Commercial buildings also will undergo a transition away from gas appliances to electric appliances, achieving 80 percent sales of all-electric appliances by 2035 and 100 percent by 2045. Appendix F (Building Decarbonization) describes a holistic policy approach to rapidly grow the

[400] *Other* fuel in the buildings sector is primarily liquid petroleum gas and waste heat.

number of zero emission appliances and buildings, to surmount the market barriers, and to prioritize an equitable transition for vulnerable communities.

Figure 4-9: Residential space heating appliance sales in the Scoping Plan Scenario



Strategies for Achieving Success

- Prioritize California's most vulnerable residents with the majority of funds in the new $922 million Equitable Building Decarbonization program, created through the 2022–2023 state budget. This would include residents in frontline, low-income, disadvantaged, rural, and tribal communities. This program is dedicated to a statewide direct-install building retrofit program for low-income households to replace fossil fuel appliances with electric appliances, energy-efficient lighting, and building insulation and sealing while also coordinating reductions in gas infrastructure in specific geographic areas.
- Achieve three million all-electric and electric-ready homes by 2030 and seven million by 2035 with six million heat pumps installed statewide by 2030.
- Expand incentive programs to support the holistic retrofit of existing buildings, especially for vulnerable communities.
- Ensure that incentive programs prioritize energy affordability and tenant protections, promote affordable and low-income household retrofits that improve habitability and reduce expenses, protect and empower small landlords and homeowners, address overlooked consumer groups, and pair decarbonization

with other critically needed renovation efforts to ensure that buildings support human health and are climate- and weather-resistant.[401]

- End fossil gas infrastructure expansion for newly constructed buildings.[402]
- Evaluate and propose, as needed, changes to strengthen the Cap-and-Trade Program.
- Strengthen California's building standards to support zero-emission new construction.
- Develop building performance standards for existing buildings.
- Adopt a zero-emission standard for new space and water heaters sold in California beginning in 2030, as specified in the 2022 State Strategy for the State Implementation Plan.
- Expand use of low-GWP refrigerants within buildings.
- Support electrification with changes to utility rate structures and by promoting load management programs.
- Increase funding for incentive programs and expand financing assistance programs focused on existing buildings and appliance replacements.
- Expand consumer education efforts to raise awareness and stimulate the adoption of decarbonized buildings and appliances, especially in vulnerable communities.
- Implement biomethane procurement targets for investor-owned utilities as specified in SB 1440 (Hueso, Chapter 739, Statutes of 2018) to reduce GHG emissions in remaining pipeline gas and reduce methane emissions from organic waste.

[401] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF23, NF24, NF25, NF26, NF28. *finalejacrecs.pdf (arb.ca.gov)*.
[402] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF22. *finalejacrecs.pdf (arb.ca.gov)*.

Carbon Dioxide Removal and Capture

Climate Change 2022: Mitigation of Climate Change,[403] a report by the IPCC released in early 2022, states "The deployment of CDR to counterbalance hard-to-abate residual emissions is unavoidable if net zero CO_2 or GHG emissions are to be achieved. The scale and timing of deployment will depend on the trajectories of gross emission reductions in different sectors. Upscaling the deployment of CDR depends on developing effective approaches to address feasibility and sustainability constraints especially at large scales." In line with that report, this Scoping Plan considers CDR as a complement to technologically feasible and cost-effective GHG emissions mitigation, and the size of its role will depend on the degree of success in reducing GHG emissions at the source across the economy. [404] The modeling shows that emissions from the AB 32 GHG Inventory sources will continue to persist even if all fossil related combustion emissions are phased out. These residual emissions must be compensated for to achieve carbon neutrality. Options for CDR include both sequestration in natural and working lands and mechanical approaches like direct air capture. Chapter 2 provides estimates on how much CO_2 removal is possible by our natural and working lands and how much must be removed by mechanical CDR.

CCS, which is carbon capture from anthropogenic point sources, is described in Chapter 2 and involves capturing carbon from a smokestack of an emitting facility. Direct air capture, on the other hand, captures carbon directly from the atmosphere. Direct air capture technologies, unlike CCS, are not associated with any particular point source.

For this section, *carbon management* refers to the capture, movement, and sequestration of CO_2 through mechanical solutions for both capture at point sources and direct removal from the atmosphere through direct air capture.[405] Enabling policies and regulations across each of these steps are necessary for individual projects, and on a broader scale, for delivering reductions in support of the state's carbon neutrality and long-term carbon-negative goals. Figure 4-10 provides a graphic of the typical carbon management infrastructure.

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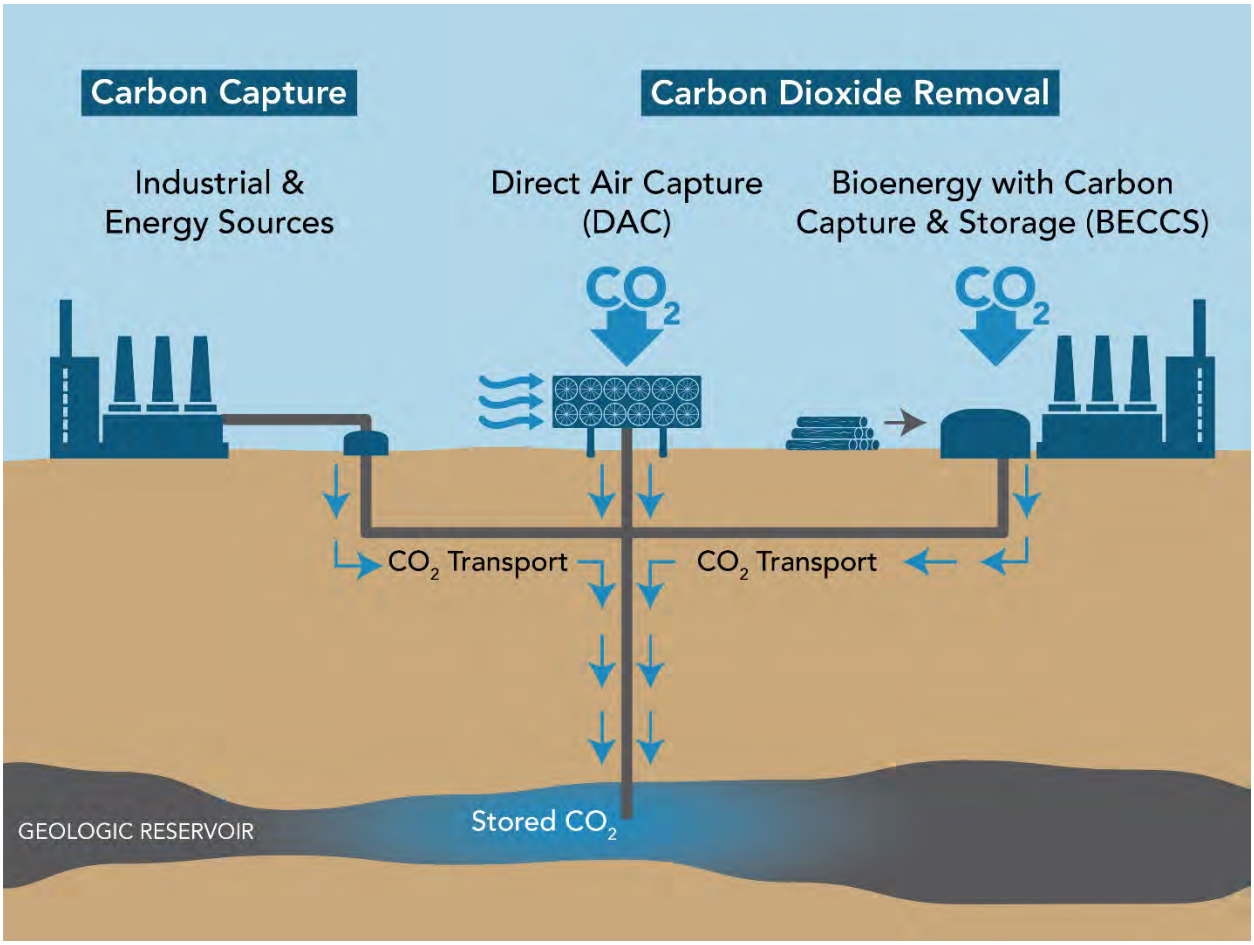
[403] IPCC. 2022. *Climate Change 2022: Mitigation of Climate Change.* https://www.ipcc.ch/report/sixth-assessment-report-working-group-3/.
[404] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.7. finalejacrecs.pdf (arb.ca.gov).
[405] CDR through natural and working lands is discussed in Chapter 2 and later in this chapter.

Figure 4-10: Carbon management infrastructure



Carbon dioxide removal directly from the atmosphere itself refers to a suite of carbon negative technologies that can be used to draw down ongoing and historical carbon emissions already in the atmosphere. Some CO_2 removal technologies leverage the abilities of both natural photosynthesis and mechanical removal by using biomass wastes as inputs to make low- or zero-carbon energy or fuels, all while capturing and storing produced CO_2.

Captured CO_2 from point sources or from the atmosphere is permanently stored in specialized geologic formations, typically half a mile or more underground. A recent Stanford University study estimated the state's commercial storage potential is nearly 70,000 million metric tons of CO_2, even when excluding oil and gas reservoirs.[406] California is well-positioned because few other places on the West Coast are suitable for

[406] Stanford Center for Carbon Storage. Opportunities and Challenges for CCS in California. https://sccs.stanford.edu/california-projects/opportunities-and-challenges-for-CCS-in-California.

geologic storage at scale. To inform discussion around CO_2 removal, CARB held two full-day workshops exploring the types of options for carbon capture and geologic storage and utilization in products.[407,408,409]

The modeling results provided in Chapter 2 demonstrate the targeted need for CCS on large facilities such as refineries and cement. The CCS numbers do not include the potential additional applications for producing hydrogen with biomethane, other manufacturing, electricity, or other bioenergy. If CCS is not deployed, those emissions would be released directly into the atmosphere and instead need to be addressed through CDR to achieve carbon neutrality. Although a study finds California has 76 existing electricity and industrial facilities that are suitable candidates for CCS retrofit,[410] this Scoping Plan proposes a targeted role for this technology such that it would only be used to address sectors where non-combustion options are not technologically feasible or cost-effective at this time, to the extent needed to achieve the 85 percent reduction in anthropogenic emissions as called for in AB 1279. In future updates to the Scoping Plan, there may be additional options for technologically feasible or cost-effective technologies that may be deployed, which would further reduce the need for CCS and CDR except in situations to address historical GHG emissions.

Recognizing the need for carbon capture and utilization sequestration and removal, the Legislature passed, and the governor signed, SB 905. It includes several key requirements in the development of the state's Carbon Capture Removal, Utilization, and Storage Program. The following is a summary of the work to be completed to establish and administer this program. Many of these steps will address the need to evaluate the safety and efficacy of actions to support carbon removal, sequestration, and transfer via pipelines. Note that not all of these actions are under CARB's authority.

- Review technology to evaluate efficacy, safety, viability of CCUS/CDR methodologies.
- Develop monitoring and reporting requirements and schedules.
- Develop a unified permit application.
- Develop financial responsibility requirements.
- Develop a centralized public database for project status.

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[407] CARB. December 11, 2019. Carbon Neutrality Meetings & Workshops. https://ww2.arb.ca.gov/our-work/programs/carbon-neutrality/carbon-neutrality-meetings-workshops.
[408] CARB. August 2, 2021 Scoping Plan Meetings & Workshops. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops.
[409] *Carbon utilization* refers to the use of captured carbon to produce products such as plastics and concrete.
[410] Glenwright, Kara. 2020. *Roadmap for carbon capture and storage in California.* Precourt Institute for Energy. https://earth.stanford.edu/news/roadmap-carbon-capture-and-storage-california#gs.ysj78q.

- Consult with CNRA on pore space requirements as CNRA develops a framework for pore space governing agreements.
- Establish a Geologic Carbon Sequestration Group to identify suitable injection well locations, subsurface monitoring, and potential hazards that may require suspension of injection.

SB 905 also has requirements for project developers such as to develop monitoring plans and to avoid any adverse health and environmental impacts at the carbon capture location—or mitigation of unavoidable impacts as required under existing requirements. For the site of injection, there are requirements for site stability, monitoring, and reporting plans. SB 905 also bans CCS with enhanced oil recovery in California and prohibits the transfer of CO_2 via pipeline until the U.S. Department of Transportation's Pipelines and Hazardous Materials Safety Administration (PHMSA) completes its current rulemaking to update existing CO_2 pipeline safety requirements.

An often-cited example of pipeline concerns involves a CO_2 pipeline in Mississippi. On February 22, 2020, a CO_2 pipeline operated by Denbury Gulf Coast Pipelines LLC (Denbury) ruptured in proximity to the community of Satartia, Mississippi. The rupture followed heavy rains that resulted in a landslide, creating excessive axial strain on a pipeline weld (DOT 2022). The combination of weather and topography resulted in a slower dissipation of the gas. The pipeline was also carrying hydrogen sulfide, a flammable and toxic gas. The pipeline failed on a steep embankment, which had recently subsided. Heavy rains are believed to have led to a landslide, which created axial strain on the pipeline and resulted in a full circumferential girth weld failure. The PHMSA investigation also revealed several contributing factors to the accident, including but not limited to: Denbury not addressing the risks of geohazards in its plans and procedures, underestimating the potential affected areas that could be impacted by a release in its CO_2 dispersion model, and not notifying local responders to advise them of a potential failure.

As the Satartia example highlights, appropriate pipeline safety and environmental standards in California are critical to minimize any risks from CO_2 transport in the future. As such, SB 905 also tasks CNRA, in consultation with the Public Utilities Commission, to, no later than February 1, 2023, provide a proposal to the Legislature to establish a state framework and standards for the design, operation, siting, and maintenance of intrastate pipelines carrying CO_2 fluids of varying composition and phase to minimize the risk posed to public and environmental health and safety. The recommended framework shall be designed to minimize risk to public health and environmental health and safety, to the extent feasible. Because SB 905 prohibits the transfer of CO_2 via pipeline until the PHMSA completes its current rulemaking to update existing CO_2 pipeline safety requirements, CCS or CDR projects that would require a pipeline to transfer CO_2 are not feasible at this time within California.

Ultimately, and in accordance with SB 905, the merits of each CCS or CDR project must be evaluated on a case-by-case basis.[411] Deployment of CCS and CDR could support skilled jobs and workforces, including those in traditional fossil energy communities. Other co-benefits could include criteria air pollutant reductions and water production. It will be important to design projects that do not exacerbate community health impacts, include early and ongoing community engagement, and are in compliance with local, state, and federal public health and environmental protection laws. It also should be noted that, as these types of projects are an emerging area of governance, additional coordination and discussion will be needed among the various levels of authorities involved. SB 905 has already initiated this process by assigning specific agencies with tasks related to their expertise and authority.

Chapter 2 includes a more detailed discussion about the proposed role of CO_2 removal in this Scoping Plan.

Sector Transition

State,[412] national,[413,414] and global decarbonization analyses[415] indicate a significant role for carbon management infrastructure, yet relatively few projects are operational. Around the world, about two dozen large CCS projects are capturing tens of millions of metric tons of CO_2 each year, with about a dozen operating in the United States.[416] The vast majority of capacity is at industrial facilities, such as ethanol and fertilizer plants, that would otherwise vent nearly pure CO_2 into the atmosphere as a by-product of normal, non-combustion processes. Future research, development, and demonstration projects must refine and commercialize capture systems for more complex applications, especially

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[411] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.5. *finalejacrecs.pdf (arb.ca.gov)*.
[412] E3. October 2020. Achieving Carbon Neutrality in California Report: Final Presentation. *https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_presentation_oct2020_2.pdf*.
[413] World Resources Institute. January 31, 2020. CarbonShot: Federal Policy Options for Carbon Removal in the United States. Working paper. *https://www.wri.org/research/carbonshot-federal-policy-options-carbon-removal-united-states*.
[414] C2ES. No date. Getting to Zero: A U.S. Climate Agenda — Center for Climate and Energy Solutions. *https://www.c2es.org/getting-to-zero-a-u-s-climate-agenda-report/*.
[415] IPCC. Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development. Chapter 2. *https://www.ipcc.ch/sr15/chapter/chapter-2/*. All analyzed pathways limiting warming to 1.5°C with no or limited overshoot use CDR to some extent to neutralize emissions from sources for which no mitigation measures have been identified and, in most cases, also to achieve net negative emissions to return global warming to 1.5°C following a peak (high confidence). The longer the delay in reducing CO_2 emissions toward zero, the larger the likelihood of exceeding 1.5°C, and the heavier the implied reliance on net negative emissions after mid-century to return warming to 1.5°C (high confidence).
[416] Congressional Research Service. 2021. Carbon Capture and Sequestration (CCS) in the United States. R44902. *https://crsreports.congress.gov/product/pdf/R/R44902?msclkid=e45e0012c25911ec8085ca575cb61e82*.

for those with limited decarbonization options. It has only been in the last few years that attention has seriously turned to mechanical CDR. As new information and modeling on climate change have been made available, the science has become clearer that avoiding the most catastrophic impacts of climate change requires both reducing emissions and deploying mechanical CDR.

California is paving a path forward on a science-based carbon management infrastructure policy that can serve as an example for other jurisdictions. The LCFS, which reduces the carbon intensity of transportation fuels, includes a protocol for select carbon management projects to become certified and generate LCFS credits.[417] CCS is not a new concept or technology. Twenty years of CCS testing show it is a safe and reliable tool.[418] As mentioned in Chapter 2, while no new CCS projects have been implemented or generated any credits under the CARB CCS protocol, CCS projects have been implemented elsewhere since the 1970s. Moreover, there has been a U.S. Department of Energy CCS research program underway for more than two decades. These all form a foundation of information for future efforts. Certified projects must successfully demonstrate adherence to rigorous pre-construction, operational, and site closure standards designed to strengthen environmental performance, as described in CARB's CCS Protocol. The protocol is designed to layer on top of existing federal carbon sequestration regulations designed to protect the environment. The protocol would need to be reevaluated if CCS were to be more broadly applied across sectors beyond transportation fuel production.

Direct air capture and carbon mineralization have high potential capacity for removing carbon, but direct air capture is currently limited by high cost. Carbon mineralization may also have high potential for removing carbon from the atmosphere, but understanding of the technology is still limited.[419] Direct air capture could also be deployed at higher rates to remove legacy GHG emissions from the atmosphere. Chapter 2 contains additional information on the current status of CCS and mechanical CDR projects globally, as well as federal support of such technologies.

Strategies for Achieving Success

- Implement SB 905.

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[417] CARB. 2018. Carbon Capture and Sequestration Protocol under the Low Carbon Fuel Standard. August 13. *https://ww2.arb.ca.gov/sites/default/files/2020-03/CCS_Protocol_Under_LCFS_8-13-18_ada.pdf*.
[418] National Energy Technology Laboratory. Permanence and Safety of CCS. *https://netl.doe.gov/coal/carbon-storage/faqs/permanence-safety*.
[419] Aines, Roger. No date. Options for Removing CO_2 from California's Air. Lawrence Livermore National Laboratory. *https://ww2.arb.ca.gov/sites/default/files/2021-08/llnl_presentation_sp_engineeredcarbonremoval_august2021.pdf*.

- Convene a multi-agency Carbon Capture and Sequestration Group comprised of federal, state, and local agencies to engage with environmental justice advocates, tribes, academics, researchers, and community representatives to identify the current status, concerns, and outstanding questions concerning CCS, and develop a process to engage with communities to understand specific concerns and consider guardrails to ensure safe and effective deployment of CCS.[420]
- Iteratively update the CARB CCS Protocol with the best available science and implementation experience.
- Incorporate CCS into other sectors and programs beyond transportation where cost-effective and technologically feasible options are not currently available and to achieve the 85 percent reduction in anthropogenic sources below 1990 levels as called for in AB 1279.
- Evaluate and propose, as appropriate, financing mechanisms and incentives to address market barriers for CCS and CDR.
- Evaluate and propose, as appropriate, the role for CCS in cement decarbonization (SB 596) and as part of hydrogen production pathways (SB 1075).
- Support carbon management infrastructure projects through core CEC research, development, and demonstration (RD&D) programs.
- Continue to explore carbon capture applications for producing or leveraging zero-carbon power for reliability needs as part of SB 100.
- Consider carbon capture infrastructure when developing hydrogen roadmaps and strategy, especially for non-electrolysis hydrogen production.
- Evaluate and streamline permitting barriers to project implementation while protecting public health and the environment.
- Explore options for how local air quality benefits can be achieved when CCS is deployed.
- Explore opportunities for CCS and CDR developers to leverage existing infrastructure, including subsurface infrastructure.
- Explore permitting options to allow for scaling the number of sources at carbon sequestration hubs.

Short-Lived Climate Pollutants (Non-Combustion Gases)

Short-lived climate pollutants (SLCPs) include black carbon (soot), methane (CH_4), and fluorinated gases (F-gases, including hydrofluorocarbons [HFCs]). They are powerful climate forcers and harmful air pollutants that have an outsized impact on climate change

[420] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.9. finalejacrecs.pdf (arb.ca.gov).

in the near term, compared to longer-lived GHGs, such as CO_2. According to the IPCC's *Climate Change 2021: The Physical Science Basis,* in the near-term (i.e., 10- to 20-year time scale) the warming influence of all SLCPs combined will be at least as large as that of CO_2.[421] The United Nations Environment Programme's Global Methane Assessment[422] advises that achieving the least-cost pathways to limit warming to 1.5°C requires global methane emission reductions of 40–45 percent by 2030 alongside substantial simultaneous reductions of all climate forcers, including CO_2 and SLCPs. Action to reduce these powerful emissions sources today will provide immediate benefits—both to human health locally and to reduce warming globally—as the effects of our policies to transition to low carbon energy systems and achieve carbon neutrality further unfold.

In 2017, the Board approved the comprehensive Short-Lived Climate Pollutant Reduction Strategy (Strategy).[423] This strategy explained how the state would meet the following SB 1383-established targets:

- 40 percent reduction in total methane emissions[424] (including a separate 40 percent reduction in dairy and livestock emissions)
- 40 percent reduction in hydrofluorocarbon gas emissions
- 50 percent reduction in anthropogenic black carbon emissions
- 50 percent reduction of organic waste disposal from 2014 levels by 2020, and 75 percent by 2025, including recovery of at least 20 percent of edible food for human consumption

The state is expected to achieve roughly half of the SB 1383 targeted emissions reductions by 2030 through strategies currently in place (See Figure 4-11). As directed by the Legislature under SB 1383, state agencies focused on voluntary, incentive-based mechanisms to reduce SLCP emissions in the early years of implementation to overcome technical and market barriers. Under this "carrot-then-stick" strategy, incentives are replaced with requirements as the solutions become increasingly feasible and cost-effective. To meet legislated targets, more aggressive action is needed.

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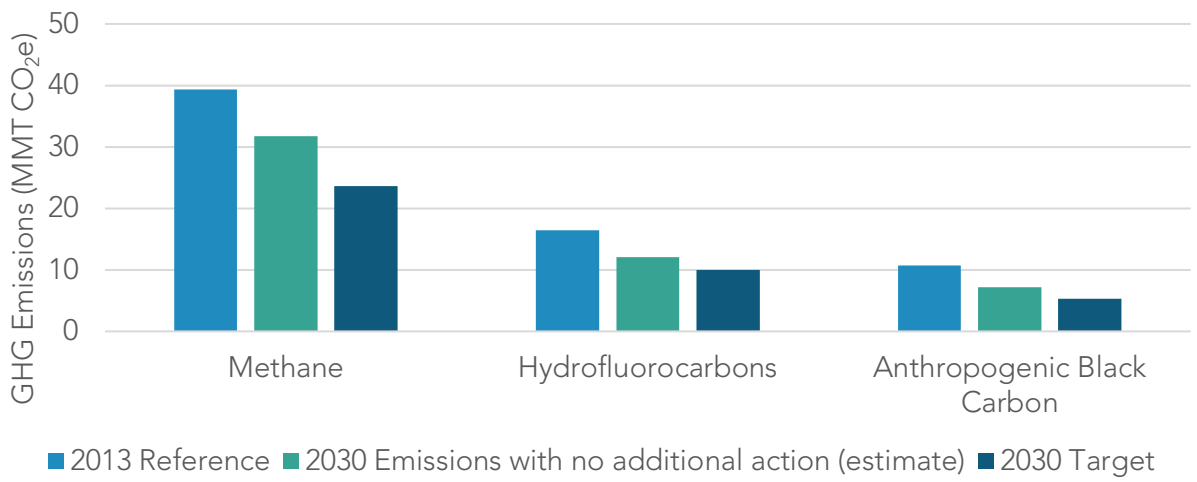
[421] IPCC. 2021. *Climate Change 2021:The Physical Science Basis.* https://www.ipcc.ch/report/ar6/wg1/.
[422] United Nations. Global Methane Assessment. Summary for Policymakers. https://wedocs.unep.org/bitstream/handle/20.500.11822/35917/GMA_ES.pdf.
[423] CARB. 2017. Short-Lived Climate Pollution Reduction Strategy. https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf.
[424] All SB 1383 emissions reductions are mandated to be realized by 2030 and are relative to 2013 levels.

Figure 4-11: Expected progress toward SB 1383 targeted emissions reductions by 2030 through strategies currently in place



While the state's overall GHG emissions have declined by 9 percent over the past decade, SLCP emissions reductions have not kept pace with broader progress toward decarbonization. After growing steadily in the preceding decade, methane emissions have remained relatively flat since 2013.

HFCs are the fastest growing source of GHG emissions, primarily driven by their use to replace ozone-depleting substances and an increased demand for cooling and refrigeration.[425] Since 2005, statewide HFC emissions have more than doubled. While the rate of increase has slowed in recent years due to the state's measures, HFC emissions are still on the rise in California, and have grown by over 50 percent since 2010.[426] Globally, as temperatures rise, adoption of cooling technologies (and refrigerants) is increasing rapidly. If no measures are taken, it is estimated that HFCs will account for 9 to 19 percent of the total global GHG emissions by 2050.[427]

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[425] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020: Trends of Emissions and Other Indicators.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

[426] CARB. 2022. *California Greenhouse Gas Emissions for 2000 to 2020.* https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf.

[427] Velders, G. J., D. W. Fahey, J. S. Daniel, M. McFarland, and S. O. Andersen. 2009. "The large contribution of projected HFC emissions to future climate forcing." *Proceedings of the National Academy of Sciences* 106(27), 10949–10954.

Methane

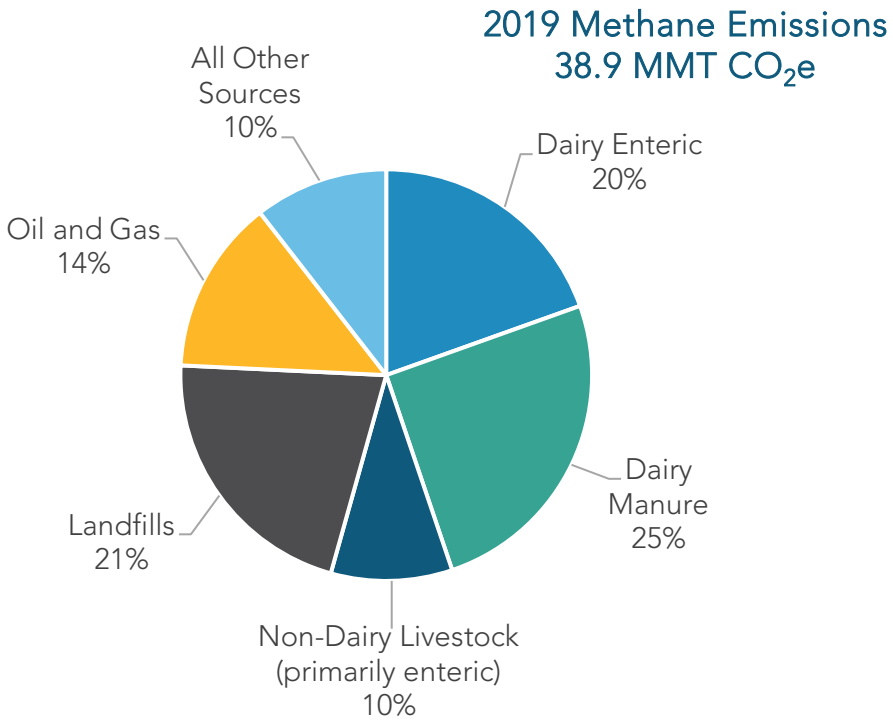
Human sources of methane emissions are estimated to be responsible for up to 25 percent of current warming.[428] Fortunately, methane's short atmospheric lifetime of ~12 years[429] means that emissions reductions will rapidly reduce concentrations in the atmosphere, slowing the pace of temperature rise in this decade. Further, a substantial portion of the targeted reductions can be achieved at low cost and will provide significant human health benefits. For example, the UN's *Global Methane Assessment* (2021)[430] found that over half of the available targeted measures have mitigation costs below $21/MTCO$_2$e, and that each million metric tons of methane reduced would prevent 1,430 premature deaths annually due to ozone pollution caused by methane.

Following the Twenty Sixth Conference of Parties (COP26) (the United Nations Convention on Climate Change in 2021), over 110 nations have signed onto the Global Methane Pledge (Pledge)[431] to limit methane emissions by 30 percent relative to 2020 levels. The Pledge covers countries that emit nearly half of all methane and make up 70 percent of global GDP. The UN's Global Methane Assessment[432] shows that human-caused methane emissions can be reduced by up to 45 percent this decade, which would avoid nearly 0.3°C of global warming by 2045.

As shown in Figure 4-12, the three largest sources of California's methane emissions are the dairy and livestock industry, landfills, and oil and gas systems.

[428] IPCC. 2021. *Climate Change 2021:The Physical Science Basis.* https://www.ipcc.ch/report/ar6/wg1/.
[429] In contrast, the lifetime of CO_2 is hundreds of years. The IPCC Third Assessment Report concluded that no single lifetime can be defined for CO_2 because of the different rates of uptake by different removal processes. According to IPCC Fourth Assessment Report, the majority of an increase in CO_2 will be removed from the atmosphere within decades to a few centuries, while the remaining 20 percent may stay in the atmosphere for many thousands of years.
[430] United Nations. 2021. Global Methane Assessment. https://wedocs.unep.org/bitstream/handle/20.500.11822/35917/GMA_ES.pdf.
[431] Global Methane Pledge. https://www.globalmethanepledge.org/.
[432] United Nations Environment Programme. 2021. Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions. https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions?msclkid=00661370c85811eca078eb8fdbd603d1.

Figure 4-12: Sources of California methane emissions (2019)



Emissions from dairy and livestock operations come from two main sources: (1) enteric fermentation and (2) manure management operations, especially at dairies that employ open anaerobic lagoons that allow methane to escape into the atmosphere. Landfills, the second largest source of methane emissions, produce methane from the decomposition of organic waste. Although approximately 95 percent of all the waste that has been disposed of in the state has been deposited in a landfill that is equipped with a gas collection and control system, as required by California's Landfill Methane Regulation,[433] a portion of the methane still escapes into the atmosphere. Fugitive methane emissions can be intermittent and highly variable, both seasonally and spatially, particularly at landfills. Research has shown that landfills are complex systems and a wide range of conditions (e.g., atmospheric, operational, biological, chemical, and physical) may contribute to variability in rates of organic waste degradation, methane generation, and capture efficiency, so reducing the amount of organics deposited in landfills is critical to reducing overall landfill methane emissions. And despite the variability in individual landfill emissions, landfill gas collection and control systems remain the most effective strategy

[433] CARB. Landfill Methane Regulation. https://ww2.arb.ca.gov/our-work/programs/landfill-methane-regulation.

for reducing methane emissions from waste once it is placed in a landfill. Non-combustion methane emissions from the oil and gas sector are the third largest source of methane emissions in California. Almost three-quarters of the methane emissions from this sector come from leaks and venting from fossil gas transmission and distribution pipelines and equipment.

Hydrofluorocarbons

HFCs are synthetic GHGs that are powerful climate forcers. They are used mainly as refrigerants or heat transfer fluids in refrigeration, space conditioning, and heat pump equipment. Refrigerants are ubiquitous and are used everywhere from supermarkets, convenience stores, cold storage warehouses and wineries, to vending machines and residential and motor vehicle air-conditioners. Additionally, HFCs are also used as foam-blowing agents, solvents, aerosol-propellants, and fire suppressants. While HFCs remain in the atmosphere for a much shorter time than CO_2, the relative global warming potential (GWP) values of HFCs can be hundreds to thousands of times greater than CO_2. The mix of HFCs currently in use in California, weighted by usage (tonnage), have an average 100-year GWP of 1,700.[434] The average atmospheric lifetime of the mix of HFCs in use is 15 years.[435] Given the short average lifetimes, rapid reductions in HFC emissions can translate into near-term reductions in climate change effects.

As the global temperatures increase, the demand for cooling and refrigerants will continue to grow, as will the use of electric heat pumps to replace conventional fossil gas heating options. Unless addressed, continued use of high-GWP HFCs will perpetuate a feedback loop, where the cooling agents themselves cause additional warming.

In 2016, representatives from 197 nations signed the Kigali Amendment, which amended the existing Montreal Protocol (to reduce ozone-depleting substance production and consumption) to include a global phasedown in the production and consumption of HFCs beginning in 2019.[436] As of September 2022, 137 nations have either accepted, approved, or ratified the Kigali Amendment. On September 21, 2022, the U.S. Senate approved ratification of the Kigali Amendment, and it is expected that the United States

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[434] CARB. 2020. *Initial Statement of Reasons: Public Hearing to Consider the Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses Regulation.* October 20. https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2020/hfc2020/isor.pdf?_ga=2.164659835.592460318.1646664679-912670513.1542398285.

[435] Zhongming, Z., et al. 2011. *HFCs: A Critical Link in Protecting Climate and the Ozone Layer: A UNEP Synthesis Report.*

[436] United Nations Treaty Collection. Chapter XXVII, Amendment to the Montreal Protocol on Substances that Deplete the Ozone Layer. https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XXVII-2-f&chapter=27&clang=_en.

will soon join the 137 nations that have already ratified.[437] In the United States, Congress enacted the federal *American Innovation and Manufacturing (AIM) Act* in December 2020.[438] The AIM Act authorizes the U.S. EPA to address HFCs in several ways, including a national HFC phasedown that nearly mirrors the schedule of the global phasedown under the Kigali amendment.[439]

Nearly 90 percent of HFC emissions in California come from their use as refrigerants in the commercial, industrial, residential, and transportation sectors. The timescales over which the HFC emissions occur vary, depending on the type of application. Thus, strategies to reduce HFC emissions must be tailored by equipment type. CARB has several measures in place to tackle HFC emissions from the various sources shown in Figure 4-13 below. This includes the Refrigerant Management Program[440] that tracks and manages emissions from large commercial, industrial, and cold storage refrigeration facilities in the state. CARB has adopted regulations to reduce HFC emissions from consumer product aerosol propellants, semiconductor manufacturing, and small cans of automotive refrigerant.[441]

In 2018, California adopted HFC prohibitions via regulation and legislation for several sectors, including stationary refrigeration and foam end uses to backstop the partially vacated federal Significant New Alternatives Policy (SNAP) program.[442] Most recently, in 2020, CARB adopted additional measures that place GWP limits on refrigerants used in refrigeration and air conditioning equipment, which are the largest sources of HFC emissions, and are commonly used in residential, commercial, and industrial buildings. Additionally, CARB adopted a unique pilot program requiring the use of reclaimed refrigerant: the Refrigerant Recovery, Reclaim, and Reuse (R4) Program. The newly adopted HFC rules for the refrigeration and air conditioning sectors are the first of their kind in the nation.

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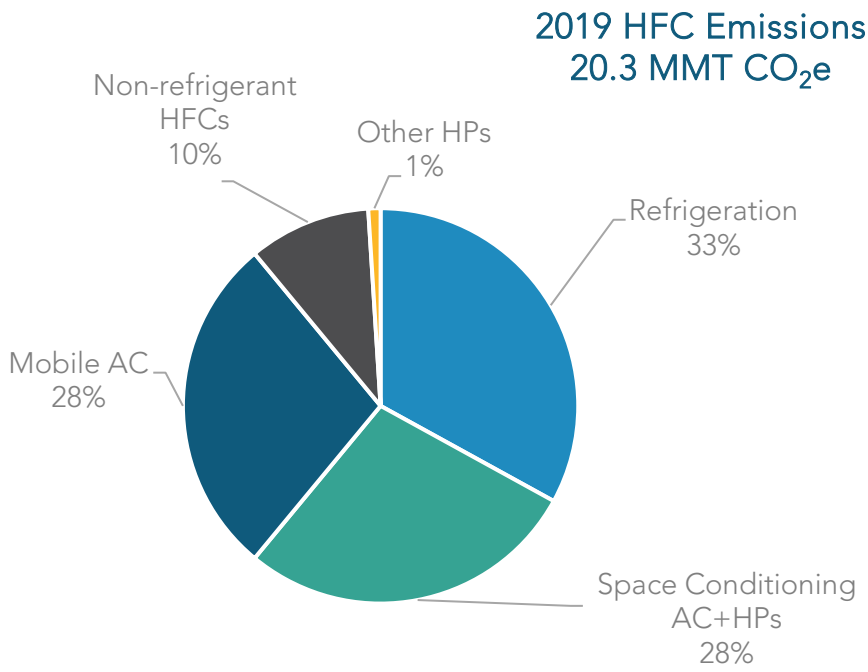
[437] U.S. Ratification of the Kigali Amendment - United States Department of State. *https://www.state.gov/u-s-ratification-of-the-kigali-amendment/*.
[438] 42 U.S.C § 7675, Pub. L. 116-260, § 103. *https://www.epa.gov/sites/default/files/2021-03/documents/aim_act_section_103_of_h.r._133_consolidated_appropriations_act_2021.pdf*.
[439] 42 U.S.C § 7675, Pub. L. 116-260, § 103.
[440] Cal. Code of Regs., tit. 17, §§ 95380, et seq.
[441] Contained in various sections, commencing with Cal. Code of Regs., tit. 13, §§ 1900 et seq.
[442] Cal. Code of Regs., tit. 17, §§ 95371, et seq.; California Cooling Act, Senate Bill 1013 (Lara, Stats. of 2018, Ch. 375, Health & Saf. Code § 39764).

Figure 4-13: Sources of hydrofluorocarbon (HFC) emissions (2019)

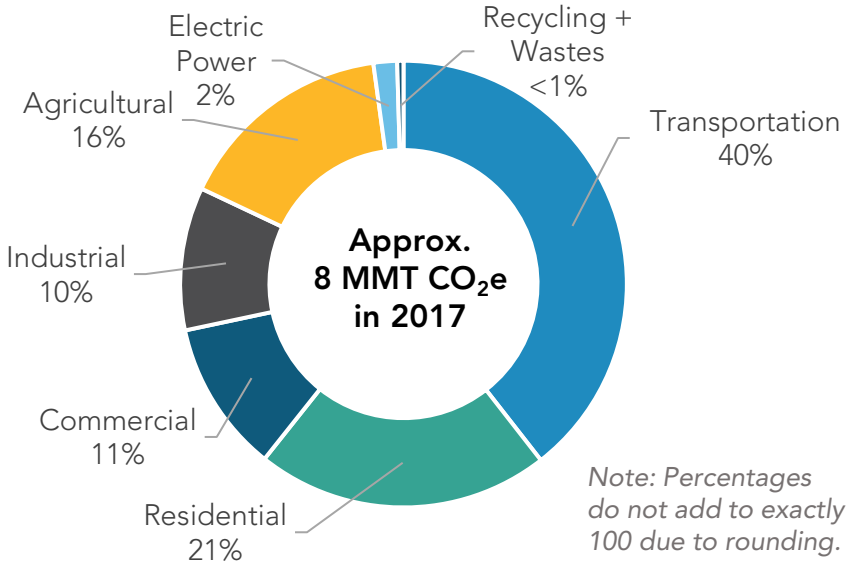


Anthropogenic Black Carbon

Black carbon is not included in AB 32 or the state's AB 32 GHG inventory that tracks progress toward the state's climate targets; however, it has been identified as a powerful climate forcer and is included California's Short-Lived Climate Pollutant Reduction Strategy. The majority of anthropogenic black carbon emissions come from transportation, specifically heavy-duty vehicles, and they have decreased since 2013 due to engine certification standards and in-use rules for on-road and off-road fleets, along with clean fuel requirements and incentives, including California Climate Investments and LCFS credits. Additionally, fuel combustion for residential, commercial, and industrial applications contribute significantly to overall black carbon emissions. Approximately 95 percent of residential black carbon emissions are due to wood combustion; these emissions are being reduced through programs like the Woodsmoke Reduction Program established by SB 563 (Lara, Chapter 671, Statutes of 2017). Alternatives to agricultural burning and policies that phase out agricultural burning will also result in agricultural black carbon emissions reductions. In 2021 CARB provided a preliminary estimate of 2017

black carbon emissions (Figure 4-14).[443] This estimate will be finalized as part of a future update to the Short-Lived Climate Pollutant Inventory.

Figure 4-14: Sources of anthropogenic black carbon (preliminary 2017 estimates; AR5 100-yr GWP 900)



Sector Transition

California has long recognized the importance of mitigating non-combustion SLCPs and took several early action measures as part of a comprehensive, ongoing program to reduce in-state GHG emissions under AB 32. The early action measures included CARB's Landfill Methane Regulation,[444] Refrigerant Management Program,[445] and Oil and Gas Methane Regulation.[446]

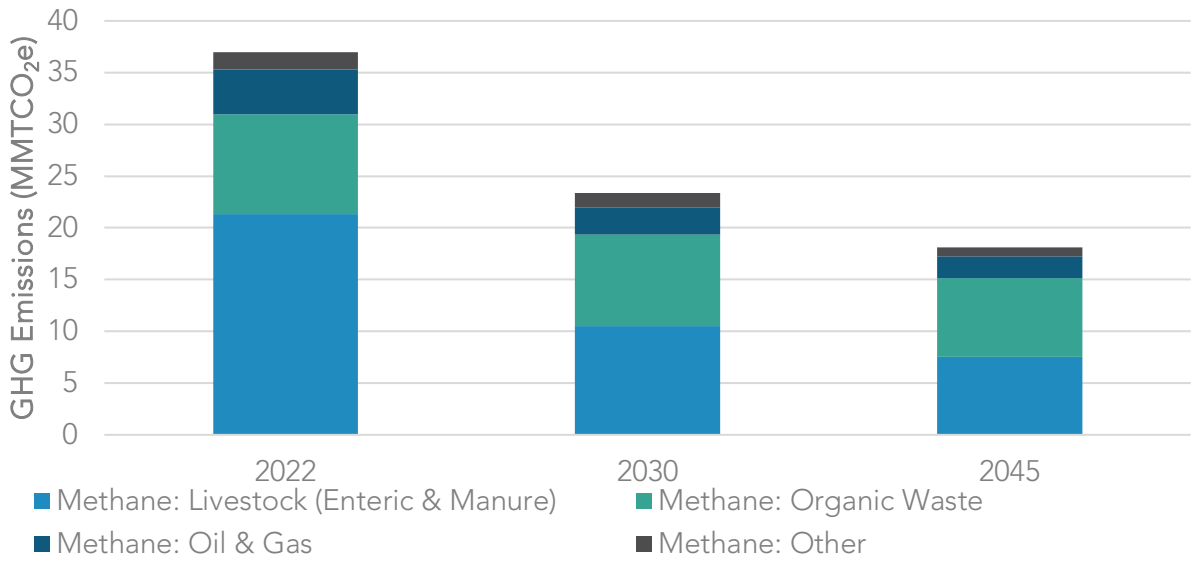
Methane

The methane abatement strategies currently in place are projected to achieve half of the methane emissions needed to meet the overall methane reduction target of SB 1383 (40 percent reduction by 2030). The reduction target translates to a limit of less than 24 MMTCO_2e in 2030 (Figure 4-15). It is anticipated that, since some sectors have fewer

[443] CARB. 2021. 2022 Scoping Plan Update – Short-Lived Climate Pollutants Workshop Presentation, September 8. https://ww2.arb.ca.gov/sites/default/files/2021-09/carb_presentation_sp_slcp_september2021_1.pdf.
[444] Cal. Code of Regs., tit. 17, §§ 95460, et seq.
[445] Cal. Code of Regs., tit. 17, §§ 95380, et seq.
[446] Cal. Code of Regs., tit. 17, §§ 95665–77.

strategies that can be implemented to reduce methane in the near-term, other sectors will need to go beyond the 40 percent reduction to meet the target.

Figure 4-15: Methane emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario[447]



Dairy and Livestock Methane

California is the largest dairy-producing state, home to one in five U.S. dairy cows. To date, methane emissions reductions from the dairy and livestock sector have mainly been driven by a decreasing animal population and the growing adoption of manure management strategies, including anaerobic digesters and conversion to dry manure systems and pasture systems. CARB recently completed a detailed analysis of the emission reductions expected by 2030 and the estimated additional investment needed to reach the dairy and livestock sector methane reduction target. [448]

Assuming no adoption of additional manure management and enteric mitigations strategies beyond the projects that have committed funding, and a continued annual animal population decrease of 0.5 percent per year through 2030, further reductions of approximately 4.4 $MMTCO_2e$ will be needed to achieve the 2030 methane emissions reduction target for the sector set by SB 1383. If the remaining reductions are met through

[447] The *Organic Waste* category includes methane from landfills, wastewater treatment, and compost facilities.
[448] CARB. 2021. Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target. June. https://ww2.arb.ca.gov/sites/default/files/2021-06/draft-2030-dairy-livestock-ch4-analysis.pdf.

a mix of dairy projects in which half are dairy digesters and half are alternative manure management projects, then it is estimated that at least 420 additional projects will be necessary. Additional emissions reductions beyond this level will likely be necessary to ensure that the overall state methane emissions reduction targets are met.

Despite the considerable methane emissions mitigation potential of enteric strategies like feed additives, little progress has been made, as few products with proven mitigation potential have become commercially available, and unlike manure management strategies, there is a lack of financial incentives for their adoption.

Market conditions favoring farm consolidation and improved production efficiencies have driven reductions in the California and U.S. dairy population over the past decade. [449] These efficiency gains have allowed California to maintain production levels despite the decreasing population. If demand for dairy and beef products remains steady or increases, continued improvements in production efficiency and adoption of effective manure management and enteric mitigation strategies will be important to support dairy and livestock methane emission reductions.

Strategies for Achieving Success

- Install state of the art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to decarbonize or as a feedstock for energy.
- Increase alternative manure management projects, including but not limited to conversion to “solid,” “dry,” or “scrape” manure management; installation of a compost-bedded pack barn; an increase in the time animals spend on pasture; and implementation of solid-liquid separation technology into flush manure management systems.
- Implement enteric fermentation strategies that are cost-effective, scientifically proven, safe for animal and human health, and acceptable to consumers, and that do not impact animal productivity. Provide financial incentives for these strategies as needed.
- Accelerate demand for dairy and livestock product substitutes such as plant-based or cell-cultured dairy and livestock products to achieve reductions in animal populations.
- In consideration of pace of deployment of methane mitigation strategies and the scale of complimentary incentives, consider regulation development to ensure that the 2030 target is achieved, assuming the conditions outlined in SB 1383 are met.

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[449] MacDonald, James M., Jonathan Law, and Roberto Mosheim. 2020. *Consolidation in U.S. Dairy Farming.* ERR-274. July. https://www.ers.usda.gov/webdocs/publications/98901/err-274.pdf.

Landfill Methane

Achieving the 75 percent organic waste disposal reduction target[450] of SB 1383, and maintaining that level of disposal in subsequent years, would bring annual landfill emissions in 2030 to just below the 2013 baseline. Annual methane emissions will be higher through 2030 than originally anticipated by the SLCP Strategy because the state did not achieve the anticipated reductions in organic waste disposal of 50 percent below 2014 levels by 2020. SB 1383 prohibited the organic disposal regulations from taking effect until 2022,[451] and, as a result, emissions have continued to increase.

Due to the multidecadal time frame required to break down landfilled organic material, the emissions reductions from diverting organic material in one year are realized over the course of several decades. For example, one year of waste diversion in 2030 is expected to avoid 8 $MMTCO_2e$ of landfill emissions, cumulatively, over the lifetime of that waste's decomposition.[452] Near-term diversion efforts are critical to avoid locking in future landfill methane emissions.

CalRecycle's 2020 report, *Analysis of the Progress Toward the SB 1383 Waste Reduction Goals,*[453] estimated that 8 million short tons of composting and anerobic digestion capacity will be needed to manage organic wastes, above the existing and new capacity expected to be available by 2025. The 2019 report, *Co-Digestion Capacity in California,*[454] from the State Water Resources Control Board estimated that at least 2.4 million tons of digester capacity is available at urban wastewater treatment plants if sufficient incentives or funding for collection, receiving, and processing operations are provided to enable utilization of this capacity. The CPUC approved a decision in February 2022 implementing the biomethane procurement program, which will require investor-owned utilities by 2025 to procure 17.6 billion cubic feet (BCF) of biomethane produced from organic wastes to support the landfill disposal reduction and SLCP target and reduce fossil gas reliance for

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[450] The target is from 2014 levels by 2025.
Public Resources Code, § 42652.5. CalRecycle approved the SLCP: Organic Waste Reductions regulations (*https://calrecycle.ca.gov/organics/slcp/*) in 2020 and began implementing them in January 2022. These regulations are designed to achieve the 2025 disposal reduction and edible food recovery targets.

[452] The life cycle emissions reduction is based on anticipated diversion of 27 million short tons of organic waste from CalRecycle (2020) Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals (*https://www2.calrecycle.ca.gov/Publications/Details/1693*). Under CalRecycle's SLCP regulations, an alternative to landfill disposal must achieve a life cycle GHG reduction of 0.3 $MTCO_2e$ per short ton of waste diverted.

[453] CalRecycle. 2020. *Analysis of the Progress Toward the SB 1383 Waste Reduction Goals.* *https://www2.calrecycle.ca.gov/Publications/Details/1693*.

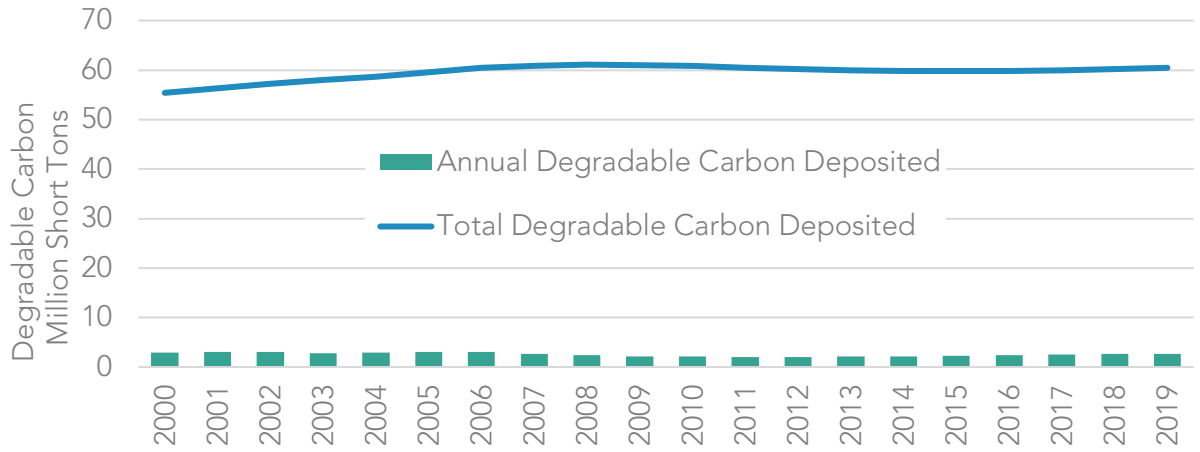
[454] State Water Resources Control Board. 2019. *Co-Digestion Capacity in California.* *https://www.waterboards.ca.gov/water_issues/programs/climate/docs/co_digestion/final_co_digestion_capacity_in_california_report_only.pdf*.

residential and commercial customers.[455] Additionally, the organic waste stream includes more than one million tons of edible food that could be recovered before it enters the waste stream through food rescue programs that combat hunger in communities throughout California.

While reducing organic waste disposal is the most effective means of achieving reductions in waste sector methane, strategies to reduce emissions from waste already in place in landfills also will play a role in achieving near-term reductions. As Figure 4-16 shows, the total degradable carbon (a measure of the amount of waste with potential to generate methane) that is accumulated from waste deposited in previous years is over 20 times greater than the amount added each year. This illustrates that even if we were able to entirely phase out landfilling of organic waste today, the existing waste in place at landfills would continue to generate methane for decades into the future.

Through a combination of improvements in operational practices, use of lower permeability covers, advanced landfill gas collection systems, and increased monitoring to detect and repair leaks, it is estimated that a direct emission reduction of 10 percent is achievable across the state's landfills by 2030. Technologies to utilize landfill gas efficiently can contribute further emission reductions in the energy sector.

Figure 4-16: Degradable carbon deposited in landfills



Strategies for Achieving Success

- Maximize existing infrastructure and expand it to reduce landfill disposal, with strategies including composting, anaerobic digestion, co-digestion at wastewater treatment plants, and other non-combustion conversion technologies.

[455] CPUC. 2022. Decision 22-02-025.

- Expand markets for products made from organic waste, including through recognition of the co-benefits of compost, biochar, and other products.[456]
- Recover edible food to combat food insecurity.
- Invest in the infrastructure needed to support growth in organic recycling capacity.
- Utilize existing digesters at wastewater treatment facilities to rapidly expand food waste digestion capacity.
- Direct biomethane captured from landfills and organic waste digesters to sectors that are hard to decarbonize.
- Implement improved technologies and best management practices at composting and digestion operations.
- Reduce emissions from landfills through improvements in operational practices, lower permeability covers, advanced collection systems, and technologies to utilize landfill gas.
- Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks, improve understanding of the factors that lead to better capture efficiency, and explore new technologies and practices that can reliably improve methane control at landfills.

Upstream Oil and Gas Methane Reduction

For oil and gas production, processing, and storage, California is currently on track to achieve a 41 percent reduction in methane emissions by 2025 relative to 2013. The additional reductions needed to meet the 2030 target may be achieved by implementing additional regulatory requirements to further reduce intentional venting of fossil gas from equipment. If necessary, additional reductions from transmission and distribution facilities may be achieved by requiring the utilities to increase inspection and repair activities or further reduce emissions from pipeline blowdowns by implementing methods such as using portable compressors, using plugs to isolate sections of pipelines, flaring vented gas, routing gas to fuel gas systems, and installing static seals on compressor rods. Advances in methane detection technologies (e.g., satellites equipped to detect large methane sources) may also help to identify and mitigate methane emissions quickly across the oil and gas sector.

As California transitions away from fossil fuels, in-state oil and gas production will likely decline. This could result in an increase over time in the number of long-term idle and orphan wells (idle wells lacking a financially solvent, responsible owner) in the state. While California has regulations aimed at helping ensure operators manage their idle wells,

[456] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F4.4. finalejacrecs.pdf (arb.ca.gov).

there could likely be an increase in California's orphan well population. Plugging all orphan wells, of which there are currently over 5,000, could take decades due to the limited resources California has for orphan well plugging. The benefits from plugging wells include methane emission reductions and job creation; employment gains from well plugging and site remediation activities could help temporarily offset job losses from the oil and gas industry. The California Council on Science and Technology's 2018 report on orphan wells, *Orphan Wells in California: An Initial Assessment of the State's Potential Liabilities to Plug and Decommission Orphan Oil and Gas Wells,*[457] found that the potential cost to the state of plugging current orphan wells could be approximately $500 million, and the cost of plugging all active and idle wells could total over $9.1 billion. As oil and gas production in California declines due to reduced demand for fossil fuels, additional funding will likely be needed to cover the costs of plugging wells that have no viable operator.

Strategies for Achieving Success

- Mitigate emissions from leaks by regular leak detection and repair (LDAR) surveys at all facilities.
- Replace high emitting equipment with zero emission alternatives wherever feasible.[458]
- Have CARB and CalGEM lead a Task Force to identify and address methane leaks from oil infrastructure near communities.
- Pursuant to SB 1137, develop leak detection and repair plans for facilities in health protection zones, implement emission detection system standards, and provide public access to emissions data.
- Minimize emissions from equipment that must vent fossil gas by design (e.g., fossil gas powered compressors).
- Install vapor collection systems on high emitting equipment.
- Phase out venting and routine flaring of associated gas (gas produced as a by-product during oil production).
- Continuous ambient monitoring at fossil gas underground storage facilities to quickly detect large methane sources.
- Reduce pipeline and compressor blowdown emissions.

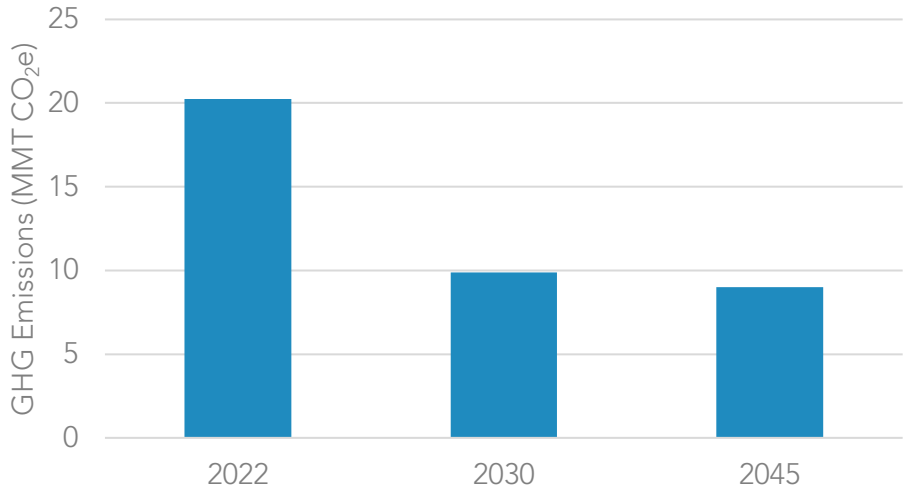
[457] The California Council on Science and Technology. 2018. *Orphan Wells in California: An Initial Assessment of the State's Potential Liabilities to Plug and Decommission Orphan Oil and Gas Wells.* https://ccst.us/wp-content/uploads/CCST-Orphan-Wells-in-California-An-Initial-Assessment.pdf.
[458] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, P5. finalejacrecs.pdf (arb.ca.gov).

- Leverage advances in remote sensing capabilities to quickly pinpoint large methane sources and mitigate leaks.[459]

Hydrofluorocarbons

In California, all the HFC measures currently in place will help achieve more than 70 percent of the reductions needed to achieve the 2030 HFC goal and provide very significant emissions reductions by 2045 and beyond. However, new targeted measures will be needed to maintain the pace of reductions, as demand for technologies that currently predominantly use high-GWP refrigerants is anticipated to grow. Despite decarbonization efforts, high-GWP HFCs are expected to be among the last remaining persistent GHG emission sources, as shown in Figure 4-17.[460]

Figure 4-17: Hydrofluorocarbon emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario



HFC emissions from new and existing sources should be addressed in tandem with building decarbonization efforts to maximize reductions.[461] As buildings are electrified in an effort to decarbonize them, the use of heat pumps for space conditioning, water heaters, and clothes dryers is expected to increase significantly. Heat pumps, while using

[459] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, CC17. finalejacrecs.pdf (arb.ca.gov).
[460] Energy and Environmental Economics, Inc. 2020. *Achieving Carbon Neutrality.* https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.
[461] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF26. finalejacrecs.pdf (arb.ca.gov).

electricity, not fossil gas, currently rely predominantly on high-GWP refrigerants. Very low- or no-GWP technologies and solutions are either available or emerging for various heat pump technologies, and likely to develop further as international efforts to mitigate HFCs continue. However, most of these technologies are still nascent in the United States. In addition, some of the alternatives cannot be used until California building codes are updated, which is currently expected at the earliest in mid-2024 for some technologies based on the recently adopted provisions in AB 209[462] requiring the California Building Standards Commission to adopt the latest safety standards for refrigerant containing equipment into California's building codes. The current updates to the building codes will allow the use of many refrigerants with lower GWPs than HFCs currently in use. However, additional building code updates are needed to expand the choices of ultra-low-GWP alternatives, and that will need to happen in the next few years. The adoption of low-GWP refrigerants must occur in parallel with building decarbonization efforts; without such efforts, the vast GHG benefits of the latter will be partially offset, and the proportion of HFC emissions from buildings will continue to grow.

Leaks from existing air conditioning and refrigeration equipment are a major source of statewide and global HFC emissions. Once installed, refrigeration and air conditioning equipment can stay in place for decades, while leaking refrigerants into the atmosphere. This makes it very important that new installed equipment use refrigerants with a GWP as low as possible. The refrigerants inside existing equipment are sometimes collectively referred to as the *installed base* or *banks* of potential HFC emissions. If released spontaneously, the existing HFC banks would equal 60 percent of all annual statewide GHG emissions in California, as illustrated in Figure 4-18.[463]

The sales prohibitions on newly produced refrigerants set forth in SB 1206 (2022) and the national/international HFC phasedown will help in reducing HFC emissions from existing equipment by restricting the supply of and increasing the value of existing high-GWP HFCs, thus enabling a circular economy. In the 2022–2023 state budget, CARB received $45 million in incentive funding for climate-friendly refrigerant technologies; this funding will be critical in shifting the market toward the best available refrigerant technologies in various sectors.

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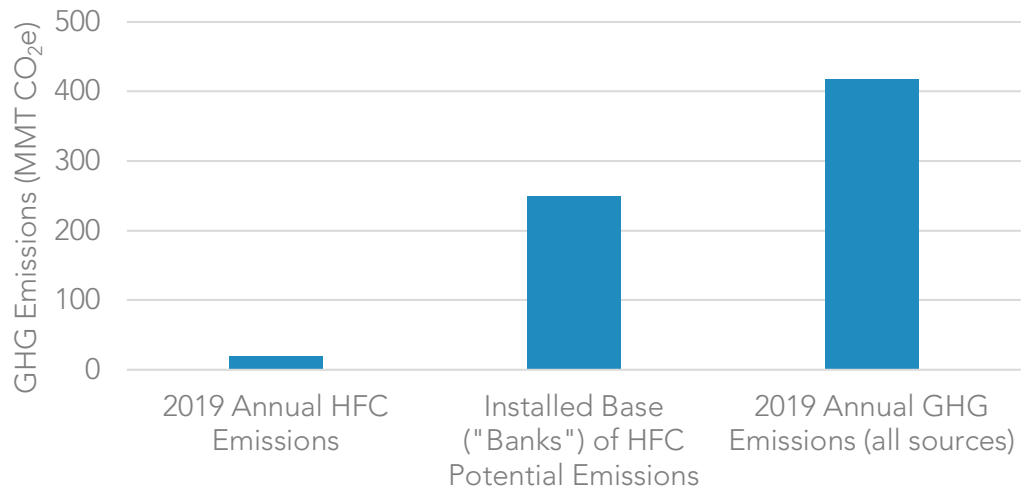
[462] AB 209: Energy and climate change. *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB209.*

[463] CARB. 2021. 2022 Scoping Plan Update – Short-Lived Climate Pollutants Workshop Presentation. September 8. *https://ww2.arb.ca.gov/sites/default/files/2021-09/carb_presentation_sp_slcp_september2021_1.pdf*.

Figure 4-18: Potential emissions from refrigerants in existing equipment



Strategies for Achieving Success

- Expand the use of very low- or no-GWP technologies in all HFC end-use sectors, including emerging sectors, like heat pumps for applications other than space conditioning, to maximize the benefits of building decarbonization.[464]
- Convert large HFC emitters such as existing refrigeration systems to the lowest practical GWP technologies.[465]
- Prioritize small-scale and independent grocers serving priority populations in addressing existing “banks” of high-GWP refrigerants.[466]
- Improve recovery, reclamation, and reuse of refrigerants by limiting sales of new or virgin high-GWP refrigerants and requiring the use of reclaimed refrigerants where appropriate.[467]
- Assist low-income and disadvantaged communities in obtaining low-GWP space conditioning units to protect vulnerable communities from heat stress and wildfire smoke.[468]

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[464] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF26. finalejacrecs.pdf (arb.ca.gov).
[465] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF22. finalejacrecs.pdf (arb.ca.gov).
[466] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT5 and JT6. finalejacrecs.pdf (arb.ca.gov).
[467] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, JT1. finalejacrecs.pdf (arb.ca.gov).
[468] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, NF28, JT5, and JT6. finalejacrecs.pdf (arb.ca.gov).

- Accelerate technology transitions in California and the U.S. overall by collaborating with international partners committed to taking action on HFCs under the Kigali Amendment to the Montreal Protocol; this includes addressing barriers to adoption of very low- or no-GWP refrigerant technologies such as high upfront costs, shortage of trained technicians, and lag in updating safety standards and building codes.

Anthropogenic Black Carbon

Significant progress has been made since 2013 to reduce anthropogenic black carbon emissions, primarily from decreased combustion of distillate fuels in the agricultural sector, as well as improvements to provide cleaner, on-road combustion technologies. Under current strategies, anthropogenic black carbon from transportation is expected to be reduced by over 60 percent in 2030. Continued reductions in combustion emissions across all sectors from both the state's climate and air quality programs will also help reduce anthropogenic black carbon emissions going forward.

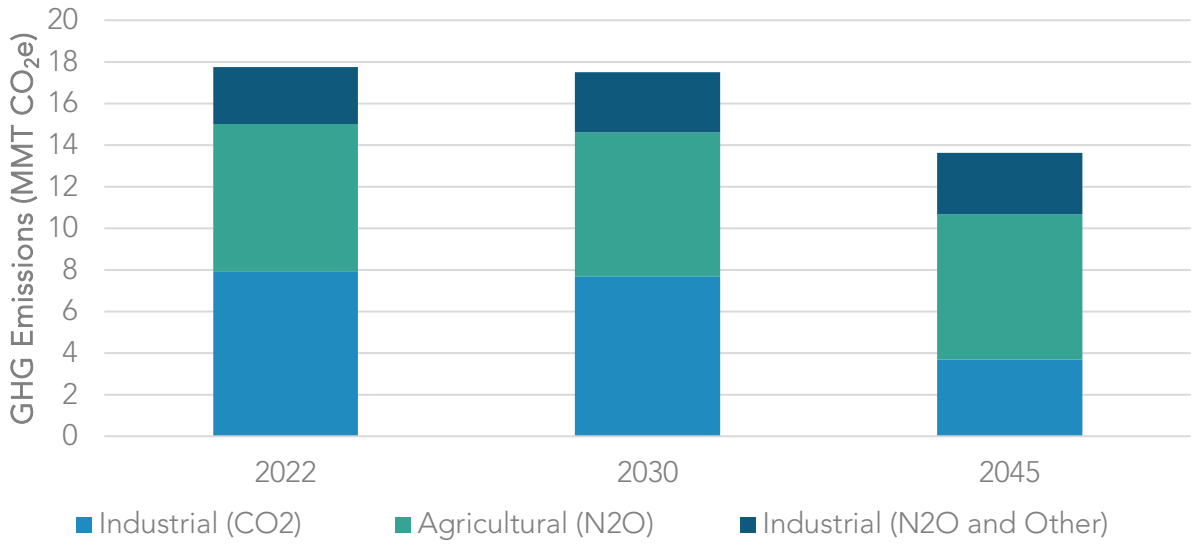
Strategies for Achieving Success

- Reduce fuel combustion commensurate with state's climate and air quality programs, particularly from reductions in transportation emissions and agricultural equipment emissions.[469]
- Invest in residential woodsmoke reduction.

In addition to SLCP emissions, some remaining non-combustion emissions are anticipated to persist in the coming decades, as shown in Figure 4-19. These include CO_2 from industrial processes such as cement manufacturing, oil and gas extraction, and geothermal electric power; N_2O from wastewater treatment, fertilizers, and livestock manure applied to agricultural soils; and other industrial, non-HFC GHG emissions.

[469] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, F1A and Appendix A (Table Summary of Direct Emission Reduction Strategies). "Emissions reductions from energy consumed by California's agricultural sector, including post-harvest processing, use of tractors and other farm equipment, and water import and irrigation." finalejacrecs.pdf (arb.ca.gov).

Figure 4-19: Remaining non-combustion emissions in 2022, 2030, and 2045 in the Scoping Plan Scenario



Natural and Working Lands

California's natural and working lands (NWL) cover approximately 90 percent of the state's 105 million acres,[470] and include forests, grasslands, shrublands and chaparral, croplands, wetlands, sparsely vegetated lands, and the green spaces in urban and built environments. These lands include California Native American tribes' ancestral and cultural lands, parks and green spaces in our cities and communities, and the waters and the iconic landscapes we know and love. The diverse landscapes and biodiversity found throughout California's NWL provide a multitude of benefits to the people of California, including clean water, clean air, biodiversity, food, economic prosperity, recreational opportunities, continuation of traditional tribal ways of life, mental health benefits, and many others.

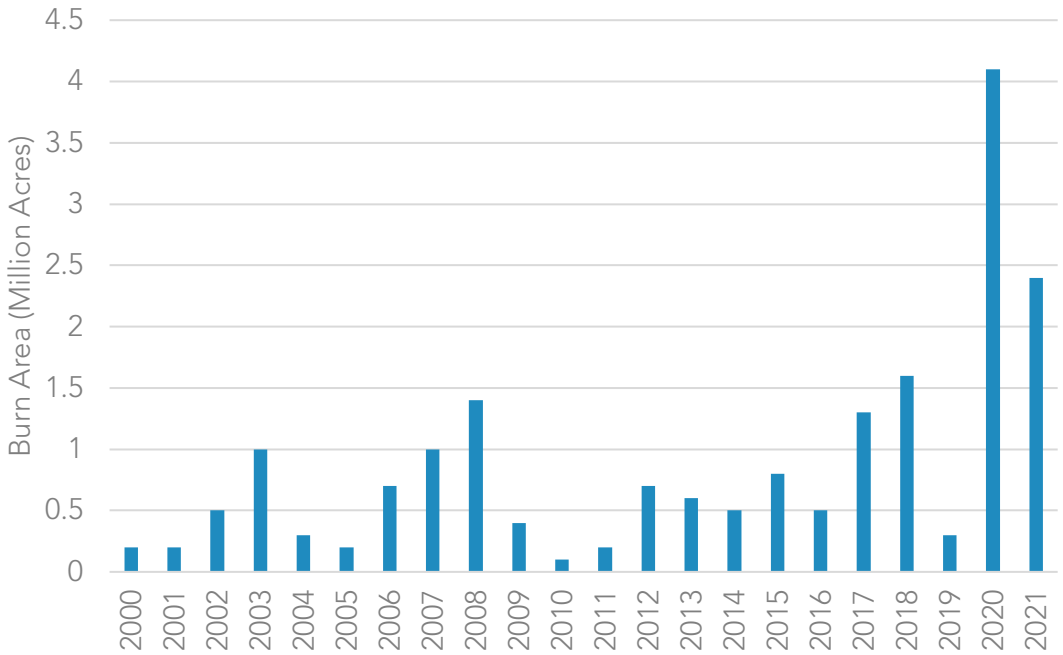
Our lands are a critical sector in California's fight to achieve carbon neutrality and build resilience to the impacts of climate change. Healthy land can sequester and store atmospheric CO_2. Healthy lands also can reduce emissions of powerful SLCPs, limit the release of future GHG emissions, protect people and nature from the impacts of climate change, and build our resilience to future climate risks. Creation of healthy lands through

[470] CNRA. 2022. Natural and Working Lands Climate Smart Strategy. *https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible_Compressed.pdf*.

multi-benefit and mitigation measures can also support tribal and local traditional lifeways. Unhealthy lands have the opposite effect—they release more GHGs than they store and are more vulnerable to future climate change impacts.

Climate change impacts have become more apparent in recent years and are having significant effects on communities throughout the state. One of these impacts is the much more frequent occurrence of unusually large, high-severity wildfires, which are being driven by climate change and by a recent history of fire-exclusion and land management practices that have resulted in forests with high levels of biomass. These recent large and high-severity wildfires have resulted in a significant amount of burned acreage and emissions in California (Figure 4-20).[471]

Figure 4-20: Acreage of burned wildland vegetation area



These wildfires deviate from the lower-severity fires that previously occurred at frequent intervals, around which California's forests evolved. As climate change accelerates, these large, uncharacteristic wildfires are likely to become more common and impact more of our landscapes. Climate change is also expected to have other significant effects on our lands, including more extreme droughts, floods, extreme heat, and the spread of invasive aquatic and terrestrial species, pests, diseases, and parasites. These impacts can lead

[471] CARB. 2022. Wildfire Emission Estimates for 2021. https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/Wildfire%20Emission%20Estimates%202000-2021.pdf.

to negative feedback loops on human and ecological health; for example, increasing the spread of invasive species can lead to increases in pesticide use, if not managed through regulation or mitigation, which can pose risks to human health and the environment.

California's approach to climate action in the NWL sector is not solely focused on maximizing carbon stocks but instead on supporting carbon management that holistically fosters ecosystem health, resilience, provision of overall climate function, and other co-benefits.

Natural systems operate on a longer timescale than the energy and industrial sectors, and benefits from climate action on our lands can take decades to accrue. Scaling climate smart land management in California requires taking action now and playing the "long game" by establishing and maintaining consistent, patient approaches and programs.

Landscapes

For the first time, this Scoping Plan includes modeling for the NWL sector. The focus of the initial modeling is limited to seven land types that align with the those in the NWL Climate Smart Strategy.[472] Work will continue to incorporate more landscapes and management practices into the modeling over time. The initial landscapes included in the modeling for this Scoping Plan are:

- Forests
- Shrublands and Chapparal
- Grasslands
- Croplands
- Wetlands
- Developed Lands
- Sparsely Vegetated Lands

Each of these land types are a key component to the state's approach to increasing climate action in the NWL sector, as called for in Executive Order N-82-20 and AB 1757.[473] The Executive Order directs CARB to update the target for this sector in support of carbon neutrality by 2045 as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. AB 1757 calls for the development of an

[472] CNRA. 2022. *Natural and Working Lands Climate Smart Strategy. Appendix B.* https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/Appendix-B_04132022_ada.pdf.
[473] AB 1757 California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands. https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB1757.

ambitious range of targets for the NWL sector to be integrated into the Scoping Plan and other state policies. It directs CARB and CNRA to work closely together to update the NWL Climate Smart Strategy, and establish an expert advisory committee to inform and advise on NWL modeling, targets, and implementation strategies.[474] Additionally, in 2021, the governor signed SB 27[475] (Skinner, Chapter 237, Statutes of 2021) into law. It directed CARB to establish CO_2 removal targets for 2030 and beyond and take into consideration the NWL Climate Smart Strategy. The governor's Executive Order, AB 1757, and SB 27 go beyond previous direction from the Legislature and past administrations. These directives emphasize the importance of quantifying land-based carbon both statewide,[476] and in programs and policies,[477] setting targets[478] for NWL to support the state's climate objectives, and advancing land management actions[479] that support the health and resiliency of these lands.

Blue carbon (also known as carbon captured and held in coastal vegetation and soils, such as seagrasses, seaweeds, and wetlands)—is also important to consider as we look at long-term climate goals. While this landscape is not currently covered by IPCC inventory guidelines or included in California's NWL Inventory, the United States was the first nation to include blue carbon in its national GHG emissions inventory. California's Ocean Protection Council and San Francisco Estuary Institute are partnering to create a new coastal wetlands, beaches, and watersheds inventory. CARB staff will utilize information from this effort and assess other available data to evaluate how this landscape may be integrated into our efforts in the future as more data become available.[480]

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[474] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N20. *finalejacrecs.pdf (arb.ca.gov)*.
[475] SB 27 Carbon sequestration: state goals: natural and working lands: registry of projects. *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB27*.
[476] SB 859 Public resources: greenhouse gas emissions and biomass (SB 859, Committee on Budget and Fiscal Review, Chapter 368, Statutes of 2016). *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB859*.
[477] SB 1386. Resource conservation: working and natural lands. (SB 1386, Chapter 545, Statutes of 2016). *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1386*.
[478] CARB. 2017. 2017 Climate Change Scoping Plan Update. Board Resolution 17-46. *https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2017/res17-46.pdf*.
[479] Executive Department. State of California. EO B-52-18. *https://www.ca.gov/archive/gov39/wp-content/uploads/2018/05/5.10.18-Forest-EO.pdf*.
[480] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N2. *finalejacrecs.pdf (arb.ca.gov)*.

Trends of Carbon on Landscapes

CARB currently tracks the carbon stock changes though the Inventory of Ecosystem Carbon in California's Lands[481] (NWL Inventory), which is summarized in Chapter 1. The NWL Inventory is a key tool for tracking changes in carbon stocks across the state, and it will serve as the inventory of record for this sector, tracking sector-wide progress toward the target. The NWL Inventory provides a retrospective snapshot of the status of California's lands, and captures the gains or losses of carbon stocks that occur over time. In addition to tracking carbon stock changes, the NWL Inventory is an important tool for understanding the impacts of our efforts to increase climate action in this sector (such as those identified in this Scoping Plan and the NWL Climate Smart Strategy) on NWL carbon stocks. The inventory is also used as the foundation for Scoping Plan scenario modeling and target setting.

CARB's inventory shows that carbon stocks decreased in NWL lands from 2001 to 2011, releasing more carbon than they were storing, and then increased slightly from 2012 to 2014.[482] These trends highlight the interannual and interdecadal variability of lands and their ability to be both a source and a sink of carbon, and the importance of looking at NWL data and trends over multiyear and multidecadal time periods, as opposed to looking only at annual changes. This movement is part of the Earth's carbon cycle, where carbon transfers between the land, ocean, and atmosphere. As part of the carbon cycle, over decades or centuries, fire and plant respiration and decomposition move carbon from the land to the atmosphere, while plant growth and other processes move carbon from the atmosphere to the land. Emissions from fossil-fuel combustion are contributing to putting this cycle out of balance.

Additionally, some historic land management practices that have resulted in the loss of carbon from the soil are also contributing to the atmospheric rise of CO_2 while simultaneously exacerbating the imbalance of the water cycle, which is influenced by and linked to the carbon cycle. These emissions are also contributing to a feedback loop for California's lands: as CO_2 emissions accumulate in the atmosphere—and California experiences more warming, extreme heat events, and droughts—the risk and intensity of carbon losses also increases, which in turn transfers more carbon from the land to the atmosphere. And because forests and shrublands comprise approximately 85 percent of the carbon stocks in California, management strategies and disturbances in forest and

[481] CARB. *An Inventory of Ecosystem Carbon in California's Natural & Working Lands.* 2018 Edition. *nwl_inventory.pdf (ca.gov).* Accessed 3/2/2022.
[482] These trends are consistent estimates in the most recent AB 1504 reporting period.

shrubland carbon play an important role in determining whether California's lands are providing either net carbon sequestration or net emissions on an annual basis.

The gains and losses of carbon on our lands will fluctuate in the future; what is important is to restore carbon in places where it has been lost and reduce large carbon losses on our NWL through active, attentive, and adaptive management. For additional details on the nexus between NWL and GHGs, see pages 5–6 of the NWL Climate Smart Strategy.

Goals and Accelerating Nature-Based Solutions

The state's climate mitigation targets are traditionally identified by individual years, (i.e., tons of GHG emissions in 2020 or 2030). However, because NWL processes fluctuate year to year and because it can sometimes take decades for climate action to fully impact carbon in NWL, it is important to consider the statewide, long-term trends of carbon stock change when identifying how this sector contributes to California's pathway to achieving carbon neutrality. Tracking carbon stock change over a multi-decadal period is the best way to assess the full direct impact climate action has on carbon storage. Such an approach filters out fluctuations from year-to-year weather variations and multi-year natural climate cycles, such as El Niño patterns.

Current data sources and methods allow us to track only certain carbon stocks that exist on NWL. For target tracking to be successful, each carbon pool must be inventoried using a methodology that can detect changes due to management and climate change. Certain carbon pools lack the scientific data and methodologies necessary for target-setting and tracking. For example, soils in forests, shrublands, and grasslands are not included in the Scoping Plan carbon stock target because, currently, there is no way to track statewide soil carbon through time in a way that would capture the effects of increased climate action and climate change.

When considering how NWL contribute to the state's goal of carbon neutrality, all lands' carbon stock gains and losses must be considered, and the Scoping Plan target is set in these terms. It is not sufficient to aggregate climate benefits only within areas where projects, management, or climate action occur. Much of the state does not receive active or quantifiable management, but these areas still contribute to the state's overall carbon stock change and GHG emissions. To incorporate the entire carbon balance toward true carbon neutrality, the Scoping Plan target is set in terms of carbon stock change across the entire state. This incorporates all lands that both receive and do not receive active management, and includes the end result of all sequestration, emissions, and other changes to carbon on the landscape.

However, carbon stock change is not equivalent to emissions. Currently, the data and emission quantification science is not sufficient to enable inventories to comprehensively track all NWL emissions in a way that would enable us to set an NWL target in terms of

statewide emissions and sequestration. There is a great need, across the entire NWL sector statewide, for more empirical data, science, and tools to track all carbon stocks across each carbon pool, and to begin to track emission and sequestration rates. As California implements AB 1757, there is an opportunity to update the data, science, and tools to enable this level of tracking and target setting in the future.

As outlined in Chapter 2, California is projected to lose carbon stocks over the coming decades, but this Scoping Plan analysis also shows that increasing the pace and scale of climate smart land management in California will reduce the carbon stock losses and GHG emissions from the NWL sector. In response to EO N-82-20 and AB 1757, the proposed target for NWL is shown in Table 4-1.

Table 4-1: Scoping Plan modeled target for NWL, based on increasing action on NWL

	Total Carbon Stock % Change from 2014
2045	-4

Achieving this target will require significant expansion of the pace and scale of climate action on California's NWL, including the following:

- Increasing climate smart forest, shrubland, and grassland management to at least 2.3 million acres a year—an approximate 10x increase in management from current levels.
- Increasing climate smart agricultural practices by at least 78,000 acres adopted a year, annually conserving at least 8,000 acres a year of croplands, and increasing organic agriculture to comprise at least 20 percent of cultivated acres in California by 2045—an approximate 7.5x increase in healthy soils practices from previous levels and a 2x increase in total acres of organic agriculture.
- Increasing annual investment in urban trees in developed lands by at least 200 percent above historic levels and establishing defensible space on all parcels by 2045.
- Restoring at least 60,000 acres, or approximately 15 percent of all Sacramento–San Joaquin River Delta (Delta) wetlands, by 2045.
- Cutting land conversion of deserts and sparsely vegetated landscapes by at least 50 percent annually from current levels, starting in 2025.

If the carbon stock target above is met, and the management actions above are implemented, the modeling for NWL indicates that California's lands will be a net source of emissions, producing approximately 7 $MMTCO_2e$ of average annual emissions.

Additional climate smart management practices and additional landscapes, such as those included in the Climate Smart Strategy and discussed below in Additional Management Strategies, have the potential to increase carbon stocks and reduce GHG emissions from NWL beyond the levels modeled for this Scoping Plan.

The purpose of the NWL target and the above estimated outcomes is to provide a numerical guide that can support the state's efforts to accelerate both near-term and long-term climate action on California's lands, prioritizing durable solutions that deliver multiple outcomes. Taking these actions over the coming decades will reduce the potential carbon losses from NWL, reduce GHG emissions from some landscape types (such as croplands and Delta wetlands), and support sequestration of GHGs from NWL between 2025 and 2045. These actions will also deliver significant benefits to Californians beyond advancing our climate goals, such as reducing wildfire emissions and their associated health impacts, increasing habitat for biodiversity, reducing urban heat island effects, reducing harmful pesticide exposure, expanding economic opportunities, and others. Additional information on several economic and health outcomes from the Scoping Plan Scenario is included in Chapters 2 and 3.

Statewide planning and target setting for the NWL sector will only create meaningful change if followed by effective on-the-ground implementation. State government cannot accomplish this implementation alone. Effective large scale climate action is dependent on partnerships among tribal, federal, state, regional, and local partners, and across governmental, private, nonprofit, and commercial sectors. The NWL sector of the Scoping Plan sets a carbon target with climate action recommendations that can be used to achieve the quantified carbon, health, and economic outcomes. Implementation of these actions must be led by local or regional partnerships that plan and execute projects appropriate to the specific conditions. The technical expertise and local knowledge of land managers and stewards in all sectors must be elevated to ensure relevant, efficient, and effective climate action.

Implementation of climate action should contribute to state targets, maximize local benefits, and alleviate environmental injustices and other social inequities. On-the-ground action is largely executed and managed by local and regional actors, but state government agencies must support communities across the state in implementing nature-based climate solutions that address statewide objectives, such as the Scoping Plan carbon target. This includes providing resources and developing frameworks, while greatly increasing capacity and technical assistance to assist and empower local partners. Examples of how this can be done are the Regional Forest and Fire Capacity Program within the forestry sector, the UC Cooperative Extension in the agricultural and forestry sectors—as well as the work of the state's 10 regional Conservancies. These programs provide strong examples to emulate as they facilitate statewide coordination, and information and resource transfer from the state to the regional and local levels. The Regional Forest and Fire Capacity Program provides funding for local and regional groups

to build their organizational capacity to plan and implement wildfire and forest management projects that are informed by their own local expertise. The UC Cooperative Extension is an example of how the state provides technical assistance to local landowners and community organizations, helping them apply the latest science-based management strategies to their lands. California's regional Conservancies play a pivotal role in implementing regional conservation, restoration, and land management efforts through activities such as grant funding, science generation, and planning assistance.

The state also has identified the need to incorporate and elevate traditional indigenous knowledge into climate action on the regional and local scales. Accomplishing this requires close partnerships with tribes for mutual knowledge and resource sharing, while protecting culturally sensitive knowledge and resources. As Tribes are sovereign nations with specialized cultural knowledge and experience in managing lands, climate action on these lands that contribute to the State of California's climate targets can only be accomplished with the full participation and under the leadership of the Tribes that govern those lands.

Strategies for Achieving Success: Crosscutting Items for all NWL

- Implement AB 1757 and SB 27.
- Implement the Climate Smart Strategy.
- Accelerate the pace and scale of climate smart action, consistent with the management levels identified above, as part of a collective effort between federal, state, private, nonprofit, and individual land managers.
- Prioritize and practice equity, including through meaningful community engagement and prioritizing implementation of nature-based solutions that benefit the communities most vulnerable to climate change.[483]
- Advance multi-benefit, collaborative, landscape-level approaches that engage communities and landowners, and incorporate adaptive managements.
- Consult and partner with California Native American tribes to increase co-management and tribal management authority; restore, protect, and enhance natural cultural resources, traditional foods, and cultural landscapes; respect tribal sovereignty; and support tribes' implementation of tribal expertise and Traditional Ecological Knowledge and cultural easements.[484]

[483] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N8. *finalejacrecs.pdf (arb.ca.gov).*
[484] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N1, N6, N16, N17, N18. *finalejacrecs.pdf (arb.ca.gov)*.

- Leverage existing innovative financial and market mechanisms, and explore new ones, between the public, private, and philanthropic sectors to secure funding of climate smart land management.
- In partnership with communities, tribes, and the private sector, expand and develop new infrastructure for manufacturing and processing of climate smart agricultural and biomass products.
- Leverage and support technical assistance providers: such as the UC Cooperative Extension and California's 98 Resource Conservation Districts, that have track records of providing technical assistance to local landowners and implementing agriculture, forestry, natural resource management, and restoration projects across the state.
- Establish and expand mechanisms that ensure NWL are protected from land conversion and parcelization (e.g., conservation easements or Williamson Act), in line with the strategies outlined in CNRA's Pathways to 30x30 California.[485,486] Pair land conservation projects with management plans that increase carbon sequestration, where feasible.
- Increase opportunities for private and philanthropic investments in nature-based climate solutions, utilizing existing voluntary and compliance carbon markets, existing state and local programs, and the California Carbon Sequestration and Climate Resiliency Project Registry established pursuant to SB 27.
- Expand monitoring and tracking of management actions and outcomes consistent with the tracking and monitoring recommendations of the Climate Smart Strategy.

Forests, Shrublands, and Chaparral

At roughly 29 million acres, forests cover 27 percent of California. Shrublands and chaparral cover 31 percent of the state; roughly 33 million acres. Both types are distinct, with their own ecological dynamics and management strategies, and are modeled within a single model that is calibrated to treat them uniquely.

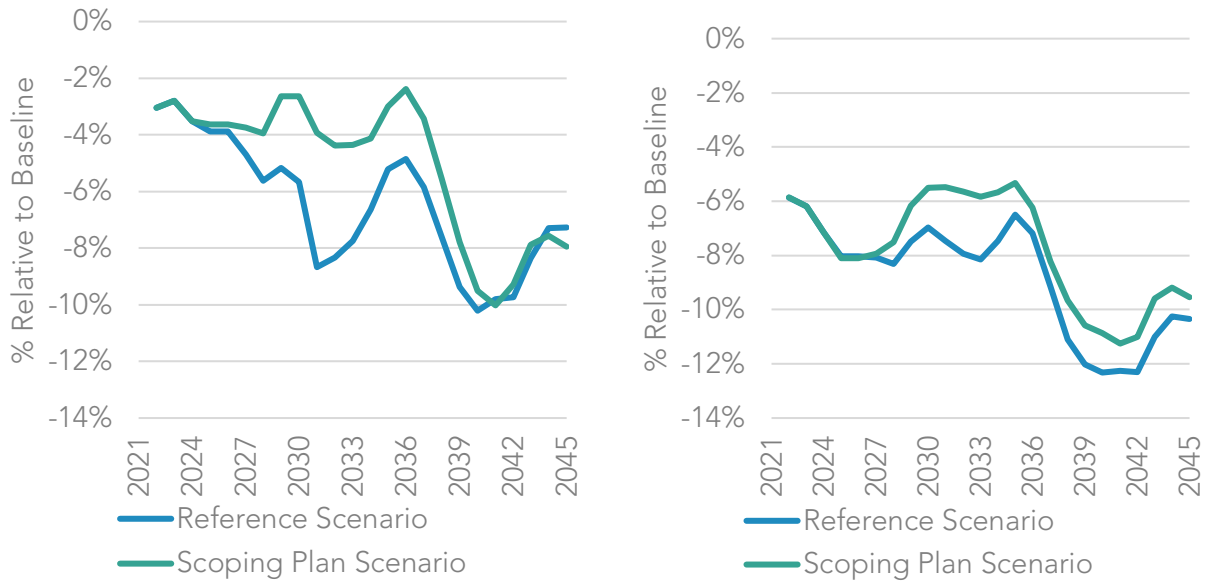
Together, forests, shrublands, and chaparral support a high biodiversity of plants and animals, in addition to high levels of carbon stocks. They provide important air and water quality benefits to all Californians, as well as recreational opportunities and, for forests, harvested wood products for the state. These landscapes are fire-adapted, and historical tribal management of these lands has fostered ecosystem health and resilience. Over the past century, these lands have been impacted severely by fire exclusion, including

[485] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N5, N26, N27. finalejacrecs.pdf (arb.ca.gov).
[486] CNRA. 2022. *Pathways to 30x30 California*. https://www.californianature.ca.gov/pages/30x30.

exclusion of indigenous people's management and past management practices, which has resulted in less resilient ecosystems and communities and more destructive wildfires today. This, along with drought induced stress and mortality, has changed these landscapes from a carbon sink to a carbon source. Climate smart management can help make forests more resilient to climate change and less prone to catastrophic wildfire. Climate-smart management in shrublands and chaparral face additional challenges and uncertainty, but can still provide protection for threatened communities and natural resources. This management, if conducted on a regular basis to maintain forest health, can help reduce emissions from forests, shrublands, and chaparral, and help strengthen and maintain the co-benefits that Californians experience from them.

Under all management levels, forests and shrublands are expected to lose carbon over the next two decades due to climate change and wildfire (Figure 4-21).

Figure 4-21: Forest (left) and shrubland (right) carbon stocks by 2045[487,488]



While this decrease in carbon stocks may be inevitable, forest management under the Scoping Plan Scenario can help direct where and how carbon loss occurs. By proactively managing forests and shrublands, the loss of carbon from wildfire can be lessened as the risk of high severity fire is decreased, with the removed biomass going toward a more

[487] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N13. *finalejacrecs.pdf (arb.ca.gov)*.
[488] This analysis is the aggregation of all forests and shrublands from all ownerships across the entire state of California.

useful purpose such as harvested wood products, bioenergy, and engineered carbon removal. Managing for a diverse and resilient forest landscape also can help forests recover more quickly so that when climate change and wildfire impacts occur, forests will be less affected and can continue to thrive and sequester carbon. Additional details on the climate benefit potential of forests and shrublands/chapparal can be found in Section 2 of the NWL Climate Smart Strategy.

Strategies for Achieving Success

- Accelerate the pace and scale of climate smart forest management to at least 2.3 million acres annually by 2025, in line with the climate smart management strategies identified in this Scoping Plan, the NWL Climate Smart Strategy, and the Wildfire and Forest Resilience Action Plan.[489]
- Establish and expand mechanisms that ensure forests, shrublands, and grasslands are protected from land conversion and that support ongoing, rather than one-time, management actions.
- In collaboration with state and local agencies, accelerate the deployment of long-term carbon storage from waste woody biomass residues resulting from climate smart management, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.
- Expand infrastructure to facilitate processing of biomass resulting from climate smart management.
- Expand permit streamlining in collaboration with state and local agencies to accelerate implementation of climate smart forest management while protecting natural resources.

Grasslands

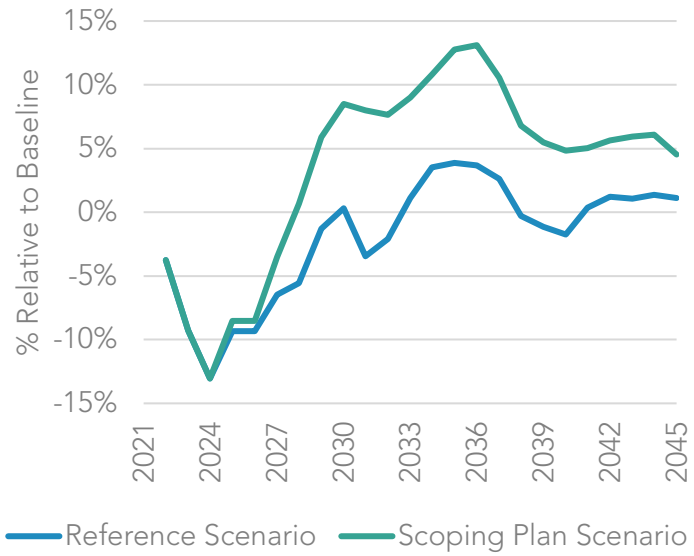
Grasslands cover 9 percent of California, roughly 10 million acres, and are found throughout the state in various landscapes, with concentrations in the foothills surrounding the Sacramento and San Joaquin Valleys. In addition to carbon storage (primarily in the soil), grasslands provide open space, wild habitat, grazing land, and important water filtration and recharge benefits. The protection of grasslands provides an opportunity to reduce sprawl and complement VMT reduction strategies. As grasslands are susceptible to invasive species, climate smart strategies can increase grassland

[489] Forest Management Task Force. 2021. *California's Wildfire and Forest Resilience Action Plan: Recommendations of the Governor's Forest Management Task Force.* https://www.fire.ca.gov/media/ps4p2vck/californiawildfireandforestresilienceactionplan.pdf.

resilience to climate change by improving species diversity and maintaining or increasing soil carbon stocks.

Modeling results show that increased fuels treatments and avoided land conversion can increase carbon stocks on grasslands by 2045, but sequestration rates fluctuate annually. Grasslands are capable of high carbon sequestration rates but are susceptible to carbon losses from wildfire and land conversion. Soil carbon is the major carbon pool on these lands, and continued future improvement of the monitoring and modeling of soil carbon is needed. Similar to forests and shrubland/chaparral, modeling alternatives that include fuels treatments resulted in greater carbon stocks compared to no management, and had lower wildfire emissions. Unlike forests and shrubland/chaparral, which have a general declining carbon stocks trend, the modeling results (Figure 4-22) show grasslands can maintain or increase carbon stocks with active management. Details on the climate benefit potential of grasslands can be found in Section 2 of the NWL Climate Smart Strategy.

Figure 4-22: Grassland carbon stocks by 2045



Strategies for Achieving Success

- Establish and expand mechanisms that ensure grasslands are protected from land conversion/parcelization and that support ongoing, rather than one-time, management actions that improve carbon sequestration.
- Deploy grassland management strategies, like prescribed grazing, compost application, and other regenerative practices, to support soil carbon sequestration, biodiversity, and other ecological improvements.

- Increase adoption of compost production on farms and application of compost in appropriate grassland settings for improved vegetation and carbon storage, and to deliver waste diversion goals through nature-based solutions.

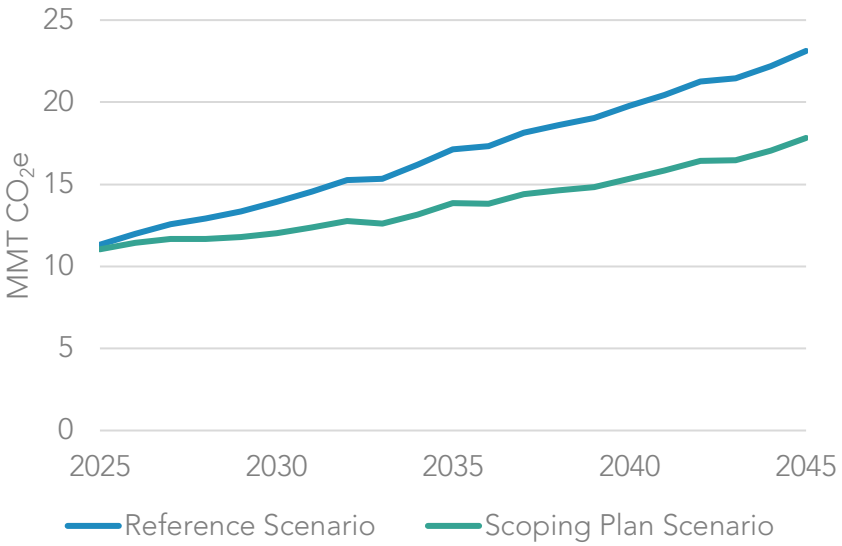
Croplands

Croplands cover 9 percent of the state, roughly 9.5 million acres. This land is some of the most productive agricultural land in the world, and enables California to be a global leader in agriculture. Aside from developed lands, croplands are the most intensively managed landscapes in the state, and are closely tied to society through the food they produce and the constant, direct contact that people have with croplands through the course of management. In addition to food security, croplands provide considerable carbon storage in the soil and, in perennial croplands, in aboveground biomass. Climate smart practices can improve public health; for example, by reducing synthetic fertilizer and pesticide use. They also help to maintain or increase the climate resilience of cropland productivity through improved soil conditions and increased pollinator habitat.

There is also significant potential to transform this sector to increase soil carbon storage, reduce GHG emissions (Figure 4-23), and reduce pesticide exposure and health impacts. Moving to an agricultural system that improves soil health and water holding capacity reduces over-application of nitrogen, reduces the use of pesticides and fumigants, and increases biodiversity and pollinator habitat, supporting California's pathway to carbon neutrality while simultaneously improving the lives of those who live and work in the agricultural community. Croplands are intricately tied to people, communities, and their health, and through climate smart practices and cropland conservation, these lands have the potential to contribute more to society than just food.[490] The implementation of climate smart agricultural practices and diversified organic agriculture can help California achieve social and environmental benefits, like improving water use efficiency, increasing pollinator habitat, and reducing synthetic fertilizer and pesticide use.[491] Additional details on the climate benefit potential of croplands can be found in Section 2 of the NWL Climate Smart Strategy.

[490] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations In-part (N3, N4, N22), N5, N21. *finalejacrecs.pdf (arb.ca.gov)*.
[491] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. *finalejacrecs.pdf (arb.ca.gov)*.

Figure 4-23: Cumulative CO_2e emissions from annual croplands in 2045[492]



CARB recognizes the complex nature of croplands, cross-sector relationships, and the need to build on this analysis to further our understanding of cropland dynamics. Many more aspects of cropland management need to be explored for potential climate benefits, such as water and nutrient use management, pest control methods, crop rotations, and other management practices. The impacts of climate change on water availability, annual/perennial crop growth, and future carbon sequestration trends are uncertain, and recent policies such as the Sustainable Groundwater Management Act may also influence cropland management in unforeseen ways. Nonetheless, it is clear that greater climate smart practice implementation can prepare California for the future and yield tangible benefits for the state.

Strategies for Achieving Success

- Accelerate the pace and scale of healthy soils practices to 80,000 acres annually by 2025, conserve at least 8,000 acres of annual crops annually, and increase organic agriculture to 20 percent of all cultivated acres by 2045.

[492] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. finalejacrecs.pdf (arb.ca.gov).

- Utilize the recommendations included in CDFA's Farmer and Rancher-Led Climate Change Solutions[493] report to accelerate deployment of healthy soils practices, organic farming, and climate smart agriculture practices.
- Establish or expand financial mechanisms that support ongoing deployment of healthy soils practices and organic agriculture.[494]
- Support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems, such as implementing the California Department of Pesticide Regulation's (DPR's) Sustainable Pest Management Work Group recommendations.[495]
- Conduct research on the intersection of pesticides, soil health, GHGs, and pest resiliency via a multi-agency effort with DPR, CDFA, and CARB.[496]
- Conduct outreach and education to develop and facilitate the increased adoption of safer, more sustainable pest management practices and tools; reduce the use of harmful pesticides; promote healthy soils; improve water and air quality; and reduce public health impacts.
- In collaboration with state and local agencies, accelerate the deployment of alternatives to agricultural burning that increase long-term carbon storage from waste agricultural biomass, including storage in durable wood products, underground reservoirs, soil amendments, and other mediums.
- Work across state agencies to reduce regulatory and permitting barriers around some healthy soils practices (e.g., composting), where appropriate.
- Utilize innovative agriculture energy use and carbon monitoring and planning tools to reduce on-farm GHG emissions from energy and fertilizer application or to increase carbon storage, as well as to promote on-farm energy production opportunities.

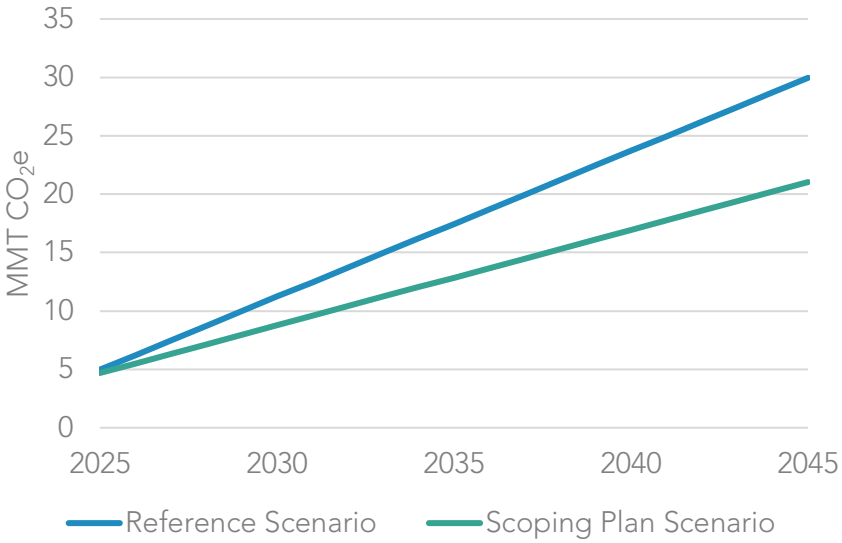
[493] California Department of Food and Agriculture. 2021. Farmer and Rancher Led Climate Change Solutions. *https://www.cdfa.ca.gov/oefi/climate/docs/cdfa_farmer_and_rancher-led_climate_solutions_meetings_summary.pdf*.
[494] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N5, N7. *finalejacrecs.pdf (arb.ca.gov).*
[495] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations N3, N4, N5, N7, N22. *finalejacrecs.pdf (arb.ca.gov)*.
[496] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N11. *finalejacrecs.pdf (arb.ca.gov)*.

Wetlands

Wetlands cover 2 percent of the state (roughly 1.7 million acres) and include inland and coastal wetlands, such as vernal pools, peatlands, mountain meadows, salt marshes, and mudflats. These lands are essential to California's communities as they serve as hotspots for biodiversity, contain considerable carbon in the soil, are critical to the state's water supply, and protect upland areas from flooding due to sea level rise and storms. Wetlands have been severely degraded through reclamation, diking, draining, and dredging practices in the past, resulting in the emissions of the carbon stored in the soils and the loss of ecosystem benefits. Climate smart strategies to restore and protect all the types of wetlands can reduce emissions while simultaneously improving the climate resilience of surrounding areas and improving the water quality and yield for the state. Restored wetlands also can reduce pressure on California's aging water infrastructure. These benefits beyond emissions reductions will help in the future, as climate change is predicted to negatively affect water supply.

Avoided conversion and restoration of Delta wetlands reduces CO_2 and methane emissions from wetlands, with GHG reductions scaling with implementation rates (Figure 4-24). Expansion of conservation and restoration efforts will generate benefits such as the conservation of biodiversity, improved water quality and supply, and reduced flood risk. Additional details on the climate benefit potential of wetlands can be found in Section 2 of the NWL Climate Smart Strategy.

Figure 4-24: Cumulative CO_2e emissions from Delta wetlands by 2045



Strategies for Achieving Success

- Restore 60,000 acres of Delta wetlands annually by 2045 to reduce methane emissions from wetlands and reverse the resulting subsidence.

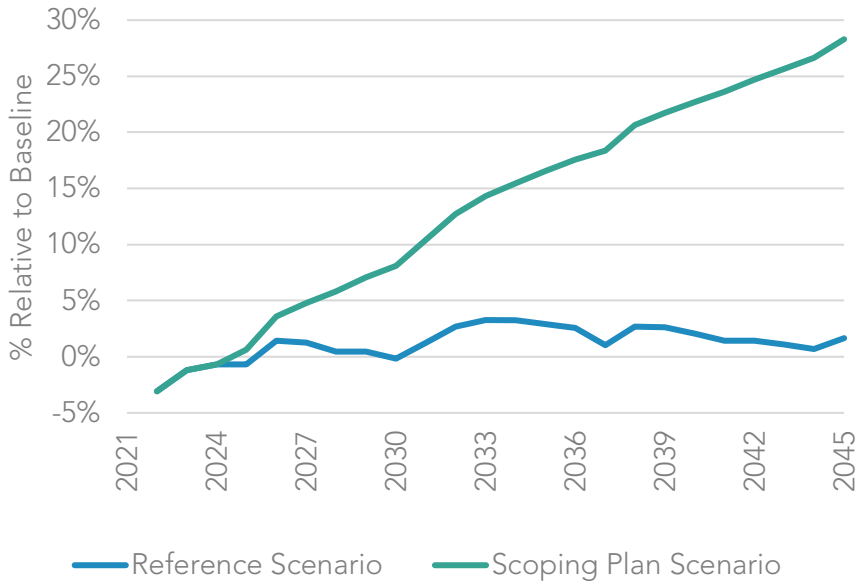
- Identify and prioritize wetland restoration efforts around climate vulnerable communities.
- Leverage other funding and institutions to support wetland restoration projects, including land trusts, local funding (e.g., San Francisco Measure AA), federal funding, and private and philanthropic funding to support wetlands restoration projects.
- Work across state agencies to reduce regulatory and permitting barriers around wetland restoration projects, where appropriate.

Developed Lands

Developed lands cover 6 percent of the state (roughly 6.8 million acres) and include urban, suburban, and rural areas, as well as transportation and supporting infrastructure throughout California. This area encapsulates the land on which the vast majority of Californians reside and call home. The vegetation within cities and communities, and along infrastructure, are all part of developed lands. This vegetation provides numerous benefits to surrounding areas, including carbon storage, air and water filtration, reduced urban heat island effect, and access to nature, aesthetics, and mental health, among others. These areas are susceptible to climate change as well, and climate smart strategies to protect and expand the urban forests, landscaping, green spaces, parks, and associated vegetation can increase their climate resilience and the benefits Californians derive from them. These strategies also have a significant opportunity to benefit disadvantaged communities, who may not have equitable access to these practices or the benefits they provide. Additional details on the climate and equity benefit potential of developed lands can be found in Section 2 and the Introduction of the NWL Climate Smart Strategy.

Urban forests have a significant potential to sequester carbon (Figure 4-25). They are vastly different from wildland forests, as they require investments to maintain and irrigate. This results in the need for a significant increase in investment to increase urban forest carbon. As urban forests become denser and management difficulty increases, the carbon stock returns on investment diminish, making it expensive to maximize carbon in urban forests. Water availability and irrigation efficiency are also an important consideration for increasing urban forest cover. As water becomes scarcer, the prioritization of irrigating trees over lawns or gardens may be required to achieve increases in urban forest carbon.

Figure 4-25: Carbon stocks in urban forests by 2045



Within wildland-urban interface (WUI) areas, defensible space can protect urban and rural communities from wildfire. Analysis results show that 48 percent of parcels are currently fully compliant with defensible space requirements. This highlights how much work needs to be done to protect communities and homes. Defensible space results in a decrease in carbon stocks, as expected when reducing fuels for wildfire.

Strategies for Achieving Success

- Increase urban forestry investment annually by 200 percent, relative to business as usual.
- Increase public awareness of urban forest benefits and, where appropriate, prioritizing irrigation of trees over lawns.
- Provide technical assistance and resources to disadvantaged communities to implement community urban greening projects to provide equitable access to the benefits of urban greening projects.[497]
- Work with state and local agencies to expand technical assistance for and enforcement of the defensible space requirements of PRC 4291 to reduce wildfire risk to homes and structures.

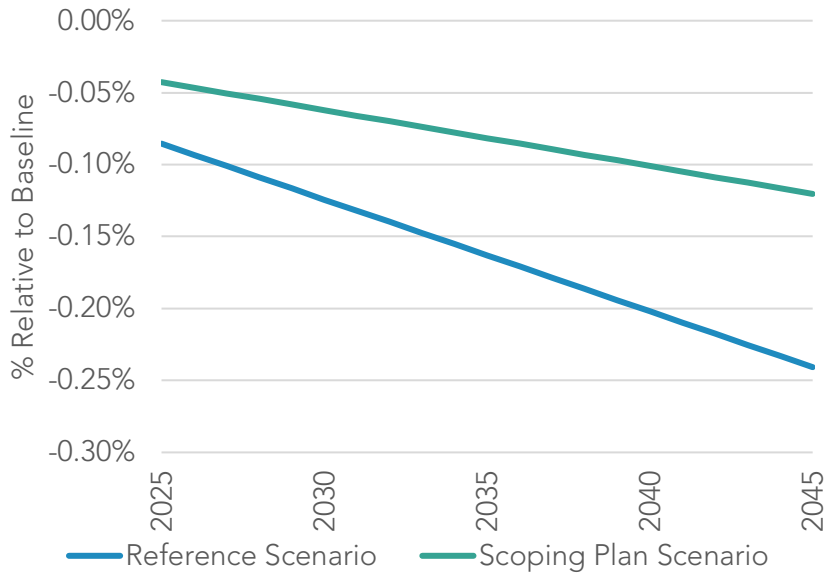
[497] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N8. finalejacrecs.pdf (arb.ca.gov).

Sparsely Vegetated Lands

Sparsely vegetated lands cover 10 percent of the state, roughly 10.2 million acres, primarily in the east and southern parts of California. These lands include deserts, beaches, dunes, bare rock, and areas covered in ice and snow (e.g., higher mountain elevations). The limited carbon storage of these lands varies from bare rock and mineral soil to more vegetated areas, though severe climate limits the amount of biomass. Nonetheless, sparsely vegetated lands are important for open space and provide rare and unique habitats for endemic species and a diversity of wildlife. These lands present important recreational opportunities for Californians and serve as important protective buffers in coastal and low-lying areas. Land use change threatens these lands, and conservation efforts are important for protecting these unique areas of California.[498]

Avoided conversion of sparsely vegetated lands reduces the organic carbon lost from the soil, which is the major carbon pool in this land type (Figure 4-26). In identifying the outcomes for sparsely vegetated lands, CARB modeled avoided land conversion to another land use.

Figure 4-26: Carbon stocks in sparsely vegetated lands by 2045



Strategies for Achieving Success

- Establish and expand mechanisms that ensure sparsely vegetated lands are

[498] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N26. finalejacrecs.pdf (arb.ca.gov).

protected from land conversion, prioritizing those areas most vulnerable to climate change and loss.

Additional Management Strategies

Additional nature-based climate solutions beyond those management strategies modeled for this Scoping Plan are available for implementation, but either cannot currently be modeled and/or affect carbon and the landscape in ways that cannot currently be tracked. Nevertheless, it is important to take action even where these technical gaps exist. Some of these actions, such as cultural burning and indigenous farming practices, have been used on large scales for decades or even centuries, while others are relatively new concepts. The state nevertheless recommends implementing the additional solutions listed here to achieve potential additional climate benefits, as well as other co-benefits. These additional solutions were drawn from the NWL Climate Smart Strategy and stakeholder, tribal government, and interagency feedback.[499]

Considerations

Although these practices are recommended, because of the lack of in-depth modeling and analysis available, several considerations must be addressed when implementing them. These considerations also apply to the management strategies included in the Scoping Plan Scenario.

- Future climate change impacts are uncertain: The negative impact that climate change can have on the ability of these practices to maintain expected climate benefits is uncertain and may significantly change in the future. Climate change is expected to further diminish the already constricting growing conditions in California, with increasing droughts, more extreme weather events, and expanding disturbances from fire, insects, and disease. It is estimated that suitable habitat for many native plant and animal species could shift, creating novel ecosystems without historical precedent. Close monitoring of all practices, including no management, across our NWL will be critical to understand if and how future climate change affects outcomes and how to adapt management to meet the needs of the system under climate change.[500]

[499] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N24. *finalejacrecs.pdf (arb.ca.gov)*.
[500] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N15. *finalejacrecs.pdf (arb.ca.gov)*.

- Local conditions: Not every practice is applicable, feasible, or even desirable in every location across California. Implementation of these practices should account for local conditions and needs that may affect the appropriateness of that practice.
- Long-term carbon storage: The ability to sequester additional carbon into NWL is only beneficial to the climate if that carbon stays out of the atmosphere. Many of the additional practices listed here may require continual incentives or interventions to ensure permanence of carbon storage in the soil and biomass. For example, in croplands, it is difficult to estimate how much of the carbon stored by no-tillage can be released by a single subsequent tillage, but a return to conventional tillage would usually be expected to erase most gains.[501,502]
- Scaling actions: There are uncertainties on how these practices may impact both the environment and communities when significantly expanded. For this reason, it is best to take a cautious and measured approach to ramping up actions to a larger scale.
- Infrastructure and operational needs: Scaling up the implementation of some of these practices demands transformational change in the supporting infrastructure and operational frameworks. For example, increasing forest management to the degree included in the Scoping Plan Scenario will require significant changes to wood-processing infrastructure, workforce capacity, permitting processes, technical assistance, and other operational constraints. The increased application of compost to croplands, and potentially to rangelands, will require a significant increase in organic waste and dairy manure collection to increase compost supply, in line with SB 1383. This will also require additional compost production facilities as well as compost/organic waste transportation and application methods.
- Co-benefits: Many co-benefits from these practices exist beyond the climate benefits. These co-benefits include improved public and worker health; improved microbial, insect, and wildlife habitat; enhanced biodiversity; greater labor demand in the nature-based economy; and improved climate resilience.
- Labor and Economics: Many of these practices require additional labor, and an evaluation of how many more jobs are needed to carry out many of these practices

[501] Muñoz-Romero, V., R. J. Lopez-Bellido, P. Fernandez-Garcia, R. Redondo, S. Murillo, and L. Lopez-Bellido. 2017. “Effects of tillage, crop rotation and N application rate on labile and recalcitrant soil carbon in a Mediterranean Vertisol.” *Soil Tillage Res.* 169, 118–123.
[502] Mitchell, J. P., A. Shrestha, W. R. Horwath, R. J. Southard, N. Madden, J. Veenstra, and D. S. Munk. 2015. “Tillage and cover cropping affect crop yields and soil carbon in the San Joaquin Valley.” *California. Agron. J.* 107, 588–596.

is currently unknown. There will also be the need to explore the costs and economic benefits of implementing these additional practices.

- Retreatments: All of these practices have limits on how long they can enhance carbon sequestration. Many of these practices need to be periodically repeated, followed by complementary practices, or maintained through time. This increases costs and requires diligence and long-term stewardship.

Additional NWL Actions and Strategies

Below is a set of additional actions that should be taken on California's natural and working lands. Again, these practices were not modeled for this Scoping Plan, and all of the considerations listed above should be taken into account before implementing the following actions.

- Conservation of all NWL types (in line with the NWL Climate Smart Strategy and CNRA's Pathways to 30x30 California) is critical to ensuring continued carbon sequestration and provision of co-benefits from these lands for all Californians.[503]
- Reforestation following disturbance, using appropriate species, is an impactful practice that can help prevent conversion away from forestland and establish new trees to sequester carbon. The number of acres that may need reforestation following high severity wildfires is estimated to continue to increase into the future.
- Restoration of shrublands, chaparral, riparian zones, and oak woodlands across California includes a variety of practices to alter their structure and return endemic species to the areas. These unique habitats provide multiple co-benefits to the state, such as clean water, reduced wildfire risk, and biodiverse habitats for flora and fauna.
- Conservation and restoration of wetlands, beyond the Delta wetlands included in the NWL modeling, can protect these unique habitats and the climate benefits they provide. These wetland types can include but are not limited to coastal wetlands, mountain meadows, vernal pool complexes, alkali sinks and meadows, and floodplains.
- Conservation and restoration of seagrasses and seaweeds provide a number of benefits, including carbon storage and sequestration, habitat provision for many culturally and commercially important species of fishes and invertebrates, shoreline protection, and tourism opportunities.[504]

[503] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N26, N27. finalejacrecs.pdf (arb.ca.gov).
[504] AB 32 EJ Advisory Committee. 2022 Scoping Plan Recommendations, N2. finalejacrecs.pdf (arb.ca.gov).

- Prescribed herbivory utilizes various livestock to consume vegetation to reduce fuel loads across an area. This fuel management practice can be used in forests, grasslands, and shrublands as an effective alternative to herbicide use, and should be considered wherever local conditions allow.
- Urban and community greening efforts such as green schoolyards, urban farms, rain gardens, community gardens, community composting, and many more provide numerous health benefits to communities.
- Additional Healthy Soils Program practices on annual croplands such as conservation cover and crop rotation, biomass planting for borders, wind barriers, riparian areas, and improved nutrient management can improve soil health, water retention, and increase carbon stocks.
- Healthy Soils Program practices on perennial croplands and rangelands, such as compost application and alley cropping/cover cropping to improve soil health, water retention, erosion control, and biomass growth.[505]
- Stacking of these Healthy Soils Program practices, where appropriate, in perennial and annual systems, can synergistically improve soil health and provide multiple benefits.
- Mulching adds high carbon materials to croplands or fallowed lands to reduce competing vegetation and retain moisture. This practice can support other benefits such as reduced water use and reduced synthetic pesticide and fertilizer use, as well as provide a use for suitable forest and agricultural waste biomass.
- Reductions in the use of synthetic fertilizers in cropland management, generally supported by the implementation of new management tools or technologies, can lead to reductions in GHG emissions from the production and application of fertilizers. This benefit is in addition to the co-benefits of reduced chemical runoff into waterways and reduced exposure of human populations to their harmful effects.

[505] Various types of organic amendments are being researched for application to particular landscape types. For example, compost application to rangelands is a relatively new practice that has been shown to improve soil health and increase carbon sequestration in the short term, though the science on the long-term impacts of this practice is still developing and the supply of available compost may be limiting.

Chapter 5: Challenge Accepted

This chapter provides an overview of the next steps and partnerships that will be needed to successfully implement this Scoping Plan. The path forward is not dependent on one agency, one state, or even one country. It will take action on a global level to address the threat climate change poses. But, the work begins at home.[506] The state can lead by engaging Californians and demonstrating how action at the state, regional, and local levels of government, as well as action at community and individual levels, can contribute to addressing the challenge before us. We must build partnerships with academic institutions, private industry, and others to support and accelerate the transition to carbon neutrality. Ultimately, the success of this Scoping Plan will be measured by our ability to implement the actions modeled in the Scoping Plan Scenario at all levels of government and society. This will depend on a mix of legislative action, regulatory program development, incentives, institutional support, workforce and business development, education and outreach, community engagement, and research and development and deployment. Optimizing this mix will help to ensure that clean energy and other climate mitigation strategies are clear, winning alternatives in the marketplace and in communities—to promote equity, drive innovation, and encourage consumer adoption. Bold institutional action will catalyze continued research and push private investment to create jobs and bring innovative ideas to reality.

State-level Action

Achieving the targets described in this Scoping Plan will require continued commitment to and successful implementation of existing policies and programs and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians.

[506] This "polycentric" approach to climate challenges, engaging many levels of government, was articulated in leading papers by Nobel laureate Elinor Ostrom. See, for example, Ostrom, E. 2014. "A Polycentric Approach to Coping with Climate Change." *Annals of Economics and Finance* 15-1, 97–134.

Regulations and Programmatic Development

Meeting the AB 32 2020 GHG emissions reduction target several years earlier than mandated demonstrated that developing mitigation strategies through a public process, where all stakeholders have a voice, leads to effective actions that address climate change and yields a series of additional economic and environmental co-benefits to the state. Following adoption of this Scoping Plan, state agencies will continue to update and implement new and existing programs to align with the outcomes in the plan. Community, tribal, and stakeholder engagement will be a critical part of this work. Several state agencies, including CARB, the CEC, the California State Transportation Agency (CalSTA), the CPUC, and others will need to be part of various subsequent rulemaking processes. Each of these agencies' leadership and technical staff will engage with the public through public meetings, written and oral comment, and other methods of engagement. This work will be informed by evaluations of the health, air quality, environmental, equity, and economic benefits and impacts of regulations, including an assessment of the societal cost of carbon, as required under AB 197.

Incentive Programs

As described in Chapter 1, incentive programs are one of the most important tools the state has in advancing our low carbon future, especially for climate vulnerable communities. The programs ensure clean technology and energy are accessible and are critical to closing ongoing opportunity gaps. These programs also leverage private-sector investment and build sustainable, growing markets for clean and efficient technologies, and they are particularly necessary to support GHG emission reduction strategies for priority sectors, sources, and technologies. Clean technologies are often already the best and lowest cost option over their lifetimes but incentive funding is critical to ensure that they are broadly available, especially in climate vulnerable communities. Incentives also build on California's long track record of driving innovative technology developments, and creating new industries, with targeted investment. The Inflation Reduction Act also provides a new source of funding and tax incentives that must be leveraged to help achieve the state's climate goals.

Many state funding programs are designed to achieve multiple objectives simultaneously: reduce emissions from GHGs, criteria pollutants, and toxic air contaminants; manage natural and working lands for carbon sequestration; and address health and opportunity gaps in disadvantaged communities. California's incentive programs focused on jump-starting the transition to a zero emission transportation future are a good example of this "stacked" approach. The state is investing billions of dollars through programs such as the On-Road Heavy-Duty Voucher Incentive Program and Clean Cars 4 All in order to replace the light- and heavy-duty vehicles most responsible for the state's GHG emissions and poor air quality, all while bolstering the nascent ZEV market. Further strategies aid in developing new technologies, in ramping up access for all, and in shifting to cleaner

modes of transport; for instance, by supporting investments in walkable, bikeable communities and transit, as well as in vehicles. This funding strategy is, of course, paired with the regulatory approach described above.

Local Action

Local action by cities can support and amplify efforts to reduce GHGs. For example, the City of Oakland requires all new construction to be all-electric and is currently working on electrifying existing buildings.[507] In addition, starting in 2023, the City of Sacramento will require all new buildings under three stories to be all-electric, and it extends the mandate to all new construction by 2026 with some limited exemptions. The City of Sacramento also requires levels of EV charging infrastructure in new construction starting in 2023, higher than the minimum state requirements, and provides parking incentives for zero-emission carsharing and EV charging.[508] Local governments asserting this type of leadership are critical partners in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment.

California must accommodate population and economic growth in a far more sustainable and equitable manner than in the past. Good climate policy can and should create affordable and pleasant places to live, with effective transport and clean air for all—a future in which local governments and communities are central partners. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority.

Local governments are also frequently the source of innovative and practical climate solutions that can be replicated in other areas. Their efforts to reduce GHG emissions within their jurisdictions are vital to achieving the state's near-term air quality and long-term climate goals. Local governments must continue to take action that affirmatively

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[507] City of Oakland. Building Electrification. *https://www.oaklandca.gov/projects/building-electrification*.
[508] City of Sacramento. Electrification of New Construction. *http://www.cityofsacramento.org/SacElectrificationOrdinance*.

builds the projects and expend the funds needed to further the state's collective path toward equitable emissions reductions. As such, aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in this Scoping Plan is critical to achieving the statutory targets for 2030 and 2045. Local governments can implement climate strategies that can effectively engage residents by addressing local conditions and issues that also deliver local economic benefits.

Local Climate Action Planning and Permitting

California encourages local jurisdictions to take ambitious, coordinated climate action at the community scale; action that is consistent with and supportive of the state's climate goals.[509] As discussed in more detail in Appendix D (Local Actions), local jurisdictions can do much to enable statewide priorities, such as taking local action to help the state develop the housing, transport systems, and other tools we all need. Indeed, state tools—such as the Cap-and-Trade Program or zero-emission vehicle programs—do not substitute for these local efforts. Multiple legal tools are open to local jurisdictions to support this approach, including development of a climate action plan (CAP), sustainability plan, or inclusion of a plan for reduction of GHG emissions and climate actions within a jurisdiction's general plan. Any of these can help to align zoning, permitting, and other local tools with climate action.

Once adopted, the GHG emissions reductions plans detailed in CAPs can provide local governments with a valuable tool for coordinated climate planning in their community. When a local CAP complies with CEQA requirements, individual projects that comply with the CAP are allowed to streamline the project-specific GHG analysis.[510,511] Effectively, local governments that adopt a CEQA-compliant CAP enable project developers to use this streamlined approach. This saves time and resources and provides more consistent expectations for how GHG reduction measures are applied across projects in the jurisdiction. While the state encourages local governments to follow this approach, we acknowledge not all jurisdictions have the resources to develop a CAP that meets the CEQA requirements.

In addition to being required for a local CAP to comply with CEQA, local GHG reduction targets have long been recommended as part of the process of developing a climate

[509] This plan provides more detailed guidance and tools to local governments in Appendix D (Local Actions).
[510] Cal. Code of Regs., tit. 14, § 15183.5.
[511] California Governor's Office of Planning and Research. n.d. "General Plan Guidelines - Chapter 8 Climate Change."

action plan.[512] One challenge local jurisdictions have faced is how to evaluate and adopt quantitative, locally appropriate goals that align with statewide goals. An effective response to this challenge is to focus on goals that can help implement overall state priorities—enabling the key transformations California needs.

There are many ways that local governments can make key contributions to this transformation, depending on the characteristics of their jurisdiction and community. For example, some jurisdictions will inherently have more land capacity to remove and store carbon, whether through natural and working lands or by other means. Other jurisdictions will be host to GHG-emitting facilities that serve necessary functions and will take time to transition to clean technology (e.g., municipal wastewater treatment plants, landfills, and energy generation and transmission facilities). It is important to recognize that we will need to build new energy production and distribution infrastructure, and repurpose existing ones, for clean technology and energy before we are able to phase down existing fossil sources. There also will be a need to handle the significant amount of biomass resulting from sustainable forest management for catastrophic wildfire prevention, agricultural waste, and landfill diversion.

Regional efforts can support change too: energy and transportation systems that serve Californians do not stop at jurisdictional boundaries, and some local decisions can have ramifications for other communities. For instance, Metropolitan Planning Organizations (MPOs) can help to integrate local efforts by planning consistent with the Scoping Plan and Climate Action Plan for Transportation Infrastructure, including by removing polluting roadway capacity expansions from project pipelines and instead focusing on climate-friendly solutions. These varied capabilities and needs should be taken into account in setting targets for local climate plans. For instance, although net zero targets can often be valuable and achievable, and mitigation is important, targets should be considered in the larger context of these goals. This all means any GHG targets on a local scale should take into consideration the actions and outcomes included in this Scoping Plan. Jurisdictions considering “net zero” targets should carefully consider the implications such targets may have on emissions in neighboring communities and the ability of the state to meet our collective targets.

Jurisdictions without formal CAPs also have important opportunities within this context. These jurisdictions can still take actions that effectively translate key state plans, goals, and targets, including those articulated in this Scoping Plan for local action. For instance, state ZEV targets can advance local efforts to promote broad and equitable access to charging and fueling. Similarly, local jurisdictions can enable reduced dependence on

[512] Climate Smart Communities. 2014. Climate Action Planning Guide. https://cdrpc.org/wp-content/uploads/2015/05/CAP-Guide_MAR-2014_FINAL.pdf.

single-occupancy vehicles by supporting dense infill housing and transit, among other actions. Such actions can be reflected in particular project plans, in general plans, or through other local policies. Regional partnerships among these jurisdictions can also help tap resources and provide for more effective overall action.

Unlocking CEQA Mitigation for Local Success

The California Environmental Quality Act also provides important tools for lead agencies to support the achievement of the state's GHG and VMT reduction goals. Although many climate-friendly local government actions already fall into categories that may not require a full CEQA analysis, thanks to streamlining or other tools, and although certain product types (such as affordable infill housing) are generally clearly consistent with state climate goals, CEQA analyses may still sometimes be required. CEQA can be a powerful and useful tool to engage the public, identify additional opportunities to support climate efforts, and localize change. It is important that lead agencies look for ways to use CEQA to support these core purposes, ensuring that these processes do not become sources of delay but instead unlock more opportunities. The uncertainty analysis in Chapter 2 evaluates how project implementation delays can lead to missed state climate targets and continued dependence on fossil energy. Mitigation measures applied in the communities affected by projects subject to CEQA have the added benefit of improving health, social, and economic resiliency as climate impacts worsen.

Appendix D (Local Actions) explores the role of local government action and CEQA in detail. As discussed there, an important CEQA-related tool is mitigation—which can be used to further drive local action consistent with state climate goals. When a lead agency determines that a proposed project would result in potentially significant GHG impacts due to its GHG emissions or a conflict with state climate goals, the lead agency must impose feasible mitigation measures to minimize the impact. Appendix D (Local Actions) provides suggestions for prioritizing the various types of mitigation, starting with on-site GHG-reducing design features[513] and mitigation measures, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. After exhausting all the on-site GHG mitigation measures, CARB recommends prioritizing local, off-site GHG mitigation measures, including both direct investment and voluntary GHG reduction or sequestration projects, in the neighborhoods impacted by the project. This could include, for example, development of a neighborhood green space, investment in street trees, or expansion of transit services. Implementing GHG mitigation measures in the project's vicinity would allow the project proponent and the lead agency to work directly with the affected community to identify and prioritize the

[513] Cal. Code of Regs., tit. 14, § 15126.4(c)(2) and (3).

mitigation measures that meet their needs while minimizing multiple environmental and societal impacts.

Once all potential on-site and local off-site GHG mitigation measures have been incorporated to the extent feasible, Appendix D (Local Actions) provides further suggestions for prioritizing other mitigation types, including non-local off-site mitigation, and voluntary offsets issued by a recognized and reputable voluntary carbon registry (as listed on CARB's website[514]) may be appropriate. Additional in-state mitigation also may be available in the upcoming SB 27[515] (Skinner, Chapter 237, Statues of 2021) registry, which will serve as a database of projects in the state that drive climate action on natural and working lands. Lead agencies should use substantial evidence to demonstrate that the project proponent explored and prioritized investments in feasible, local mitigation prior to moving mitigation to a geography located farther away from the project.

Communities and Environmental Justice

As noted in Board Resolution 20-33,[516] it is incumbent on CARB to function as an agent of responsible social change, especially when it is clear that environmental injustices continue to persist for low-income communities, tribes, and communities of color.

State law defines *environmental justice* as the fair treatment of all people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.[517] Government Alliance for Race and Equity (GARE)[518] defines *racial equity* as when race can no longer be used to predict life outcomes and outcomes for all groups are improved.

For this Scoping Plan to be successful, it must address environmental justice and advance racial equity. Implementation of the plan needs to address the needs of those communities that are disproportionately burdened by climate impacts and continue to face significant health and opportunity gaps. Now, we need to ensure our actions allow these communities to not only have a seat at the table, but also inform and shape the policies

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[514] CARB. 2022. Offset Project Registries. https://ww2.arb.ca.gov/our-work/programs/compliance-offset-program/offset-project-registries.

[515] SB 27. Carbon sequestration: state goals: natural and working lands: registry of projects. (SB 27, Skinner, Chapter 237, Statutes of 2021). https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB27.

[516] CARB. 2020. Resolution 20-33: A Commitment to Racial Equity and Social Justice. October 22. https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2020/res20-33.pdf.

[517] Gov. Code, § 65040.12, subd. (e).

[518] Local and Regional Government Alliance on Race and Equity. 2015. *Advancing Racial Equity and Transforming Government: A Resource Guide to Put Ideas into Action.* Page 9. https://racialequityalliance.org/wp-content/uploads/2015/02/GARE-Resource_Guide.pdf.

to ensure their communities thrive. With this Scoping Plan, the state also adds a new tool to identify which communities will be the least resilient in the face of selected climate impacts and will see disproportionate economic impacts as a result. As described in Chapter 3, the CVM will enable the state to target programs and policies to build resiliency in the specific regions that will feel climate impacts more acutely due to existing health and opportunity disparities leading to disproportionate economic impacts. This tool will be critical in the state's efforts to address climate impacts while accounting for environmental injustices and racial inequities. CARB will incorporate the CVM into its work as it moves forward and will share this new tool with other agencies to align our efforts. The goal is to keep expanding the CVM to incorporate additional climate impacts to better identify disproportionate economic impacts as community level data becomes available.

AB 617 is another important tool for both Air Districts and CARB to bring resources to communities that have long been disproportionately burdened by poor air quality. While AB 617 does not require local agencies to participate in the Community Air Protection Program, several AB 617 communities are finding ways to bring local land use agencies to the table to respond to community priorities. We look forward to more opportunities to foster relationships with local authorities and continued collaboration between state and air district programs.

In alignment with AB 32, and to ensure environmental justice and racial equity were integrated into this Scoping Plan, CARB reconvened the AB 32 Environmental Justice Advisory Committee (EJ Advisory Committee) to advise CARB on the development of this Scoping Plan. Since reconvening in May 2021, the EJ Advisory Committee has engaged in the following activities:

- In October 2021, the EJ Advisory Committee sent a letter to the governor requesting a timeline extension for the Scoping Plan process. In response to the EJ Advisory Committee's letter, CARB modified this Scoping Plan process[519] and committed to an active engagement with the EJ Advisory Committee following the approval of this Scoping Plan. The EJ Advisory Committee also presented to the CARB Board[520] at its October 2021 Board meeting, reiterating its request for a timeline extension, as well as sharing additional concerns about process.

[519] Randolph, L. M. 2021. LMR October 19 response to Environmental Justice Advisory Committee Letter. https://ww2.arb.ca.gov/sites/default/files/2021-10/LMR%20October%2019%20response%20to%20EJAC%20Letter%20Final.pdf.

[520] Argüello, M. D., K. Hamilton, S. Taylor, and P. Torres. 2021. EJ Advisory Committee Co-Chair Informational Presentation to CARB Board. October 28. https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2021/102821/21-11-4pres.pdf.

- In December 2021, the EJ Advisory Committee shared its responses to Scenario Input Questions,[521] as well as a narrative document outlining their concerns[522] around the process, the need for evaluation, and the need for a tribal representative. In response to the EJ Advisory Committee Scenario Input Questions, CARB incorporated the EJ Advisory Committee responses into the Scenario Assumptions document,[523] and modeled results from PATHWAYS.[524] In response to the EJ Advisory Committee's concerns, CARB worked diligently to appoint a tribal representative[525] in February 2022, and to outline additional opportunities for the EJ Advisory Committee to engage in the Scoping Plan process.[526]
- In March 2022, the EJ Advisory Committee presented at the joint EJ Advisory Committee / CARB Board meeting[527] and walked through their preliminary draft recommendations to inform this Scoping Plan. In April, the EJ Advisory Committee shared its revised preliminary draft recommendations[528] to inform this Scoping Plan.
- In September 2022, the EJ Advisory Committee presented at the joint EJ Advisory Committee / CARB Board meeting[529] and engaged in discussion about priority items as they relate to incorporating environmental justice into the Scoping Plan. By the end of September, the EJ Advisory Committee shared its final

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[521] EJ Advisory Committee. 2021. EJ Advisory Committee Final Responses to CARB Scenario Inputs. December 2. *https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Final%20Responses%20to%20CARB%20Scenario%20Inputs_12_2_21.pdf*.

[522] EJ Advisory Committee. 2021. EJ Advisory Committee Responses to Scenario Input Questions. EJ Advisory Committee narrative document regarding scenario input recommendations. December 1. *https://ww2.arb.ca.gov/sites/default/files/2021-12/EJAC%20Narrative%20Document%20re%20Scenario%20Input%20Recommendations%2012_1_2021.pdf*.

[523] CARB. 2021. PATHWAYS Scenario Modeling. *https://ww2.arb.ca.gov/sites/default/files/2021-12/Revised_2022SP_ScenarioAssumptions_15Dec.pdf*.

[524] E3. 2022. CARB Draft Scoping Plan AB32 Source Emissions Initial Modeling Results. March 15. *https://ww2.arb.ca.gov/sites/default/files/2022-03/SP22-Model-Results-E3-ppt.pdf*.

[525] CARB. AB32 EJ Advisory Committee Meeting, February 28, 2022 CARB Update. *https://ww2.arb.ca.gov/sites/default/files/2022-02/CARB%20EJAC022822presentation.pdf*.

[526] Fletcher, C. 2021. CARB Response to EJ Advisory Committee Narrative. CARB. December 15. *https://ww2.arb.ca.gov/sites/default/files/2021-12/CARB%20response%20to%20EJAC%20Narrative.pdf*.

[527] EJ Advisory Committee. 2022. EJ Advisory Committee Presentation: Preliminary Draft Recommendations. March 10. *https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/031022/ejacpres.pdf*.

[528] AB 32 EJ Advisory Committee. Draft Recommendations. *https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/031022/ejacrecsrevised.pdf*.

[529] EJ Advisory Committee. 2022. EJAC Presentation. September 1. *https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/ejacpres.pdf*

recommendations[530] to inform this Scoping Plan. To the extent possible, CARB has incorporated and cited these recommendations through this Scoping Plan.

In addition to the activities listed above, Central Valley EJ Advisory Committee members hosted a successful community engagement workshop[531] in San Joaquin Valley in February 2022 with over 100 attendees. Members of EJ Advisory Committee hosted a statewide community engagement workshop[532] in June 2022 with more than 165 attendees. Throughout the EJ Advisory Committee's process, members of the Committee continued to work with their communities to ground truth their recommendations to inform the development of the Scoping Plan. The EJ Advisory Committee worked hard to ensure the voices of those communities most burdened by climate impacts were reflected in the plan. The EJ Advisory Committee will continue to play an ongoing role in the implementation of this Scoping Plan to ensure environmental justice and racial equity are prioritized in our effort to address the climate challenge before us.

To the extent possible, the EJ Advisory Committee's recommendations were integrated throughout the plan. This plan directly cites instances where there is alignment between the plan and the EJ Advisory Committee recommendations. This approach seeks to ensure there is more transparency and identify consensus that exists, as well as relevant ways equity and environmental justice are addressed in this plan and in the planning for future related implementation activities. CARB is dedicated to its efforts to ensure this plan does not leave communities behind.

As this Scoping Plan moves into the implementation phase, there will be a need to better understand how to address EJ Advisory Committee recommendations on the following topics:

- Actions under the jurisdiction of other agencies: there are certain EJ Advisory Committee recommendations that are outside of CARB's jurisdiction. As the EJ Advisory Committee continues to convene, it would be helpful to understand the

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[530] EJ Advisory Committee. 2022. EJAC 2022 Scoping Plan Recommendations. September 30. https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2022/090122/finalejacrecs.pdf

[531] San Joaquin Valley Climate Justice & the Scoping Plan. 2022. https://ww2.arb.ca.gov/sites/default/files/2022-07/SJV%20Climate%20Justice%20%26%20the%20Scoping%20Plan%20Workshop%20Report%20out%20%26%20Recommendations_5.2022.pdf

[532] EJAC. 2022. *EJAC/Community Engagement Synthesis Report '22.* https://ww2.arb.ca.gov/sites/default/files/2022-07/EJAC-CommunityEngagement-SynthesisReport-2022-English%26Spanish.pdf.

role that CARB can play as it relates to the EJ Advisory Committee's recommendations for actions outside CARB's jurisdiction and coordinates with sister agencies.

- Actions that require legislative direction: there are certain EJ Advisory Committee recommendations that would require legislative action. As the EJ Advisory Committee continues to convene, it will be helpful to understand how CARB can work with the EJ Advisory Committee to share these recommendations with the appropriate members of the Legislature.
- Actions directly tied to implementation activities: This Scoping Plan is not an implementation document; it is a plan to chart a course to continue to reduce GHG emissions and achieve carbon neutrality. Once the Scoping Plan is approved, there will be follow-up action at CARB, as well as at other agencies. In these follow-up efforts, there will be a role for ongoing EJ Advisory Committee engagement.
- Actions to implement recent legislation, such as SB 905.

CARB proposes to continue to work with the EJ Advisory Committee to better understand how to move forward on EJ Advisory Committee recommendations that fall into the topics listed above and any other recommendations that were not included in this plan. It is also important to note that there are numerous recommendations where CARB shares the goals of the EJ Advisory Committee and can assist in implementation steps. Examples include the following:

- CARB shares the goal of prioritizing non-fossil energy generation and supports non-fossil projects and opportunities to locate behind-the-meter clean resources in communities of concern in programs such as the Solar on Multifamily Affordable Housing program.
- CARB will engage with agencies and academic institutions to further workforce development.
- Many other recommendations related to financial support for various energy projects, such as microgrids, are within the purview of the CPUC or local publicly owned utilities. Similarly, utility scale projects are within the jurisdiction of other agencies. However, CARB supports strategies identified in the recommendations such as offshore wind to reduce the reliance on fossil fuel generation.
- CARB is supportive of rooftop solar, although it is not within CARB's jurisdiction to determine how incentives for those projects are structured.
- CARB is supportive of strong energy decarbonization goals, recognizing that increased reliance on electrification in transportation and other sectors will create significant demand for electricity, and therefore ensuring reliability of a decarbonized grid is a critical need for the state.
- In the transportation sector, CARB is supportive of the EJ Advisory Committee's recommendations to maintain aggressive zero emission vehicle goals consistent

with its statutory mandate to ensure regulations are technologically feasible and in alignment with Governor Newsom's ZEV Executive Order (EO N-79-20). CARB looks forward to continued engagement on rulemakings that will implement these goals.

- As noted elsewhere in this plan, CARB is supportive of the Caltrans California Transportation Plan 2050 and the California Climate Action Plan for Transportation Infrastructure.
- CARB is supportive of additional public support for transit. CARB is supportive of locating EV charging in low-income communities and communities of color.
- CARB is supportive of prioritizing funding incentives for transit and heavy- and medium-duty vehicles, although CARB does believe there is an important role for incentives that support adoption of light-duty vehicles for the time being. CARB will also be opening a rulemaking on the Low Carbon Fuel Standard to ensure it continues to support clean fuels that will displace petroleum fuels and will consider the EJ Advisory Committee recommendations on this program.
- In the industrial sector, in addition to the strategies discussed more fully in this Scoping Plan, CARB continues to work with the Legislature, local agencies, and air districts to support, implement, and enforce effective reductions in emissions of GHGs and air pollutants in stationary sources. The air districts have the authority to directly issue permits addressing a facility's criteria pollutant and toxics emissions levels. These levels are set after careful permit review, under district regulation and statute. However, AB 617 directs and authorizes CARB to take several actions to improve data reporting from facilities, air quality monitoring, and pollution reduction planning for communities affected by a high cumulative exposure burden. CARB will continue to implement AB 617 and look for ways to strengthen the Community Air Protection Program.
- Considerations around the phaseout of oil and gas extraction and refining, and the role of carbon capture are discussed more thoroughly in Chapter 2.

As CARB continues to engage with the EJ Advisory Committee—in addition to the EJ Advisory recommendations that have been integrated throughout this plan—below are the following commitments that CARB is making to ensure that environmental justice is integrated in this plan and its implementation:

- Building decarbonization is a pillar of this Scoping Plan and CARB commits to working closely with state and local agencies to implement the EJ Advisory Committee recommendations that call for prioritization for residents in low-income communities and communities of color in this transition.
- CARB commits to sharing the EJ Advisory Committee's recommendations with the CEC, CPUC, and other agencies administering funds to support building

decarbonization, and to work closely with those agencies as they engage in public processes to further building decarbonization.

- CARB has committed to review the Cap-and-Trade program and determine what potential legislative or regulatory amendments could be necessary to ensure the program continues to deliver GHG reductions needed to achieve the statutory climate goals. In that process, CARB will consider the recommendations of the EJ Advisory Committee[533] and Independent Emissions Market Advisory Committee,[534] as well as others.

Critically, the EJ Advisory Committee makes numerous recommendations centered around tracking progress of the various strategies in this Scoping Plan. Currently, progress is tracked and reported in numerous ways, including the annual GHG inventory and reports to the Legislature. Part of the ongoing work of implementation, however, will include consideration of ways to provide more data and information to the public, such as rates of deployment of clean energy and technology as described in Chapter 1. CARB will also continue to collaborate with CDPH and OEHHA on health metrics to track cumulative benefits of air pollution and climate programs, especially in low-income communities and communities of color.

As noted earlier in this document, the EJ Advisory Committee will continue to play a vital role in the Scoping Plan and its implementation to ensure environmental justice and racial equity are prioritized in our effort to address the climate challenge before us. This includes ongoing EJ Advisory Committee engagement to advise CARB on the development of the Scoping Plan and any other pertinent matters in implementing AB 32. The ongoing EJ Advisory Committee will help to ensure integration of environmental justice in implementation efforts as it relates to AB 32, and also help CARB as we work toward a future where race is no longer a predictor for life outcomes.

Academic Institutions and the Private Sector

Academic institutions produce and present the latest science on both the impacts of, and actions to reduce, climate change damages. They are also leading the way by

[533] California Legislative Information. Bill Text – AB 32. Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006. (AB 32, Nuñez, Chapter 488, Statutes of 2006). *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200520060AB32*.

[534] California Legislative Information. Bill Text – AB 398. California Global Warming Solutions Act of 2006: market-based compliance mechanisms: fire prevention fees: sales and use tax manufacturing exemption. (AB 398). *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398*.

establishing their own climate goals and GHG emissions reductions targets.[535, 536, 537] They are incubators for innovation and knowledge in clean energy and technology and play an important role in adding to the wealth of robust information to inform policies and programs. Academic institutions have the ability to fill knowledge gaps and push us toward new frontiers. As we move forward, we will continue to see these institutions as partners and resources that can help CARB look for ways to accelerate and introduce actions to reduce GHG emissions and remove and store carbon.

As such, it will be important to maintain and enhance relationships with academic institutions, including community colleges. Community colleges are more likely to have a large proportion of first generation students or students that come from low-income communities or communities of color. The perspective of this diverse student body will be critical to inform discussions on climate change damages and mitigation efforts. This student body is also a future workforce, and courses to teach the skills for a sustainable economy are a chance to close historical opportunity gaps. Importantly, many of the students at community colleges are local residents and community members. This engagement provides another way to invest in communities across our state. The Foundation for California Community Colleges is already leading the way through innovate programs such as their Good Jobs Challenge - California Resilient Careers in Forestry.[538] These types of programs could be replicated across other sectors. CARB will evaluate how to leverage the requirements in AB 680 on workforce development in the California Climate Investments programs with the work at the Foundation for California Community Colleges.

As noted in Chapter 1, public and private partnerships will be important as we move forward in the great energy transition. But the private sector is also important in the context of research and development and deployment. Many of these companies have the resources and expertise to build and produce the clean technology and energy we will need. It was through the efforts of several private companies (Bell, Exxon, Telecom

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[535] University of California. Our Commitment. *https://www.universityofcalifornia.edu/initiative/carbon-neutrality-initiative/our-commitment*.
[536] California State University. Energy, Sustainability, & Transportation. *https://www.calstate.edu/csu-system/doing-business-with-the-csu/capital-planning-design-construction/operations-center/Pages/energy-sustainability.aspx*.
[537] California Community Colleges Chancellor's Office. Climate Action and Sustainability. *https://www.cccco.edu/About-Us/Chancellors-Office/Divisions/College-Finance-and-Facilities-Planning/Facilities-Planning/Climate-Action-and-Sustainability?msclkid=4a72350ec4f511ecaf292c6b14ac9a4f*.
[538] Foundation for California Community Colleges. 2022. Good Jobs Challenge. Developing Resilient Careers in Forestry for Californians. *https://foundationccc.org/What-We-Do/Workforce-Development/Good-Jobs-Challenge*.

Australia) that the photovoltaic solar panels in use today were developed.[539] Similarly, it was companies such as General Electric and Texas Instruments that contributed to the development of hydrogen fuel cells.[540] This Scoping Plan includes the known and emerging clean technologies and fuels available today. The private sector spirit of invention, improvement, and innovation must continue to deliver new tools in the fight against climate change.

Individuals

This Scoping Plan not only projects ambitious availability of clean technology and energy, but also includes aggressive assumptions about consumer adoption of ZEVs, heat pumps, and other energy efficiency practices, among others. When it comes to climate change mitigation, the sum of the parts matters. Only when we add up the impacts of the choices we make do we understand the true impact on GHG emissions. Today, many Californians have opportunities to choose between driving a car, taking a bus, biking, or walking. Many can choose to install a heat pump or buy an electric cooktop. Together, we can increase these opportunities and pick the future we want. We can start or transform businesses that create clean jobs, innovate new technologies, or introduce new systems. We can engage with fellow workers to support durable paths for labor in a clean economy. And we can choose to engage with our community, tribes, and our governments to advocate for change, call out challenges, and propose solutions. Our choices will help determine California's climate future. Down one path is a future of climate impacts that will continue to worsen and further increase disparities across communities. Down the other is a future that avoids the worst impacts of climate change, improves air quality—especially for the most burdened communities—and fosters new economic and job opportunities to support a sustainable economy.

Importantly, we must acknowledge that historical decisions have resulted in health and opportunity gaps for residents in low-income communities and communities of color. Not everyone has the resources or access to make these choices—to buy a ZEV, install a heat pump, or use public transit to get to work. It is here that government can help. Government, at multiple levels, can fund programs and structure policies to provide consumers with more choice and to support them in adopting cleaner technology options. Whether through affordable energy rates or assistance in purchasing zero emission vehicles and appliances, we can use the transition to a carbon neutral economy as an opportunity to close some of these persisting opportunity gaps. By acting now, we can

[539] Californiasolarcenter.org. Passive Solar History. http://californiasolarcenter.org/old-pages-with-inbound-links/history-pv/.
[540] Fuel Cell Store. History of Fuel Cells. https://www.fuelcellstore.com/blog-section/history-of-fuel-cells?msclkid=04a19450c50211ec8d20f2afff4039fe.

change our planet’s fate and build a more resilient, healthier, and equitable future for all Californians.

APPENDIX E
SUSTAINABLE AND EQUITABLE COMMUNITIES

Policy Framework to Advance Sustainable and Equitable Communities

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1. Introduction

Californians deserve great places to live – inclusive urban, suburban, and rural communities throughout the many regions of California – that provide a range of affordable housing and transportation options, efficient access to a variety of jobs and services, clean air, opportunities to safely walk and bike, and open space and recreational opportunities. Current and future generations have the right to healthy environments, protected natural and working lands that support carbon sequestration and enhance climate resilience, and reduced overall demand for energy and other natural resources. These are the core characteristics of sustainable and equitable communities, and are achieved, in part, through the combination of more compact development and enhanced transportation options that together reduce individuals' need to drive.

Building more sustainable and equitable communities in this way can help California address two of its greatest challenges. The first is meeting the State's goal to achieve carbon neutrality no later than 2045 to prevent the most adverse impacts of climate change and provide Californians healthier air to breathe. The second challenge is building more inclusive and equitable places that prioritize providing low-income and Black, Indigenous, and People of Color (BIPOC) communities all the necessary opportunities to thrive and repairing the harms caused by decades of discriminatory transportation, land use, and housing policies and practices to people of low-income and BIPOC communities.

The next section of the appendix discusses impactful opportunities California can unlock by moving away from a cars-first model and building communities and infrastructure that enable a wider range of access and mobility choices. The third section of the appendix presents a policy framework across four strategy areas – transportation planning and funding, transportation system management, new mobility, and land use and development – for the State to create more sustainable and equitable communities that reduce driving. Each strategy area includes a vision, objectives, and potential actions developed by CARB and its State government partners, with the intent that the further development and implementation of each action would be subject to additional public processes and collaboration with key stakeholders. The framework of strategies discussed in this document does not and cannot mandate any specific action or create any legal obligations. This planning document provides a menu of critical potential actions and approaches that would need to be further developed through appropriate public processes.

While the State has taken steps in each of these strategy areas, this appendix presents ways to build on that work.

2. The Need for Sustainable and Equitable Communities

Many of California's cities, towns, suburbs, and rural areas were designed and built primarily around car travel, and the legacy of that vision has been codified in public policies, business practices, and cultural expectations. For most communities in California, choices made in the past and bolstered for decades have delivered land use

patterns that place daily needs far from each other along streets designed for high-speed driving. For decades, California has widened highways and roadways in an effort to address traffic congestion. By doing so, it has facilitated more car dependence and, ironically, more congestion, with resulting increases in vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions.

Efforts to advance more sustainable and equitable communities that reduce the need to drive have been ongoing in California for many years, most prominently under the State's 2008 Sustainable Communities and Climate Protection Act or Senate Bill (SB) 375 (Steinberg, Chapter 728, Statutes of 2008), under which Metropolitan Planning Organizations (MPOs) must show coordinated land use and transportation strategies to meet regional passenger vehicle GHG reduction targets. However, as CARB's recent progress report on implementation of SB 375 indicates, individuals are driving more miles per day than ever before, and California is not on track to meet its associated climate goals under SB 375.[1]

Beyond reducing driving, far too often in California's history, new highway and major roadway infrastructure displaced BIPOC communities, increased divisions in communities, and intensified noise, traffic, and air pollution in already impacted communities. California can advance inclusive and efficient places to live if it breaks away from an entrenched policy and cultural status quo that has perpetuated car dependence and caused a significant share of California's climate-changing GHG emissions.

2.1 Zero-emission vehicles are not enough to solve the climate crisis.

Contrary to popular belief, zero-emission vehicles (ZEV) alone are not enough to solve the climate crisis. The 2022 Scoping Plan illustrates that despite cleaner vehicles and low-carbon fuels, the path to carbon neutrality by 2045 also depends on reducing per capita VMT (the total passenger vehicle miles driven by an average person in California on any given day). To meet the carbon neutrality goal, the Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles by 2030 (a 25 percent reduction) and to 17.2 miles per day by 2045 (a 30 percent reduction).

Approximately 30 percent of light-duty vehicles on the road in 2045 will still burn fossil fuels even with all new car sales being ZEVs by 2035 through implementation of CARB's Advanced Clean Cars II regulations.[2] Additionally, driving, regardless of vehicle technology, will also continue to produce particulate emissions from brake and tire wear.

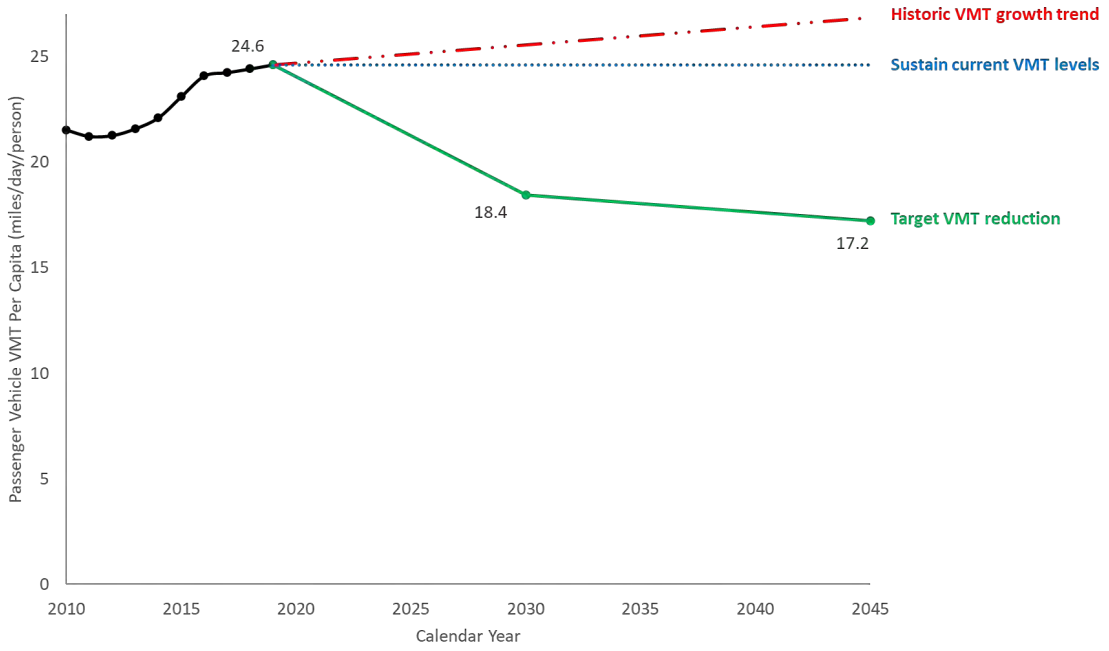
Figure W depicts the reduction in VMT identified by the Scoping Plan as necessary to help achieve the State's GHG reduction goals (green solid line), accompanied by a

[1] For more information on progress made toward achieving climate goals under SB 375 see: *https://ww2.arb.ca.gov/resources/documents/tracking-progress*

[2] For more information on the Advanced Clean Cars II regulations adopted by CARB's board on August 25, 2022, see: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii

trajectory whereby average per capita daily driving continues to increase at its historic average growth rate (red line with dashes and dots).[3] The blue dotted line shows a trajectory where average per capita daily driving remains unchanged from 2019 levels. Substantial and immediate action is needed to reverse current trends in order to reduce VMT to support achieving carbon neutrality by 2045.

Figure W. VMT trajectories and California's GHG goal



2.2 Sustainable and equitable communities reduce GHG emissions beyond the transportation sector, too.

Beyond having a direct impact on GHG emissions from cars, reducing individuals' need to drive to fulfill daily needs can also support emissions reductions in other sectors. For example, more compact infill development generally generates lower emissions because attached building types and smaller residential unit sizes require fewer emissions to construct and less energy to heat and cool.[4,5] Studies have estimated that infill development uses 10 to 20 percent less residential energy due to changes in unit types, sizes, and locations. Additional benefits include reduced heat island effects from paved

[3] There is considerable range in potential future VMT based on many exogenous, socioeconomic, and technological factors. This line represents historical VMT trends from 2001-2019 extended to 2045, normalized by the future forecasted population.

[4] Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. "Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030." Available at: https://ternercenter.berkeley.edu/research-and-policy/right-type-right-place/

[5] Ewing, Reid & Rong, Fang. 2008. "The impact of urban form on U.S. residential energy use." *Housing Policy Debate, 19(1), 1-30.* Available at: https://www.tandfonline.com/doi/abs/10.1080/10511482.2008.9521624

surfaces like parking lots, which lowers long-term building energy use, and reduced emissions from the construction of infrastructure.[6]

In contrast, the conversion of natural and working lands to residential or commercial development causes emissions from loss of carbon stored in these systems, as well as reduces the capacity of these lands to sequester carbon from the atmosphere.[7]

The 2022 Scoping Plan Update calls for reductions in GHG emissions from these sectors. More sustainable and equitable development patterns and transportation choices will support these reductions.

2.3 Departing from the status quo would ease inequitable burdens on California's low-income and BIPOC communities.

California can offer accessible, safe, and healthy communities for all by moving away from a legacy of transportation and land use decision-making that has marginalized all too many, but to a much greater extent BIPOC communities. California's transportation agencies have acknowledged that racist policies and decisions made when building and expanding the transportation system divided communities of color and primarily benefited white suburban commuters.[8] Discriminatory land use, lending, and real estate practices and policies also excluded and harmed BIPOC households and led to lasting inequality.

Some of these impacts have included less access to jobs and services, reduced household income and wealth generation, reduced social mobility, the burden of vehicle ownership, and the risk of job loss if a vehicle breaks down.

Rather than continuing these practices, California can make decisions that allow for integrated communities that are rich with services and culture. Shifting California's development patterns and transportation systems is critical to address existing injustices by making livable, affordable homes with multi-modal connections to jobs, services, open space, and education available to all Californians, not just the white and the wealthy.

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[6] Ford, Jonathan. 2010. "Smart Growth & Conventional Suburban Development: An infrastructure case study completed for the EPA." Adapted from "Comparative Infrastructure & Material Analysis" under EPA contract EP-W-05-25. Available at: *https://archive.epa.gov/epa/sites/production/files/2014-07/documents/mbd-epa-infrastructure.pdf*

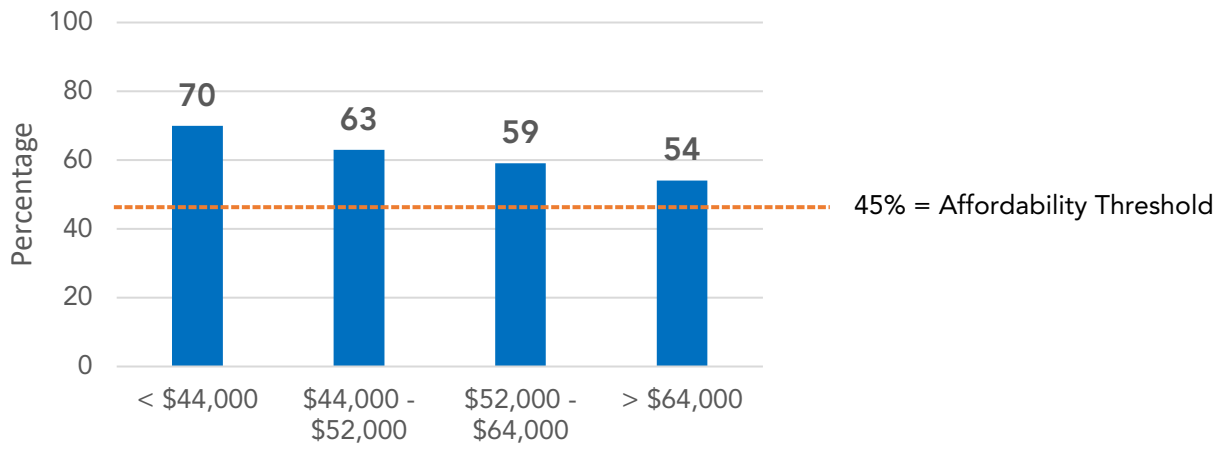
[7] California Air Resources Board. Accessed May 5, 2022. California Natural & Working Lands Inventory. Available at: *https://ww2.arb.ca.gov/nwl-inventory*.

[8] See the equity and VMT policy discussion beginning on page 107 of the California Air Resources Board's *2020 Mobile Source Strategy*, available at: https://ww2.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf.

The Burden of Housing and Transportation Costs

An example of these racial and social inequities is the unequal impact of housing and transportation costs. Low-income households pay a significantly higher portion of household income for housing and transportation. In California counties that have a median household income of $44,000 or less, housing and transportation cost the average household over 70 percent of their income, when the recommended affordability threshold is 45 percent (Figure X).[9] Given the high cost of car ownership and operation, this housing and transportation cost burden has the highest impact on communities where people have few options but to drive.

Figure X. Percentage of Income Spent on Housing and Transportation in California by Median County Household Income



Source: H+T Index 2017, ACS 2015

2.4 Reducing the need to drive advances other quality of life outcomes and opportunities.

Communities with shorter driving distances and more options for active travel produce benefits beyond the environment and equity, including reduced financial burden, better access to opportunities, and improved public health.

- **Reduced financial burden:** Reducing the need to drive saves households substantial sums of money. U.S. households spent an average of nearly $10,000 in 2019 on vehicles and fuel.[10] Driving fewer miles reduces fuel and maintenance expenses and may even allow a household to reduce the number of vehicles owned.

[9] Center for Neighborhood Technology. Accessed May 5, 2022. Housing + Transportation Index. Available at: https://cnt.org/tools/housing-and-transportation-affordability-index.

[10] U.S. Department of Transportation, Bureau of Transportation Statistics. Accessed May 5, 2022. Transportation Economic Trends. Available at: https://www.bts.gov/product/transportation-economic-trends.

- **Better access to opportunities:** Changes to the built environment that increase alternatives to driving give households more and affordable options to access services, jobs, and other activities, and thus expand economic and social opportunities.[11] These changes empower people who do not own cars and people who cannot drive, such as seniors, children, and people with disabilities, protecting their ability to hold a job, run errands, or connect with others.
- **Economic efficiency:** A development pattern that enables the same level of economic interaction with less dependence on driving can sustain the economy at a far lower cost to the public by decreasing highway maintenance costs, which have ballooned to over $500 million per year in California.[12] Infill development can also reduce road and utility line lengths, as well as the travel distances needed to provide public services like police, garbage collection, and emergency response.[13,14,15] Across the U.S., congestion cost the equivalent of $190 billion in 2019 in fuel costs and lost time.[16] Being able to access destinations more efficiently will reduce these effects on the economy.

[11] Lucas, K. 2012. "Transport and social exclusion: Where are we now?" *Transport Policy, 20, 105-113.* Available at: *https://www.sciencedirect.com/science/article/pii/S0967070X12000145*

[12] U.S. Department of Transportation. Accessed May 5, 2022. Highway Statistics 2015. Available at: *https://www.fhwa.dot.gov/policyinformation/statistics/2015/sf12.cfm*

[13] Burchell, Robert W., & Mukherji, Sahan. 2003. "Conventional Development Versus Managed Growth: The Costs of Sprawl." *American Journal of Public Health, 93 (9), 1534-1540.* Available at: *https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448006/*

[14] Busch, Chris, Lew, Erika, & DiStefano, Joe. 2015. "Moving California Forward: How Smart Growth Can Help California Reach Its 2030 Climate Target While Creating Economic and Environmental Co-Benefits." Joint report by Energy Innovation Policy and Technology LLC, and Calthorpe Analytics. Available at: *https://energyinnovation.org/wp-content/uploads/2015/11/Moving-California-Forward-Full-Report.pdf*

[15] Litman, Todd. 2016. "Understanding Smart Growth Savings: Evaluating Economic Savings and Benefits of Compact Development." Victoria Transport Policy Institute. Available at: *https://trid.trb.org/view/1685041*

[16] Texas A&M Transportation Institute. *2021 Urban Mobility Report.* Available at: *https://mobility.tamu.edu/umr/report/*

People want to drive less!

While many Californians find traveling by car a necessity, many would in fact prefer to drive less. A survey in Santa Clara County in 2020,[17] before the COVID-19 pandemic, showed that 89 percent of people believed they had to drive for daily needs, but fully half wanted to drive less. Twenty percent of respondents said owning a car was a financial strain, creating a burden on disadvantaged groups. Cars also created higher levels of stress, with 41 percent of drivers reporting that they find their daily travel stressful, but only 35 percent of bicyclists and 28 percent of transit riders feeling the same.

Furthermore, Public Policy Institute of California polls in 2019 and 2020 found that fully three quarters of respondents favored encouraging local governments to change land use and transportation planning so that people could drive less.[18]

3. Framework for Action

California's predominant development patterns and transportation systems are not conducive to building sustainable and equitable communities with low VMT. Reversing the current VMT growth trend to achieve carbon neutrality requires immediate and decisive steps to address the core issues that give individuals no choice but to drive. Accordingly, the framework for action detailed in this section aims to offer a set of key policy objectives and actions that can be attained within the planning horizon of the 2022 Scoping Plan Update to effectively support more compact development and increase transportation options that reduce VMT no later than 2045.

There is no single or immediate solution to transform the ways California builds and connects communities; instead, as all available models demonstrate, reducing VMT requires a broad range of actions across all levels of government that achieve multisectoral synergies in transportation, land use, and housing.[19,20]

This framework is structured around the following four strategy areas:

[17]Fang, Kevin. 2020. "Surveying Silicon Valley on Cycling, Travel Behavior, and Travel Attitudes." Mineta Transportation Institute. Available at: *https://transweb.sjsu.edu/research/1947-Survey-Silicon-Valley-Cycling*

[18] Baldassare, Mark, Bonner, Dean, Dykman, Alyssa, & Lawler, Rachel. 2019 and 2020. "Californians and the Environment." Public Policy Institute of California. Available at: *https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2019/* and *https://www.ppic.org/publication/ppic-statewide-survey-californians-and-the-environment-july-2020/*

[19] California Department of Transportation. *California Transportation Plan 2050*, pages 97-98. Available at: *https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf*

[20] Brown, A. L., Sperling, D., Austin, B., DeShazo, JR, Fulton, L., Lipman, T., et al. 2021. "Driving California's Transportation Emissions to Zero." UC Office of the President: University of California Institute of Transportation Studies. Available at: *https://escholarship.org/uc/item/3np3p2t0*

1. **Plan and invest in a sustainable transportation system.** Identify policies to address the way California plans, invests in, and funds its transportation system to reduce the need to drive and provide high-quality alternatives that are more convenient, efficient, and low-cost than driving.
2. **Manage the use of the transportation system to advance climate and equity goals.** Consider policies to optimize the use of California's transportation infrastructure by prioritizing the movement of people over vehicles.
3. **Shape the deployment of new mobility options**. Explore policies to leverage the potential of new mobility options to increase transportation choices, enable car-light lifestyles, and mitigate inherent risks that could increase car travel.
4. **Improve alignment of land use planning and development with climate and equity goals.** Consider policies to accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection, in furtherance of the State's planning priorities.

For each strategy area, this framework offers: i) a vision for the year 2045 that would be consistent with meeting California's carbon neutrality goal while advancing equity; ii) policy objectives that should be achieved to deliver the vision for that strategy area; and iii) selected actions that should be taken as quickly as possible, especially by the State, to implement those policy objectives.

3.1 Strategy Area 1: Plan and Invest in a Sustainable Transportation System

The institutional framework for planning and funding California's transportation system has reflected and perpetuated a car-centric bias. For many decades, the majority of federal, State, and local transportation investments has been devoted to building, operating, and maintaining a network of highways, roads, and streets. While more recently other modes of transportation have received increased funding, the dominance of car-centric investments remains unchanged.[21]

In order to help meet the State's climate goals, the California Transportation Plan 2050 identifies the need to achieve a significant shift toward non-auto modes, amounting to 23 percent of trips occurring by bicycling, walking, transit, or other non-auto modes by 2050.[22] Achieving carbon neutrality no later than 2045 requires a transportation system that works more efficiently for all Californians, regardless of their income, race, ability, or where they live. This vision offers a future in which most individuals have access to high-

[21] Considering new capacity, operations, maintenance, and rehabilitation investments. For a historic review, see California Air Resources Board, *2018 Progress Report: California's Sustainable Communities and Climate Protection Act*, available at https://ww2.arb.ca.gov/sites/d89efault/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf. The more recent data is documented in the California Transportation Assessment (pursuant to AB 285), specifically Barbour, Elisa, et al, *MPO Planning and Implementation of State Policy Goals,* UC Berkeley: Institute of Transportation Studies at UC Berkeley, page 4, available at https://escholarship.org/uc/item/7p8096mh.

[22] California Department of Transportation. *California Transportation Plan 2050*, page 96. Available at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf

quality rail and public transit services and high-quality active transportation infrastructure, so that driving is a choice and not the only option.

However, this vision will not be possible without effecting a structural realignment of the State's framework for planning and funding transportation to prioritize investing in rail, transit, active transportation, and building more sustainable communities.[23] The quality of rail, public transit services, and active transportation infrastructure needs to be improved so that these modes become more time- and cost-competitive to driving.

3.1.1 Vision

To help meet the State's carbon neutrality goal no later than 2045 and advance equity, the vision is for California to have:

A. Transportation planning and funding frameworks that are clearly aligned and prioritize the State's climate, air quality, and equity goals at all levels of government.
B. Affordable, accessible, and integrated rail and transit networks that deliver equal or higher levels of accessibility to key destinations as private cars.
C. Complete networks of safe and accessible bicycle and pedestrian infrastructure that make active transportation the preferred travel mode for short distances.

3.1.2 Objectives

To achieve this vision, the State should lead efforts to:

1. **Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.** The most critical step of this realignment of the structure for planning and investing in the transportation system will be reimagining roadway projects that increase VMT in a way that meets community needs and reduces the need to drive. It has been long proven that adding highways, interchanges, and major roadways in densely populated, suburban, and rapidly growing areas only alleviates congestion in the short-term, while increasing VMT, congestion, low-density and car-oriented development, and GHG emissions in the long-term.[24,25] Another reason to re-envision investments in highway and major roadway projects that induce VMT is that such investments take away

[23] Governor Newsom's Executive Order N-19-19 and the subsequent development of the Climate Action Plan for Transportation Infrastructure (CAPTI) call for this change and provide a general framework to achieve it, respectively. See California State Transportation Agency, *Climate Action Plan for Transportation Infrastructure*, available at: https://calsta.ca.gov/-/media/calsta-media/documents/capti-july-2021-a11y.pdf

[24] California Department of Transportation. *Transportation Analysis Framework, First Edition*, pages 28-29. Available at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-09-10-1st-edition-taf-fnl-a11y.pdf

[25] Handy, Susan, & Boarnet, Marlon G. 2014. "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions." California Air Resources Board Policy Brief. Available at: https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact_of_Highway_Capacity_and_Induced_Travel_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief.pdf

resources from investments in high-quality rail, transit, bicycling, and walking in both the short- and the long-term.[26] In other words, beyond the direct impact of inducing VMT, such projects can limit government's ability to improve transportation options that facilitate mode shift and help reduce VMT.

Actions:

- Adjust the present project pipeline of State transportation investments and reconfigure the California Department of Transportation's (Caltrans) planning processes to rescope VMT and GHG-increasing projects. Caltrans and other State agencies have committed to working with stakeholders to evolve projects in their design and suite of investments to address access and connectivity challenges while ensuring their alignment with the State's climate and equity goals and other key outcomes.
- Implement all the recommendations in the Climate Action Plan for Transportation Infrastructure (CAPTI)[27] and apply the CAPTI framework to other transportation investments to prioritize allocation of transportation funding based on projects' climate, equity, and safety impacts. This includes reviewing program eligibility criteria accordingly and advocating for legislation to support the CAPTI vision when necessary.
- Increase funding for State programs that are well-aligned with climate and equity goals, such as the Active Transportation Program (ATP), the Transit and Intercity Rail Capital Program (TIRCP), and the Low Carbon Transit Operations Program (LCTOP), as recommended in the Strategic Growth Council's California Transportation Assessment.

2. **Double local transit capacity and service frequencies by 2030**. The CTP 2050 determined that, to reach the target mode shifts that deliver the State's carbon neutrality goal, California needs to double the capacity and service frequencies of the existing local public transit networks. This type of expansion of transit services would be a massive undertaking in any time, but it is more so now given the loss of ridership and associated revenue during the COVID-19 pandemic, which forced transit service to contract. Transit's fiscal crisis has only exacerbated the adverse equity impacts of the pandemic, considering people with low-income, people with disabilities, and BIPOC communities are all commonly transit dependent populations and the services available to them are now more limited. Accordingly, securing the necessary funding to return transit operations to pre-pandemic levels in the short term needs to be considered both a priority climate and equity action for the State. Increasing equitable transit investment should serve as the

[26] Considering the budgetary impact of developing new highway infrastructure and the ensuing lifespan of operation and maintenance costs.

[27] California State Transportation Agency. *Climate Action Plan for Transportation Infrastructure*. Available at: https://calsta.ca.gov/-/media/calsta-media/documents/capti-july-2021-a11y.pdf

foundation for building a broader transit program that delivers the requisite doubling of capacity and frequencies by 2030. This type of improvement will amount to having transit stops much closer to where people need to go and offering (on average) 15-minute frequencies in urban areas, 30-minute frequencies in suburban areas, and 60-minute frequencies in rural areas for all services.

Actions:

- Secure the necessary funding to return transit operations to pre-pandemic levels in the short-term.
- Complete a new update of the State's Transit Strategic Plan by 2023, fleshing out how the proposed transit service expansion would be implemented to optimize efficiency, accessibility, climate, and equity outcomes. This Plan should be developed in close collaboration with underserved communities across local jurisdictions to prioritize improvements where needs are greatest. Beyond increasing service, additional investments will need to be made to ensure affordability for low-income and other disadvantaged populations.
- Reduce the voter approval threshold for future locally funded transportation sales tax measures that exclusively fund investments in transit or active transportation.
- Explore the feasibility of introducing consultation and reporting requirements that enhance transparency and clarity around local tax measure climate and equity impacts and mitigation strategies prior to a ballot vote.
- Remove California Constitution Article XIX restrictions on using gas tax monies for transit operational funding or other sustainable transportation-related uses.

3. **Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.** Providing efficient, high-quality alternatives to the car for intercity travel is another important element for enabling car-free and car-light lifestyles that reduce VMT and advance equity for those who do not have the means to own a car and for those who can use their car less. The California Transportation Plan 2050 (CTP 2050) identified the completion of the full 2018 State Rail Plan[28] vision by 2040 as a requirement to achieve the State's carbon neutrality goal.[29] This vision includes: the main HSR line connecting San Francisco, the Central Valley, and Los Angeles, and HSR extensions to Sacramento, the Inland Empire, and San Diego; the San Francisco Downtown Extension and a new Transbay tube; key corridor investments in the Los Angeles Basin; new regional

[28] California Department of Transportation. *California State Rail Plan*. Available at: *https://dot.ca.gov/programs/rail-and-mass-transportation/california-state-rail-plan*

[29] California Department of Transportation. *California Transportation Plan 2050*, page 86. Available at: *https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf*

services in the Central Valley, on the Central Coast, and in the North Bay; and an overall intensification of services, with more frequencies and higher speeds.[30]

4. **Expand and complete planned networks of high-quality active transportation infrastructure.** The other piece of the puzzle to achieve the target mode shift away from car travel is supporting active transportation mode users, such as bicyclists and pedestrians. The vision is to ensure every city has fully realized networks of active transportation infrastructure that ensure coverage, connectivity, accessibility, and safety to all travelers, making active transportation the preferred choice for short distance travel, and improving access to public transit services. These improvements should be developed in collaboration with community-based organizations and local leaders to address the needs and priorities of historically marginalized and underserved communities.

   Actions:

   - Require complete street enhancements, including minimum space allocations for bicycle and pedestrian infrastructure, in all State-funded transportation investments.
   - Expand State funding for active transportation projects to support a broader set of project types and investments than currently funded through the Active Transportation Program.

5. **Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.** One key action to increase access to opportunities and overcome the financial burden of driving or using transit and new mobility services is to increase low-income people's direct access to bikes, e-bikes, scooters, and other alternatives to light-duty vehicles. Similar to existing rebate programs for electric vehicles, the State and other levels of government could do more to subsidize discounts or the full purchase of these alternatives to light-duty vehicles, considering their potential contributions to both reducing VMT and advancing equity goals. As is the case with other objectives shared above, these programs should be developed in close collaboration with community-based organizations and community members to prioritize specific needs and priorities of low-income and disadvantaged communities at the local level.

   Actions:

   - Increase funding and expand eligibility of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles in State incentive/rebate programs.

[30] The 2040 Vision projects 88 million daily passenger miles diverted to rail from highways, and an increase of 92 million daily passenger miles on rail as a result of the investments outlined in the California Department of Transportation's California State Rail Plan, page 14, available at: *https://dot.ca.gov/programs/rail-and-mass-transportation/california-state-rail-plan*

6. **Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.** The need to implement a replacement to the gas tax was identified by the Legislature in 2014 through SB 1077 (DeSaulnier, Chapter 835, Statutes of 2014), which described the gas tax as an "ineffective mechanism for meeting California's long-term revenue needs."[31] SB 1077 appointed the CTC in consultation with CalSTA to form a technical advisory committee to study mileage-based fees, a system in which all drivers, regardless of the fuel used by their vehicles, pay their fair share for the road maintenance and repair needs associated with their VMT, as an alternative to the gas tax. Since then, the technical advisory committee has developed recommendations and implemented a first pilot; more pilot and demonstration work is scheduled for implementation in 2023. Implementing an alternative to the gas tax by 2030 is imperative to ensuring the viability of transportation funding that can be reinvested in sustainable transportation options.

   Actions:

   - Complete mileage-based fee pilots by 2025.

3.2 Strategy Area 2: Manage Use of the Transportation System to Advance Climate, Air Quality, and Equity Goals

In California, most of the highways, roads, and streets are utilized by single-occupancy vehicles (SOV),[32] which take up the highest amount of road space of any transportation mode relative to the amount of people moved.[33] Accordingly, the outcomes of this SOV-centric travel pattern are ever-growing levels of congestion, increasing VMT, economic inefficiency, and inequity in terms of who has easier access to jobs, services, and key destinations.[34]

As detailed in Strategy Area 1, building more roadway lanes is not an answer to these problems. Instead, the solution requires reframing the use of California's transportation infrastructure, and primarily its roadways, to maximize and prioritize getting more people where they need to go rather than prioritizing moving cars. For example, implementing

[31] Because over half of vehicles on the road by 2040 will be zero-emission vehicles that need not buy any gasoline, the Standardized Regulatory Impact Assessment (SRIA) for the Advanced Clean Cars II Regulations estimated cumulative losses through 2040 of $13.4 billion to local governments and $17.7 billion to the State. See Tables 55 and 56 on page SRIA-113 and SRIA-116 of the Advanced Clean Cars 2 SRIA (January 26, 2022).

[32] California Air Resources Board. *2018 Progress Report: California's Sustainable Communities and Climate Protection Act.* Available at: *https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf*

[33] This concept is best demonstrated through images comparing road space usage by mode. See a popular example developed by i-SUSTAIN for downtown Seattle, available at: *https://www.i-sustain.com/i-impact*. The National Association of City Transportation Officials makes a similar case comparing the carrying capacity of 10-foot lane by mode, as seen in their Transit Street Design Guide, available at: *https://nacto.org/publication/transit-street-design-guide/introduction/why/designing-move-people/*.

[34] Namely, those who can afford cars for all members of the household or the cost of housing in high accessibility locations.

dedicated bus lanes, transit signal priority schemes, and other measures could enhance transit operations on major thoroughfares and other key corridors. Likewise, it is essential to prioritize the expansion of bike lanes, sidewalks, and other active transportation pathways to increase system capacity and improve accessibility for all, including people using wheelchairs and other types of mobility devices. This shift would be effectuated by leveraging the existing infrastructure to optimize for accessibility, equity, and climate outcomes through prioritizing the needs of more efficient modes of transportation, such as transit, bicycling, and walking.

3.2.1 Vision

To help meet the State's carbon neutrality no later than 2045 and advance equity, the vision is for California to have:

A. A transportation system that clearly prioritizes the movement of people over cars.
B. Restructured pricing for all modes to clearly represent the costs and benefits that each mode represents to California.
C. The necessary road space for transit and active transportation to thrive and offer high-quality services.

3.2.2 Objectives

To achieve this vision, the State should lead efforts to:

1. **Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.** Pricing strategies take many forms and can include fees for miles driven, cordon fees for operating vehicles in designated areas, parking fees, fees on congestion impact of ride-hailing services, and dynamic fees on highway lanes and other strategic roads to manage congestion.

   Authorizing transportation pricing strategies is essential to promote more efficient use of cars and to further transit and active transportation improvements. Pricing strategies present an opportunity to fund the transportation system in a more equitable and fiscally sustainable way than current funding sources, promote more efficient functioning of existing infrastructure, and fund new transportation options, especially for those who do not own a vehicle or do not drive. Some recent analyses indicate California will not meet its climate goals without implementing equitable roadway pricing strategies as these strategies are projected to achieve up to 27 to 37 percent of the needed per capita VMT reduction.[35] The four largest MPOs have included multiple pricing strategies in

[35] See Brown, A. L., Sperling, D., et al, 2021, "Driving California's Transportation Emissions to Zero," pages 237-253, UC Office of the President: University of California Institute of Transportation Studies, available at: https://escholarship.org/uc/item/3np3p2t0 and California Department of Transportation, *California Transportation Plan 2050*, page 86, available at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf.

their adopted sustainable communities strategies (SCSs) to reduce regional GHG emissions.[36]

Pricing strategies would need to be implemented with an emphasis to ensure equitable outcomes, and in accordance with local needs and context. In particular, pricing strategies need to consider the potential travel options available for low-income and other disadvantaged populations to ensure they are not unduly impacted by the strategy.

Actions:

- Permit implementation of a suite of roadway pricing strategies by 2025 in support of adopted SCSs.

2. **Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.** Offering high-quality transit services that represent a viable alternative to driving will require multiple coordinated efforts. The proposed investments to expand service capacity and increase frequencies (described in Strategy Area 1) will be ineffective if those transit vehicles end up stuck in traffic or have limited space to operate efficiently. Transit agencies and local jurisdictions across California should come together to identify, plan, and implement strategies to prioritize transit speeds and reliability over general roadway level of service and private car needs. Those strategies, which include capital investments in the strategic redistribution of the right-of-way, signaling, and supportive traffic regulations, should be prioritized in federal and State funding programs and local investment plans.

   Actions:

   - Permit the conversion of general-purpose lanes to transit-only lanes or toll lanes and full facility tolling of state-owned facilities.
   - Establish requirements to demonstrate that addressing transit bottlenecks and other transit efficiency investments are a priority in local jurisdiction and transit agency investment plans, such as a prerequisite for overall transportation project funding eligibility.

3. **Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.** The goal of TDM is to provide people with information, incentives, and other support programs that help them utilize sustainable

[36] These metropolitan planning organizations are the Metropolitan Transportation Commission (MTC), the Sacramento Area Council of Governments (SACOG), the San Diego Association of Governments (SANDAG), and the Southern California Association of Governments (SCAG).

transportation options such as transit, ridesharing, bicycling, and walking and rely less on cars. A strategic point of focus for TDM program implementation could be large employers (more than 100 employees), which often incentivize driving alone by offering free parking, gas stipends, and similar perks, and do not offer similar levels of support to employees to take transit, ride their bicycle, or walk. Employer-based TDM strategies are needed to achieve widespread implementation for the State to meet its climate goals, including commute trip reduction programs, ride-sharing programs, on-site bicycle facilities, vanpool and shuttle services, transit fare subsidies, and parking cash-out. Another strategic point of focus for TDM programs could be large developments, particularly new ones, that through decisions such as their location, design, transportation, parking infrastructure, and their treatment and general interaction with their surrounding environment ingrain high or low VMT travel patterns for decades to come.

Actions:

- End the State's subsidies for employee parking and take additional actions to move away from subsidizing public spaces for car parking more generally while expanding efforts to promote pedestrian, bicycle, and transit travel. As the State of California employs over 200,000 people, it can expand its TDM programs, which currently vary by agency and employee union.
- Build on existing resources to further support the development and enforcement of local TDM ordinances and help begin developing a statewide TDM framework.[37]

3.3 Strategy Area 3: Shape the Deployment of New Mobility Options

In the last 20 years, California has been a hub for the development of new mobility services, new technologies, and new business models for how local transportation services can be both provided and consumed. These include, among others: shared-use mobility services such as car-share, ride-hailing, and micro-mobility services; app-based services for integrated trip planning, booking, and payment; and new travel technologies such as automated vehicles (AVs) and delivery robots and drones. These services have significantly improved mobility and access to opportunities for some people who do not own or want to rely on cars. However, without additional State actions these services could also increase VMT and GHG emissions and exacerbate equity issues related to access and costs.

Achieving carbon neutrality no later than 2045 will require leveraging the benefits of new mobility to offer high-quality alternatives to driving that reduce overall VMT, while

[37] Such as: California Air Pollution Control Officers Association. *Quantifying Greenhouse Gas Mitigation Measures - A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures.* Available at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

mitigating its risks and negative impacts. For example, rather than competing with public transit, new mobility services should complement transit services, providing flexible options in locations and times of the day where and when fixed-route transit is not efficient, and facilitating trip planning, booking and payment for multimodal trips. No single mobility service alone is the answer for the diverse needs of any given community or individual; instead, the goal is to foster a rich ecosystem of strategically integrated mobility services, with transit playing the role of anchor mode, that together deliver high-quality solutions in accordance with travelers' needs.

Another critical step is ensuring equitable access and equitable impact of new mobility options. So far, new mobility's track record on equity is mixed. On the one hand, new mobility has made new forms of travel more readily available for numerous people, increasing access to key destinations for communities with limited transportation options. On the other hand, new mobility services have catered to more affluent customers and have been slow to offer special provisions for low-income customers, people with disabilities, and low-English proficiency populations, leaving many people unable to benefit.

3.3.1 Vision

To help meet the State's carbon neutrality goal no later than 2045 and advance equity, the vision is for California to have:

A. A transportation system that leverages the combined potential of new mobility, transit, and active transportation to offer high-quality travel alternatives that enable car-free or car-light lifestyles for all.
B. Seamless integration in trip planning, booking, and payment systems across all mobility providers, both public and private.
C. A new mobility ecosystem that, as a whole, offers equitable access to all Californians regardless of race, income, age, disability, or language proficiency to live, work, and play with ease.

3.3.2 Objectives

To achieve this vision, the State should lead efforts to:

1. **Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.** A critical objective of achieving this vision will be managing and regulating the use of private AVs and AV-based taxi services. AVs could offer important access, safety, and network performance benefits, such as opening the use of cars for people who cannot drive. However, according to modeling conducted for the CTP 2050 and the University of California's "Driving California's Transportation Emissions to Zero" report, the arrival of AVs will be one of the main sources of VMT increase in California during the next 25 years – the only question is by how much. Because AVs eliminate the need for a dedicated driver, they eliminate the labor costs of taxis and ride-hail services and enable individuals to conduct any number of activities (from working to resting) while traveling. This could make car travel more convenient for those with access to AVs, cause people

to shift away from public transit and non-motorized modes, and encourage people to live further from their destinations. Whether privately owned or as taxi services, AVs will have the ability to drop off passengers and either return to their owner's garage or roam around with zero occupants looking for new passengers, further increasing congestion and its adverse impacts. In response to this risk, the CTP 2050 recommends channeling the deployment of AVs to ensure that they are shared, electric, supportive of efficient land use, and aligned with key principles for healthy and sustainable communities.[38] This will require decisive action by the State, working with industry, to implement regulations and policies, including pricing policies, that drive a more efficient use of AVs and limit their potential negative impacts.

Actions:

- Authorize pricing of empty/zero-passenger miles at higher rates than for other levels of occupancy.

2. **Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.** The State has demonstrated leadership in this area by implementing Senate Bill 1014 (SB 1014) (Skinner, Chapter 369, Statutes of 2018) and its associated Clean Miles Standard and Incentive Program,[39] which encourage ride-hail services to provide pooled services[40] and enable connections to transit. Additional funding and synergistic policy initiatives could help strengthen those use cases through lower rates, integrated fares, and strategic fleet deployments. Providers of other new mobility options, such as carshare and micro-mobility services, among others, could also be encouraged to pursue partnerships with transit providers as well as to curb the VMT impact of their operations. Similarly, there could also be opportunities to optimize the VMT impact of delivery service providers while upholding service quality.

Actions:

- Develop and adopt regulations and incentive programs that encourage new mobility providers to prioritize higher occupancy use, transit partnerships, and lower VMT impact.

[38] California Department of Transportation. *California Transportation Plan 2050*, page 120. Available at: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf

[39] California Air Resources Board. Accessed May 5, 2022. Clean Miles Standard. Available at: https://ww2.arb.ca.gov/our-work/programs/clean-miles-standard

[40] Pooled is an industry term used to refer to when multiple passengers that are not traveling together share a ride-hail vehicle.

3. **Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.** While the arrival of new mobility services has increased access to destinations for certain populations, their potential to reduce VMT relies on their ability to operate in an integrated manner with public transit services as well as with each other. The foundation for this integration is customers' ability to review schedules and availability, plan multimodal trips, book rides, pay fares, and access discounts in integrated platforms that bring together the universe of mobility services in any given region. Caltrans, through the California Integrated Travel Project (Cal-ITP),[41] aims to develop a statewide system that enables those multimodal connections, while some transit agencies are also conducting their own pilots on this front.

   Actions:

   - Provide adequate resources to support State and transit agency initiatives to continue building integrated systems to ultimately break down existing silos between providers and regions, create a consistent statewide structure, and ensure easy access to a multimodal ecosystem of mobility services for all.

4. **Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.** Transit agencies throughout California offer reduced fares for low-income and other disadvantaged populations. However, no matter the location or the quality of the local public transit system, transit services cannot offer an efficient solution to all travel needs for every individual. This is particularly true for low-income people who often have less traditional work schedules or work or reside in places that do not have high-quality public transit services, and it commonly forces people to travel by car even though they cannot easily afford to. New mobility could be the solution for many of these people, given its extended service hours and potentially larger geographic reach. Unfortunately, the cost of new mobility services can be prohibitive, especially if used frequently. The key to unlocking this potential will be to develop and scale up programs to subsidize free or reduced costs for new mobility services for low-income and disadvantaged Californians. Some jurisdictions in California are already piloting this idea by creating a "mobility wallet," which provides a monthly budget that eligible users can apply to transit and new mobility services.

   Actions:

   - Increase funding to support low-income and disadvantaged Californians' use of transit and new mobility services and streamlining its operational support for "mobility wallet" programs.

[41] California Department of Transportation. Accessed May 5, 2022. CAL-ITP: A modern and consistent transportation experience throughout California. Available at: *https://www.calitp.org/*

5. **Expand universal design features for new mobility services.** There is a large community of Californians with disabilities who cannot drive, enter the passenger seat of a regular car without assistance, operate a regular bike, or use conventional smart phone applications, yet the new mobility industry, with some exceptions, seems to be growing without addressing the needs of these persons. For example, micro-mobility services lack inclusive alternatives such as tricycles, hand-pedaled cycles, or recumbent bicycles; ride-hail services do not offer equivalent quality of service on wheelchair accessible vehicles; and mobile phone apps may not be Americans with Disabilities Act (ADA) compliant. Addressing these issues and more is a crucial goal to advance equity and a more inclusive society and may also reduce reliance on often-strained paratransit services and costly private vehicles. New regulations, incentive programs, and pricing strategies could elevate universal design standards for new mobility providers, including support of and access to adaptive modes that are designed for people with disabilities and that can carry equipment like wheelchairs.

   Actions:

   - Require all new mobility providers to meet minimum fleet percentages of adaptive devices and placement requirements.

3.4 Strategy Area 4: Improve Alignment of Land Use Planning and Development with Climate and Equity Goals

Achieving carbon neutrality no later than 2045 requires land use planning and development activities that are consistent with and advance State planning priorities[42] by significantly augmenting growth in transportation-efficient, resource-rich, accessible, and inclusive communities for all Californians. This vision is aligned with the CTP 2050's and University of California researchers' latest modeling and analyses,[43] which indicated that California would not meet its climate goals without future growth in population and employment happening primarily within the state's most densely populated areas and improving the balance of housing, employment, shopping, and other key services within

[42] The State Planning Priorities generally include (1) promoting infill development, (2) protecting natural and working lands, and (3) encouraging efficient development patterns and investments that are consistent with adopted plans in areas appropriately planned for growth. The State Planning Priorities are "intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including in urban, suburban, and rural communities" The full text of the State Planning Priorities is defined in California Government Code, § 65041.1. "Statewide Environmental Goals and Policy Report." Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65041.1

[43] See Brown, A. L., Sperling, D., Austin, B., DeShazo, JR, Fulton, L., Lipman, T., et al. 2021. "Driving California's Transportation Emissions to Zero." UC Office of the President: University of California Institute of Transportation Studies, page 236. Available at: *https://escholarship.org/uc/item/3np3p2t0* and California Department of Transportation. *California Transportation Plan 2050*, page 287. Available at: *https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf*

any given community. Although MPOs create SCSs that identify how each region may accommodate its growth in patterns that help meet GHG reduction targets set by CARB, these plans are not being fully implemented.[44]

Implementing the land use strategies in SCSs and moving towards improved planning frameworks would address the fact that local land use policies and development practices across California have often favored low-density, single-family zoning, and car-oriented development patterns and carry the legacy of racist government policies, covenants, and lending practices from the past.[45,46,47] These historic policies and practices have resulted in restricted infill development, limited access to opportunity, and disinvestment in existing neighborhoods for decades.[48,49,50] As such, they have played a key role in furthering car dependence, rising GHG emissions, and growing inequity in California's communities.

Barriers to infill development have been one factor fueling California's housing crisis, now a half century in the making. After decades of underproduction, supply is far behind need, and purchase and rental costs are soaring. Today, more than a third of households in the state cannot afford their housing costs,[51] forcing a growing number of households to either move to more remote locations with more affordable housing but more limited access to jobs, shopping, and other regular destinations, or to live in overcrowded conditions.

3.4.1 Vision

To help meet State's carbon neutrality goal no later than 2045 and advance equity, the vision is for California to have:

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[44] California Air Resources Board. *2018 Progress Report: California's Sustainable Communities and Climate Protection Act.* Available at: https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf

[45] Florida, R. 2016. "How Zoning Restrictions Make Segregation Worse." *Bloomberg.* Available at: https://www.bloomberg.com/news/articles/2016-01-04/how-zoning-restrictions-make-segregation-worse.

[46] California Environmental Protection Agency. 2021. Pollution and Prejudice: Redlining and Environmental Injustice in California. Available at: https://storymaps.arcgis.com/stories/f167b251809c43778a2f9f040f43d2f5.

[47] Rothstein, R. 2017. *The Color of Law: A Forgotten History of How Our Government Segregated America*.

[48] California Air Resources Board. *2020 Mobile Source Strategy*, page 107. Available at: https://ww2.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf.

[49] Jaffe, E. 2016. "Where Sprawl Makes It Tougher to Rise Up the Social Ranks." Bloomberg. Available at: https://www.bloomberg.com/news/articles/2016-01-27/where-urban-sprawl-makes-it-tougher-for-the-poor-to-rise-up-the-social-and-economic-ranks.

[50] Lucas, K. 2012. "Transport and social exclusion: Where are we now?" *Transport Policy*, 20, 105-113.

[51] One in three households in the state doesn't earn enough money to meet their basic needs, per the Statewide Housing Plan. California Department of Housing and Community Development. 2022. *Statewide Housing Plan.* Available at: https://www.hcd.ca.gov/docs/statewide-housing-plan.pdf

A. Future growth focused on infill sites and other climate-friendly, transportation-efficient areas appropriately planned for growth.[52]
B. The ability for every Californian to live, work, and play in climate-smart, transportation-efficient communities that provide travel choices and access to opportunity.[53]

3.4.2 Objectives

To achieve this vision, the State should:

1. **Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.** Notwithstanding the recent passage of laws that expand property owners' ability to create multiple units on single-family lots and limit local governments' ability to block new housing in certain circumstances, many barriers to infill development remain in place, discouraging this important development type in ways that need to be addressed. One critical barrier is the high cost of infill development, including the high cost of urban land, parking requirements, construction costs, and the necessary infrastructure upgrades to make sites development-ready.[54] Since the elimination of redevelopment agencies in California,[55] there is often not the fiscal capacity to take on these costs at the required scale. Also, insufficient land may be zoned for housing, and developers may have to navigate numerous and opaque regulatory hurdles and fees in the local approval process.[56] Implicit biases in real estate practices and deliberate action from current residents who are resistant to the addition of new residents and to neighborhood change also represent important obstacles to infill development and perpetuate present-day neighborhood disparities rooted in historic discriminatory housing and land use practices such as redlining.[57,58]

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[52] Building on the State's Planning Priorities as defined in California Government Code, § 65041.1. "Statewide Environmental Goals and Policy Report." Available at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65041.1

[53] Building on California Department of Housing and Community Development's vision statement. Available at: https://www.hcd.ca.gov/about/mission.shtml.

[54] California Department of Housing and Community Development. 2022. *Statewide Housing Plan.* Available at: https://www.hcd.ca.gov/docs/statewide-housing-plan.pdf

[55] There are replacements to redevelopment, such as Enhanced Infrastructure Financing Districts (EIFDs), the Infill Infrastructure Grant Program (IIG), and impact fees; they are just much smaller, not widely utilized, and may offer their own barriers.

[56] California Department of Housing and Community Development. 2022. *Statewide Housing Plan.* Available at: https://www.hcd.ca.gov/docs/statewide-housing-plan.pdf

[57] Rothstein, R. 2017. *The Color of Law: A Forgotten History of How Our Government Segregated America*.

[58] California Environmental Protection Agency. 2021. Pollution and Prejudice: Redlining and Environmental Injustice in California. Available at: https://storymaps.arcgis.com/stories/f167b251809c43778a2f9f040f43d2f5.

To increase investment in under-resourced communities and expand access to high-resource neighborhoods, the State should pursue a combination of the following actions: i) providing financial and educational tools, resources, and incentives; ii) streamlining review processes; iii) strengthening protections for natural and working lands; iv) facilitating collaboration with key partners; and v) providing and requiring anti-displacement protections for existing residents and businesses.

Actions:

- Continue to commit State funding for existing and new programs supporting predevelopment work and infrastructure improvements that accelerate climate-smart and equitable infill development.
- Eliminate State funding of infrastructure, development, or leases outside of infill areas in locations that do not demonstrate clear alignment with State guidelines on VMT, climate, and equity outcomes. (For examples of this, see Appendix D on Local Actions).
- Expand tax increment financing options and other financing tools for infill-supportive infrastructure (e.g., water, sewer, electrical, telecommunications, active transportation, urban greening, and parks). Direct these financing tools to support affordable housing, local businesses, neighborhood services and amenities, and other community-identified priority projects with a focus on under-resourced and disinvested communities.
- Continue to encourage the utilization of underutilized public sites for mixed-use development, and expand opportunities for multi-modal transportation facilities.
- Establish guidance for regional and local agencies on how to administer SB 743 mitigation banking or exchanges and how revenue should be spent to support projects that reduce VMT.

2. **Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).** SCSs illustrate future land use and transportation changes that would lead to reductions in VMT and GHG emissions to meet the regional GHG emission reduction targets set by CARB. However, as noted earlier, SCS implementation is lagging significantly across the state. As detailed in the California Transportation Assessment Report (pursuant to AB 285 (Friedman, Chapter 605, Statutes of 2019)), MPOs, which develop the SCS plans, do not have adequate instruments to implement them and do not have the authority to ensure alignment of local land use decisions – as reflected in cities and counties' general plans – with the SCSs. The goal of this objective is to strengthen regional plan implementation and funding and the ability of regional plans to achieve regional GHG targets. Advancing California regions' visions for accelerating infill development and climate-smart housing production will require a collective discussion about establishing more coordinated MPO-local

government relationships that lead to codifying those regional visions into land use plans and ordinances at the local level.[59]

Actions:

- Establish a requirement that all local general plans demonstrate consistency with the assumptions and growth allocations in regional RTP/SCSs at least every 8 years consistent with existing RHNA and housing element update timelines.
- Explore measures to ensure or require greater consistency and alignment between regional RHNA allocations, SCSs, and regional plans such as strategic planning that prioritizes green space and conservation and encourage greater integration of state housing and conservation policy priorities to minimize/prevent conflict.

3. **Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.** Another critical objective is to accelerate production of a greater diversity of housing types in climate-smart locations. According to the latest Statewide Housing Plan (SHP), California must build at least 2.5 million new homes in the current eight-year housing need cycle and no fewer than one million of those homes must meet the needs of lower-income households.[60] The State's vision, as articulated in the SHP, is to provide these homes in climate-smart areas, areas with high access to opportunities and services that reduce the need to drive and mitigate climate change while also reducing costs to government in infrastructure development, operations, and maintenance. Efforts to accelerate housing production should be complemented with bold initiatives to preserve existing affordable housing and protect vulnerable residents through continuation of expiring affordability covenants, anti-displacement and tenant protection services and resources, and climate adaptation upgrades to existing affordable housing.[61]

   Key actions are needed across multiple fronts including easing local and State barriers to increasing density and encouraging greater diversity of housing types in existing neighborhoods. Although research has shown that the California

[59] This type of coordination would also address the need for continued accountability in existing housing laws regarding additional density, affordability, and infill under the purview of California Housing and Community Development Department's Housing Accountability Unit or the Department of Justice.

[60] California Department of Housing and Community Development. 2022. *Statewide Housing Plan.* Available at: https://www.hcd.ca.gov/docs/statewide-housing-plan.pdf

[61] Potential conversion of affordable housing to market-rate housing is an ongoing and critical statewide problem. In California, there are approximately 149,000 units of privately owned, federally assisted, multifamily rental housing, plus additional tax-credit and mortgage-revenue bond properties, many with project-based rental assistance. A large percentage of these units may convert to market rate as subsidy contracts or regulatory agreements expire. These at-risk units are home to seniors and families with lower incomes who cannot afford to pay market-rate rents and who could be displaced if the developments convert. More info: https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml.

Environmental Quality Act (CEQA) is not a primary barrier to infill housing relative to other challenges, further attention to issues in its implementation can help resolve any challenges it does pose.[62] Affordable housing should be prioritized in many types of communities, including those that are already resource-rich and transportation-efficient. Additionally, affordable housing should be coordinated with supportive community investments in under-resourced communities.

Actions:

- Further ease local regulatory and California Environmental Quality Act (CEQA) barriers to increasing density and affordable housing development, especially in transportation-efficient areas, and establish protections in the law against tactics to obstruct developments that advance State equity and climate goals.
- Increase funding for affordable housing and infill-supportive developments that accelerate VMT-reducing housing production in alignment with the SCS through programs such as Regional Early Action Planning of 2021 (REAP 2.0), Affordable Housing and Sustainable Communities (AHSC), and Transformative Climate Communities (TCC).
- Scale up factory-built housing production, including investing in workforce development, boosting participation in the construction industry, and establishing labor standards, to reduce the time and cost of delivering multifamily infill housing and accelerate the infill housing pipeline.
- Leverage the State's Prohousing designation by expanding incentives in State funding programs – including transportation and other non-housing programs – for local jurisdictions to adopt pro-housing policies, especially in ways that increase infill housing and reduce VMT.
- Support programs and policies to enable different housing ownership models to expand housing access such as through community land trusts, mutual housing, and cooperative ownership models.
- Incentivize conversion of a broader array of opportunity sites for affordable housing construction including redevelopment of aging malls, office parks, and other major reuse sites.

4. **Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.** Building parking for infill development makes construction costs more prohibitive, considering parking can cost up to $100,000 per stall, which takes away both physical space and budget from the construction of housing and other needed services and amenities. Yet minimum requirements for parking in new developments are regularly set by local jurisdictions, financers, or others.

[62] O'Neill, Moira and Biber, Eric and Gualco-Nelson, Giulia and Marantz, Nicholas and Marantz, Nicholas. (September 18, 2021). *Examining Entitlement in California to Inform Policy and Process: Advancing Social Equity in Housing Development Patterns*. Available at SSRN: https://ssrn.com/abstract=3956250

Particularly where viable transportation alternatives are available, eliminating parking requirements and/or providing a "cap" on allowable parking can make infill development more financially feasible and is more conducive to lowering VMT. Measures to reduce parking in new developments can also be paired with funding or incentives for car share, electric vehicles, electric bikes and scooters, and other driving alternatives. AB 2097 (Friedman, Chapter 459, Statutes of 2022)[63] will help with this in certain areas, but there is still work to be done.

Actions:

- Develop financing and incentives programs that facilitate conversion of excess parking to housing and other strategic uses for communities.
- Enact parking maximums (caps).

5. **Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.** Identifying and preserving the existing affordable housing stock – both subsidized and "naturally occurring" affordable housing – is key to maintaining the economic accessibility and vitality of existing communities while investing in new development and ensuring that low-income residents are not displaced when new infill development occurs. Additionally, preserving all types of affordable housing requires climate mitigation and adaptation improvements to ensure the future safety and viability of those residences. One action the State could undertake could be to identify potential changes to federal and State policies to increase incentives to preserve existing affordable housing, implement climate adaptation improvements to existing affordable housing, and reduce and mitigate displacement of existing low-income residents.

   Actions:

   - Identify potential changes to federal and State policies to increase incentives to preserve existing affordable housing, implement climate adaptation improvements to existing affordable housing, and reduce and mitigate displacement of existing low-income residents.

[63] See https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2097.

APPENDIX D
LOCAL ACTIONS

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1. Local Government Actions are Crucial for Supporting Attainment of the State's Climate Goals

Local government efforts to reduce greenhouse gas (GHG) emissions within their jurisdiction are critical to achieving the State's long-term climate goals, and can also provide important co-benefits, such as improved air quality, local economic benefits, healthier and more sustainable communities, and improved quality of life. Indeed, a substantial portion of California's GHG reduction potential comes from activities over which local governments have authority or influence.[1] Since the enactment of Assembly Bill (AB) 32 (Nuñez and Pavley, Chapter 488, Statutes of 2006), many local jurisdictions have sought to identify their role in implementing State-level decarbonization efforts. With increasing severity and occurrence of droughts, wildfires, extreme heat, and other conditions, the need for action is urgent.

Local governments have responsibility and authority over the built environment, transportation networks, and provision of local services. For example, local governments have primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population and employment growth and the changing needs of their jurisdictions. They make decisions on how and when to deploy transportation infrastructure and can promote residential and commercial development that supports transit, bicycling, and walking. Local governments have the authority to adopt building ordinances that exceed statewide building code requirements and facilitate the implementation of zero-emission vehicle (ZEV) infrastructure.

Many jurisdictions have demonstrated bold climate leadership, yet meeting the challenge of climate change requires bolder actions from local governments across the state. For example, the City of Oakland requires all new construction to be all-electric and is currently working on electrifying existing buildings.[2] Starting in 2023, the City of Sacramento will require all new buildings under three stories to be all-electric. By 2026 the city will extend this requirement to all new construction, regardless of height, with some limited exemptions. The City of Sacramento also provides parking incentives for zero-emission carsharing and electric vehicle (EV) charging and will require higher than minimum State-required levels of EV charging infrastructure in new construction starting in 2023.[3] This type of leadership by local governments is critical to implementing State-level measures to address GHG emissions associated with transportation and the built environment.

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[1] Wheeler, S. M., Jones, C. M., & Kammen, D. M. 2018. Carbon Footprint Planning: Quantifying Local and State Mitigation Opportunities for 700 California Cities. *Urban Planning, 3(2), 35-51.* Available at: *https://www.cogitatiopress.com/urbanplanning/article/view/1218*.

[2] City of Oakland. *Building Electrification*. Available at: *https://www.oaklandca.gov/projects/building-electrification .*

[3] City of Sacramento. *Electrification of New Construction.* Available at: *http://www.cityofsacramento.org/SacElectrificationOrdinance*.

This appendix includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA). This appendix is not regulatory but is instead intended to provide clarification on specific topics requested by planners, CEQA practitioners, and community groups in response to challenges local jurisdictions face when implementing GHG reduction strategies or approving much-needed housing projects. It is not exhaustive and does not include everything local governments can implement to support the State's climate goals. It focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting.

Recommendations in this appendix are meant to be used in combination with other planning and CEQA guidance documents including Chapter 8 of the General Plan Guidelines published by the Governor's Office of Planning and Research (OPR),[4] the State CEQA Guidelines,[5] OPR's CEQA Technical Advisories,[6] as well as guidance from local air districts and the California Air Pollution Control Officers Association (CAPCOA).[7]

The following sections discuss the implications for sustainable development on equity and environmental justice as part of a strategy to combat climate change and provide recommendations to local governments for:

- Developing local CAPs and strategies consistent with the State's GHG emission reduction goals;
- Incorporating State-level GHG priorities into their processes for approving land use plans and individual projects;
- Implementing CEQA mitigation, as needed, to reduce GHG emissions associated with new land use development projects; and
- Leveraging opportunities for regional collaboration.

1.1 Centering Equity in Local Government Action is Key to Addressing the Climate Crisis

Local government action to reduce GHG emissions is not only essential for meeting the State's climate goals; it can build better places for everyone in ways that begin to address the

[4] OPR. *General Plan Guidelines - Chapter 8 Climate Change.* Available at: *https://opr.ca.gov/planning/general-plan/guidelines.html.*

[5] Cal. Code Regs., tit. 14, §§ 15000 et seq.

[6] OPR. *Technical Advisories.* Available at: *https://opr.ca.gov/ceqa/technical-advisories.html.*

[7] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Available at: *https://caleemod.com/handbook/index.html*.

entrenched inequities experienced by the most overburdened Californians (e.g., Black, Indigenous, People of Color [BIPOC] and low-income communities). Local policies that make it easier for people to afford homes in places with good access to jobs, services, open space, and education, as well as a variety of transportation options that reduce the need to drive, advance equity and reduce GHG emissions.

Ensuring that vulnerable communities benefit from efforts to reduce GHG emissions is crucial to the State's climate strategy. For example, Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016) recognized that efforts to meet the State's climate goals must be done in an equitable manner by directing CARB to achieve more stringent GHG emission reductions in a way that benefits disadvantaged communities, who often bear the burden of climate impacts. AB 32 also directs that CARB "ensure that the greenhouse gas emission reduction rules, regulations, programs, mechanisms, and incentives under its jurisdiction, where applicable and to the extent feasible, direct public and private investment toward the most disadvantaged communities in California and provide an opportunity for small businesses, schools, affordable housing associations, and other community institutions to participate in and benefit from statewide efforts to reduce greenhouse gas emissions."[8] To address the State goals for housing affordability, social equity, and climate simultaneously, local government institutions are well-positioned to take on a portfolio of integrated strategies such that housing policies are designed to address climate goals and climate policies are designed to meet the State's housing needs. In many cases, land use strategies that support more compact development in infill areas, particularly those already displaying efficient resident travel patterns, have the greatest potential to reduce emissions while also reducing combined housing and transportation costs for Californians and infrastructure costs for local governments due to avoided new roads, public schools, and other sprawl supporting infrastructure. Infill housing development alleviates pressure to develop on the urban periphery, preserving natural and working lands and areas often at risk of wildfire.

The issues that shape where development goes are complex, but the location and type of new housing that is developed matters for climate, health, and equity. Accelerating housing production to meet the extraordinary need for more homes can help reduce vehicle miles traveled (VMT) and GHG emissions and advance health and equity objectives when new housing is developed in types and locations that align with these goals, and particularly when accompanied by complementary policies and investments to create sustainable communities and prevent displacement of existing residents. See Appendix E, Sustainable and Equitable Communities, for strategies to foster sustainable development.

Fostering transportation-efficient, resource-rich, accessible, and inclusive communities is a key strategy for climate, equity, health, and affordability. Climate-smart locations include neighborhoods, commercial corridors, town centers, downtowns, and other areas where

[8] Health & Saf. Code, § 38565.

residents have access to a broad range of mobility options in addition to private automobiles (such as transit, walking, and biking), as well as where residents have access to housing, jobs, and other key destinations. Such communities make it possible for residents to live, work, and recreate without dependence on a personal car. For trips where driving is required, car trips can be relatively short and public infrastructure should support the use of zero-emission vehicles. The predominant historical land use development paradigm that centers on mobility (how far you can go in a given amount of time) over accessibility (how many key destinations, including jobs, housing, and other services, you can reach in that time) has not resulted in equitable outcomes for BIPOC and low-income households, and, in fact, has exacerbated barriers to access and upward economic progress. Increasing housing opportunities in transportation-efficient locations is a necessary paradigm shift and is part of the State's GHG emission reduction strategy.

However, ensuring that the households that would benefit most from living in more accessible areas are not displaced by new investments requires that State, regional, and local governments proactively anticipate and avoid potential unintended equity and social consequences, including gentrification and displacement of historically underserved and disadvantaged communities. The most recent wave of displacement stems from a variety of factors and policies: exclusionary zoning, job growth and reinvestment, changing housing preferences among higher-income households, local policies and local opposition to new housing development proposals, lack of funding for new affordable housing, increased costs of building new housing, and a dearth of policies to preserve existing affordable housing and protect tenants.[9] These variables interact to drive up housing prices and rents for all households—particularly low-income and BIPOC households—increasing displacement pressures in established neighborhoods and forcing people to live in car-dependent neighborhoods away from community support systems and economic opportunities and increase households' combined housing and transportation costs.[10] Policies to facilitate both market rate and subsidized affordable housing production in infill neighborhoods should, over time, stabilize housing costs, minimize displacement, and create new housing opportunities in transportation-efficient locations.

Communities and local jurisdictions have a range of tools and strategies that they can utilize to proactively avoid displacement while facilitating much-needed new infill housing development. The State encourages local jurisdictions and communities to cooperatively develop strategic anti-displacement and neighborhood stabilization plans. Some California jurisdictions have developed these strategic plans (e.g., the City of Oakland's Roadmap to Promote Housing

[9] See resources posted at the Urban Displacement Project: *https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/*.
[10] Ewing, R., & Hamidi, S. 2017. *Costs of Sprawl.* Taylor & Francis.

Equity[11] and the City of San Jose's Citywide Anti-Displacement Strategy[12]). Jurisdictions and communities that have not implemented localized anti-displacement strategies can review lessons from other jurisdictions and refer to a 2021 literature review funded by CARB that examines the real-world effectiveness of various strategies to curb displacement.[13] In addition to documenting the efficacy of different strategies, the literature review also examines the potential of each strategy to prevent displacement, the type of regional housing market where the strategy is most effective, the most appropriate scale to implement different strategies, and the timeframe for preventing displacement.

The Department of Housing and Community Development's (HCD) recently established Prohousing Designation Program also recognizes local jurisdictions that take actions to accelerate housing production while promoting holistic land use planning that reflects the State's climate goals and helps to reduce VMT.[14] Local governments that earn the prohousing designation are effective at simultaneously promoting multiple objectives, including: increasing housing supply, affirmatively furthering fair housing, preserving existing affordable housing, and supporting VMT reduction. Communities that earn the prohousing designation can receive additional points or preference in the scoring of competitive State housing, community development, and infrastructure funding programs.

2. The Role of Local Climate Action Planning in Supporting the State's Climate Goals

Local governments across the state have developed different types of plans to tackle climate change, including CAPs, sustainability plans, or GHG reduction plans incorporated into a general plan.[15] While CAPs have become an important avenue for climate action at the local level, 47 percent of California cities and counties have no known CAP.[16] Many jurisdictions find that performing or hiring consultants to perform a GHG inventory and developing a CAP is

[11] City of Oakland. 2015. *A Roadmap Toward Equity: Housing Solutions for Oakland, California.* Available at: *https://www.policylink.org/sites/default/files/pl-report-oak-housing-070715.pdf.*

[12] City of San Jose. 2019. *Community Strategy to End Displacement.* Available at: *https://www.sanjoseca.gov/your-government/departments-offices/housing/resource-library/housing-policy-plans-and-reports/citywide-anti-displacement-strategy*.

[13] Karen Chapple & Anastasia Loukaitou-Sideris. 2021. White Paper on Anti-Displacement Strategy Effectiveness. CARB Research Contract Number 19RD018. Available at: *https://ww3.arb.ca.gov/research/single-project.php?row_id=68795*.

[14] Department of Housing and Community Development. 2022. *Prohousing Designation Program*. Available at: *https://www.hcd.ca.gov/planning-and-community-development/prohousing-designation-program*.

[15] CARB's Climate Action Portal Map compiles information about local GHG reduction plans and strategies throughout the state. Available at: *https://webmaps.arb.ca.gov/capmap/*.

[16] Boswell et al. 2019. 2019 Report on the State of Climate Action Plans in California. CARB Research Contract Number 17RD033. Available at: *https://ww2.arb.ca.gov/sites/default/files/2020-03/17RD033.pdf*.

costly and time-consuming, regardless of their desire to take action on climate.[17] This section seeks to identify the most effective GHG reduction actions at the local level and other barriers to local climate action to help ensure that local climate efforts align with the State's climate goals.

For purposes of this appendix, a CAP that has been adopted through the CEQA review process and meets the criteria specified in CEQA Guidelines section 15183.5(b) for a "plan for the reduction of greenhouse gas emissions" will be referred to as a "CEQA-qualified CAP." These CEQA-qualified CAPs allow eligible projects to streamline their determination of significance for GHG emissions. Pursuant to CEQA Guidelines section 15183.5(b), CEQA-qualified plans must:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified period, resulting from activities within a defined geographic area;
(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
(F) Be adopted in a public process following environmental review.

Once adopted, CEQA-qualified CAPs provide local governments with a valuable tool for 1) coordinated climate planning in their community and 2) streamlining the CEQA GHG analysis for projects consistent with a CEQA-qualified CAP. When jurisdictions have a CEQA-qualified CAP, an individual project that complies with the strategies and actions within a CEQA-qualified CAP can tier and streamline its project-specific CEQA GHG analysis to make a determination "that a project's incremental contribution to a cumulative [GHG] effect is not cumulatively considerable" (CEQA Guidelines Sections 15064.4 (b)(3) and 15183.5).[18, 19] Guidance for preparing a CEQA-qualified CAP and using it to tier and streamline CEQA GHG

[17] Deborah Salon, Sinott Murphy & Gian-Claudia Sciara. 2014. Local climate action: motives, enabling factors and barriers. *Carbon Management, 5:1,67-79, DOI 10.4155/cmt.13.81.* Available at: *https://www.tandfonline.com/doi/full/10.4155/cmt.13.81*.

[18] The guidelines implementing CEQA (or "CEQA Guidelines") were amended in 2009 to include criteria for the analysis and mitigation of GHG emissions. The CEQA Guidelines acknowledge the use of plans to reduce GHG emissions in a cumulative impacts analysis. (CEQA Guidelines Section 15183.5(b)).

[19] Cal. Code Regs., tit. 14, § 15183.5.

analysis for future projects can be found in Section 15183.5(b)(2) of the CEQA Guidelines, as well as Chapter 8 of OPR's General Plan Guidelines.[20] Typically, this tiering and streamlining evaluates whether the proposed project would demonstrate consistency with 1) the adopted plans, as well as the growth and land use assumptions that underlie the CEQA-qualified CAP, and 2) all applicable GHG reduction measures identified in the CAP. This includes determining whether the growth associated with the proposed project was accounted for in the CAP's projects and whether the project's GHG reduction measures were identified to help meet the CAP target.

To assist with using a CEQA-qualified CAP for future CEQA streamlining, some jurisdictions have prepared CAP compliance checklists that future projects may use to identify and document the CAP measures that are applicable to the proposed project and how the project is consistent with the CAP measures.[21] The CAP compliance checklists are then included as part of the proposed project's CEQA analysis documenting the project's consistency with the CEQA-qualified CAP. The use of the CEQA-qualified CAP also provides greater clarity in the environmental analysis and more consistent expectations for how GHG reduction measures are applied across projects in the jurisdiction.

Because CEQA-qualified CAPs are voluntary and not subject to any legislative criteria nor requirements, the CEQA Guidelines provide that a plan should include the measures or a group of measures that would collectively achieve the plan's emissions reduction target (Section 15183.5(b)(1)(D)). As the CEQA Guidelines are silent on what measures or groups of measures a CEQA-qualified CAP should contain, this appendix identifies three priority areas that address the State's largest sources of emissions that local governments have authority or influence over. Local jurisdictions should focus on these three priority areas when preparing a CEQA-qualified CAP:

1. Transportation electrification
2. VMT reduction
3. Building decarbonization

By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction. Local governments that prepare CEQA-

[20] OPR. *General Plan Guidelines - Chapter 8 Climate Change.* Available at: *https://opr.ca.gov/planning/general-plan/guidelines.html.*

[21] Examples of CEQA-qualified CAPs include San Francisco's GHG compliance checklists for private development and municipal projects. These checklists are available at: *https://sfplanning.org/permit/environmental-consultant-pools-guidelines-and-resources*.

qualified CAPs that include strategies in these areas are contributing to alignment between local climate action and the State's climate goals.

The State encourages local governments to follow this approach and adopt a CEQA-qualified CAP addressing the three priority areas. However, as not all jurisdictions have sufficient resources (e.g., political capital, staffing, funding) to do so, jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions.

To assist local jurisdictions with developing local climate plans, measures, policies, and actions aligned with the State's climate goals, Table 1 presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments. The strategies in Table 1 are not applicable to all local jurisdictions, nor are they the only strategies that local governments can adopt, but they represent the core strategies that most jurisdictions in California can implement to reduce GHG emissions regardless of whether they have developed a CEQA-qualified CAP. Reaching the outcomes of these priority GHG reduction strategies requires a locally appropriate, comprehensive adoption of policies in support of these objectives. When developing local climate plans, measures, policies, and actions, local jurisdictions should incorporate the recommendations described in Table 1 to the extent appropriate to ensure alignment with State climate goals.

Table 1 – Priority[22] GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies
Transportation Electrification	Convert local government fleets to ZEVs and provide EV charging at public sites
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)
VMT Reduction	Reduce or eliminate minimum parking standards[23]
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements[24,25]
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
	Implement parking pricing or transportation demand management pricing strategies

[22] These areas and strategies are designated as "priority" because they are the GHG reduction opportunities over which local governments have the most authority and that have the highest GHG reduction potential.
[23] AB 2097, adopted by the Legislature and signed by the Governor in September 2022 eliminates parking requirements for residential and commercial development within a half-mile of transit. Government Code, § 65863.2. "Residential, commercial, or other development types: parking requirements." Available at: *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2097*
[24] U.S. Department of Transportation. *Complete Streets.* Available at: *https://www.transportation.gov/mission/health/complete-streets.*
[25] OPR. *General Plan Guidelines - Chapter 4 Circulation Element.* Available at: *https://opr.ca.gov/planning/general-plan/guidelines.html.*

Priority Areas	Priority GHG Reduction Strategies
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)[26]
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses[27]
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)

[26] AB 2011, adopted by the Legislature and signed by the Governor in September 2022 streamlines multifamily housing development that meet affordability, labor, and other objective standards in parcels zoned for office, retail, or parking uses. Government Code, § 65912.100. "Affordable Housing and High Road Jobs Act of 2022." Available at: *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2011*

[27] California Energy Commission. Local Ordinance Exceeding the 2019 Energy Code. Available at: *https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-3.*

2.1 Setting Local GHG Targets

Historically, local climate action planning by California cities and counties has primarily focused on adopting supportive measures, such as replacing incandescent traffic lights with LED traffic lights, for reaching the State GHG emission reduction targets mandated by law. Initially, targets were based on consistency with meeting AB 32's 2020 GHG reduction target. More recently, local jurisdictions have looked to consistency with the longer-term targets in following the adoption of SB 32 and issuance of various executive orders (e.g., EO B-30-15 and EO B-55-18) to look beyond 2020 (e.g., 2030, 2045, 2050, etc.), when setting longer-term targets. In September 2022, Governor Newsom signed AB 1279 (Muratsuchi and Garcia, Chapter 337, Statutes of 2022), which codifies a statewide target to achieve carbon neutrality by no later than 2045. The State's climate strategy and the role of local governments continue to evolve as climate goals become more refined and ambitious, and as we advance our understanding of GHG emission sources. To be consistent with science-based statewide targets, local GHG reduction targets should evolve as well. In addition to being required for a local CAP to comply with CEQA, local targets have long been recommended as part of the process of developing, monitoring, and updating a CAP regardless of whether it is CEQA-qualified.[28]

The agency preparing a local GHG reduction target is responsible for determining the precise method for doing so. This appendix is not intended to limit or to provide an exhaustive list of options for setting a local GHG reduction target. Any target should be supported by substantial evidence and meet the criteria in CEQA Guidelines Section 15183.5. Ultimately, a jurisdiction's GHG reduction efforts and target(s) should help to better inform decision-makers and the public about the sources of GHG emissions under a jurisdiction's control (also known as a GHG emissions "inventory") that would be affected by a proposed project and provide a basis for identifying ways to avoid or reduce potentially significant GHG emission impacts. It can be challenging to localize and sub-allocate an individual jurisdiction's share of the GHG reductions needed to curb a global crisis. Developing a localized GHG reduction target requires an adequate local GHG inventory from which to calculate a target, which most jurisdictions have not developed. The 2017 Scoping Plan Update suggested some non-binding options for setting GHG reduction targets.[29] In recognition of different sources of, and opportunities to reduce, GHG emissions, this appendix recognizes the complexities involved in local GHG target-setting and, as a result, does not recommend a specific GHG target or target-setting method for local governments. However, the appendix presents some considerations for various target-setting approaches below.

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[28] Climate Smart Communities. 2014. Climate Action Planning Guide. Available at: *https://cdrpc.org/wp-content/uploads/2015/05/CAP-Guide_MAR-2014_FINAL.pdf.*

[29] In the 2017 Scoping Plan, CARB recommended per capita, plan-level GHG targets of 6 MTCO2e per capita in 2030 and 2 MTCO2e per capita in 2050. Because the State is now pursuing carbon neutrality no later than 2045, CARB recommends that jurisdictions focus on developing locally appropriate, plan-level targets that align with the trajectory to carbon neutrality instead of focusing on a per capita 2050 target.

GHG reduction targets should typically be estimated for specific years aligned with the State's long-term climate targets established through existing laws or policy guidance. Various target years that are often, but not always, used in climate action planning include 2020 (for AB 32, SB 375, and EO S-3-05 consistency), 2030 (for SB 32 and EO B-30-15 consistency), 2035 (for SB 375 consistency), 2045 (for EO B-55-18 consistency, and there is now a statutory 2045 target in AB 1279), and 2050 (for EO S-3-05 and EO B-30-15 consistency),[30] as well as horizon years of local planning documents, such as general plans.

When establishing GHG reduction targets, jurisdictions should consider their respective share of the statewide reductions necessary to achieve the State's long-term climate target for each target year, and how they can best support those overall goals. Jurisdictions should also evaluate their specific inventory profile when establishing targets consistent with the State's long-term climate targets and should tailor their specific inventory profile to ensure the sectors included in the State's targets align with those included in the local jurisdiction's inventory and target, recognizing each region's distinctive sources and profile. For example, as the State's long-term climate targets address all emissions sectors within the state, a jurisdiction without an airport or port should "factor out" and remove these sectors from the State's long-term climate target when establishing local reduction targets. In essence, local governments should focus on sources and actions within their control, and set targets that support overall state goals.

Generally, a city or county that periodically examines their long-term GHG reduction trajectory is in a better position to determine whether GHG emission levels contemplated in their CAP are sustainable. This type of long-term approach benefits from interim reduction targets rather than a single target. Local governments that choose to adopt a single target year or opt to use a different method (e.g., project-by-project analysis, adopted significance thresholds, specific regional emissions targets, other State-related climate programs, etc.) should explain why their approach reflects sensible long-range planning horizons and should provide substantial evidence to support a conclusion that GHG emissions would decline along a trajectory consistent with the State's climate goals.

One approach to setting targets is to align local GHG-reducing strategies and actions with the respective State policies that will deliver GHG emission reductions, if successfully implemented and supported at the local level.[31] The CAP target-setting process should

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[30] AB 32 calls for California to reduce GHG emission to 1990 levels by 2020; SB 375 requires CARB to develop and set regional targets, indexed to years 2020 and 2035, for emission reductions from passenger vehicles; EO S-3-05 established a statewide interim target to reduce GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050; SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030; EO B-55-18 and AB 1279 call for carbon neutrality as soon as possible, but no later than 2045; and EO B-30-15 established a statewide interim GHG reduction target of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

[31] OPR. *General Plan Guidelines - Chapter 8 Climate Change.* Available at: *https://opr.ca.gov/planning/general-plan/guidelines.html.*

account for projected GHG emission reductions from State policies, programs, and strategies implemented over time. However, when using statewide data, local governments should avoid double-counting GHG emission reductions that are achieved through State-level efforts and should ensure that their target focuses on GHG emission reductions within the scope of the CAP. Local jurisdictions should refer to Table 2-2 in Chapter 2 of the 2022 Scoping Plan Update, which summarizes the key State actions (as well as supportive statutes, executive orders, and outcomes) under the Scoping Plan Scenario and identifies approaches to help guide setting targets that align with the State's GHG-reducing strategies. [32]

A number of these key State actions are directly relevant to the priority strategies described in this appendix and should be accounted for in local target-setting, including zero-emission light-duty vehicles (relevant to transportation electrification); smart growth/VMT reduction (relevant to vehicle miles traveled reduction); and new and existing residential and commercial buildings (relevant to building decarbonization). Table 2 summarizes these actions with milestones and benchmarks.[33] Local jurisdictions should consider these recommendations as a starting point when contextualizing the State's climate goals, GHG emissions inventory sectors, and actions for a CAP target-setting process to help align local targets with the State's climate goals.

[32] The Proposed Scenario is the Scoping Plan alternative that most closely aligns with existing statute and Executive Orders and assumes carbon neutrality by 2045 the deployment a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies.

[33] The information in this table should be viewed as a general reference and may serve multiple uses, including providing resources that act as an aid to local governments when developing localized GHG targets for CAPs. The applicability of data, actions, and recommendations may vary across regions and should not be viewed or interpreted as official guidance, as thresholds of significance, or as dictating requirements for GHG target-setting processes. This is not considered an exhaustive list and does not represent the complete list of data resources and tools available. Not every recommendation provided will be relevant to, or appropriate for, a given area or plan.

Table 2 –Summary of Priority Key Actions[34] and Recommendations for CAP Target-Setting Processes

Priority Areas	Related Actions in the Proposed Scenario	Recommendations for Local CAP Target-Setting
Transportation Electrification	100 percent of light-duty vehicle sales are ZEVs by 2035	Potential data sources and tools to localize this for target-setting include EMFAC *Fleet Database* (by county) and *Scenario Analysis Tool* and *Department of Motor Vehicles Database* (by fuel type and registration)
VMT Reduction	VMT per capita reduced 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045	Potential data sources to localize this for target-setting include VMT modeling outputs prepared for, or consistent with, the travel outcomes associated with the adopted SCS or other applicable regional plan
Building Decarbonization	All electric appliances in new construction beginning 2026 (residential) and 2029 (commercial)	Potential data sources to localize these for target-setting include: *Commercial Building Energy Consumption Survey*

[34] These areas and strategies are designated as “priority” because they are the GHG reduction opportunities over which local governments have the most authority and that have the highest GHG reduction potential.

Priority Areas	Related Actions in the Proposed Scenario	Recommendations for Local CAP Target-Setting
	For existing residential buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035 (appliances replaced at end of life) For existing commercial buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2045 (appliances replaced at end of life)	*California Commercial End Use Survey* *Residential Appliance Saturation Survey*

California's overall state goal of achieving carbon neutrality no later than 2045 can also inform GHG reduction targets at individual community levels, and some communities or regions may be able to reach neutrality themselves. However, it is important to design targets in ways that support overall state goals, recognizing that each region has distinctive sources and systems. For instance, energy and transportation systems that serve Californians do not stop at jurisdictional boundaries, and some decisions can have ramifications for other communities (e.g., by inadvertently exporting emissions from a jurisdiction with a net-zero target to another jurisdiction with less stringent or no target). Jurisdictions considering a net-zero target should carefully consider the implications it may have on emissions in neighboring communities and beyond. Jurisdictions should also avoid creating targets that are impossible to meet as a basis to determine significance. For example, a net-zero target may imply that the GHG emissions of any project that are not reduced or offset to zero would be considered potentially significant. This may lead to undue burdens and frustrate project approval processes, which may be particularly problematic for residential development in climate-smart, infill areas. In addition, some jurisdictions have more land capacity to remove and store carbon, while others host GHG-emitting facilities that serve necessary functions and will take time to transition to new technology (e.g., municipal wastewater treatment plants, landfills, energy generation facilities). In those cases, jurisdictions that work together on a regional framework to rapidly decarbonize together may have better success in maximizing both emission reductions and other co-benefits. Ultimately, a net-zero target that makes it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development or solar arrays, is not consistent with the State's goals. The scale of GHG reductions needed across all communities will be substantial. Local governments have the discretion to adopt targets that apply to their jurisdictions and may utilize the streamlining functions afforded in CEQA[35] so long as those targets are supported by substantial evidence.

3. The Role of Land Use Plans and Development Projects in Supporting the State's Climate Goals

3.1 Housing Demand and GHG Efficiency

Local governments are responsible for adopting and updating land use plans and related implementing ordinances, such as zoning and other development codes, as well as evaluating and making decisions regarding a development project's impact on the environment. The adoption of, or update to, local plans, as well as local discretionary approvals for new development, are subject to environmental review under CEQA, which requires public agencies, including local governments, to evaluate and disclose potential environmental effects from their discretionary decisions and actions and implement feasible mitigation. This environmental review process must address whether GHG emissions from a proposed project,

[35] Cal. Code Regs., tit. 14, § 15183.5.

as defined in Section 15378 of the CEQA Guidelines, would result in a cumulatively considerable contribution to climate change. As part of this review, lead agencies must consider whether a proposed project or plan would be consistent with, and supportive of, the State's climate goals.[36] Section 15064.4(b)(3) of the CEQA Guidelines states that lead agencies should evaluate whether a proposed project would "[c]onflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases." Moreover, CEQA Guidelines Section 15125(d) requires a discussion "of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans…regional transportation plans …[and]…plans for the reduction of greenhouse gas emissions," among others.

However, the discretionary processes through which local jurisdictions permit land use development projects vary widely across California and are sometimes not uniformly applied within the same jurisdiction.[37] O'Neill et al. (2022) found that restrictive local zoning and development approval processes are the chief regulatory contributors to California's housing crisis. Local governments have a clear opportunity to eliminate these barriers by reforming their local laws to facilitate dense development in infill areas, particularly those in high-resource and/or low-VMT communities. Local jurisdictions can also choose to adopt ministerial entitlement processes[38] for housing instead of imposing discretionary review processes (some jurisdictions currently even impose multiple layers of discretionary review) that provide project opponents opportunities to slow or stop projects, sometimes without advancing legitimate environmental goals.

The literature review conducted by O'Neill et al. (2022) does not find a consensus among CEQA experts on the impact of litigation (or the threat thereof) on new housing construction. The report finds that litigation rates among entitled housing projects in the jurisdictions studied were low (less than three percent overall). Of the relatively small percentage of projects that were litigated, approximately two-thirds were challenged based on claimed deficiencies in their GHG or VMT analysis. (Note, however, that this statistic in itself is not particularly revealing, since attorneys frequently include in their lawsuits a range of claims regarding various CEQA resource areas to maximize chances of prevailing.) Thus, among other bases for CEQA challenges, CEQA GHG impact analyses and mitigation measures can to be sources of

[36] See, e.g., *Cleveland Nat'l Forest Found. v. San Diego Assn. of Governments* (2017) 3 Cal. 5th 497, 519 (holding that CEQA requires planning agencies to ensure their CEQA GHG analysis stays in step with evolving scientific knowledge and state regulatory schemes).

[37] O'Neill et al. 2022. "Final Report: Examining Entitlement in California to Inform Policy and Process: Advancing Social Equity in Housing Development Patterns." Available at: *https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3956250.*

[38] CEQA environmental review requirements only apply to discretionary project approvals; ministerial approvals are not subject to CEQA review. (Cal. Code Regs., tit. 14, § 15002(i).)

litigation and delay for projects, especially for housing projects in high-resource areas.[39] While the State has long been clear that urban infill projects, particularly in high-resource and low-VMT areas, would be generally supportive of the State's climate and regional air quality goals, such claims can persist. Although CEQA litigation can present additional complexity for housing development, restrictive local zoning and development approval processes are clearly the primary hurdles for housing development in California. Local jurisdictions have clear discretion to remove these barriers.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households.[40] This represents more than double the housing planned for during the last eight years.[41] The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals.[42] The following section includes recommendations to make doing so easier.

3.2 Evaluating Plan-Level and Project-Level Alignment with the State's Climate Goals in CEQA GHG Analyses

CEQA requires lead agencies to analyze the potential GHG-related impacts from their proposed projects.[43] As part of these analyses, agencies consider the extent to which their projects are consistent with the State's climate goals and requirements.[44] Land use plans (e.g., general plans, specific plans, area plans) and development projects have long operational lifespans, potentially locking in GHG emissions for decades. Some agencies have improperly attempted to use compliance with statewide regulatory programs to determine that their projects' GHG impacts are mitigated or are otherwise consistent with the Scoping Plan. While CARB has developed programs such as the State vehicle emissions standards (e.g., Advanced Clean Cars), the Low Carbon Fuel Standard, and the Cap-and-Trade program to reduce sector-wide GHG emissions, these programs were not designed to directly mitigate individual land use development project emissions from a CEQA perspective. Therefore, claimed consistency with these programs should not be used to conclude that motor vehicle

[39] O'Neill et al. 2022. Final Report: Examining Entitlement in California to Inform Policy and Process: Advancing Social Equity in Housing Development Patterns. CARB Research Contract 19STC005. Available at: *https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3956250*.

[40] California Department of Housing and Community Development. 2022. *Statewide Housing Plan.* Available at: *https://www.hcd.ca.gov/docs/statewide-housing-plan.pdf*.

[41] Ibid.

[42] Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Available at: *https://ternercenter.berkeley.edu/research-and-policy/right-type-right-place/*.

[43] Cal. Code Regs., tit. 14, § 15064.4.

[44] Cal. Code Regs., tit. 14, § 15064.4(b)(3).

emissions from a land use development project are fully mitigated or that such projects are definitively consistent with the Scoping Plan—particularly where the project at issue is not itself directly regulated by these programs.[45]

This section outlines three distinct approaches that lead agencies may consider for evaluating alignment of proposed plans and residential and mixed-use[46] development projects with the State's climate goals and, therefore, may have a less-than-significant impact on GHG emissions. These approaches are recommendations only and are not requirements. They do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.[47]

The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future.

3.2.1 Project Attributes for Residential and Mixed-Use Projects to Qualitatively Determine Consistency with the Scoping Plan

Absent consistency with an adequate, geographically specific GHG reduction plan such as a CEQA-qualified CAP, as described in Section 2, the first approach the State recommends for determining whether a proposed residential or mixed-use residential development would align with the State's climate goals is to examine whether the project includes key project attributes that reduce operational GHG emissions while simultaneously advancing fair housing. Consistent with the Priority Strategies shown in Table 1, empirical research shows that the following project attributes result in reduced GHG emissions from residential and mixed-use development. Residential and mixed-use projects that have all of the key project attributes in Table 3 should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals.

[45] CEQA Guidelines section 15064.4(b)(3) allows compliance with "regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions" as an approach for the determination of significance for GHG emissions.
[46] Mixed use residential is defined as development including both residential and nonresidential uses with at least two-thirds of the square footage designated for residential use per Cal. Gov. Code., tit. 7, § 65589.5(h)(2)(B)).
[47] Cal. Code Regs., tit. 14, § 15064.4.

Table 3 – Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval[48]
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)[49]
	Does not result in the loss or conversion of natural and working lands
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre),[50] or Is in proximity to existing transit stops (within a half mile),[51] or Satisfies more detailed and stringent criteria specified in the region's SCS[52]
	Reduces parking requirements[53] by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or

[48] Cal. Code Regs., tit. 24, Part 11.
[49] Government Code, § 65041.1. "Statewide Environmental Goals and Policy Report." Available at: *https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65041.1*.
[50] Federal Transit Administration. 2014. *Planning for Transit-Supportive Development: A Practitioner's Guide.* Available at: *https://www.transit.dot.gov/funding/funding-finance-resources/transit-oriented-development/planning-transit-supportive*.
[51] Washington Department of Transportation. 2013. *Tools for Estimating VMT Reductions from Built Environment Changes.* Available at: *https://www.wsdot.wa.gov/research/reports/fullreports/806.3.pdf.*
[52] One example of an evaluation of consistency with the region's SCS is from the 2013 draft EIR for The Cannery in Davis, p. 3.7-26. Available at: *https://www.cityofdavis.org/home/showpublisheddocument/650/635607772224000000.*
[53] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Available at: *https://caleemod.com/handbook/index.html*.

Priority Areas	Key Project Attribute
	For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.[54]
	At least 20 percent of units included are affordable to lower-income residents[55, 56]
	Results in no net loss of existing affordable units
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking[57, 58]

These project attributes are intended as a guide to help local jurisdictions qualitatively identify those residential and mixed-use projects that are ***clearly*** consistent with the State's climate goals, since these attributes address the largest sources of operational emissions for residential projects. In general, residential and mixed-use development projects that incorporate ***all*** of these key project attributes are aligned with the State's priority GHG reduction strategies for local climate action as shown in Table 1 and with the State's climate and housing goals. As such, they are considered to be consistent with the Scoping Plan or other plans, policies, or regulations adopted for the purposes of reducing GHGs; therefore, the GHG emissions associated with such projects may result in a less-than-significant GHG impact under CEQA. Lead agencies may determine, with adequate additional supporting evidence,

[54] AB 2097, adopted by the Legislature and signed by the Governor in September 2022 eliminates parking requirements for residential and commercial development within a half-mile of transit. Government Code, § 65863.2. "Residential, commercial, or other development types: parking requirements." Available at: *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2097*

[55] Newmark, G. and Haas, P. 2015. Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy. Available at: *https://chpc.net/wp-content/uploads/2016/05/CNT-Working-Paper-revised-2015-12-18.pdf*.

[56] California Housing Partnership Corporation and TransForm. 2014. Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy. Available at: *https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2015/11/4-AffordableTODResearchUpdate070114.pdf*.

[57] Energy and Environmental Economics. 2019. Residential Building Electrification in California: Consumer economics, greenhouse gases and grid impacts. Available at: *https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf*.

[58] Energy and Environmental Economics. 2021. Achieving Carbon Neutrality in California: PATHWAYS Scenarios Developed for CARB. Available at: *https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf.*

that projects that incorporate some, but not all, of the key project attributes are consistent with the State's climate goals.

This qualitative approach to determining the significance of GHG impacts is only intended for residential and mixed-use development projects. CARB will continue to explore this qualitative approach for evaluating the significance of GHG impacts for other types of land uses and encourages CEQA practitioners and lead agencies to do the same. The following two sections describe additional approaches lead agencies may employ in CEQA analyses.

3.2.2 Net-Zero Threshold of Significance

Absent consistency with an adequate, geographically specific GHG reduction plan, as described in Section 2 or consistency with the project attributes approach identified in Table 3 for residential and mixed-use development project types, lead agencies can make a significance determination, consistent with Section 4 below, based on whether the project would result in net-zero GHG emissions. (Note that lead agencies can also use other valid significance thresholds, as described in subsection 3.2.3 below.) Although achieving net-zero GHG emissions may be an appropriate overall objective, it should be noted this approach may not be feasible or appropriate for every project. Furthermore, in determining a project's net GHG impacts, agencies should carefully consider how to view the GHG emissions implications of changes to existing land uses at the project site, particularly where such uses may simply relocate to another location. Lead agencies should consider whether there is substantial evidence that the GHG emissions generated by existing uses of the project site will cease to exist as a direct result of the proposed project and will not merely occur at a different location after the proposed project is developed. If substantial evidence demonstrates that emissions from existing sources currently operating or generating emissions at the project site would continue elsewhere, lead agencies should account for those emissions when calculating the net change in emissions associated with the proposed project.

However, there are recent examples of land use development projects in California that have demonstrated that it is feasible to design projects of nearly any scale that achieve net-zero GHG emissions. Several projects have received certification from the Governor under AB 900, the Jobs and Economic Improvement through Environmental Leadership Act (Buchanan, Chapter 354, Statutes of 2011) and a similar program authorized under SB 7 (Atkins, Chapter 19, Statutes of 2021), demonstrating an ability to design economically viable projects that create jobs while contributing net-zero GHG emissions.[59] These projects have included mixed-use housing and commercial developments, large-scale residential projects, sports arenas, a medical center, and business campuses.

As discussed in Section 3.2.1, "Project Attributes for Residential Projects to Qualitatively Determine Consistency with the Scoping Plan," development in infill and transit-oriented areas

[59] OPR. 2021. *Judicial Streamlining*. Available at: *https://www.opr.ca.gov/ceqa/judicial-streamlining/*.

helps to reduce or avoid increasing GHG emissions. Although, while land use development patterns in California have become, in general, more compact than in the past, new low-density, auto-oriented development is still being planned for and built.[60] Despite this continuing challenge, several large and mixed-use projects within California have ultimately committed to achieving net-zero GHG emissions. For example, as part of the Downtown West Mixed Use Plan,[61] the applicant, Google LLC, ultimately committed to achieving net-zero GHG emissions for an approximately 80-acre mixed-use property, including almost 6,000 residential units, as well as retail, office, and other land uses, located in downtown San Jose, California. This commitment will be achieved through a combination of on-site measures and the purchase and retirement of carbon offset credits from CARB-approved registries in the voluntary market. Similarly, the Oakland Athletics, the applicant for the Oakland Waterfront Ballpark District Project located in Oakland, California, also committed its development to result in no net increase of GHG emissions through a combination of on-site and local mitigation measures and the purchase and retirement of carbon offset credits from CARB-approved registries in the voluntary market.[62] Design and local reduction measures[63] were employed by the developers to reduce 54 percent of total non-residential emissions, while 49 percent of operational emissions were reduced via carbon offset credits from the voluntary market.

Even California's largest, most sprawl-intensive housing developments have ultimately committed to achieving net-zero GHG emissions, even if only after intense legal battles. For example, under the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan,[64] the applicant, Newhall Land and Farming Company, ultimately committed to achieving net-zero GHG emissions for an almost 12,000-acre plan area in the Santa Clarita Valley. This commitment will be achieved through a combination of on-site and local mitigation measures and the purchase and retirement of carbon offset credits from the voluntary market. Similarly, as a result of a recent settlement agreement, Tejon Ranch Company, the developer for the Centennial Specific Plan located in northern Los

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[60] CARB. 2022. Draft 2022 Progress Report California's Sustainable Communities and Climate Protection Act. P. 22-25. Available at: *https://ww2.arb.ca.gov/sites/default/files/2022-07/2022_SB_150_Main_Report_Draft_ADA.pdf*.

[61] OPR. 2022. *Judicial Streamlining: Archived Applications*. Available at: *https://opr.ca.gov/ceqa/judicial-streamlining/archive.html*.

[62] Ibid.

[63] Local reduction measures include measures to reduce VMT and trips (including reduced parking and transportation network surcharges), installing EV chargers at 10 percent of onsite parking spaces, electrification (i.e., prohibition of non-electric energy, such as natural gas) of 50 percent of residential units, and either converting an existing jet-fueled peaker plant to battery storage or installing 1,013 EV charging stations in the community.

[64] California Department of Fish and Wildlife. 2021. Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan: Final EIS/EIR Documents. Available at: (*https://nrm.dfg.ca.gov/documents/ContextDocs.aspx?cat=NewhallRanchFinal*).

Angeles County,[65] also committed its development to result in no net increase of GHG emissions.[66] Mitigation measures employed by these developers include the prohibition of natural gas in residential and commercial properties; the requirement of on-site solar photovoltaic energy systems on residential and commercial properties; the installation of almost 30,000 EV chargers within and outside the plan area; funding incentives for the purchase of 10,500 passenger EVs and electric school buses and trucks; and procuring and retiring carbon offset credits from the voluntary market.

Although the projects in San Jose and Oakland may not meet all of the key project attributes for qualitatively determining project consistency with statewide GHG goals, as shown in Table 3, and the Newhall and Tejon Ranch projects do not necessarily represent the type of development that California most needs to simultaneously tackle the housing and climate crises, they do demonstrate the feasibility of a net-zero approach for other large and complex residential development projects.

3.2.3 Recommended Thresholds of Significance

Lead agencies may also analyze the GHG impact of proposed projects by employing a threshold of significance recommended by the applicable air district[67] or other lead agencies.[68] As stated in CEQA Guidelines section 15064.7(b), "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." However, thresholds for analyzing a project's GHG emissions can become outdated if they are not aligned with the State's most recent GHG reduction goals.[69] To be defensible, CEQA significance thresholds must be supported by substantial evidence.[70] Mitigating GHG emissions below an applicable GHG threshold of significance is one way lead agencies may demonstrate that a project's GHG emissions would have a less-than-significant impact on the environment. For lead agencies that pursue this approach, CAPCOA, which

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[65] Los Angeles County Department of Regional Planning. 2019. *Specific Plan No. 02-232 / Centennial Specific Plan.* Available at: *https://planning.lacounty.gov/case/view/specific_plan_no_02_232_centennial_specific_plan*.

[66] Tejon Ranch. 2021. *Settlement Agreement Reached in Centennial lawsuit.* Available at: *https://tejonranch.com/settlement-agreement-reached-in-centennial-lawsuit/*.

[67] CARB research indicates that less than 20 percent of California's population is located in an area with CEQA GHG thresholds of significance addressing SB 32 reduction goals adopted by an air district (Bay Area Air Quality Management District and Sacramento Metropolitan Air Quality Management District).

[68] As with all CEQA significance thresholds, GHG significance thresholds must be supported by substantial evidence. Some lead agencies, such as the City of San Luis Obispo and County of Santa Barbara, have adopted CEQA GHG thresholds of significance due to the absence of a local air district-adopted threshold or because a local CEQA-qualified CAP used to tier and streamline its project-specific CEQA GHG analysis (per CEQA Guidelines Sections 15064.4 (b)(3) and 15183.5) may not be available or applicable.

[69] CEQA GHG analyses (including significance determinations) "must reasonably reflect evolving scientific knowledge and state regulatory schemes." (Cal. Code Regs., tit. 14, §§ 15064.4(b))

[70] Cal. Code Regs., tit. 14, § 15064.7(b).

provides a forum for the sharing of knowledge, experience, and information between air districts throughout the state, has developed tools and guidance for CEQA practitioners, such as the California Emissions Estimator Model[71] (CalEEMod) and guidance for developing and quantifying project-level GHG mitigation measures.[72]

4. Mitigating Greenhouse Gas Emissions Pursuant to CEQA

If a lead agency determines that a proposed project's GHG emissions would result in a significant impact and a cumulatively considerable contribution to climate change, the lead agency must impose feasible mitigation measures to reduce the project's GHG impact to a less-than-significant level.[73] According to the CEQA Guidelines, mitigation measures must be feasible, roughly proportional, not inappropriately deferred, capable of being monitored or reported, fully enforceable, and based on substantial evidence. They must also have a nexus to a legitimate governmental interest.[74] Any GHG offsets used as CEQA mitigation must not be otherwise required (e.g., by regulation or by existing permitted CEQA projects).[75] Lead agencies should present substantial evidence to document that a given mitigation measure would actually serve to mitigate the proposed project's GHG emissions.[76]

CAPCOA has developed tools and guidance for CEQA practitioners for developing and quantifying project-level GHG mitigation measures. These include CAPCOA's Handbook,[77] which it published in 2021 along with the mitigation module in CalEEMod.[78]

As the severe impacts of climate change become better understood and the State's climate goals become more stringent over time, local, off-site CEQA GHG mitigation measures will become increasingly necessary. However, several factors often hinder the adoption of local, off-site GHG mitigation under CEQA, including confusion about CEQA's requirements for GHG mitigation, a focus on carbon offset credits and lack of awareness of local GHG mitigation

[71] CAPCOA. 2022. *California Emissions Estimator Model.* Available at: *www.caleemod.com*.
[72] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Available at: *https://caleemod.com/handbook/index.html*.
[73] Cal. Code Regs., tit. 14, § 15126.4(c).
[74] Cal. Code Regs., tit. 14, § 15126.4(a)(4)(A).
[75] Cal. Code Regs., tit. 14, § 15126.4(c)(3)).
[76] Cal. Code Regs., tit. 14, § 15126.4(c)).
[77] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions. Assessing Climate Vulnerabilities and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Available at: *https://caleemod.com/handbook/index.html*.
[78] CAPCOA. 2022. *California Emissions Estimator Model.* Available at: *www.caleemod.com*.

opportunities, and a perception of high costs (e.g., mitigation costs for project sponsors, administrative costs for lead and responsible agencies).

This section seeks to assist in overcoming barriers to GHG mitigation under CEQA and reduce the use of statements of overriding considerations by lead agencies by establishing a hierarchy of mitigation opportunities that reflect the State's priorities for mitigation. In doing so, this section encourages project applicants and local governments to use local and non-local off-site GHG mitigation approaches (including carbon offset credits) consistent with CEQA's requirements. This section also seeks to clarify how CEQA's mitigation requirements apply to GHG mitigation (including carbon offset credits).

While this section identifies ways to overcome some common barriers to local CEQA GHG mitigation, other barriers may take longer to remove and may even require legislative or other State-level action. Through appropriate application of local GHG mitigation under CEQA, lead agencies have an opportunity to benefit their communities while addressing the climate crisis. Local, off-site mitigation measures implemented in the communities in which project impacts occur have the added potential co-benefit of reducing emissions of toxic air contaminants and criteria air pollutants, which will improve health and social and economic resiliency to climate-related impacts. Verification of local mitigation can also be more straightforward than verification of mitigation that is outside of the jurisdictional boundaries of the lead agency.

4.1 GHG Mitigation Hierarchy

CEQA requires lead agencies to impose all feasible mitigation measures necessary to avoid or reduce GHG emissions to a less-than-significant level prior to certifying an Environmental Impact Report (EIR) or mitigated negative declaration. CEQA does not require mitigation measures that are infeasible for specific legal, economic, technological, or other reasons. If there are not sufficient mitigation measures that the lead agency determines are feasible for avoiding GHGs or reducing GHGs to a less-than-significant level, before approving a project, the lead agency must adopt all measures that are feasible and adopt a statement of overriding considerations (or significance "override") that explains why additional mitigation is infeasible.[79] The statement of overriding considerations must be supported by substantial evidence in the record.

A wide array of CEQA GHG mitigation that can help avoid the need to adopt statements of overriding considerations is discussed in Section 4.1.2 below. The hierarchy outlined below may provide a helpful reference for lead agencies and project sponsors on how to approach mitigation in a way that maximizes benefits to communities surrounding projects, with a particular emphasis on benefitting historically underserved and disadvantaged communities.

[79] Cal. Code Regs., tit. 14, § 15093(b).

The State recommends prioritizing CEQA GHG mitigation according to a geographic hierarchy as follows:

1. On-site design measures;
2. Off-site GHG mitigation:
    a. Funding or implementing local, off-site GHG reduction projects (within the communities or neighborhoods in the vicinity of the project);
    b. Funding or implementing non-local, off-site GHG reduction projects;
3. Purchasing and retiring carbon offset credits:
    a. That originate in the same air basin as the project;
    b. That originate elsewhere in California;
    c. That originate outside of California.

This geographical hierarchy is consistent with SB 7, in which the Legislature mandated a similar hierarchy for land use development projects seeking to be designated as "environmental leadership development projects" and granted certain streamlining provisions. Under this hierarchy, the community in which the project is located is prioritized to receive the environmental and economic co-benefits of the mitigation, especially the reductions in emissions of criteria air pollutants and toxic air contaminants that accompany many GHG reduction measures. Similar prioritization was included in the Oakland Waterfront Ballpark District Project, which required that a minimum of 50 percent of the GHG emission reductions from non-residential land uses result from local, direct measures, and stipulated that no more than 50 percent of reductions may result from offset credits.[80]

The following sections discuss each level of mitigation in the suggested hierarchy of mitigation.

4.1.1 On-site GHG Mitigation

Lead agencies should prioritize on-site design features within the project site that minimize GHG emissions. On-site GHG mitigation includes the implementation of project features, project design, or other measures, including but not limited to energy efficiency measures, installation of renewable energy electricity generation, all-electric building design, EV charging connections, and features that reduce VMT, such as a transportation demand management plan or the provision of shared mobility options (such as facilitating carpooling, providing active transportation and transit vouchers, and implementing telecommuting and alternate work schedules). Chapter 3 of CAPCOA's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*,[81] includes

[80] Bonta, Chapter 959, Statutes of 2018. California Environmental Quality Act: Oakland Sports and Mixed-Use Project. Available at: *https://leginfo.legislature.ca.gov/faces/billPdf.xhtml?bill_id=201720180AB734&version=20170AB73492CHP*.

[81] CAPCOA. 2021. Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. Available at: *https://caleemod.com/handbook/index.html*.

many on-site GHG reduction measures for a variety of project and plan types for lead agencies to consider. Many on-site GHG mitigation measures also result in a reduction in emissions of criteria air pollutants and toxic air contaminants in the air basin in which the project is located, as well as emissions of toxic air contaminants on or near the project site, consistent with legislative direction from SB 32 to "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities."

4.1.2 Off-site GHG Mitigation

If implementation of all feasible on-site GHG reduction measures is insufficient to reduce a project's impact to a less-than-significant level, the State recommends that the lead agency next explore options to fund or implement ***local***, off-site direct GHG reduction strategies.

Funding or implementing GHG mitigation measures in the project's vicinity may allow the project proponent and the lead agency to work directly with the impacted community to identify and prioritize the mitigation measures that meet its needs while minimizing multiple environmental and societal impacts. Direct, local investments help build relationships for future mutually beneficial development and mitigation opportunities in that community and may also provide a multitude of other co-benefits to the neighborhood's residents. To help remove barriers to employing these types of mitigation, lead agencies may wish to consider developing a local mitigation bank[82] that enables project applicants to fund such projects in exchange for being credited with the resulting GHG reductions in their CEQA analyses. The lead agency should also provide substantial evidence to show that the mitigation would actually serve to mitigate the proposed project's GHG emissions (i.e., a project cannot take credit for unrelated off-site measures that would occur independently of the proposed project). Examples of local investments and their co-benefits include:

- **Local urban forestry** programs that increase the number of trees and other plants in urban areas can sequester carbon, reduce air pollution and ambient temperatures, help manage stormwater and improve water quality, provide shade to reduce energy demand for cooling buildings (and the associated cost and GHG emissions of that energy), improve aesthetics, foster mental health, and encourage physical activity of residents and employees, among many other benefits.
- **Local building retrofit programs** targeting existing residential and commercial buildings in the project's vicinity can fund installation of cool roofs, solar panels, solar or heat pump water heaters, smart meters, and energy efficient lighting and appliances; replacement of fossil fuel-powered appliances with electric models; installation of energy efficient windows, insulation, and other building envelope measures; and

[82] As discussed in Section 5, below, the Regional GHG Collaborative Group along the Central Coast are working to educate and provide avenues for offset projects to help meet current and future local GHG reduction targets and CEQA GHG reduction needs.

implementation of water conservation measures. These investments can improve comfort, reduce utility bills, and help manage the demand for electricity while reducing GHG emissions.

- **Off-site EV chargers** can increase access to EV charging throughout a community. Some examples could include EV chargers in multi-unit dwellings in disadvantaged or low-income areas, public locations (schools, libraries, city centers), workplaces, key destinations (e.g., parks, recreation areas, sports arenas).
- **Public transit subsidies** can increase access to transit and to daily activities served by transit and can encourage less reliance on driving and increased reliance on other modes of transportation (e.g., transit and active transportation), which provides air quality and cost savings co-benefits to residents.

Like many on-site GHG mitigation measures, implementation of most local, off-site GHG reduction strategies also results in reductions of toxic air contaminants and criteria air pollutants and their precursors in the same air basin in which the project is located. The State recommends that lead agencies prioritize GHG mitigation that also increases a community's social and economic resilience to adverse impacts exacerbated by climate change. Applying a local lens to GHG mitigation and allowing for community-led decision-making helps prioritize the mitigation measures that address community-identified needs and can also fill gaps in the existing local approach to climate action.

If a project needs further GHG reductions after adoption of all feasible local, off-site mitigation options, applicants should next consider non-local, off-site mitigation. There has been concern that GHG emission reductions from off-site GHG mitigation measures (including carbon offset credits) may double count GHG emission reductions from California's Cap-and-Trade program. However, off-site mitigation measures, such as EV charging or building efficiency retrofits, are viable options for mitigation under CEQA and would not be double counted, provided they are not otherwise required by law or regulation and would not have happened but for the mitigation requirements of the project. If the mitigation would have been implemented or required through another statute, regulation, existing local program, or requirement other than the project it is mitigating, then the project being mitigated may not also claim credit for the reductions.

4.1.3 Conditions Applicable to Carbon Offset Credits

If implementation of all feasible on-site GHG reduction measures and all feasible off-site GHG reduction measures are insufficient to reduce a project's impact to a less-than-significant level, then the lead agency or project applicant should consider purchasing and retiring carbon offset credits. The State recommends that carbon offset credits retired as CEQA mitigation be registered with a recognized and reputable carbon registry on the voluntary market. For example, while CARB does not review or authorize voluntary-market offset registries or protocols for use as CEQA mitigation, CARB notes that the registries

approved by CARB for the Cap-and-Trade Program also serve as voluntary market credit registries, with voluntary market offsets available for CEQA mitigation purposes.[83]

In addition, starting in 2023, the California Carbon Sequestration and Climate Resiliency Project Registry[84] will be maintained by the California Natural Resources Agency for the purposes of identifying and listing projects in the state that drive climate action on the state's natural and working lands. The Registry is seeking funding from State agencies and private entities and may provide additional carbon offset credits. Note that compliance offsets for the Cap-and-Trade Program (a state market-based carbon program unaffiliated with CEQA) cannot be used for any purpose other than Cap-and-Trade compliance by covered entities and therefore cannot be purchased for use as CEQA mitigation.[85] As with other types of off-site mitigation, the State recommends pursuing carbon offset credits that are as close to the project site as possible in the following order of priority: (1) carbon offset credits that originate in the same air basin as the project, (2) carbon offset credits that originate elsewhere in California, (3) carbon offset credits that originate outside of California.

4.2 Clarifying CEQA's Requirements for GHG Mitigation

Over the years, agencies and courts have provided direction and guidance regarding GHG mitigation. Given the variety of potential projects and mitigation scenarios, some uncertainty and misconceptions persist. For example, when lead agencies consider off-site GHG mitigation (including carbon offset credits), they may sometimes conflate the requirements for compliance-grade offsets in California's Cap-and-Trade regulation with the requirements for GHG mitigation measures under CEQA. The Cap-and-Trade regulation requires that compliance offsets used in the Cap-and-Trade Program meet certain regulatory criteria, including that they be real, additional, quantifiable, permanent, verifiable, and enforceable. In general, the State's Cap-and-Trade Program restricts compliance offsets from being used for any purpose other than Cap-and-Trade compliance, including being used as mitigation under CEQA.

When designing GHG mitigation measures (whether local, off-site mitigation or carbon offset credits), the State recommends that lead agencies focus on applying the requirements specified in the CEQA statute, Guidelines, and case law – e.g., not otherwise required (see CEQA Guidelines section 15126.4(c)(3)); enforceable (see CEQA Guidelines section 15126.4(a)(2)); supported by substantial evidence; etc. – rather than strictly importing all of the regulatory requirements used for compliance offsets within California's Cap-and-Trade

[83] CARB. 2022. *Offset Project Registries.* Available at: *https://ww2.arb.ca.gov/our- work/programs/compliance-offset-program/offset-project-registries*.
[84] Skinner, Chapter 237, Statutes of 2021. Carbon sequestration: state goals: natural and working lands: registry of projects. Available at: *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB27*.
[85] Cal. Code Regs., tit. 14, Chapter 3, §§ 15000 et seq.

program. It may be appropriate for lead agencies to require CEQA mitigation that helps localities meet targets or commitments set in local planning documents, including CAPs, lacking sufficient funding and are not otherwise explicitly required by regulation. Lead agencies should use substantial evidence to document that a specific off-site mitigation measure is not otherwise required and would not have occurred at that time ***but for*** the requirement to mitigate a project's GHG impacts. Examples of off-site GHG mitigation that would not have occurred but for the requirement to mitigate a project's GHG impacts and could therefore be not otherwise required are included in Section 4.1.2, Off-site GHG Mitigation.

5. Importance of Regional Collaboration

While local jurisdictions have considerable authority to act individually, it is important to consider the many benefits of regional collaboration. Transportation, land use, housing, climate, and energy issues are often interconnected. Local governments can benefit from collaborating with neighboring jurisdictions and regional agencies as they seek to reduce GHG emissions from these sectors. For example, CAPs that consider regional travel patterns, job and housing availability, and regional opportunities to mitigate GHG emissions can be more effective. In collaboration with other regional entities, local jurisdictions can leverage investments, data, best practices, and opportunities for GHG emission reductions in an equitable manner.

Regional collaboration and partnership across levels of government can bring together community leaders, agencies, academia, industry, community-based organizations, and other stakeholders from multiple jurisdictions within a region to share expertise, information, lessons learned, and strategies to promote mutually defined goals. Regional collaboration may include leveraging existing collaboratives and partnerships or establishing new ones. There are many excellent examples of regional collaboration in California that support the intersection of transportation, housing, and land use in tackling climate change. Local jurisdictions can leverage the work of these collaboratives and build on existing efforts to support equitable implementation of priority strategies and GHG mitigation. Examples of existing regional collaboratives include Community Choice Aggregators (CCAs), Regional Energy Networks (RENs), Regional Climate Collaboratives, Regional Housing Collaboratives, and Plug-in Electric Vehicle Collaboratives. The Integrated Climate Adaptation and Resiliency Program (ICARP)[86] offers funding, case studies, and tools for forming regional climate coordination entities.

Regional collaboration has tremendous potential to address barriers and expand opportunities for successful local GHG mitigation. It can help increase local opportunities for feasible GHG mitigation under CEQA that also benefit the communities impacted by the development. It can

[86] Governor's Office of Planning and Research. 2022. *Integrated Climate Adaptation and Resiliency Program (ICARP)*. Available at: https://opr.ca.gov/climate/icarp/.

help overcome barriers, such as project and administrative costs. It can help increase awareness of local mitigation opportunities for project applicants and lead agencies, improve connections with existing programs that offer mitigation opportunities, and identify sites for off-site mitigation opportunities, all in an effort to support a local voluntary mitigation market. And it can help site owners aggregate smaller mitigation projects to potentially reduce costs, increase the efficiency of mitigation projects, and leverage expertise on mitigation strategies and quantification methodologies.

Regional collaboration can also lend support to lead agencies and air districts as they seek opportunities for local GHG mitigation. San Luis Obispo County Air Pollution Control District, County of Santa Barbara, County of Ventura, City of Santa Barbara, City of San Luis Obispo, and Community Environmental Council formed a tactical Regional GHG Collaborative Group to understand and identify opportunities for local carbon sequestration and GHG reduction projects.

Developing a local voluntary mitigation market will help a city or region capture mitigation dollars and provide local benefits that are not realized by the purchase of distant, out-of-state carbon offset credits, while providing greater transparency and enforceability. Keeping GHG mitigation dollars within communities or regions can also be a strategy to address community needs and inequities from historic and ongoing underinvestment in vulnerable and disadvantaged communities.

Creating, sustaining, and expanding regional collaboratives takes time, resources, and expertise that are not always available to local jurisdictions. There may be a role for the State to ensure that all regions have access to mitigation opportunities. One potential avenue to accomplish this would be through the creation of a statewide GHG mitigation bank designed for CEQA mitigation purposes.

6. Conclusion

Local governments are essential partners in California's efforts to reduce GHGs. Their unique expertise and respective authorities allow them to shape growth and development patterns within their jurisdiction, and as a result, local actions remain critical for reducing GHG emissions from the built environment and transportation. Indeed, the Scoping Plan proposes transformative reductions in GHG emissions from the building and transportation sectors. These critical emission reductions rely on significant electrification of the state's vehicle fleet and building stock, but also require a significant shift in the transportation choices for Californians favoring active mobility, shorter trips, and robust public transit rather than sprawl and automobile dependence. Local governments have a critical role to play in this transition through their land use policies, transportation investments, and partnerships with neighboring jurisdictions, community organizations, business and labor groups, and the State.

Local leadership and regional collaboration are paving the way for reducing emissions in these sectors, and this appendix seeks to inform jurisdictions about opportunities to promote transportation electrification, VMT reduction, and building decarbonization through:

- Developing local CAPs and strategies consistent with the framework described in Section 2: “The Role of Local Climate Action Planning in Supporting the State’s Climate Goals;”
- Localizing State-level GHG priorities when approving individual land use plans and projects as described in Section 3: “The Role of Land Use Development Projects in Supporting the State’s Climate Goals;”
- Implementing mitigation to reduce GHG emissions associated with CEQA projects, consistent with Section 4: “Mitigating Greenhouse Gas Emissions Pursuant to CEQA;” and
- Leveraging regional collaboration to enhance the effectiveness of local climate action and overcome barriers to CEQA GHG mitigation as highlighted in section 5: “Importance of Regional Collaboration.”

California must accommodate population and economic growth in a far more sustainable and equitable manner than in the past. California’s climate trajectory relies on local efforts that align with and help implement the State’s priorities. The recommendations provided in this appendix are non-binding and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California’s climate goals.

From:	Keith B. Jones
To:	mike_bullock@earthlink.net
Subject:	Re: Oceanside Transit Center: Housing Retail Office = need for an intelligent car-parking system
Date:	Friday, March 11, 2022 2:51:00 PM
Attachments:	image001.jpg

Mike,

Happy Friday afternoon to you. Thank you for your thoughtful and well crafted response.

Yes, please feel free to share ACE's interest in participating in an opportunity to provide these parking solutions.

Have a great weekend,
Keith

Keith B. Jones
Owner | ACE Parking
ACE Parking
645 Ash Street
San Diego, CA 92101
T: 619.233.6624

On Sat, Mar 5, 2022 at 5:41 PM <mike_bullock@earthlink.net> wrote:

> Keith,
>
> Thank you so much for getting back to me.
>
> No, there is no RFP.
>
> However, the North County Transit District (NCTD), the agency doing the Transit Center project, has a representative on the Oceanside Bike-Ped Committee who seems interested. The Bike-Ped Committee supports the Dividend Account Parking (DAP) system. The Chair of the NCTD, Tony Krantz, who is an Encinitas Councilman, should be supportive, but I have not presented to him. I have presented to the Mayor of Encinitas.
>
> I have put more work into this for the City of Oceanside, for their Civic Center

Parking Garage, which is supposed to be City Employee parking, but is also free to the public. On Thursdays, when Oceanside has its Farmers Market, late-arriving employees sometimes find no vacant parking and then park in the neighborhood. Oceanside is not planning to issue an RFP. However, I may be able to coax one out of them if they know you are interested. I need 3 votes and I estimate that I have only 1 right now. However, several on the Council have expressed interest in the Dividend Account Parking (DAP) system. At the Oceanside Climate Action Plan (CAP) meeting, where I was hoping to get three votes, only one Council Member expressed interest. If DAP were installed at the Civic Center Parking Garage, the Transit Center should follow. They are about 4 blocks away.

Most realize that our climate emergency is getting more acute. However, no city has ever done this, and it is tough to ask an elected official to do something new. Most Climate Action Plans have a Transportation Demand Management (TDM) ordinance, where DAP would fit.

Oceanside has parking meters and pay-station parking close to the Civic Center Parking Garage and close to the Transit Center. Both the parking meter parking and the pay-station parking could be automated with DAP, so the user could take their pick. I predict that younger people would tend to choose DAP; older drivers would tend to use the meters and the pay station. Over time, DAP would win out.

Regarding climate, humanity needs the private sector to do the design and operation of the needed systems (parking and roads.) (Where would we be without Elon Musk?)

Would it be OK for me to disclose your interest in submitting a proposal for a DAP system RFP? Your interest would be important, it seems to me. I have also raised this issue in Encinitas and Carlsbad. Barbara and I were strategizing on how to introduce this to San Diego, when the pandemic hit. San Diego is known to have a poor Climate Action Plan when it comes to driving. Driving is the category that emits the most GHG. A reduction of 10% at a location would be very significant and be a good verification of the system. And employees would have to be pleased with the new system.

The County might be interested, especially if they knew you were interested. DAP was ruled to be a feasible mitigation measure in the lawsuit against their first CAP. There are 3 members on the BOS who claim to be very concerned about climate. You have probably read about their “framework for decarbonization by 2035.” After

nearly 10 years of trying, the County still has no legal CAP.

Ukraine (Putin) has presented another argument for having meaningful TDM measures to reduce gasoline use. In any case, any measure adopted would need to increase choice and equity. DAP would do that.

Regards,

Mike Bullock
1800 Bayberry Drive
Oceanside, CA 92054
760-421-9482

Former California Democratic Party Delegate, 76th Assembly District

Former Elected (now Associate) Member of the San Diego County Democratic Party Central Committee

Satellite Systems Engineer, 36 years (Now Retired)

Air and Waste Management Association published and presented papers:

Author, ***The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving***

Author, ***A Climate-Killing Regional Transportation Plan Winds Up in Court: Background and Remedies***

Co-author, ***A Plan to Efficiently and Conveniently Unbundle Car Parking Cost***

From: Keith B. Jones <kjones@aceparking.com>
Sent: Thursday, March 3, 2022 2:06 PM
To: mike_bullock@earthlink.net
Subject: Fwd: FW: Oceanside Transit Center: Housing Retail Office = need for an intelligent car-parking system

Mike,

Good afternoon. Barbara Bry sent me your email regarding Oceanside Transit Center. Is there an RFP for the car parking you suggest I respond to?

Thanks,

Keith

Keith B. Jones
Owner | ACE Parking
ACE Parking
645 Ash Street
San Diego, CA 92101
T: 619.233.6624

---------- Forwarded message ---------
From: **Barbara Bry** <bbry@blackbirdv.com>
Date: Sun, Feb 27, 2022 at 6:36 PM
Subject: FW: Oceanside Transit Center: Housing Retail Office = need for an intelligent car-parking system
To: Keith Jones <kjones@aceparking.com>

Fyi, from Mike Bullock, hope you're having a great time visiting islands!

Barbara Bry

Chief Operating Officer

Chief Financial Officer

Blackbird Ventures

(858) 248-9465

https://www.linkedin.com/in/barbarabry/

From: Mike Bullock <mike_bullock@earthlink.net>
Date: Sunday, February 27, 2022 at 4:24 PM
To: Barbara Bry <bbry@blackbirdv.com>
Subject: Oceanside Transit Center: Housing Retail Office = need for an intelligent car-parking system

http://enewspaper.sandiegouniontribune.com/infinity/article_share.aspx?guid=0dbb7ab6-0514-4bc1-b06b-4d7d1894f882

Please forward this to Keith. Would he submit a response to an RFP if the NCTD issued one for a good car-parking system? This is a bit of a chicken and egg situation.

Putin gives us one more reason to stop using a car-parking system that incentivizes driving. Our climate emergency is all the reason we need.

We need a car parking vendor to take over the world of bad car-parking systems.

Mike

CITY OF CORONADO
OFFICE OF COUNCILMEMBER CARRIE ANNE INADA DOWNEY

1825 STRAND WAY
CORONADO, CA 92118

CITY HALL
(619) 318-1643

July 18, 2025

SANDAG Board of Directors
1011 Union Street, Suite, Suite 400
San Diego, CA 92101

RE: Comments on 2025 SANDAG Draft Regional Plan

Dear SANDAG Board of Directors,

Thank you for the opportunity to review and comment on the 2025 SANDAG Draft Regional Plan. I applaud the hard work and analysis in the draft 2025 Regional Plan. After reviewing the plans details, I now understand the negative defects of creating High Occupancy Vehicle (HOV) and High Occupancy Toll (HOT) lanes on the short San Diego-Coronado Bridge will have. Planning for each unique transportation situation includes factoring in history and achievable goals for each project in each locality. I echo and incorporate the comments of the City of Coronado in their entirety and won't repeat them. In the hopes of improving the final environmental, financial and needs analysis, I provide the following additional comments to encourage SANDAG to remove the proposed High Occupancy Vehicle (HOV) and High Occupancy Toll (HOT) managed lanes and new Rapid Bus Route over the Coronado Bridge for five reasons:

1.Managed lanes that allow single driver use for payment burdens military and hospitality workers.

Charging for the privilege of riding in a "managed lane" will greatly impact the military, hotel and restaurant workers while the higher income users will save time. In 2002 the original toll came off the San Diego-Coronado Bridge because of the deleterious effect it had on lower income workers. It will also make the Bridge traffic back up on Interstate 5 in the morning and cause traffic slowdowns in the afternoon as base employees and others exit to the Bridge blocking cross traffic in Coronado. It seems unfair to San Diego-Coronado Bridge users to take away a lane thereby slowing their commute while in the same plan removing the toll from users of the 125.

2. History suggests Coronado will never have enough users to justify a Rapid Bus.

The City of Coronado has supported mass transit for many years. The vast majority of the traffic coming to Coronado in the morning is civilian and military Department of Defense employees heading to work on Naval Base Coronado (NBC) and then home in the afternoon. Several years ago, the City of Coronado, the Metropolitan Transit System (MTS), SANDAG, and the Commanding Officer NBC, approved a pilot program that had a dedicated bus that ran from San Diego's largest

Navy active duty family housing complex in Murphy Canyon to Naval Base Coronado. After the pilot program concluded, it was determined that there were very little benefits for the cost because very few people ever rode the bus. It was not financially or operationally sustainable. If MTS was unable to entice service members to avail themselves of free almost direct service, it suggests making the current bus option faster for a portion of the ride would receive the same response.

Several years after September 11, 2001, security concerns about transit vehicles like buses and even the Ferry reaching/entering Naval Base Coronado, make it harder to address the last mile concern. Currently all buses wishing to stop within the base can only drop off and pick up in one location right before the inbound security checkpoint. Everyone riding will have to walk the last mile, which for some could be several miles.

3. MTS cannot afford to operate a new Rapid bus line. It is not in their current or future plans.

In gathering data on bus ridership on the existing ridership in Coronado on the 901 and 904 buses to see if there is any demand for earlier and more frequent stops. SANDAG in the 2024 State of the Commute reported average weekday boardings for the 901 as 2,125 and 216 for the 904. Those numbers include passengers riding for free on the Free Summer Shuttle (FSS) during the summer months. The FSS is still in the pilot stage and we have decreased the number of days to lower the cost per rider this year. MTS reports recent weekly averages for the 901 are 1,721 and 121 for the 904. Coronado pays for the FSS to run every 15 minutes. Based solely on low ridership uses MTS had considered cutting the 904 entirely. When the FSS isn't running, MTS uses only one bus to cover the route. The change proposed by the Regional Plan would require 4 buses at all times from 4:00 am to Midnight.

Even if SANDAG or CALTRANS build the road and Bridge changes to accommodate a new Rapid bus line it would have to be operated by MTS. As an MTS Board member, I have participated in MTS's operational budget. Unlike many other Rapid Bus upgrades proposed in the Regional Plan, upgrading the 904 has no evidence of ridership growth for the reasons discussed above. MTS currently, like many other transit agencies, is facing a financial cliff and have already deferred capital projects to meet current operational costs. MTS input should include projects both agencies could reasonably support based on future long range budgets for both agencies.

4. Strategic Highway Corridor Network (STRAHNET) concerns

The San Diego-Coronado Bridge and third and Fourth Streets are also known as California State Route 75, which was designated part of the Strategic Highway Corridor Network (STRAHNET). STRAHNET was established to ensure movement of military personnel and equipment, and goods in commerce. Navy Base Coronado has started a pilot project using face recognition to make the process to enter military installations faster. It has already proven effective on one entry lane and will be extended to all shortly. This will ultimately decrease the length of time everyone driving across the San Diego-Coronado Bridge spends waiting and will decrease Green House Gases in Coronado. The HOV/HOT proposal should not affect the benefits from the Navy's Face Recognition Program.

5. The Coronado Bridge is a significant cultural and historical building.

Should the proposal for the HOV and HOT lanes remain in the Final Regional Plan, they will have to go through historic review. For several years the City of Coronado was trying to work with Caltrans to beautify the entrance to Coronado and clean up the old toll collection plaza at the entry of the San Diego-Coronado Bridge. We discovered that the Coronado Bridge entry Plaza was designated Historic because it is greater than 50 years old. We were not allowed to remove the old toll plaza or even change the design. This project would have to request a Historic Alteration Permit if possible.

Sadly, the iconic nature of the San Diego-Coronado Bridge has made it a magnet for individuals seeking to end their lives. CALTRANS has been trying to find an effective deterrent method to install for 10 years. They have agreed to place a metal net under the bridge. The project is in the beginning phase. Finally finding a way to prevent suicide from the San Diego-Coronado Bridge is of great importance. The HOV/HOT proposal should not interfere with the Net project in any way.

I appreciate the opportunity to provide suggestions to improve the analysis of the plan. I encourage a reanalysis without the Rapid Bus or Managed Lane beyond designated carpool.

Respectfully,

Carrie Downey

July 18, 2025

To: SANDAG Board of Directors
Re: 2025 Regional Plan

Directors:

Neighbors For A Better San Diego (NFABSD) thanks SANDAG staff for development of the Draft 2025 Regional Plan. I have attached NFABSD's comments on the Plan, which focus on the following topics:

- Concentrate New Development to Achieve Transit Adoption
- Transit Planning as Zoning
- Weighting Revenue Sources and Project Deliveries by Risk
- Viability of Bus Rapid Transit Conversions
- Apparent Contradiction of Series 15 Population and Jobs Projections

The common theme of these comments is that state and local land use policies are evolving towards automated density bonuses based on proximity to transit. If future transit plans are going to dictate land use, then those plans need to be appropriate and realistic, with walkable distances and reasonable land uses.

Respectfully,

Geoffrey Hueter

Geoffrey Hueter, Chair
Neighbors For A Better San Diego

Attachment: NFABSD Comments on the 2025 Regional Plan

NFABSD Comments on the 2025 Regional Plan

Concentrate New Development to Achieve Transit Adoption

Because of the San Diego region's relatively low overall population density, the barriers to broad increased transit usage aren't network effects, but rather the lack of housing close to transit at the start of the journey and job centers and other highly connected uses at the destination end of the trip.

Therefore, to have the greatest success in maximizing transit adoption and minimizing vehicle miles traveled (VMT), the Sustainable Communities Strategy in the Regional Plan rightly proposes to add housing and commercial development in focused areas. As stated on page 18 of the Plan: "The Series 15 Regional Growth Forecast/SCS land use pattern focuses 80% of future residential development and employment growth in areas with a high concentration of transportation options."

It is important to have a clear definition of "areas with a high concentration of transportation options," including consideration of how far people are willing to walk to and from transit. The 2023 SANDAG On-Board Transit Survey reports that 75% of transit riders walk less than four-tenths of a mile to transit, and 50% walk less than two-tenths of a mile, emphasizing that transit incentive areas, such as the countywide Transit Priority Area (one-half mile as the crow flies to transit stops) and San Diego's Sustainable Development Area (one-mile walking distance) are much too broad to achieve the goals of walkable communities, transit-oriented development, and 15 minute trips.

Transit Planning as Zoning

With the City of San Diego's use of bonus densities based on the Sustainable Development Area and statewide proposals, such as SB 79 (Wiener), future transit decisions are de facto zoning decisions. While transit modeling can inform city and county planners where new development can best take advantage of transit, automated upzoning based on transit may include areas that have other constraints to development or that include lower-priority transit routes that may be eliminated in future iterations of the Regional Transportation Plan (RTP). To be cognizant of this effect, the RTP should be realistic about funding for future projects and certain in the prioritization of projects. Projects that are not certain of being funded should be eliminated from the Plan or at least identified as contingent and therefore excluded from SANDAG's major transit stops maps.

Weighting Revenue Sources and Project Deliveries by Risk

By extension of the previous point, NFABSD questions the likelihood that some future revenue sources will materialize and therefore that there will be sufficient funding for all of the listed projects. The Plan assumes multiple transit-specific sales tax increases in 2032 and 2036, on top of an extension of the TransNet tax to take the program beyond 2048. These taxes will be further competing against city-level sales tax measures, making it unlikely that SANDAG can count on approval of all three sales tax increases.

Rather than just listing the risk factors for each funding source, this uncertainty should be accounted for in the revenue forecast using probability weights for each revenue source and then prioritizing projects against the probability-weighted revenue forecast. In particular, there may be high confidence that voters will extend TransNet, but budgeting an additional $13.72 billion on the assumption of new transit taxes, as proposed on page I.16 (Appendix I), is highly optimistic, especially given the failure of a transit tax measure on the last San Diego County ballot (2024).

On the expense side, given past projects being delivered later than planned, at higher costs, it is important that these contingencies be accounted for in the budgeting and prioritization of projects. This is especially important given that the Plan does not consider any margin for error. Per page 40 of the Plan: "… given how funding sources have been approved historically, it is reasonable to assume that new funding sources will continue to be established. We assume that none of the new sources will begin prior to 2028, **and they would be required to complete all of the projects in the Regional Plan**." [emphasis added]

It is unrealistic to assume that there will be exactly the amount of funding needed to deliver every project. More likely, some of the proposed projects will need to be moved to a future plan or abandoned in favor of higher value projects. To accommodate funding changes, project overruns, and other contingencies, the Plan should separate high-priority projects that can be confidently executed within the Plan horizon from lower-priority projects that will only be started if funds are still available after the high-priority projects have been completed. These contingent, lower-priority projects should not be included in the major transit stops map for the San Diego region.

<u>Viability of Bus Rapid Transit Conversions</u>

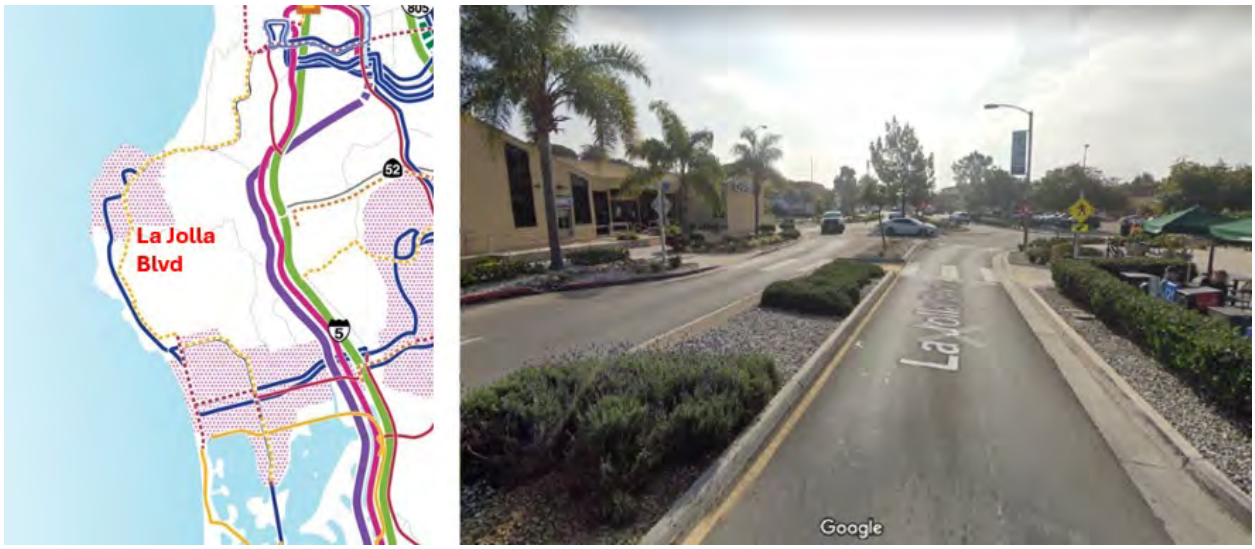
The Plan includes ambitious plans for Bus Rapid Transit (BRT), which are labeled as "Nextgen Rapid" in the Plan. In addition to their expense, BRT has the stringent legal requirements defined in Public Resources Code 21060.2:

(a) "Bus rapid transit" means a public mass transit service provided by a public agency or by a public-private partnership that includes all of the following features:

> (1) Full-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
> (2) Transit signal priority.
> (3) All-door boarding.
> (4) Fare collection system that promotes efficiency.
> (5) Defined stations.

Given these requirements, NFABSD calls into question the physical viability of some of the proposed BRT conversions, which require removing at least two automobile lanes from the streets that are being converted. For example, Figure A.3 (Appendix A of the Plan), shows a BRT conversion on La Jolla Boulevard, but as the photo below makes clear, it is not physically possible to do this in some locations without completely re-routing automobile traffic around bottlenecks in the road.

The Plan needs to be pragmatic. All proposed BRT conversions, including the one below, should be surveyed for their viability, and those that are unrealizable should be removed from the Plan.



Alternatively, if "Next Gen Rapid" is not intended to meet the requirements of Bus Rapid Transit, then these routes need to be downgraded to local bus service in designation of major transit stops.

Note that the requirement of dedicated bus lanes for BRT precludes sharing these lanes with alternative mobility options, such as using these as bike lanes, as is done on the purported BRT route on El Cajon Boulevard in the City of San Diego. Sharing uses downgrades these routes from BRT to local bus service and changes the criteria for including these routes in the major transit stops maps.

This issue is particularly important because a substantial number of SANDAG major transit stops are included only on the basis of future BRT service and wouldn't qualify based on current local bus service. As noted above, these stops are being used to allow projects based on San Diego's Sustainable Development Area and would also be used in the future to allow development under SB 79, if it passes.

<u>Apparent Contradiction of Series 15 Population and Jobs Projections</u>

The Series 15 projections show that population is flat between 2035 and 2050, yet employment increases by 140,000. Given that the population will be aging (and presumably retiring, not entering the workforce), it would be helpful if the Plan could provide a succinct explanation for the apparent divergence of population and job projections.

Tuere Faaola

Deputy Director of Regional Planning

SANDAG

1011 Union Street, Suite 400,

San Diego, CA 92101

RE: Comments on the SANDAG 2025 Regional Plan

Dear Ms. Faaola,

The Building Industry Association of San Diego is pleased to submit the following feedback on the Draft Regional Plan. As an association that has the singular goal of providing attainable housing for all San Diegans, we hope to be able to provide industry expertise that will improve the plan via housing impacts and considerations.

The BIA commends efforts to reduce GHG emissions and address the causes of climate change. Given that transportation is the largest contributor to CO2e emissions in San Diego, we support efforts focused on reducing traffic congestion, as well as toxic air contaminants, especially around historically disadvantaged communities. Simultaneously, our members believe it is essential to plan adequate, attainable housing across the region to meet the ever-growing demand from existing and future residents, while recognizing new realities in our workforce, most notably the results of a post-pandemic environment where “Work From Home” (WFH) has become commonplace. To take Henry Ford, “We think San Diego can prosper from more housing and at the same time meet and exceed climate goals.”

Acknowledging that a home is where a job goes to sleep, it’s critically important to provide adequate housing AND mobility choices for San Diegans – which is one of the relationships analyzed by SANDAG and The Regional Plan. Unfortunately, the balance that is so critical to ensuring people working in San Diego also have a place to sleep in San Diego continues to be heavily tilted against a healthy and equitable housing stock. We feel compelled to express significant concerns with SANDAG’s “self-fulfilling” prophecy of not planning for sufficient regional growth, which in turn stifles housing production and employment, leading to inflated home prices and making our business community less competitive, ultimately driving residents and employers out of San Diego.

The evidence is clear. SANDAG's projections for the number of new housing units, the number of jobs and the overall population, have declined since at least Series 12 (2008). Tables 1, 2 and 3, below, show how SANDAG's projections have steadily, or in the case of Series 15 employment projects abruptly, declined over the last nearly two decades. As shown therein, SANDAG projections have reduced the estimated population projection by nearly one million residents (from 4.34M to 3.44 million) while cutting the number of housing units and jobs by over 90,000 apiece.

Acknowledging SANDAG doesn't have direct land use authority over any of its member jurisdictions, we believe SANDAG has *de facto* influence both directly (through Board action on transportation projects) and indirectly through these regional projections and plans.

As jurisdictions update their General Plans or analyze potential new projects, they are required to demonstrate compliance with other regional plans such as the RTP/SCS, RCP and others. Plans and projects which exceed the projections of The Regional Plan could be determined to be inconsistent with growth projections, resulting in cumulative impacts and reducing project feasibility. Yet, the current Regional Plan likely underestimates buildout for the regions 18 jurisdictions, resulting in questions about the consistency of existing General Plans with SANDAGs projections. One example is the County of San Diego, which has a General Plan capacity of approximately 50,000 housing units, yet, The Regional Plan only allocates approximately 25% of that total, fewer than 13,000 homes, towards the 2050 projections.

Further, there is the general perception that growth is stagnating and the associated challenges brought forward with such a perception – concerns over the future viability of the region to be a leader in technology, bio-medical engineering, education, healthcare, tourism, military, etc. San Diego has already seen a reduction in population during the COVID pandemic and rising housing affordability crisis. The perpetuation of this trend should be alarming for local businesses and threatens the region as a whole.

Finally, we're already seeing the negative consequences as population growth has slowed and our population has aged. It's not surprising to see school closures. San Diego district-run schools have seen a decline in enrollment of some 53,000 students in public schools since 2014, a 5-percent decline, according to Voice of San Diego.[1] This trend is likely to continue, with the state Department of Finance projecting this decline "will nearly double to 10.5 percent [which] would mean the county would lose a further 50,185 students," and that by 2044, "San Diego County will lose an additional 61,844 students." When combined, this could total a decline of nearly 140,000 students over a

[1] San Diego County's Schools Have 27,000 Fewer Students Than a Decade Ago. It Will Get Worse. | Voice of San Diego

30-year period. This outcome will have a deleterious effect on our local economy and could disproportionately affect disadvantaged communities.

Housing

But the biggest concern for the Building Industry Association is housing. Amid a widely recognized housing shortage, when the #1 issue among many residents, employers and elected officials is housing affordability (and a reason cited for why schools are closing), SANDAG continues to project a reduction in the number of housing units. The Regional Plan cuts housing projections by another 32,825 units over the next 25 years. We believe this projection is misguided.

Every eight years, the state sets goals for each MPO to plan for sufficient housing. SANDAG is responsible for allocating each local jurisdictions share of the Regional Housing Need as part of the RHNA process. In 2013, the 5th RHNA cycle, the total for the San Diego Region was 161,980 units. The current Sixth RHNA cycle, adopted in 2021, set a total of 171,685 units. Because the RHNA cycle is mandated to occur on regular intervals, it's understood there will be the 7th (2029), 8th (2037) and 9th (2045) RHNA cycles before the 2050 "buildout" horizon embodied in the RTP.

Based on the prior two years allocations of 161,980 and 171,685 units, SANDAG should be planning for AT LEAST 412,898 new units, which is equal to the roughly 19,662 units/year average over the prior two cycles, projected forward to 2050. While this total may be ambitious, it would at least accommodate the reasonably expected share of the RHNA over the next 25 years.

Instead, SANDAG is projecting a mere 202,819 over the next 25 years (less than HALF of what RHNA could require), equivalent to roughly 8,113 units per year. San Diego builders by most estimates, should be building at least 10,000 units per year just to keep pace with housing need, and 20,000/year to address long-term under-supply (this number is supported by the state-allocation to the San Diego region the last two RHNA cycles). SANDAG is not even planning for this total.

It's no small wonder why there is a housing affordability issue – the demand for housing far exceeds supply, which has put upward pressure on prices, which have been further exacerbated by inflation and supply chain challenges and material shortages brought on by the COVID pandemic.

The net effect has been outsourcing housing to Riverside, Mexico and other states. According to a report by London Moeder Advisors, San Diego County has "exported" as many as 66,588 housing units to Riverside County and 21,609 housing units to Orange

County, not to mention a significant number of homes to northern Mexico, where 60,000 vehicles cross the border daily.[2]

As a result of this, the LMA paper estimates that San Diego was importing 47,073 commuters from Riverside County and 12,094 commuters from Orange County by 2018. These numbers have likely increased as the region has fallen further behind annual goals for new home construction.

While the Sustainable Communities Strategy, as part of The Regional Plan, considers "Induced GHG", it appears to be silent on "Exported GHG" that occurs from out-of-County commuters. A preliminary assessment that assumes each trip from the geographic middle of Riverside County (Perris) to Escondido (North San Diego County) with an "average" commute distance of 51.1 miles would find that, across 47,073 commuters, San Diego is "exporting" approximately 1,163,644,560 miles per year. OVER 1 BILLION VMT. This likely equates to tens, if not hundreds, of millions of metric tons of CO2e annually.

Why isn't this part of the SCS calculation if SANDAG is also calculating things like induced GHG? This a reasonably foreseeable (and already documented) outcome. And not only is this an existing reality, but unfortunately when The Regional Plan is not projecting sufficient housing, the reasonably foreseeable outcome is the continuation of this trend - greater numbers of people commuting to San Diego. In a broad sense, SANDAG is doing the same thing with housing and CO2e emissions that the United States did with domestic manufacturing in the 80s/90s - exporting it to lower-cost providers at the expense of local communities.

Further, can SANDAG capture the embedded reductions in CO2e when employees and residents from higher-generating states like Arizona, Texas and Arizona move to San Diego? Emissions don't stop at county or state boundaries.

Rather than this bleak outlook, we support SANDAG, as the MPO, being the leader in regional coordination to reduce GHG while at the same time thinking about the entire region and ways to grow responsibly – planning for more housing and more employment across San Diego while sighting and funding appropriate transit options.

One way that we encourage SANDAG in this role is for SANDAG to model and identify land use changes that would reduce overall CO2e emissions largely associated with VMT. This could be done as an Alternative in The Regional Plan DEIR. Where should the region be focusing on development and what uses are missing that would achieve the goals of more housing, more employment and less CO2e per capita?

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[2] LMA-Report-on-VMT-Policy-Impacts.pdf (SECURED)

For instance, one outcome of the Innovate 78 study several years ago was the identification of tens of thousands of jobs along the Hwy-78 corridor from Carlsbad/ Oceanside to Escondido, but not enough housing is available to fill all these employment opportunities. Alternatively, eastern Chula Vista is largely a bedroom community that needs more employment opportunities for residents on the east side of I-805 (such as the Regional Technology Park in Otay Ranch).

SANDAG could model the regional reduction in VMT and CO2e if land uses were changed in various locations across the County such that the region would benefit rather than on individual jurisdictions fighting for every ounce of CO2e reductions to make individual Climate Action Plans "work". Thereafter, SANDAG could allocate funding based on jurisdictions revising their general plans and zoning to facilitate uses that reduce CO2e. Such an approach could provide more housing, more employment, reduced VMT/commutes, and lower CO2e contributions.

In addition to the incorporated cities, a similar exercise for the unincorporated County communities could identify potential locations for more single-family housing opportunities around the Villages planned in the General Plan Update. These Village areas have yet to realize the benefit of increased density and intensity, but adding appropriate amounts of small-lot single family detached housing and townhomes in and around Village areas (on SR-1 and SR-2 designated lands) could encourage more housing to support offices, retail, and other Village-uses. Along with more housing, development in County villages could also spur additional park and recreational facilities, infrastructure improvements, and generate fees for enhancements and upgrades to schools.

By spreading out land uses across the County, such an approach would enable more small-lot homes and townhomes. These are much less expensive to build that apartments and provide home ownership opportunities that provide for families to start to build generational wealth. Under the current AB32/SB375/SB743 planning construct, the majority of hew housing is high-density multi-family/apartments located in infill areas near transit. This is the most expensive type of housing to build, because it cannot be phased and is often (in the case of wrap and podium housing), using the most expensive construction practices. In the current interest-rate environment, with the potential for inflation in a post-tariff economy (including higher materials costs) forcing interest rates to stay high, these high-density product types simply do not pencil.

We have witnessed the challenges when building activity has significantly over-weighted towards apartments and multi-family. It is a double-edged sword because this has had multiple consequences.

- It skews to rental opportunities, which precludes home ownership and the ability to growth generational wealth.
- It's the most expensive kind of construction (examples) so it also skewed towards higher rent particularly post-supply chain and material cost inflation shock of COVID. Thus, it's actually not as affordable.
- It can only be built in higher-rent markets in general, which has left out growth in many historically economically disadvantaged markets.
- When combined with new planning paradigm under SB743, many communities are essentially stuck with very limited options for producing housing.

By coordinating regional planning with efforts to reduce CO2e emissions while meeting the reasonably-foreseeable RHNA housing totals into The Regional Plan, SANDAG will allow for a more even distribution of housing typologies and choice. This is a more equitable approach to housing by giving developers more flexibility to respond to unique markets rather than forcing all development into high-density apartments near transit.

Summary

Our assessment of The Regional Plan leads us to conclude that SANDAG is trading off addressing state-mandated GHG cuts at the expense of strengthening our economy, housing choices, and affordability by exporting more San Diego residents and business. Rather than capitulate to the self-fulling doom-spiral of the last 20 years under climate planning, the BIA encourages SANDAG to consider a growth mentality by providing housing opportunities across San Diego and combat CO2e emissions by putting more of the right uses in the right locations for the entire region to thrive. If nothing else, in the words of Les Brown, "It's better to aim high and miss than aim low and hit."

Respectfully Submitted,

Lori Holt Pfeiler

President & CEO
Building Industry Association of San Diego

TABLE 1. POPULATION PROJECTIONS (SERIES 12 TO SERIES 15)

	Series 12	Series 13	Series 14	Series 15
2008	3,131,552			
2012		3,143,429		
2016			3,309,510	
2020	3,535,000	3,435,713	3,383,949	
2022				3,287,306
2029				3,334,675
2035	4,026,131	3,853,698	3,620,317	
2040				3,432,211
2050	4,384,867	4,068,759	3,746,052	3,400,250

TABLE 2. HOUSING UNITS PROJECTIONS (SEREIS 12 TO SERIES 15)

	Series 12	Series 13	Series 14	Series 15
2008	1,140,654			
2012		1,165,818		
2016			1,190,555	
2020	1,262,488	1,249,684	1,226,461	
2022				1,235,642
2029				1,320,010
2035	1,417,520	1,394,783	1,409,853	
2040				1,410,615
2050	1,529,090	1,491,935	1,471,286	1,438,461

TABLE 3. EMPLOYMENT PROJECTIONS (SERIES 12 TO SERIES 15)

	Series 12	Series 13	Series 14	Series 15
2008	1,399,469			
2012		1,357,044		
2016			1,629,940	
2020	1,515,926	1,520,013	1,699,555	
2022				1,611,632
2029				1,641,598
2035	1,696,252	1,655,737	1,915,286	
2040				1,721,324
2050	1,872,795	1,787,432	2,072,704	1,782,389

The City of SAN DIEGO

City Planning

July 23, 2025

Ms. Antoinette Meier
Senior Director of Regional Planning
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, CA 92101

Reference: 2025 Draft Regional Plan

Dear Ms. Meier:

Thank you for providing the opportunity to comment on the 2025 Draft Regional Plan. The City of San Diego appreciates the San Diego Association of Governments' (SANDAG) approach for this Regional Transportation Plan cycle and its inclusion of robust transit and multimodal solutions while generally delivering more convenient, equitable, and healthy mobility options for the region and for the City of San Diego (City) within a more fiscally responsible revenue envelop than previous Plans. The City respectfully submits the following comments on the Draft Plan for consideration in the development of the Final 2025 Regional Plan for Board consideration:

- **Fair Housing**: SANDAG and each of its member jurisdictions is required by law to administer programs and activities related to housing in a manner that affirmatively further fair housing[1]. According to the California Department of Housing and Community Development[2], affirmatively furthering fair housing goals include combating housing discrimination, eliminating racial bias, undoing historic patterns of segregation, and lifting barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians. Providing more affordable housing in places where it has historically been excluded is an important way to meet fair housing goals.

  The Regional Plan is also required to meet the greenhouse gas (GHG) reduction targets determined by the California Air Resources Board[3]. Locating more homes in places with access to high-quality transit services allows for existing and future residents to walk, roll, bike and take transit to more locations, which leads to GHG reductions by reduced automobile trips.

  However, achieving GHG reductions while affirmatively furthering fair housing can be difficult, as high-quality transit is not commonly located in communities that need more affordable homes to achieve

[1] Government Code 8899.50(b)
[2] Department of Housing and Community Development Affirmatively Furthering Fair Housing website
[3] Government Code 65080(b)(2)(H)

the fair housing goals described above. Providing more homes without transit would lead to increased GHGs, while focusing transit improvements and home development outside of these communities would not affirmatively further fair housing.

Prioritizing transit investments in communities that currently do not have major transit stops or high-quality transit and are determined to be High or Highest Resource Opportunity Areas by the California Tax Credit Allocation Committee[4] can help to achieve the GHG reduction target while affirmatively furthering fair housing, High and Highest Resource Opportunity Areas are those with access to higher paying jobs, better performing schools, and fewer environmental issues like poor air quality. While the City of San Diego supports transit improvements in all resource areas, the City recommends that SANDAG also prioritize transit investments that result in new major transit stops in communities determined to be High or Highest Resource Opportunity Areas to support the opportunity for more homes, especially affordable homes, and access to higher paying jobs and educational services to affirmatively further fair housing while providing opportunities for more transit ridership and reducing GHGs.

- **Efficient and Equitable Improvement Priorities:** The City appreciates the inclusion of many mobility improvements within the City of San Diego's jurisdiction, while noting that all jurisdictions also have many included improvements. While the City of San Diego's share of overall improvements exceeds those of other jurisdictions, the City would like to point out that on a per capita basis, the draft plan actually has struck a fairly reasonable balance in identifying improvements across the region. However, to the extent that any changes are made to this draft plan, the City cautions that any fewer investments within its jurisdiction would result in the City of San Diego receiving *fewer* per capita improvements than other jurisdictions. It is important to note that while on a per capita basis, improvements have been allocated in a generally balanced manner, investments in the City of San Diego represent projects that will ultimately result in the greatest amount of regional GHG emissions reductions due to the City's jurisdiction containing the most VMT efficient areas.

- **Community Plan Consistency**: The City appreciates the collaboration between SANDAG's Regional Planning and the City's Planning staffs to include updated Community Plan information and mobility projects within the 2025 Regional Plan. The City has compared the project list contained in the Regional Plan (Appendix A and equivalent Dataviewer) to the mobility networks within the City adopted community Plans, and has developed a list of suggested minor modifications. The City recommends that SANDAG evaluate these modifications and revise the Final Plan accordingly (see Attachment 1).

- **Project Programming and Environmental Analysis:** The City requests that projects included in the unconstrained portion of the Draft Plan be considered during the project programming and environmental analysis phases of adjacent or equivalent projects as funding is identified and

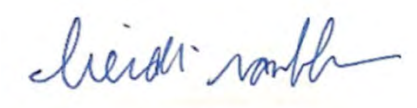
[4] California Tax Credit Allocation Committee Opportunity Area Maps

programmed. Specifically, the City requests that both the Hillcrest and Mira Mesa Skyway projects (Routes 573 and 592) be considered as alternative alignments and modes as parallel Rapid buses lines (or other transit improvements) are evaluated in those same communities (e.g. Arterial Rapid Routes 237 and 238 for the UC San Diego to Mira Mesa connection).

- **Mobility Programs:** The City appreciates the inclusion of complementary mobility programs to align with capital funding efforts as is done similarly in the City's newly adopted Mobility Master Plan. The inclusion of robust programs such as the Youth Opportunity Pass, vanpool programs, and shuttle services will maximize regional investments in capital infrastructure and can connect with similar efforts supported by the City of San Diego.

The City appreciates the emphasis on multimodal solutions contained in the Draft 2025 Regional Plan and supports SANDAG's achievement of its greenhouse gas emissions targets through this planning work. We look forward to our continuing partnership with SANDAG on project and program implementation and welcome the opportunity to work collaboratively on new grant funding opportunities and other efforts to ensure the development of meaningful mobility options for all San Diegans.

Sincerely,



Heidi Vonblum
City Planning Director

Attachment: 1. Regional Plan Project List Comments

cc. Casey Smith, Deputy Chief Operating Officer, Mayor's Office
Walt Bishop, Director of Government Affairs, Mayor's Office
Chris Akerman-Avila, Policy Advisory, Mayor's Office
Tait Galloway, Deputy Director, City Planning Department
Shelby Buso, Deputy Director, City Planning Department

Attachement A: Draft 2025 SANDAG Regional Plan Comments - City of San Diego

No.	Location/Route/Project/Policy	Comment
1	CC039: I-8 Operational Improvements - Street J/Hotel Circle N/ Hotel Circle S to SR 67; 2050; $220M, 2024 est.	Based on location this appears to be Via Las Cumbres/Street J/I8 interchange from Mission Valley CPU however the "project name" and "description" do not make this clear. Additionally, "SR 67" seems to be a typo and should be "SR 163". Costs appear to be inclusive of Phase 1 ($70M, 2017 est.) and Phase 2 ($110M, 2017 est.)
2	AT062: Hotel Circle Connection - List of relevant plans; 2050, $25M, 2024 est.	Could be Hotel Circle cycletracks (separated bikeway) per Mission Valley CPU. Unclear from project name and description. Data viewer shows project extends onto Taylor St. to Old Town Transit Center. Unclear if the cost is included or additional to CC039.
3	SR 163/Friars Interchange Phase 2 and Phase 3	Appears to be no corresponding project in the Draft RP.
4	AT052: San Diego River Trail - Bridge connection (Sefton Field to MV YMCA); 2035; $8M 2024 est. AT051: San Diego River Bikeway Connections; Various locations; 2050; $14M 2024 est.	Early action program, consistent with Mission Valley CPU. However, other AT connections across rivers to provide additional access to Hazard and Mission Valley transit centers not included. AT051 shows connections across Qualcomm Avenue and parallel near Fashion Valley Mall.
5	AT103: Clairemont Mesa to Tierrasanta Bikeway	Draft 2025 RP assumes western terminus of the on-street bikeway is at Clairemont Mesa Bl/Clairemont Dr/Kleefeld Ave. Draft Clairemont CPU proposes Class IV one-way cycle tracks along Clairemont Mesa Bl through the entire length of the community including into the SR-52 where the University Community Plan assumes Class IV one-way cycle tracks along CMB/Regents from Governor to SR-52.
6	Morena Blvd/Balboa Ave ramp reconfiguration and consolidation	The proposed ramp configuration at the Balboa/Morena interchange, as proposed per the Balboa Avenue Station Area Specific Plan and Draft Clairemont CPU, is not listed as a 2025 RP project. I'm not sure if this has regional significance to warrant inclusion; however, it would affect how bus transit would traverse through the area.
7	AT009: Morena Bikeway	Draft 2025 RP assumes the northern terminus of the on-street bikeway is at Balboa Ave. Draft Clairemont CPU proposes to extend the planned two-way cycle track along Morena Bl from Balboa Ave to Jutland Dr.
8	AT037: Kearny Mesa to Beaches Corridor - Clairemont Drive (Mission Bay Drive to Burgener Boulevard) On-Street Bikeway	Draft Clairemont CPU proposes a combo of one-way cycle tracks and bike lanes along Clairemont Drive for the entire stretch from Clairemont Mesa Bl/Kleefeld Ave to Mission Bay Dr
9	AT030: Genesee Bikeway	University City CPU planned facilites along Genesee Ave are mixed from Regents Rd to Scripps Hospital Dr northbound one-way cycle track and southbound existing buffered bike lane. From Scripps Hospital Dr to I-5 northbound one-way multi-use path and southbound existing buffered bike lane. From I-5 to North Torrey Pines two-lane one-way cycle track on both sides.
10	AT106: Gilman Connector	University City CPU planned on-street Class IV facility for the extent of Gilman Dr from La Jolla Colony Dr to La Jolla Village Dr. Upgraded from a Class II
11	AT065: La Jolla to Scripps Ranch	University City CPU planned on-street Class IV cycle track along La Jolla Village Dr from North Torrey Pines to Miramar Rd upgraded from a class II
12	AT014: La Jolla to Del Mar	Central Coast Corridor: University City CPU planned facility on-street as Class IV cycle track from La Jolla Village Dr to Torrey Pines Science Park
13	SMART Corridor for University	SMART corridors not included for potential University City improvements on Genesee Ave, La Jolla Village Dr and Nobel Dr
14	AT020: Coastal Rail Trail San Diego - Carmel Valley to Roselle via Sorrento	Mira Mesa CP classifies this bike facility as a Class II Buffered Bike Lane. Listed as an Off-street Bikeway.
15	AT042: Mira Mesa Neighborhood Bikeway	Mira Mesa CP classifies this bike facility as a mixture of Class II Buffered Bike Lane, Bike Boulevard, Class IV Two-way Cycle Track. Listed as On-street Bikeway.
16	AT059: I-15 Bikeway - Murphy Canyon Rd to Affinity Ct	Includes portion of bike facility in Mira Mesa CP classified as Class I Shared Use Path on Mira Mesa Blvd between Black Mtn Rd and eastern limits into Scripps Ranch. Listed as Off-street bikeway.
17	AT065: La Jolla to Scripps Ranch	Mira Mesa Community Plan classifies this bike facility as a mixture of Class I Multi-use Path, Class IV Two-way Cycle Track, Class II Buffered Bike Lanes along Miramar Rd. Listed as On-street Bikeway.
18	AT089: Black Mountain Bikeway	Mira Mesa Community Plan classifies this bike facility as a mixture of Class IV one-way cycle track, Class II Buffered Bike Lane. Listed as On-street Bikeway.

19	AT140: Mira Mesa Corridor - Scranton Rd and I-15 Bikeway	Mira Mesa Community Plan classifies this bike facility as a mixture of - Class IV one-way cycle track - Shared bus/bike lane - Class I Shared Use Path Listed as On-street Bikeway.
20	AT141: Mira Mesa Corridor - Sorrento Vly Bl to Mira Mesa Bl	Mira Mesa Community Plan classifies this bike facility as a Class I Multi-use Path along Sorrento Vly Bl. Listed as On-street Bikeway.
21	AT0142: Mira Mesa to Miramar	Mira Mesa Community Plan classifies this bike facility as Class IV one-way cycle track on Camino Santa Fe between Calle Cristobal and Miramar Rd. Listed as On-street Bikeway.
22	TL072: Sorrento Valley Flexible Fleet	Mira Mesa Community Plan recommends microtransit (Shared NEV/Bike lanes.) for Sorrento Valley Pkwy/Calle Cristobal and Camino Santa Fe. Is the polygon representative of the proposed service area?
23	Sorrento Valley Coaster Transit Station Relocation	Not included in 2025 RP, but included in prior RPs, CMCPs and In Mira Mesa and University Community Plan.
24	TL028: Arterial Rapid Route 238	Route goes through Carroll Canyon Rd with assumption of road completion by 2035.
25	Local Bus 30	Rapid 30 from Balboa Station to Sorrento Mesa removed. Was this intentional?
26	Flexible Lanes	Mira Mesa Community Plan recommends flexible lanes on Mira Mesa Bl, Barnes Cyn Rd/Scranton Rd, Carroll Canyon Rd, Pacific Heights Bl, Lusk Bl, Camino Ruiz, Westview Py, Miramar Rd.
27	SMART Corridor	Mira Mesa Community Plan recommends SMART corridors on Mira Mesa Bl, Carroll Canyon Rd, Miramar Rd.