

ATTACHMENT 1B

STATEMENT OF OVERRIDING CONSIDERATIONS

THE 2025 REGIONAL PLAN

The San Diego Association of Governments (SANDAG) Board of Directors (Board) adopts and makes this Statement of Overriding Considerations concerning the unavoidable significant impacts of the 2025 Regional Plan to explain why its benefits override and outweigh its unavoidable significant impacts.

The Final Environmental Impact Report (FEIR) has identified and discussed significant effects that would occur as a result of the 2025 Regional Plan. As set forth in the California Environmental Quality Act (CEQA) Findings of Fact (Findings) for the FEIR, SANDAG has made a reasonable and good faith effort to avoid or substantially reduce the significant impacts resulting from the 2025 Regional Plan and has made specific findings on each of the 2025 Regional Plan's significant impacts and on mitigation measures and alternatives. Even with implementation of all feasible mitigation, the 2025 Regional Plan will result in significant and unavoidable impacts, both direct and cumulative, to the following resources: Aesthetics and Visual Resources; Agriculture and Forestry Resources; Air Quality; Biological Resources; Cultural Resources; Geology, Soils, and Paleontological Resources; Greenhouse Gas (GHG) Emissions; Hazards and Hazardous Materials; Land Use; Mineral Resources; Noise and Vibration; Population and Housing; Public Services, Recreation, and Utilities; Transportation; Tribal Cultural Resources; Water Supply; and Wildfire.

In accordance with Section 15093 of the CEQA Guidelines, having reduced the significant environmental effects of the 2025 Regional Plan to the extent feasible, having considered the entire administrative record for the 2025 Regional Plan, and having weighed the benefits of the 2025 Regional Plan against its unavoidable adverse impacts after mitigation, the Board hereby finds that the following legal, economic, social, and environmental benefits of the 2025 Regional Plan outweigh its unavoidable adverse impacts and render them acceptable based upon the following considerations. Each benefit set forth below constitutes an overriding consideration warranting approval of the 2025 Regional Plan, independent of the other benefits, despite each and every unavoidable impact.

2025 REGIONAL PLAN BENEFITS

SANDAG developed seven project objectives for the 2025 Regional Plan EIR to address the many regional transportation challenges. The anticipated economic, legal, social, technological and other benefits of the 2025 Regional Plan are an integral part of the project objectives as outlined below. The 2025 Regional Plan continues to integrate land use planning and transportation improvements and use technology to offer more options for travel and increased safety. Compared to baseline conditions, the outcome is greater mobility and transportation connectivity. The 2025 Regional Plan has the following benefits:

1.1 Focus population and employment growth to protect sensitive habitat and natural resource areas.

- ▶ The 2025 Regional Plan will concentrate higher density growth in developed land use areas to protect sensitive habitat and natural resources. Additionally, the majority of development under the spaced rural residential land use designation is subject to the Multiple Species Conservation Program guidelines and County of San Diego ordinances that restrict development to various degrees (Final EIR Section 4.4, "Biological Resources").

1.2 Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.

- ▶ The 2025 Regional Plan will result in lower vehicle miles traveled per capita in the 2030, 2045, and 2050 scenarios. Daily vehicle miles traveled per capita will decrease by about 8.9%, from 16.9 miles per person per day in 2019 to 15.4 miles per person per day in 2050 (Final EIR Section 4.16, "Transportation").

1.3 Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.

- ▶ The 2025 Regional Plan will achieve the Senate Bill (SB) 375 regional GHG emissions reduction target, reducing 2035 per capita emissions by 19.35% compared to the SB 375 2005 baseline (Final EIR Section 4.8, "Greenhouse Gas Emissions").¹
- ▶ The 2025 Regional Plan will result in sustained and continued reductions in total GHG emissions from passenger vehicles and light duty trucks. In 2016, there were 10.9 million metric tons of carbon dioxide equivalent (MMTCO₂e) emitted from passenger vehicles and light duty trucks; in 2035, the 2025 Regional Plan will reduce emissions to 5.68 MMTCO₂e and in 2050 to 5.32 MMTCO₂e. (Final EIR Section 4.8, "Greenhouse Gas Emissions").
- ▶ The 2025 Regional Plan will result in sustained and continued reductions in total GHG emissions from all sources. In 2022, total annual emissions were 22.39 MMTCO₂e; in 2035, the 2025 Regional Plan will reduce total annual emissions to 16.85 MMTCO₂e and in 2050 to 16.65 MMTCO₂e (Final EIR Section 4.8, "Greenhouse Gas Emissions").

1.4 Provide transportation investments and a land use pattern that promotes social equity.

- ▶ The 2025 Regional Plan includes development patterns which would focus more residential, commercial, and office uses in existing urban areas, and growth in unincorporated areas would be focused within existing rural communities. These development patterns, which would be served by transit capital projects, improvements in transit service, and active transportation projects, are consistent with local land use plans, policies, and subregional plans in urban areas. This approach supports social equity by expanding access to affordable housing, employment opportunities, and sustainable transportation options for those traditionally underserved by existing transportation systems (Final EIR Section 4.11, "Land Use and Planning").
- ▶ The 2025 Regional Plan will improve accessibility and connectivity potentially gained from transportation investments, which could facilitate greater access to Tier 1, 2, 3, and 4 employment centers and higher education institutions (public and private colleges, universities, community colleges, and vocational training centers) throughout the region. This supports social equity by expanding access to job opportunities, as well as greater choice of educational opportunities, for those traditionally underserved by existing transportation systems (2025 Regional Plan, Appendix E).

1.5 Provide transportation investments and a land use pattern that improves air quality.

- ▶ The 2025 Regional Plan will result in sustained and continued decreases for multiple criteria pollutants. By 2035, ROG and CO emissions would be reduced by 43% each, NO_x would be reduced by 45%, PM_{2.5} would be

¹ Steinberg. 2008. *California Senate Bill 375*. Available: http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.pdf. Accessed April 8, 2025.

reduced by 2%, and SO_x would be reduced by 11%, compared to 2022 levels. By 2050, ROG emissions would be reduced by 58%, CO reduced by 53%, NO_x by 56%, PM_{2.5} by 2%, and SO_x would be reduced by 19%, compared to 2022 levels (Final EIR Section 4.3, "Air Quality").

- ▶ The 2025 Regional Plan will result in improved PM_{2.5}-related health outcomes for sensitive receptors. At the regional level, receptors in the plan area would experience a reduction in impact to health outcomes such as mortality, incidence of outcomes such as asthma, lung cancer, and strokes, work loss days, and number of hospital/emergency room visits in both 2035 and 2050 (Final EIR Section 4.3, "Air Quality").
- ▶ The 2025 Regional Plan will result in lower incremental noncancer risks at the maximally exposed sensitive receptors near existing roadway and rail sources compared to 2022 conditions. For all residential, park, or school sensitive receptors in these areas, there are no projected increases in chronic or acute hazard indices by 2050 relative to 2022 (Final EIR Section 4.3, "Air Quality").
- ▶ The 2025 Regional Plan will result in reduced vehicle miles traveled (VMT) by providing alternative forms of transportation, including biking, walking, and transit, which would reduce passenger car travel and thereby reduce exposure to emissions at congested roadways, ultimately resulting in CO concentrations that are currently well below relevant standards. CO emissions are expected to be substantially lower by 2050 (Final EIR Section 4.3, "Air Quality").

1.6 Provide multimodal access to employment centers and key destinations for all communities.

- ▶ The 2025 Regional Plan will result in increased transit ridership and a higher number of walking and biking trips throughout the region, demonstrating improved access to multimodal travel options. The 2025 Regional Plan will also increase the total service population within Transit Priority Areas, resulting in greater proximity of jobs and residents to transit opportunities. As a result, the 2025 Regional Plan aligns with plans and policies related to the circulation system (Final EIR Section 4.16, "Transportation").
- ▶ The 2025 Regional Plan will result in reduced VMT per capita, per employee, and per service population. These reductions reflect the inclusion of dynamic pricing for on-street parking in the ABM3 modeling results for the 2025 Regional Plan. Dynamic pricing incentivizes travelers to utilize other modes of travel during peak times, thus potentially reducing VMT (Final EIR Section 4.16, "Transportation").
- ▶ The 2025 Regional Plan will be consistent with the policies outlined in the San Diego Regional Bike Plan (Riding to 2050). The 2025 Regional Plan will increase the total number of protected and separated bicycle facilities within the region (Class I and Class IV facilities). These facilities provide cyclists their own right-of-way within the roadway and would reduce the number of conflicts with vehicular traffic, resulting in safer conditions (Final EIR Section 4.16, "Transportation").

1.7 Enhance transportation network efficiency, reduce transportation fuel usage, and improve energy efficiency.

- ▶ The 2025 Regional Plan will expand regional transportation safety programs and efforts, including the Regional Vision Zero Program, Regional Border Management System, and Comprehensive Multimodal Corridor Plans. These initiatives will incorporate emerging technologies and updated design standards to enhance the efficiency of the transportation network by improving safety conditions and optimizing performance standards, thereby supporting the seamless movement of people and goods (Final EIR Section 4.16, "Transportation").
- ▶ The 2025 Regional Plan will result in a land use pattern focused on smart growth and transit-oriented strategies that, combined with transportation improvement projects, will reduce transportation fuel usage (Final EIR Section 4.16, "Transportation").

- ▶ The 2025 Regional Plan will result in transportation network improvements and programs that, together with compact land use patterns, reduce regional per capita VMT for passenger and light-duty vehicles. This reduction will decrease gasoline and diesel fuel usage, helping to achieve statewide GHG targets in the 2022 Scoping Plan developed by CARB. By lowering fossil fuel consumption and improving energy efficiency, the 2025 Regional Plan supports California's energy goals and complements local efforts to reduce GHG emissions from the on-road transportation sector (Final EIR Section 4.16, "Transportation").

The SANDAG Board has weighed each of the above benefits of the 2025 Regional Plan against its unavoidable adverse environmental effects after mitigation identified in the Final EIR and hereby determines that these benefits outweigh the unavoidable adverse environmental effects and, therefore, further determines that the unavoidable adverse environmental effects of the 2025 Regional Plan are acceptable and overridden. Each benefit set forth above constitutes an overriding consideration warranting approval of the 2025 Regional Plan.