ATTACHMENT 1A
CEQA FINDINGS OF FACT

I. INTRODUCTION TO CEQA FINDINGS

These findings are made pursuant to the California Environmental Quality Act (Pub. Res. Code Section 21000 et seq., ("CEQA") and the CEQA Guidelines (Cal. Code Regs. Title 14, Section 15000 et seq.) by the Board of Directors of the San Diego Association of Governments ("SANDAG") as the lead agency for the 2025 Regional Plan ("the proposed Plan"). These findings pertain to Environmental Impact Report ("EIR") SCH # 2023010039.

A. Project Description Summary

SANDAG, as the Regional Transportation Commission and federally designated Metropolitan Planning Organization ("MPO") for the San Diego region, builds consensus, develops strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life. As a regional Council of Governments, voting members of the agency consist of the County of San Diego and 18 cities in the region.

The proposed Plan is an update to the Amended 2021 Regional Plan for the San Diego region. The proposed Plan envisions a sustainable and resilient future for the region and economy supported by a transportation network that is convenient, equitable, healthy, and safe. The proposed Plan looks approximately 25 years ahead, accommodating more than 112,000 people, 202,000 new homes, and 170,000 new jobs.

The proposed Plan's Sustainable Communities Strategy (SCS) land use pattern is based on the housing elements and local zoning codes of each of the region's 19 jurisdictions. The SCS land use pattern accommodates the 6th cycle Regional Housing Needs Allocation (RHNA) by including sufficient zoned housing capacity identified in each jurisdiction's housing elements. Based on identified housing capacity and the Series 15 Regional Growth Forecast and the SCS land use pattern projects, an additional 202,819 housing units will be built by 2050, surpassing the 6th cycle RHNA planning requirement of 171,685 units.

Under the Sustainable Communities and Climate Protection Act - Senate Bill (SB) 375, the Regional Transportation Plan must include an SCS consisting of land use, housing, and transportation strategies that, if implemented, would allow the region to meet its regional targets for greenhouse gas (GHG) emissions reductions from passenger vehicle use established by the California Air Resources Board (CARB). The purpose of an SCS is to align regional transportation, housing, and land use planning to attain the regional GHG reduction targets.

Building on the current transportation system with funding anticipated over the next 25 years, the proposed Plan includes transportation improvements such as active transportation, complete corridors, transit, flexible fleets, and transportation system management. Each of the transportation improvements will tackle an aspect of the total transportation system, but the success of each will rely on the success of the others and they will be inextricably linked. The outcome will be more mobility options for everyone and a shift away from overloading the region's roadways with cars. The proposed Plan's SCS shows how the region would exceed the SB 375 GHG emissions reduction targets for passenger vehicles established by CARB for 2020 and 2035 by using land in a way that makes development more compact, conserving open space and investing in a transportation network that reduces per capita vehicle miles traveled and gives residents alternative transportation options.

B. Project Objectives

SANDAG developed the following project objectives for the EIR:

- Focus population and employment growth to protect sensitive habitat and natural resource areas.
- Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.
- Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.
- Provide transportation investments and a land use pattern that promotes social equity.
- Provide transportation investments and a land use pattern that improves air quality.
- Provide multimodal access to employment centers and key destinations for all communities.
- Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

C. Type of EIR

The EIR for the proposed Plan is a Program EIR, which CEQA Guidelines Section 15168(a) defines as an EIR that may be prepared on a series of actions that can be characterized as one large project and are related (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts that can be mitigated in similar ways.

A Program EIR can provide a comprehensive environmental review for a program of related projects, such as the proposed Plan, which are to be developed over a long period of time. This allows lead agencies to consider program-wide alternatives and cumulative impacts consistently, and avoids unnecessary repetition of analysis in subsequent project-specific reviews (see CEQA Guidelines Section 15168(b)).

The degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). The EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan. The EIR provides a foundation for second-tier CEQA documents for subsequent projects but does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely. When a first-tier Program EIR is prepared, "leaving project-specific details to subsequent EIRs when specific projects are considered" is a proper approach to CEQA tiering (*In re Bay Delta* [2008] 43 Cal. 4th 1143, 1174).

D. Procedural Compliance with CEQA

SANDAG published a Draft EIR for public review on August 22, 2025, and a Final EIR for certification on December 12, 2025, in compliance with CEQA requirements. SANDAG prepared the Final EIR in accordance with CEQA and the CEQA Guidelines. As allowed for in CEQA Guidelines Section 15084(d)(2), SANDAG retained a consultant to assist with the preparation of the environmental documents. SANDAG, acting as lead agency, has directed, reviewed, and edited as necessary all material prepared by the consultant, and such material reflects SANDAG's independent judgment. In general, the preparation of the EIR included the following key steps and public notification efforts:

- A 60-day scoping process began with SANDAG's issuance of the Notice of Preparation (NOP) of an EIR and filing of the NOP with the State Clearinghouse on January 3, 2023, which started a 60-day comment period that ended March 6, 2023. SANDAG noticed and held an EIR scoping meeting on January 12, 2023, and

February 15, 2023, at the SANDAG Office at 401 B Street, San Diego, CA 92101 to receive perspective and input from agencies, organizations, and individuals on the scope and content of the environmental information to be addressed in the EIR.

- SANDAG issued the Draft EIR on August 26, 2025. The Notice of Availability for the Draft EIR was published in local newspapers and mailed to an extensive distribution list. The Draft EIR was also posted on SANDAG's website and was available for review at the SANDAG Office at 1011 Union Street, Suite 400, San Diego, CA 92101. In addition, the Notice of Availability and link to the Draft EIRs was provided to those who provided comments on the NOP, the SANDAG Board of Directors, SANDAG member agencies, and other interested parties and stakeholders. A hardcopy of the EIR was made available at the SANDAG office and City of San Diego Central Library.
- The Notice of Completion for the Draft EIR was filed with the State Clearinghouse on August 22, 2025. The Draft EIR was available for a 49-day public review period starting August 26, 2025. Following close of the public review period on October 13, 2025, SANDAG revised the Draft EIR, including the project description, in response to comments received during the public review period, and provided written responses addressing all significant environmental issues raised. Revisions made to the Draft EIR are shown throughout the Final EIR in strikethrough and underline text.
- SANDAG published the Final EIR on December 5, 2025. SANDAG provided written responses to all public agencies that commented on the Draft EIR 10 days prior to certifying the EIR. The SANDAG Board of Directors held a public hearing on December 12, 2025, to consider certification of the Final EIR.

E. Incorporation of Final EIR by Reference

The Final EIR is hereby incorporated by reference into these Findings. The Final EIR consists of: (1) the Draft EIR, including revisions; (2) all appendices to the Draft EIR (Appendices A–M), including revisions; and (3) comments received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; SANDAG's responses to significant environmental issues raised in the review and consultation process; Master Responses to comments; and other information (bound separately as "Appendix N").

II. FINDINGS REGARDING ENVIRONMENTAL IMPACTS

Pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report. (The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the Project's underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint. See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

SANDAG has made one or more of these specific written findings regarding each significant impact associated with the proposed Plan. These findings are presented below, along with a presentation of facts in support of the findings. The Board certifies these findings are based on full appraisal of all viewpoints, including all comments

received up to the date of adoption of these findings, concerning the environmental issues identified and discussed. The Board relies on substantial evidence to support these findings.

As lead agency, SANDAG has discretion to resolve disputes among experts with differing opinions. SANDAG has weighed the evidence adopted the environmental conclusions reached by SANDAG's experts even though others may disagree with the underlying data, analysis, or conclusions, consistent with CEQA Guidelines Section 15151. Disagreement among experts is acceptable and does not make an EIR inadequate.

The EIR evaluation included a detailed analysis of impacts on 19 issue areas and analyzed the impacts of the proposed Plan and alternatives to the proposed Plan, including a No Project Alternative. The EIR disclosed the environmental impacts that would result from the adoption and implementation of the proposed Plan. Feasible mitigation measures were identified to avoid or substantially lessen significant environmental effects.

III. FINDINGS REGARDING ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 do not require findings of fact for impacts that are less than significant. Nevertheless, for the sake of completeness, the SANDAG Board of Directors hereby finds that the following environmental impacts of the proposed Plan either would not occur or are less than significant. These findings are based on the detailed impact analyses provided in Sections 4.1 through 4.19 of the EIR. Under CEQA, no mitigation measures are required for impacts that are less than significant (CEQA Guidelines Section 15126.4(a)(3)).

A. Air Quality (EIR Section 4.3)

AQ-1 CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE REGIONAL AIR QUALITY STRATEGY, STATE IMPLEMENTATION PLAN, AND/OR COMMUNITY EMISSIONS REDUCTION PLANS.

The SANDAG Board of Directors finds that implementation of the proposed Plan would be consistent with the State Implementation Plan (SIP) growth forecasts, and applicable rules, regulations, and programs adopted as part of the plans by the San Diego Air Pollution Control District (SDAPCD) and California Air Resources Board (CARB). Implementation of the transportation network improvements and programs would also be consistent with the applicable air quality plans because the emissions are less than the conformity emissions budget for reactive organic gases (ROG) and nitrogen oxides (NO_X). Also, the transportation network improvements and programs are consistent with the transportation control measures (TCMs) contained within the SIP and the Regional Air Quality Strategy (RAQS). Therefore, this impact (AQ-1) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to conflicts with or obstruction of applicable air quality plans (2022 RAQS and 2020 SIP), in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans, would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to conflicts with, or obstruction of, applicable air quality plans (AQ-1) are less than significant and not cumulatively considerable in 2035 and 2050.

AQ-6 EXPOSE SENSITIVE RECEPTORS TO CARBON MONOXIDE HOT-SPOTS.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not expose sensitive receptors to substantial concentrations of carbon monoxide (CO) because the 2015 Regional Plan EIR did not find a CO hotspot at congested intersections while assuming higher on-road source CO emissions; the proposed Plan would also not create any CO hotspots. Therefore, this impact (AQ-6) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to exposure of sensitive receptors to substantial concentrations of CO, in combination with similar impacts that would result in the southern California

and northern Baja region based on projections in adopted plans, would not cause a significant cumulative impact. Therefore, the Plan's incremental contributions to less than significant cumulative impacts related to exposure of sensitive receptors to substantial concentrations of CO (AQ-6) are less than significant and not cumulatively considerable in 2035 and 2050.

AQ-7 RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not result in significant odor impacts because both development projects and transportation network improvements would be required to comply with applicable odor regulations that prevent impacts from being significant, including SDAPCD Rule 51. Odors from these projects would not cause nuisance to a considerable number of persons or to the public, when compared to existing conditions.

Regarding cumulative impacts, the proposed Plan's impacts related to odors, in combination with similar impacts that would result in the southern California and northern Baja region based on projections in adopted plans, would not be causing a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to odors (AQ-7) are less than significant and not cumulatively considerable in 2035 and 2050.

B. Biological Resources (EIR Section 4.4)

BIO-4 CONFLICT WITH THE PROVISIONS OF AN ADOPTED HCP, NCCP, OR OTHER CONSERVATION PLAN, OR WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES.

The SANDAG Board of Directors finds that implementation of the proposed Plan would require biologically equivalent or superior habitat compensation or project redesign when there is encroachment into hardline preserve areas. This would result in less-than-significant impacts related to encroachment into hardline preserve areas identified by adopted Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs). Project-specific planning, review by local agencies (including jurisdictions), regulatory agencies, and Wildlife Agencies, and CEQA review of land use and transportation projects would minimize or remove any potential conflicts with policies and ordinances protecting biological resources. No other conflicts are expected with any approved local, regional, state, or federal regulations, policy, ordinance or plan. Therefore, this impact (BIO-4) is less than significant in 2035 and 2050.

The proposed Plan's contribution to cumulative impacts involve conflicts with adopted policies of HCPs and NCCPs and other local policies and ordinances protecting biological resources, in combination with similar impacts. These cumulative impacts in the Southern California and Northern Baja California region, based on projections in adopted plans and other cumulative projects, would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to conflicts with adopted HCPs and NCCPs and other local policies and ordinances protecting biological resources (BIO-4) are less than significant and not cumulatively considerable in 2035 and 2050.

C. Cultural Resources (EIR Section 4.5)

CULT-2 DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF DEDICATED CEMETERIES, IN VIOLATION OF EXISTING LAWS AND REGULATIONS PROTECTING HUMAN REMAINS.

The SANDAG Board of Directors finds that although ground-disturbing activities associated with the implementation of proposed Plan have the potential to uncover buried human remains, existing laws and

regulations would be followed, ensuring that any human remains encountered are treated appropriately. Therefore, this impact (CULT-2) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to disturbance of human remains in violation of existing laws and regulations, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to disturbance of human remains in violation of existing laws and regulations (CULT-2) are less than significant and not cumulatively considerable in 2035 and 2050.

D. Energy (EIR Section 4.6)

EN-1 RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY DURING PROJECT CONSTRUCTION OR OPERATIONS.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not result in an increase in overall per capita energy consumption, or otherwise use energy in an inefficient, wasteful, or unnecessary manner, because per capita energy use would decrease by approximately 12% from 2022 to 2050 (see EIR Table 4.6-1).

Regarding cumulative impacts, the proposed Plan's impacts related to overall per capita energy consumption and use of energy in an inefficient, wasteful, or unnecessary manner, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects, would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to overall per capita energy consumption relative to baseline conditions and use of energy in an inefficient, wasteful, or unnecessary manner (EN-1) are less than significant and not cumulatively considerable in 2035 and 2050.

EN-2 CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not result in increased reliance on fossil fuels and decreased reliance on renewable energy sources because total energy use would decrease, fossil fuel energy consumption would decrease, and renewable energy consumption would increase. Therefore, this impact (EN-2) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to reliance on fossil fuels and renewable energy sources, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans and other cumulative projects would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to reliance of fossil fuels and renewable energy sources (EN-2) are less than significant and not cumulatively considerable in 2035 and 2050.

E. Geology, Soils, and Paleontological Resources (EIR Section 4.7)

GEO-1 DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING (A) RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA, OR BASED ON OTHER SUBSTANTIAL EVIDENCE SHOWING AN EARTHQUAKE FAULT IS ACTIVE; (B) STRONG SEISMIC GROUND SHAKING; (C) SEISMIC RELATED GROUND FAILURE, INCLUDING LIQUEFACTION; OR (D) LANDSLIDES.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in land use changes and the construction of transportation network improvements that would expose a greater number of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides. However, adherence to the laws, regulations, and programs, including but not limited to those described in Section 4.7.2 of the Final EIR, would ensure people or structures would not be exposed to substantial adverse effects. Therefore, this impact (GEO-1) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to exposure of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans, would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to exposure of people and structures to impacts from seismic activity, including earthquakes, ground shaking, ground failure, and landslides (GEO-1) are less than significant and not cumulatively considerable in 2035 and 2050.

GEO-2 LOCATE PROJECTS ON A GEOLOGIC UNIT OR SOIL THAT IS EXPANSIVE OR UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIALLY RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE, CREATING SUBSTANTIAL DIRECT OR INDIRECT RISKS TO LIFE OR PROPERTY.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in regional growth development and transportation network improvements that would be constructed on expansive soils or expose a greater number of structures to risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable. Adherence to the laws and regulations and programs including but not limited to those described in Section 4.7.2 of the Final EIR and project-specific investigations consistent with local and State standards and practices would minimize risks to people and property. Therefore, this impact (GEO-2) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to geologic hazards, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to expansive soils or expose a greater number of structures to risks from unstable soils, including landslides, lateral spreading, subsidence, liquefaction, or collapse, or cause soils to become unstable (GEO-2) are less than significant and not cumulatively considerable in 2035 and 2050.

GEO-3 LOCATE PROJECTS ON A GEOLOGIC UNIT OR SOIL THAT IS EXPANSIVE OR UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIALLY RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE, CREATING SUBSTANTIAL DIRECT OR INDIRECT RISKS TO LIFE OR PROPERTY.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in land use changes and the construction of transportation network improvements, both of which would cause soil erosion or the loss of topsoil. Compliance with regulatory requirements and implementation of required design measures would

ensure that regional growth and land use changes as well as transportation network improvements and programs associated with the proposed Plan would not cause substantial soil erosion or the loss of topsoil. Therefore, this impact (GEO-3) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to substantial soil erosion or the loss of topsoil, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to substantial soil erosion or loss of topsoil (GEO-3) are less than significant and not cumulatively considerable in 2035 and 2050.

GEO-4 HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTEWATER, POTENTIALLY CAUSING ADVERSE GROUNDWATER IMPACTS.

The SANDAG Board of Directors finds that implementation of the proposed Plan would potentially occur on expansive or unstable soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems; however, adherence to required design standards and laws and regulations including but not limited to those described in Section 4.7.2 of the Final EIR and described above would minimize the potential for adverse impacts on groundwater. Therefore, this impact (GEO-4) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to soils that are incapable of adequately supporting septic tanks or alternative wastewater systems and potentially causing adverse groundwater impacts, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans would not cause a significant cumulative impact. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to soils that are incapable of adequately supporting septic tanks or alternative wastewater systems and potentially causing adverse groundwater impacts (GEO-4) are less than significant and not cumulatively considerable in 2035 and 2050.

C-GEO-1 MAKE A CUMULATIVE CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS ON GEOLOGICAL AND SOIL RESOURCES.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in land use changes and the construction of transportation network improvements would not result in cumulatively considerable impacts related to geologic and seismic hazards or unstable soils. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to this impact (C-GEO-1) are less than significant and not cumulatively considerable in 2035 and 2050.

F. Greenhouse Gas Emissions and Climate Change (EIR Section 4.8)

GHG-1 DIRECTLY OR INDIRECTLY RESULT IN AN INCREASE IN GHG EMISSIONS COMPARED TO EXISTING CONDITIONS (2022).

The SANDAG Board of Directors finds that implementation of the proposed Plan would not directly or indirectly result in an increase in greenhouse gas (GHG) emissions compared to existing conditions because total annual regional emissions would be approximately 25% lower in 2035 relative to 2022, and 1.19% lower in 2050, relative to 2036. Therefore, this impact (GHG-1) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to increases in GHG emissions compared to existing conditions (2022), in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because the proposed Plan's GHG emissions would decrease compared to 2022 levels. Therefore, the proposed Plan's incremental contributions to

less than significant cumulative impacts related to direct or indirect increases in GHG emissions compared to existing conditions (2022) (GHG-1) are less than significant and not cumulatively considerable in 2035 and 2050.

GHG-2 CONFLICT WITH THE SANDAG REGION'S ACHIEVEMENT OF SB 375 GHG EMISSIONS REDUCTION TARGETS FOR 2035.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not conflict with Senate Bill (SB) 375 emission reduction targets for 2035 because it would result in a 19.35% reduction in per capita carbon dioxide (CO_2) emissions from passenger cars and light-duty trucks from 2005 levels by 2035, which exceeds the 2035 target of a 19% reduction for the SANDAG region. Therefore, this impact (GHG-2) is less than significant in 2035.

The proposed Plan's impacts related to conflicts with SB 375 GHG emission reduction targets, in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with the SB 375 emissions reduction targets. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to conflicts with SB 375 GHG emission reduction targets (GHG-2) are less than significant and not cumulatively considerable in 2035.

GHG-3 CONFLICT WITH OR IMPEDE THE IMPLEMENTATION OF LOCAL PLANS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not conflict with or impede the implementation of adopted climate action plans (CAPs), GHG reduction plans, and/or sustainability plans. Therefore, this impact (GHG-3) in the years 2035 and 2050 is less than significant.

Regarding cumulative impacts, the proposed Plan's impacts related to conflicts with local plans, in combination with global emissions projections in adopted plans and other authoritative sources, would not cause a significant cumulative impact because there are no Plan conflicts with adopted CAPs, GHG reduction plans, and/or sustainability plans. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to conflicts with local plans adopted for the purpose of reducing GHG emissions (GHG-3) are less than significant and not cumulatively considerable in 2035 and 2050.

G. Hazards and Hazardous Materials (EIR Section 4.9)

HAZ-1 CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT FROM THE TRANSPORT, USE, DISPOSAL, OR RELEASE OF HAZARDOUS MATERIALS, INCLUDING THE RELEASE OF CONTAMINANTS FROM A GOVERNMENT CODE SECTION 65962.5 HAZARDOUS MATERIALS SITE.

The SANDAG Board of Directors finds that increased regional growth, land use changes, and transportation network improvements associated with implementation of the proposed Plan by 2035 and 2050 would increase the risk of hazards to the public and the environment through the routine transport, use, or disposal of hazardous materials, and their accidental release, during construction and operations associated with the proposed Plan. However, adherence to the existing regulations would ensure that these activities do not create a significant hazard to people or the environment. Therefore, this impact (HAZ-1) is less than significant for 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to hazardous materials would generally be confined to a specific project area, rather than resulting in an incremental cumulative effect spread over the Southern California and Northern Baja region. Adherence to federal, state, and local regulations, would reduce incremental impacts associated with exposure to hazards and hazardous materials in each of the affected project areas. Therefore, the proposed Plan's incremental contribution to less than significant cumulative impacts associated with significant hazards to the public and the environment through the routine transport, use, disposal, and release of hazardous materials (including from hazardous waste sites included on the Cortese List) would not be cumulatively considerable. Therefore, the proposed Plan's incremental impacts related to the transport, use,

disposal, and release of hazardous materials (HAZ-1) are less than significant and not cumulatively considerable in 2035 and 2050.

HAZ-2 EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL.

The SANDAG Board of Directors finds that increased regional growth, land use changes, and transportation network improvements associated with implementation of the proposed Plan by 2035 and 2050 would increase risks related to the handling and emission of hazardous materials near schools. However, adherence to existing regulations would ensure that risks associated with the handling or emissions of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be minimized. Therefore, this impact (HAZ-2) is less than significant for 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's incremental impacts related to the handling and emissions of hazardous materials near schools would be reduced through adherence to existing regulations, which provide a high level of protection related to the handling of hazardous materials near schools. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to emitting and handling hazardous materials, substances, or waste within one-quarter mile of existing and proposed schools (HAZ-2) are less than significant and not cumulatively considerable in 2035 and 2050.

HAZ-3 FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA.

The SANDAG Board of Directors finds that implementation of the proposed Plan would increase development near public-use or military airports. Adherence to the regulations described in Section 4.9.2, "Regulatory Setting," of the EIR would minimize safety hazards associated with airports. Therefore, this impact (HAZ-3) is less than significant for 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to the exposure of people to aircraft and airport-related safety hazards near public airports and public-use airports that result in substantial safety risks, in combination with similar impacts that would result in the Southern California and Northern Baja region based on projections in adopted plans would not cause significant cumulative impacts. Cumulative projects in the United States would be subject to safety regulations such as Airport Land Use Compatibility Plans (ALUCPs), Federal Aviation Administration (FAA) standards, and the State Aeronautics Act, which minimize airport hazards. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to the exposure of people working or residing in the proposed Plan area to aircraft and airport-related safety hazards near public airports and public-use airports are less than significant and not cumulatively considerable in 2035 and 2050.

H. Hydrology and Water Quality (EIR Section 4.10)

HWQ-1 SUBSTANTIALLY DEGRADE SURFACE WATER OR GROUNDWATER QUALITY, INCLUDING IN VIOLATION OF ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR IN CONFLICT WITH A WATER QUALITY CONTROL PLAN OR ITS IMPLEMENTATION, OR AS A RESULT OF SUBSTANTIALLY ALTERING THE EXISTING DRAINAGE PATTERN OF THE AREA IN A MANNER WHICH PROVIDES SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF.

The SANDAG Board of Directors finds that implementation of the proposed Plan's regional growth, land use changes, and transportation network improvements by 2035 and 2050 could alter existing topography, change drainage patterns, increase impervious surface area, add pollutant sources, and reduce natural (i.e., undeveloped) landscape. However, adherence to existing regulations would ensure that regional growth and land use changes as well as transportation network improvements associated with the proposed Plan would not substantially alter

existing drainage patterns in a manner that would provide substantial sources of polluted runoff. Therefore, this impact (HWQ-1) is less than significant for 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to degrading surface water or groundwater quality, in combination with similar impacts that would result in the southern California and northern Baja California region based on projections in adopted plans, would not cause significant cumulative impacts. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to substantially degrading surface water or groundwater quality (HWQ-1) are not cumulatively considerable in 2035 and 2050. Therefore, the proposed Plan's incremental impacts related to cumulative water quality impacts are less than significant and not cumulatively considerable in 2035 and 2050.

HWQ-2 SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF AN AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE.

The SANDAG Board of Directors finds that that compliance with regulatory requirements and implementation of design measures similar to those described in Sections 4.10.2 and 4.10.4 would ensure that regional growth and land use changes as well as transportation network improvements associated with the proposed Plan would not substantially alter existing drainage patterns such that erosion and siltation would increase. Through the various requirements to incorporate hydromodification and low impact development (LID) measures, the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff. Therefore, this impact (HWQ-2) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to substantially altering the existing drainage pattern of an area, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans, would not cause significant cumulative impacts. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to substantially altering the existing drainage pattern of an area (HWQ-2) are less than significant and not cumulatively considerable in 2035 and 2050.

HWQ-3 SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF AN AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD (I) SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE OR (II) IMPEDE OR REDIRECT FLOOD FLOWS.

The SANDAG Board of Directors finds that compliance with regulatory requirements and implementation of design measures similar to those described in Sections 4.10.2 and 4.10.4 would ensure that regional growth and land use changes as well as transportation network improvements associated with the proposed Plan would not substantially alter existing drainage patterns such that erosion and siltation would increase. Through the various requirements to incorporate hydromodification and LID measures, the proposed Plan would maintain pre-development hydrology, and would reduce, infiltrate, and properly manage stormwater runoff. Therefore, this impact (HWQ-3) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to substantially altering the existing drainage pattern of an area, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans, would not cause significant cumulative impacts. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to substantially altering the existing drainage pattern of an area (HWQ-3) are less than significant and not cumulatively considerable in 2035 and 2050.

HWQ-4 Substantially Increase Risk of Pollutant Release due to Inundation of a Flood Hazard, Tsunami, or Seiche Zone.

The SANDAG Board of Directors finds that compliance with applicable regulatory requirements and implementation of design measures, safety ordinances, and water quality requirements would ensure that regional growth and land use changes as well as transportation network improvements associated with implementation of the proposed Plan would minimize the release of pollutants due to inundation of a flood hazard, tsunami, or seiche zone. Through the various requirements to incorporate floodplain management, safety ordinances, and treatment best management practices (BMPs) described in Sections 4.10.2 and 4.10.4, the proposed Plan would not substantially increase the risk of pollutant release due to inundation in a flood hazard, tsunami, or seiche zone. Therefore, this impact (HWQ-4) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to substantially increasing risk of pollution release due to inundation, in combination with similar impacts that would result in the Southern California and Northern Baja California region based on projections in adopted plans, would not cause significant cumulative impacts. Therefore, the proposed Plan's incremental contributions to less than significant cumulative impacts related to substantially increasing risk of pollution release due to inundation (HWQ-4) are less than significant and not cumulatively considerable in 2035 and 2050.

I. Land Use and Planning (EIR Section 4.11)

LU-1 PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY (THROUGH 2035).

The SANDAG Board of Directors finds that implementation of proposed Plan would result in reasonably foreseeable beneficial impacts to the connectivity of established communities by promoting infill development and improving transit services. Therefore, regional growth, land use changes, and transportation network improvements associated with the implementation of the proposed Plan would not physically divide established communities through the year 2035 and this impact is less than significant.

Regarding cumulative impacts, the proposed Plan's impacts related to physically dividing an established community, in combination with similar impacts that would result in the Southern California and Northern Baja California region, would not result in impacts that are cumulatively considerable. However, although cumulative impacts related to the physical division of an established community would be significant in the absence of the proposed Plan, the proposed Plan would not physically divide established communities through the year 2035, the proposed Plan's incremental contributions to significant cumulative impacts related to physically dividing an established community (LU-1) are less than significant and not cumulatively considerable.

LU-2 CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY OR REGULATION (INCLUDING, BUT NOT LIMITED TO, THE GENERAL PLAN, LOCAL COASTAL PROGRAM, OR ZONING ORDINANCE) AND RESULT IN A PHYSICAL CHANGE TO THE ENVIRONMENT NOT ALREADY ADDRESSED IN THE OTHER RESOURCE CHAPTERS OF THIS EIR.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not conflict with land use plans, policies, and regulations, including general plans, specific plans, and community plans adopted for the purpose of avoiding or mitigating an environmental effect, or result in a physical change to the environment not already evaluated in other sections of the Final EIR. Therefore, this impact (LU-2) is less than significant in 2035 and 2050.

Regarding cumulative impacts, cumulative land use impacts related to conflicts with land use plans, policies, or regulations throughout the Southern California region in 2050 in the absence of the Plan would be significant. However, the proposed Plan's impacts related to conflicts with land use plans, policies, or regulations not already evaluated in other sections of the Final EIR would not be significant because the proposed Plan would create no such conflicts. Therefore, the proposed Plan's incremental contributions to significant cumulative impacts related

to conflicting with land use plans, policies, or regulations are less than significant and not cumulatively considerable in 2035 and 2050.

J. Noise and Vibration (EIR Section 4.13)

NOI-3 FOR A PROJECT LOCATED WITHIN THE VICINITY OF A PRIVATE AIRSTRIP OR AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC-USE AIRPORT, THE PROJECT WOULD EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS.

The SANDAG Board of Directors finds that implementation of the proposed Plan, including improvements associated with regional growth, would not expose noise-sensitive land use to levels of noise in excess of applicable standards. Adherence to the regulations and land use compatibility standards within ALUCPs and AICUZs would ensure that residents and workers occupying noise-sensitive land uses are not exposed to noise levels that exceed applicable standards. As such, this impact (NOI-3) would be less than significant in 2035 and 2050.

Regarding cumulative impacts, implementation of the proposed Plan would occur near public airports and private airstrips, but residents and workers would not be exposed to excessive noise levels. As discussed in Section 4.13, while the 2019 SDIA Development Plan EIR identified a cumulative aircraft-induced noise exposure due to the Airport Development Plan (SDCRAA 2019), the proposed Plan's impacts related to aircraft noise would continue to be less than significant because residents and workers would continue to not be exposed to excessive noise levels. Therefore, cumulative aircraft noise exposure impacts would not be significant, and the proposed Plan would be less than significant and not result in a cumulatively considerable incremental contribution to aircraft noise exposure in 2035 and 2050.

K. Transportation (EIR Section 4.16)

TRA-1 CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

The SANDAG Board of Directors finds that implementation of the proposed Plan would result in additional bicycle facilities, additional transit service miles, and would increase the number of bicycle, pedestrian, and transit trips, while reducing vehicular mode share. These characteristics of the proposed Plan would not conflict with the Amended 2021 Regional Plan and Riding to 2050. Therefore, this impact (TRA-1) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the proposed Plan's impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would not create significant cumulative impacts. Other adopted plans and related projects did not identify an impact related to conflicts with a program, plan or ordinance in the region. Therefore, the proposed Plan's incremental impacts related to the proposed Plan's incremental contributions to less than significant cumulative transportation impacts associated with conflicts with a program, plan, or ordinance (TRA-1) are less than significant and not cumulatively considerable in 2035 and 2050.

TRA-3 SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES.

The SANDAG Board of Directors finds that implementation of the proposed Plan would not change the applicable design standards of the implementing agencies, and the transportation network improvements would be designed consistently with those standards. Further, the proposed Plan includes several planning efforts that would improve transportation safety. Therefore, this impact (TRA-3) is less than significant in 2035 and 2050.

Regarding cumulative impacts, the impacts related to substantially increasing hazards due to a design feature or incompatible use would not create significant cumulative impacts. Other adopted plans and related projects did not identify any impacts related to increased hazards. Therefore, the proposed Plan's incremental contributions to less than significant cumulative transportation impacts associated with substantially increasing hazards due to a design feature or incompatible use (TRA-3) are less than significant and not cumulatively considerable in 2035 and 2050.

TRA-4 LEAD TO A LACK OF PARKING SUPPLY THAT WOULD CAUSE SIGNIFICANT SECONDARY ENVIRONMENTAL IMPACTS NOT ALREADY ANALYZED IN OTHER RESOURCE CHAPTERS OF THIS EIR.

The SANDAG Board of Directors finds that the proposed Plan pricing strategies and policies were integrated into the Year 2050 vehicle miles traveled (VMT) and results were analyzed under Impact TRA-2. These VMT results were relied upon for air quality, energy, and GHG impact analyses (See Sections 4.3, 4.6 and 4.8). Therefore, the dynamic pricing related programs for on-street parking included within the proposed Plan's policies are anticipated to reduce VMT and better manage the existing public parking supply that is available today. As such, these policies would not lead to a lack of parking supply by 2050, and the impact would be less than significant in 2035 and 2050.

Regarding cumulative impacts, the impacts related to implementation of the proposed Plan leading to a lack of parking supply that would cause significant adverse environmental impacts not already analyzed in the EIR would not create significant impacts, and no cumulative impact is identified that was not identified elsewhere in the EIR. Thus, the proposed Plan would not contribute to a cumulative impact associated with the lack of parking. Therefore, the proposed Plan's incremental contributions to less than significant cumulative transportation impacts associated with a lack of parking that would cause significant secondary environmental impacts not already analyzed in the EIR (TRA-4) are less than significant and not cumulatively considerable in 2035 and 2050.

L. Water Supply (EIR Section 4.18)

WS-1 NOT HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECTED REGIONAL DEMAND DURING SINGLE DRY YEAR AND MULTIPLE DRY YEARS.

The SANDAG Board of Directors finds that, with implementation of the proposed Plan, water supplies would be adequate to serve regional growth and land use change and transportation network improvements and programs up until the year 2045. The water supply is adequate to serve these needs even in the event of a dry year or multiple dry years. The impacts of regional growth and land use change and transportation network improvements and programs on water supplies between 2022 and 2035 are less than significant. Therefore, the impact related to not having sufficient water supplies available to serve the projected regional demand during normal, dry, and multiple years (WS-1) is less than significant in 2035.

IV. FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

The SANDAG Board of Directors hereby finds that mitigation measures that have been identified in the EIR will lessen the following significant environmental impacts but not to a less-than-significant level. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts discussed in Sections 4.1 to 4.19 of the EIR as well as relevant responses to comments in the Final EIR.

Impacts within the following resource categories will remain significant and unavoidable with implementation of all feasible mitigation measures:

- aesthetics and visual resources;
- agricultural and forestry resources;
- air quality;
- biological resources;
- cultural resources;
- geology, soils, and paleontological resources;

- greenhouse gas 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.

A. Aesthetics and Visual Resources (EIR Section 4.1)

AES-1 HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA (2035 AND 2050).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including development associated with regional growth and land use change, as well as planned transportation network improvements, would have substantial adverse effects on scenic vistas. Therefore, this impact (AES-1) in the years 2035 and 2050 is significant.

Mitigation Measures

Implementation of mitigation measures AES-1a and AES-1b would reduce the proposed Plan's significant impact to scenic vistas but would not reduce the impact to a less-than-significant level.

AES-1a Protect Public Views of Scenic Vistas for Transportation Network Improvements.

During planning, design, project-level CEQA review, and construction of transportation network improvements SANDAG shall, and other transportation project sponsors can and should, ensure that projects protect public views of scenic vistas. Construction and operations measures consist of, but are not limited to, the following:

- Site construction-staging areas away from scenic vistas. If this is infeasible, reduce the visibility of construction-staging areas. Fence and screen these areas with low-contrast materials consistent with the surrounding environment.
- Avoid permanent obstruction of scenic vistas from public-viewing areas when selecting alignments and the grade of new infrastructure (i.e., above, at, or below grade).
- Use transparent safety barrier designs (e.g., railings) rather than walls.

AES-1b Protect Public Views of Scenic Vistas for Development Projects.

During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate scale and massing measures, as well as measures specific to development projects. These measures consist of, but are not limited to, the following:

- Ensure building siting, height, and mass protect scenic vistas.
- Design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid large cuts and/or fills, where material is removed (cut) from certain areas and hauled away or used to fill in others using either onsite or offsite soil, when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.
- Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive or interfere with the experience within the scenic vista. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.

- Require development in visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:
  - creative site planning,
  - integration of natural features into the project,
  - appropriate scale, materials, and design to complement the surrounding natural landscape,
  - minimal disturbance of topography,
  - clustering of development to preserve a balance of open space vistas, natural features, and community character, and
  - creation of contiguous open space network.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-1a and AES-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact on scenic vistas caused by blocking panoramic views or impeding public views of major landscape features or landforms. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-1a and AES-1b would reduce significant impacts on scenic vistas caused by blocking panoramic views or impeding public views of major landscape features or landforms. However, some of the development associated with implementation of the proposed Plan, including regional growth and land use change and transportation network improvements, would be located in areas where substantial adverse effects on scenic vistas cannot be avoided. Due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-1) remains significant and unavoidable.

AES-2 SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING BUT NOT LIMITED TO, TREES, ROCKS, OUTCROPPINGS, AND HISTORIC STRUCTURES WITHIN A STATE SCENIC HIGHWAY (2035 AND 2050)

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in new development and infrastructure affecting scenic resources, including trees, rocks, outcroppings, and historic structures in a state scenic highway and local scenic routes. Therefore, this impact (AES-2) in the years 2035 and 2050 is significant.

Mitigation Measures

Implementation of mitigation measures AES-2a and AES-2b, as well as AES-1a, as discussed under Impact AES-1, would reduce the proposed Plan's significant impacts to scenic resources, public viewsheds, and eligible and designated state scenic highways, but would not reduce the impact to a less-than-significant level.

AES-2a Reduce Impacts on Scenic Resources in a State Scenic Highway and Local Scenic Routes for Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements in eligible or designated state scenic highways and local scenic routes, SANDAG shall, and other transportation project sponsors can and should ensure that projects are designed to minimize damage to scenic resources.

The following measures would reduce the significant effects related to damage of scenic resources in a state scenic highway, another scenic resource, or a local scenic route that are in the jurisdiction and responsibility of California Department of Transportation ("Caltrans") or other public agencies. Where a project has the potential for significant effects, mitigation measures shall ensure compliance with regulations for Caltrans scenic vistas, requirements of the Coastal Act, and policies in county and city general plans. Such measures may include the following:

- Use a palette of colors, textures, and building materials that are graffiti-resistant or use vegetation as a physical barrier that complements the surrounding landscape and development.
- Retain or replace trees bordering scenic highways and routes to the extent feasible.
- Provide new corridor landscaping that provides appropriate transition to existing natural and human-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.

AES-2b Reduce Impacts on Scenic Resources in a State Scenic Highway and Local Scenic Routes for Development Projects.

During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce impacts on scenic resources in eligible and designated state scenic highways, coastal areas, and local scenic resources. Measures consist of, but are not limited to, the following:

- For projects in or adjacent to designated or eligible state scenic highway corridors and local scenic routes identified in local approved plans, prior to project approval, complete visual resources studies. If a significant impact on scenic resources is identified, the study would require site-specific mitigation measures, which may include those identified below.
  - Avoid damaging, moving, or removing trees, rock outcroppings, historic structures, and other scenic resources from eligible or designated state scenic highway corridors and local scenic resources, where those scenic resources are relevant to the designation or eligibility for designation as a state scenic highway or are identified as a protected visual resource in local plans.
  - Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, and site grading.
  - Ensure vegetation used as screening and landscaping blends in and complements the natural landscape.
  - Retain or replace trees in scenic highways and routes.
  - Ensure grading blends with the adjacent landforms and topography.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-2a, AES-2b, and AES-1a have been required in, or incorporated into, the proposed Plan to reduce this significant impact on scenic resources, including resources within a state scenic highway and local scenic routes and protected public viewsheds. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are

SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-2a, AES-2b, and AES-1a would reduce significant impacts on scenic resources, including resources within a state scenic highway and local scenic routes and protected public viewsheds. However, some of the growth and land use change, and transportation network improvements associated with implementation of the proposed Plan are located in areas where damage, movement, or removal of trees, rocks, outcroppings, and other scenic resources cannot be avoided, such as improvements on state-designated SR 52 and SR 125, and eligible scenic highways I-5, SR 76, SR 52, I-8, and SR 94. Due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-2) remains significant and unavoidable.

AES-3 SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OF QUALITY OF PUBLIC VIEWS OF THE SITE AND ITS SURROUNDINGS, INCLUDING ADDING A VISUAL ELEMENT OF URBAN CHARACTER TO AN EXISTING RURAL OR OPEN SPACE AREA, CONFLICTING WITH REGULATIONS GOVERNING SCENIC QUALITY (2035 AND 2050).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in regional growth, and land use change and transportation network improvements would substantially degrade visual character, including adding visual elements of urban character to existing rural or open space areas. Therefore, this impact (AES-3) in the years 2035 and 2050 is significant.

Mitigation Measures

Implementation of mitigation measures AES-3a and AES-3b, as well as AES-1a, AES-2a, and AES-2b, as discussed under Impact AES-1 and Impact AES-2, would reduce the proposed Plan's impacts on visual character, but not to a less-than-significant level.

AES-3a Reduce Impacts on Visual Character for Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures consist of, but are not limited to, the following:

- Use contour grading to match surrounding terrain and existing natural and human-made features of the area.
- Revegetate graded slopes and exposed earth surfaces prior to completion of construction.
- Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that consist of, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.

AES-3b Reduce Impacts on Visual Character for Development Projects.

During planning, design, and project-level CEQA review of development projects the County of San Diego, cities, and other local jurisdictions can and should incorporate measures that ensure that projects are designed to reduce significant impacts on visual character. Measures consist of, but are not limited to, the following:

- Use contour grading to match surrounding terrain and existing natural and human-made features of the area.

- Revegetate graded slopes and exposed earth surfaces prior to completion of construction.
- Construct permanent barriers (e.g., soundwalls, safety barriers, retaining walls) of materials whose color and texture or treatment (e.g., landscaping cover) complements the surrounding landscape and development. Break up large barrier façades using techniques that consist of, but are not limited to, color, texture, landscaping, see-through safety barriers, and alternating façades.
- Apply development standards and design guidelines to maintain compatibility with surrounding development, including site coverage, building height and massing, building materials and color, landscaping, and site grading.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-3a, AES-3b, AES-2a, AES-2b, and AES-1a have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial degradation of visual character. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-3a, AES-3b, AES-2a, AES-2b, and AES-1a would reduce this significant impact of substantial degradation of visual character. However, while these mitigation measures reduce changes in visual character, it would be infeasible to prevent all instances of substantial degradation of visual character caused by implementation of the proposed Plan, including regional growth and land use change as well as transportation network improvements. Due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-3) remains significant and unavoidable.

AES-4 SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF PUBLIC VIEWS OF THE SITE AND ITS SURROUNDINGS BY CREATING A NEW SOURCE OF LIGHT AND GLARE THAT WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS (2035 AND 2050).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use change and transportation network improvements, would create new light sources from new development and vehicle headlights at night that would adversely affect dark skies in some locations as well as cause daytime glare in areas. Therefore, this impact (AES-4) in the years 2035 and 2050 is significant.

Mitigation Measures

Implementation of mitigation measures AES-4a and AES-4b, as well as BIO-2a, as discussed under Impact BIO-2, would reduce the proposed Plan's significant impacts on visual character or quality of public views caused by new light sources, but not to a less-than-significant level.

AES-4a Minimize Effects of Light and Glare for Transportation Network Improvements.

During planning, design, project-level CEQA review, and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, and on adjacent properties.

Where SANDAG and other transportation project sponsors have identified that a project has the potential for significant effects, they can and should adopt mitigation measures to ensure consistency with the goals and

policies in county and city general plans, as applicable. Construction and operational measures consist of, but are not limited to, the following:

- Minimize and control glare from transportation projects through the adoption of project design features that reduce glare, such as those listed below:
  - Planting trees along transportation corridors to reduce glare from the sun.
  - Landscaping off-street parking areas, loading areas, and service areas.
  - Limiting the use of reflective materials, such as metal.
  - Using nonreflective material, such as paint, vegetative screening, matte finish coatings, and masonry.
  - Screening parking areas by using vegetation or trees.
  - Using low-reflective glass.
- Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with transportation network improvements. These standards include the following:
  - Minimizing incidental spillover of light onto adjacent nighttime light-sensitive uses and undeveloped open space.
  - Installing luminaries that provide good color rendering and natural light qualities.
  - Minimizing the potential for back scatter into the nighttime sky.

AES-4b Minimize Effects of Light and Glare for Development Projects.
During planning, design, project-level CEQA review, and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should ensure that projects avoid or minimize the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, and on adjacent properties. Where a project has the potential for significant effects, mitigation measures shall ensure consistency with the goals and policies in county and city general plans, as applicable. Such measures may consist of, but are not limited to, the following:

- Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.
- Restrict the operation of outdoor lighting for construction from the hours of 7:00 p.m. to 7:00 a.m.
- Use low-intensity fixtures for outdoor lighting.
- Use unidirectional lighting to avoid light trespass onto adjacent properties.
- Provide structural or vegetative screening from light-sensitive uses.
- Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.
- Use nonreflective glass or glass treated with a nonreflective coating for all exterior windows and glass used on building surfaces.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-4a, AES-4b, and BIO-2a have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial degradation of visual character associated with light and glare. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-4a, AES-4b, and BIO-2a would reduce significant impacts associated with the introduction of new light and glare sources. However, while these mitigation measures reduce light and impacts, it would be infeasible to prevent all instances of new light and glare sources caused by implementation of the proposed Plan, including regional growth and land use change as well as transportation network improvements, particularly from additional light sources from vehicle headlights at night. Due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AES-4) remains significant and unavoidable.

C-AES-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO AESTHETICS AND VISUAL RESOURCES (2035 AND 2050).

Significant Impact

Because cumulative aesthetic and visual resource impacts throughout the Southern California and Northern Baja region by 2035 and 2050 would be significant and because the proposed Plan's incremental aesthetic and visual resource impacts are significant in 2035 and 2050, the proposed Plan's incremental aesthetic and visual resource impacts (AES-1, AES-2, AES-3, and AES-4) are cumulatively considerable in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, and AES-4b, as well as mitigation measure BIO-2a, as discussed above, would reduce significant impacts on scenic vistas, scenic resources within a state scenic highway, degradation of the visual character of an area, and light and glare. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on scenic vistas, scenic resources within a state scenic highway, degradation of the visual character of an area, and impacts from light and glare would be significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, AES-4b, and BIO-2a have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative aesthetic and visual resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AES-1a, AES-1b, AES-2a, AES-2b, AES-3a, AES-3b, AES-4a, AES-4b, and BIO-2a would reduce the proposed Plan's significant cumulative aesthetic and visual resources impacts. However, while these mitigation measures reduce the proposed Plan's significant aesthetic and visual resources impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant aesthetic and visual resources impacts to less-than-significant levels, these impacts (AES-1, AES-2, AES-3, and AES-4) remain cumulatively considerable post-mitigation.

B. Agricultural and Forestry Resources (EIR Section 4.2)

AG-1 CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND), AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, OR OTHER AGRICULTURAL LANDS, TO NON-AGRICULTURAL USE (2035 AND 2050).

Significant Impact

Implementation of implementation of the proposed Plan, including forecasted regional growth and land use change and planned transportation network improvements associated with the proposed Plan, would convert approximately 5,072 acres of agricultural lands to nonagricultural use from 2026 to 2035 (including about 1,270 acres of Farmland Mapping and Monitoring Program (FMMP)-designated agricultural lands), and approximately 346 acres from 2036 to 2050 (including 155 acres of FMMP-designated agricultural land under). Between 2025 and 2050, about 5,418 total acres of existing agricultural land would be converted in total to nonagricultural use by regional growth, land use change, and transportation network improvements, including 1,425 acres of FMMP-designated agricultural land under CEQA. In addition, growth and land use change near agricultural lands would indirectly decrease the viability of agriculture production on those lands. Therefore, this impact (AG-1) in the years 2035 and 2050 is significant.

Mitigation Measures

Implementation of mitigation measures AG-1a and AG-1b would reduce the proposed Plan's direct and indirect significant impacts associated with the conversion of agricultural lands to nonagricultural use, but would not reduce the impact to a less-than-significant level.

AG-1a Preserve Existing Agricultural Lands.

During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall—and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—preserve existing agricultural lands by avoiding agricultural land conversion when feasible. If avoidance is not feasible, measures to reduce conversion of agricultural lands to nonagricultural use consist of the following:

- Acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to areas in which the conversion occurs. Where conversion occurs within the coastal zone, locate the easement within the coastal zone, if feasible. If a project requires cancellation of a Williamson Act contract, acquire or dedicate agricultural conservation easements (minimum acreage ratio of 1:1 of comparable quality land). If feasible, locate the easement within or close to the same city or community in which the cancellation occurs. Where the cancellation occurs within the coastal zone, locate the easement within the coastal zone, if feasible.
- Where agricultural conservation easements are acquired or dedicated, consider the suitability of a specific proposed easement based on its ability to avoid or reduce fragmentation of agricultural land to enhance overall production value and operation viability.
- Where project-specific mitigation described above is not feasible, use other commensurate solutions, such as payment of an agricultural resource impact fee made pursuant to an approved in-lieu fee program. Possible programs include the Purchase of Agricultural Conservation Easement (PACE) Program established by the County of San Diego where the PACE Mitigation Bank can be used to offset impacts.

AG-1b Reduce Transportation Network Improvement and Development Conflicts with Agricultural Operations.

During project design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall—and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—reduce conflicts with agricultural operations. These conflicts shall be reduced

through the implementation of project design features and mitigation measures to protect surrounding agriculture, consisting of, but not limited to, the following:

- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, topographic features, and open space, and to reduce conflict between transportation network improvements or developments and farming.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at necessary intervals to provide property access.
- Align corridors, incorporate buffer zones and setbacks, and design berms and fencing to avoid agricultural lands and to reduce conflicts between transportation projects and agricultural lands.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a and AG-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of converting existing agricultural lands to nonagricultural use. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a and AG-1b would reduce significant impacts related to the direct and indirect conversion of existing agricultural lands to nonagricultural use. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AG-1) remains significant and unavoidable.

AG-2 CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE OR A WILLIAMSON ACT CONTRACT (2035 AND 2050).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use changes and transportation network improvements and programs, would conflict with approximately 3,344 acres of lands zoned for agricultural use and would have no conflict with Williamson Act contracts from 2026 to 2035, as well as approximately 272 acres of lands zoned for agricultural use and 1 acre of land with Williamson Act contracts from 2036 to 2050, with a total conflict from 2025 to 2050 of about 3,616 total acres of land zoned for agricultural use and 1 total acre of lands with Williamson Act contracts. Therefore, this impact (AG-2) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AG-1a and AG-1b would reduce the proposed Plan's direct and indirect significant impacts associated with the conversion of agricultural lands to nonagricultural use and conflicts with Williamson Act contracts, but would not reduce the impact to a less-than-significant level.

See Impact AG-1 for a description of mitigation measures AG-1a and AG-1b.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a and AG-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of conflicts with existing zoning for agricultural use and Williamson Act contract lands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are

within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a and AG-1b would reduce significant impacts related to conflicts with existing zoning for agricultural use and Williamson Act contract lands. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AG-2) remains significant and unavoidable.

FR-1 CONVERT OR RESULT IN THE LOSS OF "FOREST LAND" AS DEFINED IN THE CALIFORNIA FOREST LEGACY ACT OF 2007 (PRC SECTION 12220[G]) (2035 AND 2050)

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use change and transportation network improvements and programs, would result in a direct loss of approximately 1,588 acres of forest land, between 2025 and 2035, and approximately 59 acres of forest land, between 2036 and 2050. Between 2025 and 2050, in total approximately 1,647 total acres of forest land would be lost. Therefore, this impact (FR-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure FR-1, as well as BIO-1a, BIO-1b, and BIO-1e as discussed under Impact BIO-1, would reduce the proposed Plan's significant impacts of direct and indirect loss of forest lands, but not to a less-than-significant level.

FR-1 Reduce Impacts on Forest Lands.

During project planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall—and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—preserve forest lands by avoiding conversion of such lands when feasible and, if not feasible, by implementing measures to reduce impacts on forest lands, consisting of the following:

- Implement Compensatory Mitigation of Forest Lands

Provide compensatory mitigation using mitigation ratios as specified through consultation with resource agencies and in approved natural community conservation plans and habitat conservation plans. Compensatory mitigation outside the coastal zone would be provided either through the purchase of credits at an existing authorized mitigation bank or in-lieu fee program, or through project-specific mitigation. Authorized programs include the San Vicente or San Miguel Conservation Banks, or in-lieu fee options approved under the County's Multiple Species Conservation Plan (MSCP), depending on habitat type and service area availability (County of San Diego 2025). Compensatory mitigation for impacts inside the coastal zone may not be satisfied through in-lieu fee programs and is required to be located within the coastal zone close to the impact. To the extent allowed by the above plans and ordinances, project-specific mitigation would be provided through on site restoration of temporary impacts, on site or off-site preservation of existing habitats, or off-site restoration.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure FR-1, as well as mitigation measures BIO-1a, BIO-1b, and BIO-1e have been required in, or incorporated into, the proposed Plan to reduce this significant impact of loss of forest lands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the

responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure FR-1, BIO-1a, BIO-1b, and BIO-1e would reduce significant impacts related to loss of forest lands. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (FR-1) remains significant and unavoidable.

C-AG-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS ON AGRICULTURE AND FORESTRY RESOURCES (2035 AND 2050).

Significant Impact

Because cumulative impacts on agriculture and forest resources throughout the state by 2035 and 2050 would be significant, and because the proposed Plan's incremental impacts on forest resources are significant, the proposed Plan's incremental contributions to cumulatively significant impacts (AG-1, AG-2, and FR-1) on agriculture and forest resources are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AG-1a, AG-1b, FR-1, BIO-1a, BIO-1b, and BIO-1e, as discussed above, would protect existing agricultural and forestry land and avoid conflicts with implementation of the proposed Plan, including regional growth and land use change and transportation network improvements. The mitigation measures will reduce impacts on resources when avoidance is not feasible. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on agricultural and forestry land would be less than significant and would remain cumulatively considerable post-mitigation in 2035 and 2050.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AG-1a, AG-1b, FR-1, BIO-1a, BIO-1b, and BIO-1e have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative agriculture and forest resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AG-1a, AG-1b, FR-1, BIO-1a, BIO-1b, and BIO-1e, would reduce the proposed Plan's significant cumulative agriculture and forest resources impacts. However, while these mitigation measures reduce the proposed Plan's significant agriculture and forest resources impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant agriculture and forest resources impacts to less-than-significant levels, these impacts (AG-1, AG-2, and FR-1) remain cumulatively considerable post-mitigation in 2035 and 2050.

C. Air Quality (EIR Section 4.3)

AQ-2 RESULT IN AN OPERATIONS-RELATED CUMULATIVELY CONSIDERABLE NET INCREASE IN NONATTAINMENT OR ATTAINMENT CRITERIA POLLUTANT, INCLUDING VOC, NO_X, PM_{10}, $PM_{2.5}$, AND SO_X (2035 AND 2050).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in a cumulatively considerable net increase in particulate matter smaller than or equal to 10 microns in diameter (PM_{10}) emissions in 2035 and 2050. Therefore, this impact (AQ-2) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AQ-2a, AQ-2b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2 as discussed under Impact GHG-4 and TRA-2, would reduce the proposed Plan's significant impacts related to the net increases in PM_{10} criteria pollutants, but not to less than significant levels.

AQ-2a Secure Incentive Funding.

SANDAG, in partnership with SDAPCD and the Port of San Diego, and member cities, will seek to secure incentive funding to reduce mobile particulate matter (PM) emissions from mobile exhaust, and entrained PM sources such as tire wear, brake wear, and re-entrained road dust. Such incentive funding or programs are:

- Vehicle Registration Fund Program (VRF),
- Carl Moyer Memorial Air Quality Attainment Program,
- Community Air Protection Program (CAPP), and
- Short-Haul Zero Emission Truck Pilot Project.

AQ-2b Regional Plan VMT Credit/Banking Program.

SANDAG shall establish a VMT Credit / Banking program that captures and banks any VMT reductions that may be associated with VMT reducing infrastructure and programs, such as bicycle infrastructure improvements, pedestrian facilities, and expansion of transit services (VMT Reduction Credits). The VMT reduction credits generated through the program could be used to offset VMT-related impacts caused by induced travel demand that are associated with roadway capacity improvements included within the proposed Plan. Additional credits could also be sold to development projects within the region, consistent with the SCS, to offset their land use related to VMT impacts. Revenue from the credits sold through the banking program shall be used to help advance the timing of implementation of VMT reducing infrastructure or programs in the proposed Plan, develop new or further expand the VMT reducing infrastructure and programs included in the proposed Plan, or allocate towards grant funding to construct multi-modal infrastructure within the local jurisdictions. This measure would also reduce emissions of fine and respirable particulate matter (PM_{10} and $PM_{2.5}$) by reducing vehicle traffic on all roadways, including those near sensitive receptor locations. SANDAG shall include a pilot version of this program within the 2029 Regional Plan.

Findings and Rationale

The SANDAG Board of Directors finds that the provision of mitigation measure AQ-2a would reduce PM_{10} emissions from on-road sources by securing funding to implement ways to reduce all emissions, including PM_{10} emissions from mobile sources. Mitigation measures AQ-2b and TRA-2 aim to achieve VMT reductions for transportation and development projects by implementing various plans and programs, including requiring transportation demand management (TDM) strategies, reducing parking minimums, implementing active transportation facilities beyond those in the proposed Plan, and facilitating a VMT exchange program. Implementation of these actions would reduce PM_{10} emissions from on-road sources by reducing VMT throughout the region.

In addition, mitigation measures GHG-4a, GHG-4b, GHG-4c, GHG-4d, and GHG-4e would reduce PM_{10} emissions from tire wear, brake wear, and vehicle exhaust, as discussed in Section 4.8, Greenhouse Gas Emissions and Climate Change of the EIR. In addition, mitigation measure TRA-2 would reduce criteria pollutants through project-level VMT reduction measures, as discussed in Section 4.16, "Transportation," of the EIR. Measures to reduce VMT or vehicle exhaust (e.g., electric vehicles (EVs)) in these mitigation measures would reduce PM_{10} emissions and associated concentrations.

Mitigation that reduces VMT would reduce PM_{10} emissions from road dust. Meanwhile, mitigation that supports zero-emission (ZE) vehicles would reduce PM_{10} emissions associated with vehicle exhaust. However, ZE vehicles still emit road dust, so PM_{10} emissions would remain above the thresholds.

However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that the proposed Plan's incremental PM_{10} emissions contribution would be reduced to a level that would be less than cumulatively considerable. Therefore, impacts related to cumulatively considerable net increases in air pollutant emissions would remain significant and unavoidable.

AQ-3 RESULT IN CONSTRUCTION-RELATED EMISSIONS ABOVE REGIONAL MASS EMISSION THRESHOLDS.

Significant Impact

By 2035 and 2050, the proposed Plan could result in a substantial increase in construction-related emissions exceeding daily thresholds as the various land use changes and transportation network improvements are constructed. Therefore, this impact (AQ-3) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AQ-3a, AQ-3b, and AQ-3c, as well as GHG-4a through GHG-4e as discussed under Impact GHG-4, would reduce the proposed Plan's significant impacts associated with fugitive dust (fugitive PM_{10} and $PM_{2.5}$ emissions) during construction, as well as the impacts associated with exhaust emissions from construction equipment, but not to a less-than-significant level.

AQ-3a Implement Construction Best Management Practices for Fugitive Dust.

During planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential for localized particulate (PM_{10} and $PM_{2.5}$) construction impacts that result in exceedances of the numerical mass emission thresholds). If impacts are significant, during project level construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce impacts, including but not limited to, the following:

- Use fugitive dust control measures to reduce generation from exposed surfaces during construction, as specified in SDAPCD Rule 55 (SDAPCD 2009). SDAPCD Rule 55 includes various requirements, including preventing visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, removing all track-out/carry-out dust at the conclusion of each workday. Compliance with these regulatory requirements is a performance standard for mitigation of construction activity particulate emissions. Reductions in fugitive dust emissions range from 40 to 80% for minimizing track-out to 90% for use of tarps or cargo covering when transporting material (SCAQMD 2007; WGA 2006).
- Use additional fugitive dust control measures such as watering or application of dust suppressants to reduce the generation of fugitive dust at active construction sites. Reductions in fugitive dust emissions range from 10 to 74% for watering of unpaved surfaces to 84% for use of dust suppressants (WGA 2006; CAPCOA 2025).

- Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off site. Reductions in fugitive dust emissions are estimated at 91% for use of tarps or cargo covering when transporting material (SCAQMD 2007).
- Remove visible mud or dirt track-out onto adjacent public roads. Reductions in fugitive dust emissions range from 40 to 80% for minimizing track-out (WGA 2006).
- Limit vehicle speeds on unpaved surfaces during construction to 15 mph. Reductions in fugitive dust emissions from unpaved surfaces are estimated at 57% (WGA 2006).
- Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph. Reductions in fugitive dust emissions are estimated at 98% (WGA 2006).
- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas. Reductions in fugitive dust emissions from wind erosion are estimated at 90% (WGA 2006).
- Wash all trucks and equipment, including their tires, prior to leaving the construction site. No quantitative estimate of the effectiveness of this measure is available.

AQ-3b Reduce Diesel Emissions During Construction From Off-Road Equipment.
For impacts on air quality from construction exhaust, during planning, design, and project-level CEQA review of transportation network improvements and programs or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce criteria pollutant and TAC impacts from off-road equipment, including, but not limited to, the following:

- Ensure off-road equipment greater than 25 horsepower (hp) that will be operating for more than 20 hours during construction meets the following requirements:
  - Ensure engines are zero emissions or equipped with a CARB Level 3 Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.
  - If project-specific analysis demonstrates that the above measure would not adequately reduce impacts (as determined by the project-level lead agency), provide engines that meet or exceed either EPA Tier 4 offroad standards.
- Monitor idling time of diesel-powered construction equipment and limit to no more than 2 minutes.
- Maintain and properly tune construction equipment in accordance with the manufacturers' specifications.
- Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.
- Use late model engines.
- Use low emission diesel products.
- Use alternative fuels in construction equipment.
- Use engine retrofit technology to control emissions from off-road equipment.

AQ-3c Reduce Diesel Emissions During Construction From On-Road Vehicles.
For impacts on air quality from construction exhaust as a result of transportation network improvements and programs or development projects, during project-level CEQA review and construction, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement BMPs to reduce criteria pollutant and TAC impacts from on-road vehicles, including but not limited to:

- Monitor idling time of diesel-powered trucks, and limit to no more than 2 minutes.

- Provide clear signage for construction workers at all access points.
- Maintain and properly tune vehicles in accordance with the manufacturers' specifications.
- Ensure that construction activity deliveries are scheduled during off-peak hours (e.g., 10 a.m. to 3 p.m.) and are coordinated to consolidate truck trips. When the movement of construction materials and/or equipment impacts traffic flow, provide temporary traffic control (e.g., flag person) to improve traffic flow.
- Use late model engines (2010 or new model years).
- Use low emission diesel products in on-road vehicles.
- Use zero emission or near-zero emission technologies or alternative fuels in on-road vehicles.
- Use engine retrofit technology on on-road vehicles.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-4a through GHG-4e, AQ-3a, AQ-3b, and AQ-3c, have been required in, or incorporated into, the proposed Plan to reduce this significant impact of cumulatively considerable increases in particulate emissions. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Mitigation measure AQ-3a would reduce the impacts associated with fugitive dust (fugitive PM_{10} and $PM_{2.5}$ emissions) during construction, as well as the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3b would reduce the impacts associated with exhaust emissions from construction equipment. Mitigation measure AQ-3c would reduce diesel emissions during construction from on-road vehicles. Additionally, mitigation measures GHG-4d and GHG-4e would reduce construction emissions through use of energy and fuel-efficient vehicles and equipment.

Although mitigation would reduce impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level, and impacts would be significant and unavoidable. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-3) remains significant and unavoidable.

AQ-4 EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL PM_{10} AND $PM_{2.5}$ CONCENTRATIONS.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan could substantially contribute to violations or create new violations of the $PM_{2.5}$ Annual NAAQS, $PM_{2.5}$ Annual CAAQS, $PM_{2.5}$ 24hr NAAQS, PM_{10} Annual CAAQS, PM_{10} 24hr CAAQS, and PM_{10} 24hr NAAQS and thereby expose sensitive receptors to substantial PM_{10} and $PM_{2.5}$ concentrations. Therefore, this impact (AQ-4) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AQ-4, as well as AQ-2a, AQ-2b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, TRA-2, as discussed under Impacts AQ-2, GHG-4, and TRA-2, would reduce the proposed Plan's significant impacts associated with exposing sensitive receptors to substantial PM_{10} and $PM_{2.5}$ concentrations, but not to a less-than-significant level.

AQ-4 Reduce Exposure to Localized Particulate Emissions.

During planning, design, and project-level CEQA review of transportation network improvements and programs, and during planning, design, and project-level CEQA review of development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, evaluate the potential particulate matter concentration impacts of the project using applicable procedures and guidelines for such analyses. If exceedances of PM_{10} or $PM_{2.5}$ standards are predicted, SANDAG shall, and other transportation project sponsors can and should, apply measures to reduce PM emissions, including but not limited to the following:

- Design sites to locate sensitive receptors more than 500 feet of a freeway, 500 feet of urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
- Design sites to locate sensitive receptors more than 1,000 feet of a major diesel rail service or railyards.

Where adequate buffer cannot be implemented, implement the following:

- Install air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to indoor reduce pollution exposure for residents and other sensitive populations in buildings that are close to transportation network improvement projects. Use air filtration devices rated MERV-13 or higher. As part of implementing this measure, require an ongoing maintenance plan for the building's Heating, Ventilation and Air Conditioning (HVAC) air filtration system. Air filtration devices rated MERV-13 are estimated to reduce indoor levels of particulates by 75 to 90% (CARB 2017).
- Plant trees and/or vegetation suited to trapping roadway air pollution and/or sound walls between sensitive receptors and the pollution source. This measure would trap pollution emitted from pollution sources such as freeways, reducing the amount of pollution to which residents and other sensitive populations would be exposed. The vegetation buffer should be thick, with full coverage from the ground to the top of the canopy (CARB 2017, Baldauf 2016). Vegetation can be combined with sound walls to further reduce pollution exposure, particularly for locations immediately behind the barrier.
- Design streets that have more open space and varied building heights.
- Move bus stops and other gathering location farther from intersections.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, TRA-2, and AQ-4 have been required in, or incorporated into, the Plan to reduce this significant impact of exposing sensitive receptors to substantial PM_{10} and $PM_{2.5}$ concentrations. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AQ-2a and AQ-2b would help secure incentive funding to reduce PM emissions from mobile sources and reduce PM emissions by reducing VMT, respectively. Implementation of mitigation measures GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2 would reduce PM_{10} and $PM_{2.5}$ emissions from tire wear, brake wear, vehicle exhaust, and through project-level VMT reduction measures. Mitigation measure AQ-4 would reduce the exposure of sensitive receptors to localized PM emissions with the implementation of design measures. Although mitigation would reduce impacts, there is no guarantee that all projects would be reduced to below a level of significance.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-4) remains significant and unavoidable.

AQ-5 EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL TAC CONCENTRATIONS.

Significant Impact

By 2035 and 2050, implementation of the proposed plan would not expose existing sensitive receptors, but would expose new receptors, to substantial concentrations of toxic air contaminants (TACs) emissions. Therefore, this impact (AQ-5) would be significant.

Mitigation Measures

Implementation of mitigation measures AQ-5a and AQ-5b, as well as AQ-2a, AQ-2b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2, as discussed under Impacts AQ-2, GHG-4, and TRA-2, would reduce the proposed Plan's significant impacts associated with exposing sensitive receptors to substantial TAC concentrations, but not to a less than significant level.

AQ-5a Reduce Exposure to Localized Toxic Air Contaminant Emissions.

During planning, design, and project level CEQA review of transportation network improvements and programs, SANDAG shall, and other transportation project sponsors can and should, evaluate the potential toxic air contaminant (TAC) impacts of the project using applicable procedures and guidelines for such analyses (for example, California Air Pollution Control Officers' Association, OEHHA, and EPA air toxics health risk assessment guidance).

In addition, during planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should apply the above measures, and additional measures to reduce TAC emissions or exposure to TAC emissions, including but not limited to:

- Reduce the potential for TACs to be introduced into buildings by all of the following:
  - Maintaining a positive air pressure within buildings that include sensitive receptors.
  - Achieving a performance standard of at least one air exchange per hour of fresh outside filtered air.
  - Achieving a performance standard of at least 4 air exchanges per hour of recirculation.
  - Achieving a performance standard of at least 0.25 air exchanges per hour of unfiltered air if the building is not positively pressurized.
- Within developments, separate sensitive receptors from truck activity areas, such as loading docks and delivery areas. This measure would reduce exposure of residents and other sensitive receptors by locating sources of TACs associated with loading docks and delivery areas away from sensitive receptors.
- Replace or retrofit existing diesel generators that are not equipped to meet CARB's Tier emission standards.
- Reduce emissions from diesel trucks using the project site through the following measures:
  - Install electrical hook-ups for electric or hybrid trucks at loading docks.
  - Require trucks to use Transportation Refrigeration Units (TRUs) that meet Tier 4 emission standards.
  - Require truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels.
  - Prohibit trucks from idling for more than 2 minutes as feasible.

This measure would reduce emissions of TACs from trucks and TRUs by reducing operations and requiring them to use electrical hookups.

- Do not locate sensitive receptors in the same buildings as a perchloroethylene dry cleaning facility. This measure would reduce potential exposure of sensitive receptors to perchloroethylene from dry cleaning facilities.
- Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year). This measure would reduce potential exposure of sensitive receptors to emissions from gas stations.

- Ensure that private (individual and common) exterior open space, including playgrounds, patios, and decks, is shielded from stationary sources of air pollution by buildings or otherwise buffered to further reduce air pollution exposure for project occupants. This measure would reduce the potential for exposure of residents and other sensitive populations to stationary sources of TAC emissions.

AQ-5b Reduce Exposure to Localized Toxic Air Contaminant Emissions during Railway Design.
In order to help reduce localized toxic air contaminant (TAC) concentrations at sensitive receptors near the future proposed railway(s), SANDAG shall require the design of railway tunnels or other approaches to move emissions underground, where feasible, during individual project-level design. Furthermore, individual project-level design of railway tunnels or other underground features shall require that portals, adits, windows, and other venting features are located as far away as feasible from nearby sensitive receptor(s).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, TRA-2, AQ-5a, and AQ-5b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of exposing sensitive receptors to substantial TAC concentrations. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure AQ-2a and AQ-2b would help reduce TAC concentrations by reducing VMTs. Implementation of mitigation measure AQ-5a would reduce TAC emissions and TAC emission exposure on existing and new receptors through design and siting requirements. Implementation of mitigation measure AQ-5b would reduce diesel emission exposure on existing and new receptors through undergrounding and design. Implementation of mitigation measures GHG-4a, GHG-4b, GHG-4d, GHG-4e, and TRA-2 would reduce PM_{10} and $PM_{2.5}$ emissions from tire wear, brake wear, vehicle exhaust, and through project-level VMT reduction measures which would reduce TAC emissions and associated concentrations. Although mitigation would reduce impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects there is no guarantee that all projects would be reduced to below a level of significance for every project. Therefore, impacts would be significant and unavoidable.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the impact to a less-than-significant level, this impact (AQ-5) remains significant and unavoidable.

C-AQ-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO AIR QUALITY.

Significant Impact

By 2035 and 2050, cumulative air quality impacts throughout the Southern California and Northern Baja California region would be significant and because the proposed Plan's incremental air quality impacts are significant in 2035 and 2050, the proposed Plan's incremental air quality impacts (AQ-2, AQ-3, AQ-4, and AQ-5) are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2 as discussed above, would reduce air quality impacts, but would not reduce the proposed Plan's incremental impacts to less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2 have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant air quality impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures AQ-2a, AQ-2b, AQ-3a, AQ-3b, AQ-3c, AQ-4, AQ-5a, AQ-5b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, GHG-4e, and TRA-2 would reduce the proposed Plan's significant cumulative air quality impacts. However, while these mitigation measures reduce the proposed Plan's significant air quality impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant air quality impacts to less-than-significant levels, these impacts (AQ-2, AQ-3, AQ-4, and AQ-5) remain cumulatively considerable post-mitigation.

D. Biological Resources (EIR Section 4.4)

BIO-1 HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY SENSITIVE NATURAL COMMUNITIES IDENTIFIED IN LOCAL OR REGIONAL PLANS, POLICIES, REGULATIONS, OR BY CDFW OR USFWS; OR HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE OR FEDERALLY REGULATED WATERS AND WETLANDS THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in substantial adverse effects on sensitive natural communities and regulated aquatic resources. Therefore, this impact (BIO-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures BIO-1a through BIO-1e would reduce or minimize the proposed Plan's significant impact on sensitive natural communities and regulated aquatic resources, but not to less-than-significant levels.

BIO-1a Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources.

During project planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid impacts on sensitive natural communities and regulated aquatic resources when feasible. Avoidance measures include, but are not limited to, the following:

- Conduct early coordination with the wildlife agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands.

- During the site identification and project design process, to the extent feasible, prioritize the least environmentally constrained site, and select a design that avoids and minimizes impacts on biological resources and NCCP lands, and maintains habitat integrity.
- Confine development footprints to the minimum amount of undeveloped area necessary for construction and safe, reliable operation. Limit access routes and staging areas to existing roadways and developed or disturbed areas. Direct drainages away from sensitive habitats, such as canyons. Clearly delineate all construction areas, staging areas, and access routes in the final engineering plans.
- Limit grading and earth-moving activities to the permitted impact footprint. Install environmentally sensitive area fencing or flagging along the limits of disturbance prior to the start of construction to avoid incidental loss of sensitive habitat types.
- Require biological monitoring and regular inspections for construction in the vicinity of and adjacent to sensitive habitats to avoid impacts on these habitats. Report any special-status species and natural communities detected during project surveys to the CNDDB.

BIO-1b Provide Compensatory Mitigation.

Where impacts are unavoidable, during project planning, design and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation, as specified by and consistent with adopted MSCP or MHCP guidelines and agreements, applicable federal and state regulatory requirements for mitigating impacts on wetlands and regulated aquatic resources, and applicable local regulations protecting sensitive natural communities, or through consultation with resource agencies (including federal and state wildlife and regulatory agencies, such as USFWS, CDFW, USACE and RWQCB). SANDAG shall, and other implementing agencies can and should, establish appropriate mitigation ratios where ratios have not already been established through ordinances and guidelines, specifically for impacts on sensitive coastal, riparian, and shrubland communities. SANDAG shall, and other implementing agencies can and should, design compensatory mitigation to result in the conservation, establishment, or creation of self-sustaining sensitive natural and native communities, replacing the lost habitat or habitat value as required to offset those lost from project implementation. Otherwise, mitigation measures would include the requirement for and financing of long-term conservation and management requirements of the mitigation projects.

For impacts outside the coastal zone, provide compensatory mitigation in the form of project- and habitat-specific onsite or offsite mitigation. Offsite mitigation would occur through several options, including (1) the purchase of credits at an existing authorized mitigation bank within or adjacent to the ecoregion or watershed within which the impacts occurred; (2) in-lieu fee program; or (3) project-specific (permittee responsible) mitigation, such as habitat enhancement, establishment (creation), or reestablishment (restoration). Mitigation should occur as close to the impact and in the same local watershed as feasible, unless compelling ecological benefits, as supported by the state and federal wildlife agencies, would result from mitigation located in another area.

Compensatory mitigation for impacts inside the North Coast Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP) (2014) should be consistent with Chapter 6B Resources Enhancement and Mitigation Program. Compensatory mitigation for impacts inside the coastal zone and outside the PWP/TREP should be provided within the coastal zone as close as feasible to the impact. Consistent with the resource agencies' approval and applicable adopted plans, ordinances, and policies, provide compensatory mitigation for sensitive upland vegetation communities through the following:

- Onsite restoration and post-restoration monitoring for temporary impacts using appropriate native species and natural habitat configurations similar to or better than those impacted.
- On- or offsite preservation of existing habitats through acquisition or restoration using TransNet and other (e.g., project-specific) mitigation funds for permanent impacts. Protect mitigation lands in perpetuity (e.g., through a conservation easement or similar legal conservation assurance to be approved by the regulatory agencies), fund long-term management (e.g., through the establishment of an endowment for habitat

management and for easement management), and adequately manage such lands to maintain the originally intended biological quality and function in perpetuity.

- Offsite mitigation requirements met through TransNet or other (e.g., project specific) mitigation funds. When mitigation is provided outside of an adopted NCCP/HCP plan area, the following conditions should apply:
  - Give priority to mitigation lands connected to existing conserved open space.
  - Consider contributing to the establishment of large blocks of habitat or lands that are otherwise critical for covered species or providing for biological core areas and habitat linkages consistent with current regional conservation planning goals.
  - Mitigate impacts on critical habitat within the same Critical Habitat Unit where the impacts occurred.
  - Purchase of habitat credits at an approved mitigation bank, or through payment into an in-lieu mitigation fee program applicable to the impacts and as approved by the wildlife agencies.
  - Construction within regulated aquatic resources would be subject to prior authorization by USACE, the RWQCB, CDFW, and CCC (as applicable in the coastal zone). Consistent with the resource agencies' permitting and applicable adopted plans, ordinances, and policies, provide project-specific mitigation for impacts on regulated aquatic resources, including waters and wetlands, and associated state-regulated riparian habitat, through one of the following, in order of priority:
  - Purchase of credits at an existing authorized mitigation bank (as available) or in-lieu fee program, except within the coastal zone. Provide compensatory mitigation for impacts inside the coastal zone at sites within the coastal zone close to the impact. Mitigation of impacts to aquatic resources within the coastal zone may require offsets outside the coastal zone and would be negotiated with CCC on a case-by-case basis.
  - Project-specific (permittee responsible) mitigation. Apply an appropriate mitigation ratio for regulated aquatic resources in consultation with the regulatory agencies (i.e., following the USACE Standard Operating Procedure and any other applicable standards) to ensure no net loss of wetlands functions and services, account for temporal losses, and set in coordination with USACE, the RWQCB, and CDFW. Use bioengineered soft structure creek and wetland restoration methods where feasible. Impacts on vernal pools in the city of San Diego would require mitigation consistent with the VPHCP (City of San Diego 2017); impacts on vernal pools outside the city of San Diego would require permitting through the RWQCB.

BIO-1c Prepare a Habitat Restoration Plan.

During planning, design, and project-level CEQA review of transportation network improvements or development projects, and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should—as specified through consultation with and as approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and state regulatory requirements—prepare and implement a habitat restoration plan for impacts on sensitive natural communities or a habitat mitigation and monitoring plan consistent with the requirements of and approved by USACE, the RWQCB, and CDFW for all impacts on regulated waters, including wetlands. This mitigation measure applies provided that mitigation does not occur through credit purchase at a mitigation bank. The restoration plan should include the following:

- Details regarding the location of the site, site conditions and functions, site preparation (e.g., grading, bioengineering methods), recontouring, planting specifications (including native seed mixes and plant palettes), irrigation design (if determined necessary), and measures to control exotic vegetation.
- Details on avoidance of impacts on any extant sensitive biological resources that may occur as the result of habitat restoration, including direct loss and indirect effects related to changes in hydrology and associated potential effects on species composition.

- Identification of locally appropriate plant species for the plan, sourcing (e.g., seed collection, contract-growing of container plants), and outline of performance standards (success criteria). Success should be measured by comparing a similar, natural (undisturbed) reference site containing the same vegetation communities and located within the same watershed as the restoration site, and should use statistical metrics in consideration of the temporal difference between an established reference site and an immature restoration site.
- Performance standards sufficient to create self-sustaining habitat providing the functions and values required to offset those lost to the impacts and meet the requirements of applicable agency and adopted plans, ordinances, and policies. After final performance standards have been met and any relevant permitting agencies have approved the mitigation project as complete, the mitigation areas must be conserved and managed in perpetuity (see BIO-1d).
- Maintenance and monitoring procedures (including post-restoration monitoring and reporting). Any habitat restoration and mitigation site should be monitored for a minimum of 5 years or as required by regulatory agencies but continue maintenance and monitoring until performance standards are met.
- Identification of remedial measures if the mitigation efforts fall short of the performance standards. Remedial measures typically consist of, but are not limited to, replanting, reseeding, topographical/surface contour adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods.
- Climate science and climate change resiliency and adaptation measures, to be developed as adaptive management strategies for restoration and long-term management planning, to reflect the latest available information on climate change impacts and adaptation measures, such as seed storage and adaptation of the seed mixes and planting palettes to adapt to changing climate conditions and sea-level rise.

BIO-1d Prepare Habitat/Long-Term Management Plans.

During project-level CEQA review of transportation network improvements or development projects and as part of the regulatory permitting process, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions should—as specified through consultation with and approved by the resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, and applicable federal and state regulatory requirements—prepare and implement a long-term management plan (LTMP) consistent with the requirements of USACE, the RWQCB, and CDFW for all impacts on regulated waters, including wetlands, or an HMP or resources management plan (RMP) for upland mitigation areas. The management plans can and should be consistent with the SDMMP MSP and be prepared by qualified and experienced ecologists to develop appropriate management and monitoring measures. The management plans should describe management in perpetuity of the mitigation and conservation areas, illustrate adaptive management measures, outline management goals and objectives, and identify management tasks consistent with these goals and objectives. Management goals should include adaptive management measures for climate adaptation and resiliency. Furthermore, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, prepare a management cost analysis to identify long-term management costs pursuant to measures outlined in the LTMP, HMP, or RMP. Long-term management should be funded using endowments or other financial assurances to generate sufficient annual interest to manage mitigation areas in perpetuity. In addition to the funding requirements, the management plans should also identify the habitat manager and propose a site protection instrument, such as an agency-approved conservation easement (CE), restrictive covenant, long-term conservation assurances (i.e., through an approved NCCP), or other title restriction that identifies the mitigation site to be conserved in perpetuity. In some cases, compensatory mitigation would occur through adding lands through public lands that are already preserved (e.g., National Wildlife Refuge).

BIO-1e Implement Best Management Practices to Avoid Indirect Impacts.

During planning, design, project-level CEQA review, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities,

and other local jurisdictions can and should, include location-specific measures to avoid and minimize construction-generated dust, erosion, runoff, and sedimentation, and exotic plant invasion, within or into sensitive natural habitats and jurisdictional waters. Location-specific measures consist of, but are not limited to, the following:

- Place construction materials, staging, storage, dispensing, fueling, and maintenance activities in upland areas outside of sensitive habitat, and take adequate measures to prevent any runoff from entering regulated waters, including wetlands.
- Fuel equipment on existing paved roads. Check contractor equipment for leaks prior to operation and repaired as necessary.
- Monitor construction activities using a qualified biologist when construction is occurring in, or adjacent to, sensitive natural communities and grant the biologist the authority to stop work if it deviates from approved plans and mitigation measures.
- Prohibit planting or seeding of invasive plant species that appear on the most recent version of the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory, including the development of an integrated invasive plant control plan describing protocols and enforcement schedules for maintenance, construction, and emergency activities working within and moving between important habitat areas.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial adverse effects on riparian habitat, wetlands, and uplands. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would reduce significant impacts related to substantial adverse effects on riparian habitat, wetlands, and uplands. However, there is no assurance that these mitigation measures would be implemented by non-SANDAG project sponsors or would be equally effective for all projects due to the wide variety of circumstances, such as lack of available mitigation sites, shortage of acreage at mitigation banks, mitigation complexity and cost, lack of long-term management and monitoring, and lack of enforcement. Instances may occur in which impacts are not reduced to less than significant.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-1) remains significant and unavoidable.

BIO-2 HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR INDIRECTLY, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL-STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR LISTED BY CDFW OR USFWS, INCLUDING THEIR FEDERALLY DESIGNATED CRITICAL HABITAT, OR SPECIES THAT ARE CONSIDERED SENSITIVE IN CEQA GUIDELINES SECTION 15380.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in substantial adverse impacts to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS, including the habitat of these special-status species. Therefore, this impact (BIO-2) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures BIO-2a through BIO-2c, as well as BIO-1a through BIO-1e as discussed under Impact BIO-1, would reduce the proposed Plan's significant impacts to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS, and the habitat of these special-status species, but not to a less-than-significant level.

BIO-2a Implement Design, Minimization, and Avoidance Measures for Special-Status Animal Species.

During planning, design, project-level CEQA review, regulatory permitting process, and construction of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, incorporate measures to avoid and minimize impacts on special-status animal species.

Construction

Construction measures consist of, but are not limited to, the following:

- Identify potential habitats using regionally available data sources and conduct biological field habitat assessments and species surveys as required by regional programs, protocols, or regulatory requirements.
- Avoid construction during the nesting or breeding season of special-status animal species.
- If the nesting or breeding seasons cannot be avoided, conduct focused surveys (by certified or trained biologists approved by the wildlife agencies) and implement mitigation measures. For indirect impacts, noise attenuation measures (e.g., temporary noise barriers) may be required if construction noise levels are found by the focused survey to disturb special-status animal species, specifically during the breeding season.
- Backfill all wildlife pitfalls (trenches, bores, and other excavations) at the end of each work day. If backfilling is not feasible, slope all trenches, bores, and other excavations at a 3:1 ratio at the ends to provide wildlife escape ramps or cover completely to prevent wildlife access.
- Delineate permitted work areas, including staging areas, equipment access, and placement of soils, with fencing or stakes prior to construction to prevent access to areas occupied by special-status species.
- Require monitoring of construction activities by qualified or certified biologists when construction occurs in, or adjacent to (i.e., within buffer areas approved by the regulatory agencies), areas suitable for or occupied by special-status species, with authority to stop work if it deviates from approved plans and mitigation measures. Avoidance buffers may vary by species and should be approved by the wildlife agencies.
- Avoid nighttime construction or minimize lighting. When activities must occur at night, direct lighting (e.g., staging areas, equipment storage sites, roadway) downward and away from sensitive vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.
- Remove spoils, trash, or any debris to an offsite, approved disposal facility. Contain trash and food items in closed containers and remove daily to reduce the attractiveness to opportunistic predators, such as coyotes and feral dogs and cats that may prey on sensitive species. Prohibit workers from bringing pets and firearms to the site.
- Clear vegetation outside of the typical breeding season of special-status animal species as determined by the wildlife agencies or qualified biologist. If activities must occur during special-status species breeding season timeframes, conduct a preconstruction survey by a qualified biologist to determine whether the species of concern, including special-status birds protected under the MBTA, are present within the proposed work area or appropriate buffer (buffer distance may vary depending on the type of activity and the species and other site conditions). If the species of concern are found onsite, implement measures, surveys, and construction monitoring to avoid impacts as determined by the regulatory agencies or the qualified biologist.

Operation and Maintenance

Operation and maintenance measures may incorporate the same measures as detailed above and consist of, but are not limited to, the following:

- If permanent lighting is necessary, use motion sensitive lighting rather than steady burning, and direct downward and away from natural vegetation communities. Use light glare shields to reduce the extent of illumination into adjoining areas.
- In the event that vegetation clearing or other vegetation maintenance is required, schedule vegetation clearing outside special-status animal species breeding seasons.
- Implement operational noise-reduction measures described in Section 4.13, Noise and Vibration (see Mitigation Measure NOI-1b).

BIO-2b Provide Compensatory Mitigation for Special-Status Plant Species.

Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status plant species as specified through consultation with resource agencies, and consistent with adopted MSCP or MHCP guidelines and agreements, federal and State regulatory requirements, or local regulations.

Federally and State-Listed Plant Species:

- If an individual project would result in take of a federally or state-listed plant species, consult with the wildlife agencies or require the applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, NCCP, Section 7, Section 10 HCP) prior to construction as required by state and federal law. Federally listed plant species may not fall under this requirement if no federal project nexus is provided. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation according to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines.
- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted plans, ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in-lieu fee program to compensate for impacts.
- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat, consisting of, but not limited to, seed collection, salvage of whole plants and soil/root masses (i.e., for impacts to San Diego ambrosia), translocation of transplantation of populations or plant parts, and planting seeds or root masses in an area with suitable conditions as approved by the wildlife agencies or authorized jurisdiction. Included in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.
- Implement habitat and species-specific mitigation measures that may include habitat restoration with species specific habitat components, such as constructing artificial burrowing owl burrows; creating vernal pools in the appropriate historical habitat context; establishing habitat components for sensitive amphibians and reptiles, such as cover boards; and including nectaring and flowering plant species in the restoration planting specifications for sensitive invertebrates.
- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources and their ability to sustain populations following the completion of the program.
- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures consist of, but are not limited to, exotic species management, access control, replanting and reseeding of appropriate

habitat elements, maintenance of habitat structures (i.e., artificial burrows), and propagation and seed bulking programs.

- Conserve any restoration and translocation sites in perpetuity, fund a long-term management endowment, identify a long-term habitat manager, and provide long-term adaptive habitat management measures through an HMP.

Nonfederally and Nonstate-Listed Special-Status Plant Species

- For plant species covered by adopted NCCPs or other ordinances, such as the San Diego County RPO, obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances. This may include species-specific mitigation for covered narrow endemic plant species according to MSCP or MHCP requirements.
- Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, translocation/transplantation, restoration, or creation of self-sustaining suitable habitat as described above for federally and state-listed species. Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.

BIO-2c Provide Compensatory Mitigation for Special-Status Animal Species.
Where impacts are unavoidable, during planning, design, regulatory permitting, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, provide compensatory mitigation for impacts on special-status animal species as specified through consultation with resource agencies, and in adopted MSCP or MHCP guidelines and agreements, federal and state regulatory requirements, or local regulations.

Federally or State-Listed Animal Species and Plant Species with Federal Nexus

- If an individual project would result in take of a federally or state-listed animal species, consult with the wildlife agencies and require the project applicant to obtain appropriate take authorizations (e.g., Section 2081 Incidental Take Permit, Section 7, NCCP, HCP) prior to construction as required by state and federal law. If the area is covered by an adopted NCCP (e.g., MSCP, MHCP), provide mitigation according to the requirements of the NCCP, subarea plan, and associated ordinances and guidelines. As identified through the appropriate take authorizations, develop mitigation plans and long-term conservation and management strategies, as required and approved by the wildlife agencies.
- Mitigate loss of habitat through open space conservation, using mitigation banks (as available) or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat following the most recent scientific information and guidance available.
- Establish appropriate habitat mitigation ratios—depending on the location of the impact and the species—that are also consistent with the requirements of resource agencies and applicable adopted NCCP plans, and local ordinances, and policies that include the appropriate habitat, area, and species in compensation lands. If appropriate, require the applicant to acquire suitable mitigation habitat as part of the SANDAG EMP or use a mitigation bank or in-lieu fee program to compensate for impacts.
- Prepare a species and habitat mitigation plan to identify effective methods for reestablishing the affected species and habitat based on available scientific information and as recommended by the respective species experts. If appropriate and approved by the regulatory agencies, mitigation may include translocation (active or passive) of the species (plants and animals). Include in the mitigation plan success criteria for reestablishing the affected species and habitat, and remedial measures that must be implemented if the project is not meeting specified performance criteria.

- Include a monitoring program designed to maintain the resources on lands used as mitigation. Design the monitoring program to evaluate the current and probable future health of the resources, and their ability to sustain populations following the completion of the program.
- Design remedial measures appropriate for the species and habitat. Appropriate remedial measures consist of, but are not limited to, exotic species management, access control, habitat restoration, species translocation, and predator control programs.

Nonfederally and Nonstate-Listed Special-Status Animal Species

- Obtain all appropriate authorizations prior to construction as required by state, federal, and regional conservation plan (NCCP/HCP) regulations and local ordinances (such as the County RPO).
- Follow guidelines that identify mitigation requirements, such as local biology guidelines and mitigation ordinances, or MOU between the respective jurisdiction and wildlife agencies.
- Mitigate loss of habitat using mitigation banks or through project-specific mitigation. Mitigate habitat impacts through preservation, restoration, or creation of self-sustaining suitable habitat. Create species-specific breeding opportunities and protect mitigation areas from edge effects (e.g., roadkill). Establish appropriate habitat mitigation ratios, depending on the location of the impact and the species, to meet the requirements of resource agencies and applicable adopted plans, ordinances, and policies.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, Bio-1e, BIO-2a, BIO-2b, and BIO-2c have been required in, or incorporated into, the proposed Plan to reduce this significant impact of direct and indirect substantial adverse effects on wildlife and plants identified as candidate, sensitive, or special-status species. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-2a, BIO-2b, BIO-2c, BIO-1a, BIO-1b, BIO-1c, BIO-1d, and BIO-1e would reduce significant impacts related to direct and indirect substantial adverse effects on wildlife and plants identified as candidate, sensitive, or special-status species. However, there is no assurance that these mitigation measures would be implemented or would be equally effective for all projects due to the wide variety of circumstances, complexity of some sites, and impacts on wildlife and plants. Instances may occur in which impacts are not reduced to less-than-significant levels.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-2) remains significant and unavoidable.

BIO-3 INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including forecasted regional growth and land use change and planned transportation network improvements, would interfere substantially with fish and wildlife movement, wildlife corridors, and nursery sites. Therefore, this impact (BIO-3) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure BIO-3a would reduce the proposed Plan's significant impacts on fish and wildlife movement, wildlife corridors, and nursery sites, but not to a less-than-significant level.

BIO-3a Facilitate Wildlife Movement.

During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement project designs that provide for continued movement of wildlife by limiting edge effects and assisting wildlife navigation through or across barriers in areas where wildlife corridors and nursery sites are impacted, as determined by best available information, modeled wildlife corridors, linkages identified in adopted HCP/NCCPs, studies conducted by the SDMMP with their partners, or project-specific wildlife movement studies. When second-tier projects are evaluated in the future, information and linkages identified in draft HCPs may be also be considered as part of best available information. Wildlife movement studies, and before-after-control-impact-studies where data are lacking, shall be conducted prior to project design, including identifying corridor widths and wildlife crossing structures and balancing conservation and recreation. Adaptive management and monitoring measures in the CEQA review and mitigation measures, shall be included in project design. Design measures consist of, but are not limited to, the following:

- Incorporate wildlife movement and corridor planning and utilize data generated by SDMMP into project design.
- Allow corridor buffer zones and wide movement corridors to remain or incorporate periodic larger habitat patches along a corridor's length.
- Where feasible, site linear projects, including pedestrian trails, away from wildlife corridors and conserved lands or NCCP lands.
- Where feasible, prohibit nighttime trail use and enforce seasonal trail closure, and plan access points and infrastructure carefully to minimize the effects on biological resources and wildlife corridors.
- As feasible, within 200 feet of a wildlife corridor, use nonreflective glass or glass treated with nonreflective coating for all exterior windows and building surfaces.
- Use only native species for landscaping within at least 200 feet of identified wildlife corridors.
- Incorporate dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consider high-pressure sodium or cut-off fixtures as feasible, and provide vegetative screening to reduce light pollution on corridors.
- Include permanent noise barriers and sound-attenuating features as part of the project design and incorporate temporary noise barriers and noise-reduction devices on equipment during construction; require the use of hydraulically or electrically powered tools, as feasible. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Install physical barriers (e.g., wildlife fencing) that prevent human and domestic predator entry into the corridor and, if appropriate, limit the amount of noise and lighting that enters the corridor. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials (i.e., rubberized asphalt), and traffic calming measures.
- Minimize the number of road and rail crossings through identified wildlife corridors.
    - Incorporate the appropriate wildlife crossing infrastructure into project design. Wildlife crossing infrastructure will be designed following the latest scientific information and should include upgrading existing culverts to facilitate functional wildlife movement, installing crossing and directional fencing at roadkill hotspots, installing wildlife bridges (overpasses) or undercrossing, and managing in perpetuity both sides of the wildlife crossings. Construct or retrofit with features such as open span bridges instead of closed culverts to allow for wildlife movement under linear transportation corridors.
    - Maximize the use of overpasses strictly for the use of wildlife movement when feasible (i.e., not paired with other recreational uses that may interfere with the use of the overpass by wildlife). However, if the construction of or retrofitting with wildlife bridges is infeasible, incorporate undercrossings or other

crossing structures that use scientifically accepted openness ratios to allow for continued movement of wildlife where transportation facilities create barriers to wildlife movement and use of nursery sites. Evaluate size-class-specific crossing structures and movement enhancement features (e.g., habitat refugia within structure, soft bottom undercrossings) for each species to ensure that crossings are functional for movement. Additionally, within aquatic habitat impacting fish corridors for species such as southern steelhead, create passable aquatic barriers for migratory fish species in order to provide fish access to spawning and rearing habitats.

- Additionally, within aquatic habitat and identified fish migration corridors for migratory fish, address fish passage for anadromous species pursuant to SHC 156.3, and implement project designs that provide adequate fish passage, and create passable aquatic barriers in order to provide fish access to spawning and rearing habitats.
- Maintain undercrossings and other crossing structures as needed to ensure wildlife movement. Prepare a fencing and wildlife crossing structure maintenance plan for projects with edge effects to maintain permeability for wildlife across corridors.
- Install directional fencing, where appropriate, to reduce vehicle mortality and guide wildlife to proposed bridges, undercrossings, and other crossing structures. Where fencing stops, extend the fence and angle it away from the roadways to deter wildlife from being funneled to roadways. Because it is not possible to install a continuous fence, use one-way gates or jump-outs so animals that do get around fence end runs can safely exit roadways.

In addition, consistent with the California Ecosystems Protection Act (AB 1788), ban the use of anticoagulant rodenticides near open space, conserved lands, and areas identified as core, linkages, wildlife corridors, or other connectivity areas. The use of anticoagulant rodenticides causes secondary poisoning in predators and may contribute to reduced functional connectivity in an already constrained landscape.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures that the provisions of mitigation measure BIO-3a have been incorporated into the proposed Plan to reduce this significant impact of decreasing the permeability of existing wildlife corridors. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure BIO-3a would reduce significant impacts related to decreasing the permeability of existing wildlife corridors. However, there is no assurance that these mitigation measures would be implemented for all projects or would be equally effective due to the wide variety of circumstances, complexity of some sites, and impacts on wildlife corridors. Instances may occur in which impacts are not reduced to less-than-significant levels.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (BIO-3) remains significant and unavoidable.

C-BIO-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS ON BIOLOGICAL RESOURCES.

Significant Impact

By 2035 and 2050, cumulative biological resources impacts throughout the Southern California and Northern Baja California region by 2035 and 2050 would be significant, and because the proposed Plan's incremental biological

resources impacts are significant in 2035 and 2050, the proposed Plan's incremental biological resources impacts (BIO-1, BIO-2, and BIO-3) are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures BIO-1a through BIO-1e, BIO-2a through BIO-2c, and BIO-3a, as discussed above, would reduce the proposed Plan's direct and indirect significant impacts on biological resources. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on sensitive natural vegetation communities and aquatic resources, special-status wildlife and plant species, on sensitive natural communities and regulated aquatic resources; species identified as candidate, sensitive, or special-status species in local or regional plans, policies or regulations, or by the CDFW or USFWS; and interference with wildlife movement and wildlife corridors would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure BIO-1a through BIO-1e, BIO-2a through BIO-2c, and BIO-3a have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant biological resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures BIO-1a through BIO-1e, BIO-2a through BIO-2c, and BIO-3a would reduce the proposed Plan's significant biological resources impacts. However, while these mitigation measures reduce the proposed Plan's significant biological resources impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant biological resources impacts to less-than-significant levels, these impacts (BIO-1, BIO-2, and BIO-3) remain cumulatively considerable post-mitigation.

E. Cultural Resources (EIR Section 4.5)

CULT-1 CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE OR UNIQUE ARCHAEOLOGICAL RESOURCE.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including forecasted regional growth and land use change and planned transportation network improvements and programs, would cause a substantial adverse change in the significance of historical resources and unique archaeological resources. Therefore, this impact (CULT-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures CULT-1a and CULT-1b would reduce the proposed Plan's significant impacts associated with changes in the significance of historical resources and unique archaeological resources, but not to a less-than-significant level.

CULT-1a Develop Project-Level Measures for Development Projects and Transportation Network Improvements.
During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a CEQA-defined historical resource or significantly affect a unique archaeological resource, the County of San Diego, cities, and other local jurisdictions can and should, or SANDAG shall, and other transportation project sponsors can and should, develop project-level protocols and mitigation measures, consistent with CEQA Guidelines Section 15126.4(b), to avoid substantial adverse changes to CEQA-defined historical resources and unique archaeological resources. The local lead agency can and should, SANDAG shall, and other transportation project sponsors can and should allow for adequate resources to identify (through survey, consultation, or other means) resources to develop minimization and avoidance methods where possible, and will/can and should consult with appropriate Native American representatives to provide necessary input as to resources that are of concern. These may include natural areas that contain resources of importance to tribes if they are historical resources or unique archaeological resources. These identification efforts shall be conducted by qualified professionals, as defined by the Secretary of the Interior's professional standards. Project-level mitigation measures include, but are not limited to, the following:

Archaeological Resources

- Where feasible, avoid impacts on archaeological resources through preservation in place by:
  - avoiding archaeological sites entirely during project design and construction;
  - dedicating archaeological sites as permanent easements;
  - capping or covering archaeological sites with a layer of chemically stable soil prior to development of tennis courts, parking lots, or similar facilities
- If preservation in place is not feasible, reduce impacts on archaeological sites through a data recovery program consistent with CEQA Guidelines Section 15126.4(b). (A data recovery program for archaeological sites may include excavation of a representative portion of the site—determined in consultation with the lead agency—to collect information necessary to address significant research questions.)

Historic Architectural Resources

- Conduct maintenance, repair, stabilization, rehabilitation, restoration (including that which may be required to address operational impacts), preservation, conservation, relocation, or reconstruction to reduce impacts on historic architectural resources, and have a qualified architectural historian or historic architect review mitigation plans to review consistency with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.
- If avoidance of a built historic architectural resource is not feasible, apply additional mitigation options consisting of, but not limited to, specific design plans for historic districts, or plans for alteration or adaptive reuse of a historical resource that follow the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings.
- If demolition of a historic structure must occur, apply mitigation options such as recordation including a building description, historical narrative, and photographic documentation of the building and appropriate as-built drawings similar to the Historic American Building Survey documentation outlined by the National Park Service (National Park Service 2023).

CULT-1b Implement Monitoring and Data Recovery Programs for Development Projects and Transportation Network Improvements.
During project-level CEQA review and during construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should, or during construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement monitoring and data recovery measures to reduce impacts on both known and undiscovered CEQA-defined historical

resources of an archaeological nature and unique archaeological resources, including but not limited to the following:

- Require areas identified in any required archaeological resource identification report or monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist and tribal monitor, consistent with CEQA and AB 52 requirements.
- Should an archaeological deposit or feature be encountered during construction activities that is determined to be a historical resource or unique archaeological resource by a qualified archaeologist, stop ground-disturbing activities and prepare or implement an Archaeological Data Recovery Program (ADRP) in consultation with, when applicable, qualified local agency staff with technical expertise in archaeological and cultural resources management and California Native American tribes, consistent with CEQA and AB 52 requirements.
- Integrate curation of archaeological materials and associated records in a regional center focused on the care, management, and use of archaeological collections if the artifact must be excavated; if the archaeological materials are Indigenous in nature, this must be approved by the regionally affiliated Native American tribe. This does not include Native American human remains and associated burial items, the disposition of which must be determined in consultation with the Most Likely Descendants, pursuant to PRC Section 5097.98 (see Impact CULT-2).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures CULT-1a and CULT-1b have been required in, or incorporated into, the proposed Plan to reduce the significant impact resulting from causing a substantial adverse change in the significance of a historical resource or unique archaeological resource. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures CULT-1a and CULT-1b would reduce significant impacts related to causing a substantial adverse change in the significance of a historical resource or unique archaeological resource through proper resource handling, surveys, regulatory compliance, and mitigation monitoring. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (CULT-1) remains significant and unavoidable.

C-CULT-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS ON CULTURAL RESOURCES.

Significant Impact

Because cumulative cultural impacts throughout the Southern California and Northern Baja California region by 2035 and 2050 would be significant, and because the proposed Plan's incremental cultural impact is significant in 2035 and 2050, the proposed Plan's incremental cultural resources impact (CULT-1) is cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures CULT-1a and CULT-1b, as discussed above, call for measures to avoid or substantially reduce adverse changes in the significance of a cultural resource and protect cultural resources listed

on or eligible for listing on the CRHR. These measures also require the implementation of monitoring and data recovery programs during construction. The mitigation measures would be included in project-level planning, design, and CEQA reviews. The measures would be required as part of transportation projects under the proposed Plan for which SANDAG is the lead agency and would be recommendations when other local jurisdictions act as lead agency. However, their implementation would not reduce impacts to less than significant because it cannot be guaranteed that all future project-level impacts under the proposed Plan can be mitigated to a less-than-significant level and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures CULT-1a and CULT-1b have been required in or incorporated into the proposed Plan to reduce the proposed Plan's significant cultural resources impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures CULT-1a and CULT-1b would reduce the proposed Plan's significant cumulative cultural resources impacts. However, while these mitigation measures reduce the proposed Plan's significant cultural resources impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant cultural resources impacts to less-than-significant levels, the impact (CULT-1) would remain cumulatively considerable post-mitigation.

F. Geology, Soils, and Paleontological Resources (EIR Section 4.7)

GEO-5 DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGICAL FEATURE.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including forecasted regional growth and land use change and planned transportation network improvements and programs, would directly or indirectly destroy unique paleontological resources or sites and unique geologic features. Therefore, this impact (GEO-5) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures GEO-5a and GEO-5b would reduce the proposed Plan's significant impacts associated with directly or indirectly destroying unique paleontological resources or sites and unique geologic features, but not to a less-than-significant level.

GEO-5a Identify the Potential for Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements or development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, assess the potential for disturbing unique paleontological resources (e.g., fossils and fossiliferous deposits consisting of identifiable vertebrate fossils, large or small; and uncommon invertebrate, plant, and trace fossils) or affecting unique geological features (i.e., a geologic feature that is the best example of its kind locally or regionally, illustrates a geologic principle, provides a key piece of geologic information, is the

"type locality" of a fossil or formation, or has high aesthetic appeal) in the project area. For project sites with a high probability of these resources being present, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist to conduct a field survey and recommend subsequent steps to be taken during project construction to reduce or avoid impacts on these resources—as described in Mitigation Measure GEO-5b—in a report documenting the field survey, and with as-needed support from a registered geologist for unique geologic features not related to fossil localities or fossiliferous deposits.

GEO-5b Impacts on Unique Paleontological Resources or Unique Geologic Features for Development Projects or Transportation Network Improvements.

If it is determined during planning, design, and project-level CEQA review that transportation network improvements or development projects would be located within an area that likely contains unique paleontological resources or unique geologic features (based on results of the work done in mitigation measure GEO-5a), SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, avoid or reduce impacts on these resources when feasible.

If impacts to paleontological resources cannot be avoided, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, retain a qualified paleontologist prior to construction to:

- Prepare a paleontological monitoring and mitigation plan, which will outline where monitoring should occur and procedures for discoveries, consistent with applicable regulations and guidelines. Such regulatory standards include the Antiquities Act of 1906, PRPA, and PRC requirements; regional and local policies of San Diego County and the cities of Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, and Vista; and guidelines of other transportation project sponsors, such as California Department of Transportation's Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance, "Chapter 8: Paleontology" (Caltrans 2025).
- Establish procedures for monitoring and the possible preconstruction salvage of exposed unique resources if fossil-bearing rocks or unique geologic features have the potential to be affected.
- Provide preconstruction coordination with contractors.
- Be on site to observe during grading operations and oversee original cutting in previously undisturbed areas of sensitive geologic formations, temporarily halt or redirect construction activities as appropriate to allow recovery of newly discovered fossil remains, recover scientifically valuable specimens or ensure avoidance of the unique paleontological resource, and oversee fossil salvage operations and reporting.

If impacts to unique geologic resources cannot be avoided, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should:

- Implement construction techniques or project features that minimize the potential for damage, if feasible.
- Establish procedures for the collection and preservation of important scientific data from the unique geologic feature prior to and, if warranted, during construction.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GEO-5a and GEO-5b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GEO-1a and GEO-1b would reduce significant impacts related to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (GEO-5) remains significant and unavoidable.

C-PALEO-1 MAKE A CUMULATIVE CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS ON PALEONTOLOGICAL RESOURCES.

Significant Impact

By 2035 and 2050, cumulative impacts on paleontological resources and unique geologic features throughout the southern California and northern Baja California region would be significant, and because the proposed Plan's incremental impacts to paleontological resources and unique geologic features are significant in 2035 and 2050, the proposed Plan's incremental paleontological resources impacts (C-PALEO-1) are cumulatively considerable and thus significant in 2035 and 2050

Mitigation Measures

Implementation of mitigation measures GEO-5a and GEO-5b, as discussed above, would reduce the significant impact on paleontological resources and unique paleontological resource or site or unique geologic feature. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GEO-5a and GEO-5b have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative paleontological resources and unique geologic features impact. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure GEO-5a and GEO-5b would reduce the proposed Plan's significant paleontological resources and unique geologic feature impact. However, while these mitigation measures reduce the proposed Plan's significant paleontological resources and unique geologic feature impact, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to a cumulatively significant paleontological resources and unique geologic feature impact to a less-than-significant level, the impact (GEO-5) remains cumulatively considerable post-mitigation.

G. Greenhouse Gas Emissions and Climate Change

GHG-4 BE INCONSISTENT WITH THE STATE'S ABILITY TO ACHIEVE THE 2030 REDUCTION TARGET OF SB 32 AND 2045 REDUCTION GOAL OF AB 1279.

Significant Impact

By 2030, 2045, and 2050, the total emissions in the San Diego region of 18.98 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2030 would exceed the regional 2030 GHG reference point of 15.69 $MMTCO_2e$ (which is based on SB 32 targets for 2030). As such, the proposed Plan's 2030 GHG emissions would be inconsistent with the state's ability to achieve the goals of SB 32. Additionally, because the total emissions in the San Diego region of 16.72 $MMTCO_2e$ in 2045 would exceed the regional 2045 GHG reference point of 3.92 $MMTCO_2e$ (which is based on AB 1279 targets for 2045), the proposed Plan's 2045 GHG emissions would be inconsistent with the state's ability to achieve the goals of AB 1279. Further, given the evidence put forth by CARB and in the documents prepared by CARB related to the SB 375 target setting finalized in March 2018, more must be done to reduce emissions from the transportation sector to achieve the state's climate goals. Therefore, the proposed Plan's measures alone would not be sufficient to achieve the state's GHG reduction goals outlined in the 2022 Scoping Plan (i.e., 40% below 1990 emissions by 2030 [SB 32] and 85% below 1990 anthropogenic emissions by 2045 [AB 1279]), and this impact would be significant. These inconsistencies would persist through 2050. Therefore, this impact (GHG-4) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b, as discussed under Impacts AQ-3, TRA-2, and WS-1, would reduce the proposed Plan's significant impacts associated with the amount GHG emissions, but not to a less-than-significant level.

GHG-4a Allocate Grant Funding to Projects that Reduce GHG Emissions.

SANDAG shall implement a grant program(s) that allocate(s) funding to underfunded GHG-reducing projects that implement the stated strategies or measures in local jurisdiction CAPs or GHG reduction plans. Examples of such projects to reduce GHG emissions include activities at the local level that reduce VMT such as transit-oriented development (TOD) projects, microtransit shuttles including, neighborhood electric vehicle (NEVs), bikeways, and walkways.

The grant program(s) shall (1) achieve additional annual GHG emissions reductions during the proposed Plan horizon by implementing projects that would not otherwise occur due to insufficient funding, and/or (2) achieve additional cumulative GHG emissions reductions under the proposed Plan planning horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan's contribution to climate change.

To be eligible for grant funding, local jurisdictions would be required to have a CAP or GHG reduction plan adopted by the agency's elected decision-making body. Any jurisdiction without a local CAP could work with SANDAG's Climate Planning Services for member agencies (mitigation measure GHG-4b) so long as the CAP or GHG reduction plan is completed prior to project implementation being started. Applications should include estimated GHG emissions reductions or other details that estimate the climate benefits from the project, which shall be prepared using established methods or protocols approved by SANDAG. The grant program(s) shall be structured (e.g., using evaluation criteria and/or weighting of evaluation criteria) to prioritize the allocation of funds to projects based on the amount of measurable progress towards achieving the GHG emissions reductions targets identified in that jurisdiction's adopted CAP or GHG reduction plan.

To implement this measure SANDAG shall:

- Continue to require locally adopted CAPs or GHG reduction plans as prerequisites to be eligible for grant funding in future cycles of the TransNet SGIP and Active Transportation Grant Programs.

- Document and report to the SANDAG Transportation Committee on the activities funded by this grant program and the estimated GHG emissions reductions on an annual basis once implemented.

GHG-4b Coordination and Support to SANDAG Member Agencies to Adopt, Update, and Monitor GHG Reduction Plans.
SANDAG, in coordination with the local air district, shall establish Climate Planning Services for member agencies to facilitate and expedite the adoption, updating, and monitoring of CAPs or GHG reduction plans, develop GHG-reducing planning policies, and/or support local implementation of GHG-reducing initiatives that align with the San Diego Regional Climate Action Roadmap.

Providing centralized Climate Planning Services through SANDAG will allow local jurisdictions to access technical climate planning experts, which will enhance interregional coordination, facilitate consistent GHG inventories across the region, provide access to the latest climate research, support best practices, standardize GHG reduction measures across reduction plans, enable regional data collection and performance monitoring, and reduce administrative contract burden.

The Climate Planning Services will enable member agencies to adopt or update GHG reduction plans and GHG-reduction initiatives that would not otherwise occur due to insufficient funding, staff capacity and/or administrative burdens. These efforts will support more effective decision making and help jurisdictions implement GHG-reducing projects under the proposed Plan planning horizon ahead of schedule and realize GHG reductions earlier than they would otherwise occur.

To support monitoring and implementation of local CAPs, GHG reduction plans, and the San Diego Regional Climate Action Roadmap, SANDAG shall coordinate and collaborate with the local jurisdictions within the county to compile, monitor, and share progress on climate action through its publicly available Climate Action Data Portal. The portal will be updated with new data and functions to enable jurisdictions to track progress, identify gaps, and adjust strategies over time in response to evolving conditions. This will accelerate the implementation of GHG-reducing projects.

From 2016-2020, SANDAG had provided similar services to its member agencies. SANDAG would reestablish the program to provide member agencies with no-cost consultant services for climate action planning assistance. This measure will enable local jurisdictions to prepare regionally consistent CAPs and participate in regional CAP monitoring efforts. These centralized services have been requested by SANDAG's members agencies during the development of the Climate Action Roadmap.

To implement this measure SANDAG shall allocate an estimated $10 million over the next 5 years to:

- Host and facilitate Climate Action Taskforce meetings with local governments on a quarterly basis to inform development of the Climate Planning Services procurement and to help guide the timely collection and analysis of climate action data.
- Release a competitive procurement for climate planning services through a Request for Proposal process in FY 2026.
- Enter a four-year contract beginning in FY 2027 with the winning solicitation to allow local jurisdictions access to the firm's or firms' services via a task order at no direct cost to the local jurisdiction.
- Report out on the utilization of the services each year as part of SANDAG's budget monitoring process.
- Collect data on GHG reduction measures on a biannual basis from local jurisdictions in the region and update the SANDAG Data Portal with information for use by federal, state and local governments, researchers, non-profit entities, and the general public.
- Prepare local GHG inventories for member agencies every 4 years after RTP adoptions.

GHG-4c Allocate Funding for Zero-Emission Vehicle Infrastructure.
Since October 2020, SANDAG has partnered with the San Diego County Air Pollution Control District and the California Energy Commission on the California Electric Vehicle Infrastructure Project ("CALeVIP"). The San Diego

County portion of CALeVIP 1.0 has provided $21.7 million to fund workplace and public charging stations at businesses, multifamily residences, school districts, and local government buildings in the region. This program will end in December 2025 without additional investment.

SANDAG shall continue to allocate funding for one or more programs that offer incentives to support and encourage the purchase and installation of EV charging infrastructure, also known as electric vehicle supply equipment (EVSE), within San Diego County. Increased installation of EVSE would facilitate increased use of zero-emission rideshare vehicles, microtransit shuttles including NEV shuttles, and personal vehicles.

Beginning in FY 2026, SANDAG shall identify programs and projects for which to provide EVSE funding. Programs could include but not be limited to SANDAG's Flex Fleet Program to address the costs for EVSE purchase and installation for projects that choose to use zero-emission vehicles.

The lack of existing EV chargers in some flex fleet pilot service areas, and a lack of funding for EV chargers within existing Flexible Fleet pilots hinders implementation of these pilot projects in the region. SANDAG has identified multiple "charging deserts" in the region that coincide with low-income communities and areas where some flexible fleet pilot projects are being considered. Focus groups with Community-Based Organizations (CBOs) and community members identified the lack of access to EV charging as a top barrier to considering the purchase of an electric vehicle (SANDAG 2024).

To implement this measure SANDAG shall:

- In FY 2026, begin integration of an EV charging component into the Flexible Fleets Pilot Grant Program.
- Identify other regional projects that received CARB Clean Mobility Options (CMO) awards to implement local rideshare projects and identify where EV charging infrastructure can be supplemented to enhance rideshare success.
- In FY 2026, seek partnerships with state and local agencies to collaborate on the next iteration of a regional EV infrastructure incentive program.
- Allocate up to $3 million dollars over the next four years to implement this incentive program.

Project Level Mitigation

The mitigation measures summarized below represent feasible strategies that can be applied to future projects constructed and operated under the proposed Plan.

GHG-4d Implement Measures to Reduce GHG Emissions from Transportation Projects.

During the planning, design, project-level CEQA review, construction, operation, and maintenance of transportation network improvements, SANDAG shall, and transportation project sponsors can and should, implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to applicable transportation project measures from Chapter 3, "*Measures to Reduce GHG Emissions*" of the California Air Pollution Control Officers Association's (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA 2024) and the Center for Resource Efficient Communities and the Center for the Built Environment's *Zero-Carbon Buildings in California Feasibility Study* (Center for Resource Efficient Communities and the Center for the Built Environment 2021). These GHG reduction measures include, but are not limited to, the following.

- Implement sustainable construction measures through construction bid specifications, including the following:
  - use energy and fuel-efficient vehicles and equipment and/or use alternative fuel vehicles and equipment, where applicable.
  - use cleaner-fuel equipment
  - limit heavy-duty vehicle idling.

- Use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less-GHG intensive asphalt pavements.
- Use building materials that are locally sourced and processed (i.e., close to the project site, as opposed to in another state or country)
- Recycle construction and demolition waste.
- Install efficient lighting (including LEDs) for traffic, street, and other outdoor lighting.
- Install Energy Star (or equivalent) cool roofing systems on all buildings.
- Design project sites to include areas where motor vehicles are prohibited, such as paseos, bikeways, etc.
- Contribute to the provision of synchronized traffic signals on roadways affected by the project and as deemed necessary by the local public works department.
- Require commuters to pay for parking on-site.
- Include bus shelters at transit access points where deemed appropriate by local public transit operator in large residential, commercial, and industrial projects.
- Build low stress bicycle networks including bike trails and connections, lanes, parking, and end of trip facilities.
- Subsidize transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.
- Provide transit-enhancing infrastructure that includes bus turnouts or bulbs, passenger benches, street lighting, route signs and displays, and shelters as demand and service routes warrant, subject to review and approval by local transportation planning agencies.
- Provide preferential parking spaces for carpool and vanpool vehicles, implement parking fees for single-occupancy vehicle commuters, and implement parking cash-out program for employees.
- Contribute to traffic-flow improvements (e.g., right-of-way, capital improvements) that reduce traffic congestion and do not substantially increase roadway capacity.
- Provide pedestrian-enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs and infrastructure, street furniture and artwork, street lighting, pedestrian signalization and signage, and/or access between bus service and major transportation points within the project.
- Increase the sidewalk coverage to improve pedestrian access.
- Include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses;
- Incorporate infrastructure electrification into project design (e.g., EV charging; charging for electric bikes) above minimum code requirements.
- Measures to plan, design and construct all new, upgraded, and regularly maintained infrastructure which uses electricity shall demonstrate how such infrastructure will achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
- Incorporate and increase electric vehicle charging equipment and preferred EV parking spots into projects that include commuter parking areas.
- Provide short-term and long-term bicycle parking near rail stations, transit stops, and freeway access points where there are commuter or rapid bus lines.
- Install park-and-ride lots near transit stops and high occupancy vehicle lanes.
- Include design measures (e.g., curb management strategies) to accommodate flexible fleets.

- Install solar photovoltaic canopies over parking areas wherever feasible.
- Construct buildings to Leadership in Energy and Environmental Design (LEED) certified standards or equivalent standards.
- Design measures to reduce water consumption, such as drought-resistant landscaping, smart irrigation systems, and other measures, including those listed in mitigation measures WS-1a and WS-1b in Section 4.18, Water Supply of the EIR.
- Design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Increase sidewalk coverage to improve pedestrian access.
- Funding for those measures that SANDAG selects would be included in individual project budgets.

GHG-4e Implement Measures to Reduce GHG Emissions from Development Projects.
During the planning, design, project-level CEQA review, construction, and operation of development projects, the County of San Diego and cities can and should implement measures to reduce GHG emissions and achieve zero-net energy, including but not limited to, applicable land use measures from Chapter 3, "Measures to Reduce GHG Emissions," of the CAPCOA *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA 2024) and the Center for Resource Efficient Communities and the Center for the Built Environment's *Zero-Carbon Buildings in California Feasibility Study* (Center for Resource Efficient Communities and the Center for the Built Environment 2021). These GHG reduction measures include, but are not limited to, the following:

- Measures that reduce VMT by increasing transit use, carpooling, bike-share and car-share programs, and active transportation, including the following:
  - Building or funding a major transit stop within or near development, in coordination with transit agencies.
  - Developing car-sharing and bike-sharing programs.
  - Providing pedestrian network improvements and a comprehensive bicycle network.
  - Providing traffic calming measures.
  - Providing transit incentives, including transit passes for Metropolitan/North County Transit District buses and trolleys.
  - Consistent with the Regional Bike Plan, incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network.
  - Implementing Complete Streets consistent with the SANDAG Regional Complete Streets Policy, including adopting local Complete Streets policies.
  - Improving transit access to bus and trolley routes through incentives for constructing transit facilities within developments, and/or providing dedicated shuttle service to trolley and transit stations.
  - Implementing measures to increase transit use through service frequency and affordability as identified through community engagement activities, including but not limited to input from local residents, stakeholders, and Community-Based Organizations.
  - Building low stress bicycle networks including bike trails and connections, lanes, paring, and end of trip facilities.
  - Subsidizing transit service expansion by increasing service hours, decreasing fares, and adding additional transit fleets.

  - Implementing employer trip reduction measures to reduce employee trips and VMT such as vanpool and carpool programs, providing end-of-trip facilities, telecommuting, teleconferencing, and alternative work schedule programs.
  - Incorporating ride hailing and autonomous vehicle innovations.
  - Including design measures (e.g., curb management strategies) to accommodate flexible fleets.
  - Implementing a school bus program in areas currently not served by school buses.
- Measures to plan, design, and build all new, renovated, and upgraded development and infrastructure with electricity demand to achieve zero-net energy using onsite innovative technologies (e.g., photovoltaic system, battery storage, energy efficiency) or offsite solutions.
- Orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial).
- Incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, and housing options on the project site.
- Measures that reduce VMT through Transportation Systems Management (TSM).
- Measures that increase vehicle efficiency or reduce the carbon content of fuels, including constructing EV charging infrastructure, alternative fueling infrastructure, or neighborhood electric vehicle networks or charging infrastructure for electric bicycles consistent with SANDAG's regional readiness planning for alternative fuels.
- Build on a project site within 1/2 mile of a major transit station that includes service from a mode with dedicated right-of-way.
- Include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses.
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
- Measures to reduce water consumption, including those listed in mitigation measure WS-1a and WS-1b in Section 4.18, Water Supply.
- Land use siting and design measures that reduce GHG emissions, including the following:
  - Focus development on infill and brownfields sites.
  - Building high density and mixed-use developments near transit.
  - Developing within areas with high jobs gravity to increase destination accessibility.
  - Orienting development towards transit or an active transport corridor.
- Retaining onsite mature trees and vegetation, and planting new trees. Provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways.
- Install Energy Star (or equivalent) cool roofing systems on all buildings.
- Include passive solar cooling and heating features in designs, as well as ceiling and whole house fans.
- Include programmable thermostats in the design of heating and cooling systems.
- Use day lighting systems, such as skylights, light shelves, and interior transom windows.
- Provide ancillary services (e.g., cafeterias, health clubs, automatic tellers, and post offices) within walking distance of proposed development (no further than 1,500 feet) as appropriate and in compliance with local development regulations.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b have been required in, or incorporated into, the proposed Plan to reduce this significant greenhouse gas emissions impact. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Mitigation measures GHG-4a and 4b would reduce total regional GHG emissions in two ways: (1) allocating funding to under-funded GHG reducing projects that implement and monitor local jurisdiction CAPs or GHG reduction plans and (2) allocating funding for local jurisdictions to prepare and update CAPs and GHG reduction plans that keep pace with future longer-term State targets and goals for GHG emissions reductions. Providing funding for these projects and plans would achieve additional annual GHG emissions reductions by implementing projects that would not otherwise occur due to insufficient funding. Reducing total annual and cumulative GHG emissions under the proposed Plan planning horizon would reduce the proposed Plan's inconsistencies with the state's ability to achieve long-term climate goals.

Mitigation measure GHG-4c would reduce total regional GHG emissions by allocating funding for EV charging infrastructure (e.g., electric vehicle charging equipment and/or hydrogen fueling stations), removing a key barrier to adoption of EVs. Increasing the amount of VMT by zero emissions vehicles under the proposed Plan horizon would reduce the proposed Plan's inconsistencies with the state's ability to achieve long-term climate goals.

Project-level mitigation measure GHG-4d shall be implemented by SANDAG and can and should be implemented by transportation project sponsors to reduce GHG emissions associated with transportation projects. The effectiveness of the actions included in this measure has been demonstrated by CAPCOA and the Center for Resource Efficient Communities and the Center for the Built Environment (CAPCOA 2024, Center for Resource Efficient Communities and the Center for the Built Environment 2021). SANDAG's implementation of this measure during transportation project implementation will reduce total GHG emissions under the proposed Plan. Implementation of this measure by other transportation project sponsors will also reduce total GHG emissions under the proposed Plan; however, SANDAG does not have the authority to require other agencies to implement this measure. It is the responsibility and jurisdiction of the implementing agency to determine and adopt project-specific mitigation measures.

Similarly, project-level mitigation measure GHG-4e can and should be implemented by the County of San Diego and cities with the SANDAG region to reduce GHG emissions from development projects that implement the proposed Plan. The effectiveness of the actions included in this measure has been demonstrated by CAPCOA and the Center for Resource Efficient Communities and the Center for the Built Environment (CAPCOA 2024, Center for Resource Efficient Communities and the Center for the Built Environment 2021). Implementation of this measure by the County of San Diego and cities will also reduce total GHG emissions under the proposed Plan, however, SANDAG does not have the authority to require other agencies to implement this measure. It is the responsibility and jurisdiction of the implementing agency to determine and adopt project-specific mitigation measures.

Implementation of mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b, would substantially lessen the amount of proposed Plan GHG emissions in 2030 and 2050. These mitigation measures would achieve GHG emissions reductions within the SANDAG region. However, even full implementation of all identified mitigation measures would not be sufficient to reduce the proposed Plan's GHG emissions to below the regional 2030 and 2045 reference points based on SB 32 and AB 1279 targets.

As described in Final EIR Section 4.8.4, the 2022 Scoping Plan traces the state's pathway to achieve its goals of carbon neutrality and an 85% reduction in anthropogenic emissions by 2045 relative to 1990 levels, as codified by AB 1279 in September 2022. The 2022 Scoping Plan identifies the reductions needed by each GHG emission sector (e.g., transportation [including off-road mobile-source emissions], industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste) to achieve these goals. The 2022 Scoping Plan details a multitude of strategies for reducing GHG emissions in each of these

sectors. Available research and reports indicate that achieving statewide GHG reduction goals will require major shifts or even fundamental transformations in the economic, social, technological, and political fabric of life in California and beyond, including the development of new technologies, large-scale deployment of new and existing technologies, the roles of local, State, and the federal government in regulating economic activities, and personal behaviors that affect GHG emissions. Achieving carbon neutrality no later than 2045 would require the decarbonization of the state's electrical sector, decarbonization of existing buildings and new construction, electrification of the entire transportation sector, investments in healthy soils, sustainable solid waste and wastewater management, and carbon dioxide removal strategies, such as land-based carbon sequestration and direct air capture of CO_2. The required GHG reductions from the aforementioned sectors will be achieved through a coordinated effort by, at minimum, State, regional, and local agencies, organizations, and stakeholders, and is well beyond the scope and jurisdiction of SANDAG alone.

While mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b would reduce GHG emissions throughout the Plan area, the actual reductions achieved are uncertain at this time. If SANDAG and the implementing agencies other than SANDAG adopt those mitigation measures (i.e., mitigation measures GHG-4d and GHG-4e), Impact GHG-4 may be reduced, but not to a less-than-significant level. However, SANDAG cannot require implementing agencies other than SANDAG to adopt mitigation measures where SANDAG is not the lead agency, and it is ultimately the responsibility and jurisdiction of the implementing agency to determine and adopt project-specific mitigation. Because the proposed Plan's 2030, and 2045 GHG emissions would remain inconsistent with the State's ability to achieve its 2030, and 2045 GHG reduction goals, Impact GHG-4 is significant and unavoidable. These impacts would persist through 2050.

C-GHG-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO GHG EMISSIONS.

Significant Impact

By 2030 and 2035, as shown in Impact GHG-1, implementation of the proposed Plan in 2035 in combination with reductions attributable to statewide legislative reductions would decrease GHG emissions from 2022 levels. Moreover, the proposed Plan would not conflict with SB 375 emission reduction targets for 2035 because it would result in a 19.35% reduction in per capita CO_2 emissions from passenger cars and light duty trucks from 2005 levels by 2035, which is greater than the 2035 target of a 19% reduction for the SANDAG.

By 2045 and 2050, as shown in Impact GHG-4, total emissions in the San Diego region in 2045 exceed the regional 2045 GHG reduction reference point based on AB 1279 and thus the proposed Plan's 2045 GHG emissions would be inconsistent with state's ability to achieve the AB 1279 GHG reduction goal of an 85% reduction in 1990 anthropogenic emissions by 2045. This would persist through 2050.

Because cumulative GHG impacts on a global basis would be significant when considering statewide and global emissions, and because the proposed Plan's incremental GHG impacts (GHG-4) are significant, the proposed Plan's incremental contributions to significant GHG impacts would also be cumulatively considerable and are thus significant in 2045 and 2050.

Mitigation Measures

Implementation of mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b, as discussed above, would reduce the proposed Plan's significant greenhouse gas emissions impact related to inconsistency with the State's ability to achieve the GHG reduction goals of SB 32 and AB 1279. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts would be less than significant and cumulatively considerable post mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b, as discussed above, would reduce the proposed Plan's significant greenhouse gas emissions impact. The SANDAG Board of Directors finds that specified

provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GHG-4a through GHG-4e would reduce direct and indirect GHG emissions associated with the proposed Plan. These mitigation measures include actions such as competitive grant funding for GHG-reducing projects, allocation of additional funding for electric vehicle-charging infrastructure and incentives, and measures to reduce GHG emissions from transportation and development projects. Additional mitigation measures that would reduce GHG emissions are presented in the air quality, energy, and water supply sections.

While mitigation measures GHG-4a through GHG-4e, as well as mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, and WS-1b would reduce GHG emissions throughout the Plan area, the actual reductions achieved are uncertain at this time. Full implementation of all identified mitigation measures would not be sufficient to reduce the proposed Plan's GHG emissions below the regional 2030 and 2045 GHG reduction reference points based on SB 32 and AB 1279. Mitigation measures GHG-4a through GHG-4e would reduce regional GHG emissions by reducing VMT, increasing use of alternative fuels, and other measures; they would reduce inconsistency of the proposed Plan's GHG emissions with the state's ability to achieve the SB 32 and AB 1279 GHG reduction goals. However, full implementation of changes required to achieve the SB 32 and AB 1279 goals is beyond SANDAG's or local agencies' current ability to implement. Because the proposed Plan's 2030 and 2045 GHG emissions would remain inconsistent with the state's current ability to achieve the state's GHG reduction goals, and these impacts would persist until through 2050.

Additionally, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the Plan's incremental contributions to cumulatively significant GHG emissions impacts to a less-than-significant level, this impact (GHG-4) remains cumulatively considerable post-mitigation.

H. Hazards and Hazardous Materials (EIR Section 4.9)

HAZ-4 IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN OR RESULT IN INADEQUATE EMERGENCY ACCESS.

Significant Impact

By 2035 and 2050, increased development and transportation network improvements associated with implementation of the proposed Plan may cause obstruction for emergency response vehicles or result in activities that would cause physical interference with the implementation of an emergency response or evacuation plan. Numerous statewide, regional, and local plans provide guidance for emergency response and evacuation in the San Diego region, and these plans are updated at regular intervals to ensure effectiveness in accordance with planned growth. However, it cannot be assured that emergency evacuation and response would not be impaired during an emergency, particularly during major catastrophic events. Therefore, this impact (HAZ-4) is significant for 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure HAZ-4 would reduce the proposed Plan's significant impacts associated with the interference on emergency evacuation and response emergency plans, but not to a less-than-significant level.

HAZ-4 Demonstrate Consistency with Adopted Emergency Response or Evacuation Plans or Emergency Access.
SANDAG shall, and implementing agencies and/or project sponsors can and should, demonstrate project consistency with all applicable emergency response and evacuation plans, where necessary based on project- and site-specific considerations. Where temporary road closures would be required during a project's construction, SANDAG shall and implementing agencies and/or project sponsors can and should prepare traffic mitigation plans that address traffic control and establish alternate emergency response and evacuation routes in coordination with emergency service providers.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure HAZ-4 has been required in, or incorporated into, the proposed Plan to reduce this significant impact of physical interference in the implementation of an emergency response or evacuation plan. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure HAZ-4 would reduce significant impacts related to physical interference in the implementation of an emergency response or evacuation plan. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (HAZ-4) remains significant and unavoidable.

C-HAZ-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS.

Significant Impact

By 2035 and 2050, increased development and transportation network improvements in the proposed Plan and other related projects would, in some locations, cause obstruction for emergency response vehicles or result in activities that would cause physical interference in the implementation of an emergency response or evacuation plan. Statewide, regional, and local plans have been adopted to ensure coordinated response and evacuation, which would reduce cumulative risk from future growth and development in the San Diego region. The State of California Emergency Plan (Cal OES 2023a) addresses the State's response to extraordinary emergency situations associated with natural disasters or human-caused emergencies and describes the methods for carrying out emergency operations, the process for rendering mutual aid, the emergency services of governmental agencies, how resources are mobilized, how the public will be informed, and the process to ensure continuity of government during an emergency or disaster. The State Emergency Plan encourages local jurisdictions to develop hazard mitigation plans so that they can be eligible to receive federal funding for hazard mitigation capabilities (e.g., risk reduction projects, critical infrastructure improvements, post-disaster initiatives) intended to reduce or eliminate the long-term risk to human life and property from natural or human-caused hazards and their effects (Cal OES 2023a). The County of San Diego and various jurisdictions throughout the county have prepared the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2025i), which provides a risk assessment and identification of hazards prevalent within the region. The plan also provides guidance to local jurisdictions on developing mitigation strategies and incorporating the mitigation strategies into existing planning mechanisms, such as the County Comprehensive Land Use Plan, capital improvement plans, and building codes.

Although growth and changes in land use would be reflected in updated emergency plans, it cannot be assured that emergency evacuation and response would not be impaired during an emergency, particularly during major catastrophic events. Thus, the impact of the cumulative projects and projections would be cumulatively significant.

The combined effects of the proposed Plan and other cumulative projects could result in cumulative impacts on emergency response and evacuation if multiple projects affect the same routes or contribute to growth that results in more people using the same evacuation routes. Because the proposed Plan's impact on emergency response and evacuation (HAZ-4) is significant, the proposed Plan's incremental contribution to the significant cumulative impacts on emergency response and evacuation would be cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure HAZ-4, as discussed above, requires implementing agencies and project sponsors to evaluate the potential for individual development and transportation network improvement projects to impair implementation of or physically interfere with adopted emergency response and evacuation plans or impair emergency access. However, as discussed previously, SANDAG cannot require local implementing agencies to adopt the measures outlined in mitigation measure HAZ-4, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the proposed Plan's contributions to cumulative impacts on emergency response, evacuation, and access would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure HAZ-4 have been required in, or incorporated into, the proposed Plan to reduce this significant impact of physical interference in the implementation of an emergency response or evacuation plan. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure HAZ-4 would reduce the proposed Plan's significant cumulative hazards and hazardous material impacts. However, while these mitigation measures reduce the proposed Plan's significant impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant hazards and hazardous materials impacts to less-than-significant levels, the impact (HAZ-4) would remain cumulatively considerable with mitigation.

I. Land Use and Planning (EIR Section 4.11)

LU-1 PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY (THROUGH 2050).

Significant Impact

By 2050, implementation of transportation network improvements, but not regional growth and land use change, associated with implementation of the proposed Plan could physically divide established communities. Therefore, this impact (LU-1) in the year 2050 is significant, although less than significant in 2035.

Mitigation Measures

Implementation of mitigation measure LU-1a would reduce the proposed Plan's significant impacts associated with the physical division of established communities by transportation network improvements, but not to a less-than-significant level.

LU-1a Provide Access and Connections for Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements, including new rail extensions and roadway widening improvements, SANDAG shall, and other transportation project sponsors can and should, design new transportation network improvements within established communities to avoid the creation of barriers that physically divide such communities. Where avoidance is not feasible, measures to reduce the creation of barriers that physically divide such communities should be considered, including but not limited to, the following:

- Selecting alignments within or adjacent to existing public rights-of-way.
- Designing sections above- or below-grade to avoid or reduce physical division of communities, where feasible.
- Providing direct crossings, overcrossings, or undercrossings at regular intervals for various modes of travel (e.g., pedestrians/bicyclists, vehicles).

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure LU-1 have been required in, or incorporated into, the proposed Plan to reduce this significant impact from physically dividing established communities. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure LU-1 would reduce significant impacts related to physically dividing established communities associated with transportation network improvements through implementation of feasible alignments, design options, and other design features that avoid or substantially reduce impacts on community division. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, there is no guarantee that the impact would be reduced to less-than-significant levels for all projects. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (LU-1) remains significant and unavoidable.

C-LU-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE IMPACTS RELATED TO LAND USE AND PLANNING.

Significant Impact

By 2050, cumulative land use impacts through the Southern California and Northern Baja California region would be significant, and because the proposed Plan's incremental land use impacts are significant in 2050, the proposed Plan's incremental land use impacts (LU-1) are cumulatively considerable and thus significant in 2050, although not cumulatively considerable and less than significant in 2035.

Mitigation Measures

Implementation of mitigation measure LU-1a, as discussed above, would reduce land use impacts due to transportation improvements in 2050. However, as outlined above, implementation of the mitigation measure would not guarantee reduction of proposed Plan impacts associated with physically dividing established communities to a less-than-significant level and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure LU-1a have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant land use impacts. The SANDAG

Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure LU-1a would reduce the proposed Plan's significant land use impacts. However, while these mitigation measures reduce the proposed Plan's significant land use impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant land use impacts to less-than-significant levels, this impact (C-LU-1) remains cumulatively considerable post-mitigation.

J. Mineral Resources (EIR Section 4.12)

MR-1 RESULT IN THE LOSS OF AVAILABILITY OF KNOWN AGGREGATE AND MINERAL RESOURCES SUPPLY SITES THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE, OR RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED IN A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN.

Significant Impact

By 2035 and 2050, implementation of implementation of the proposed Plan, including regional growth and land use change, as well as transportation network improvements and programs, would result in the loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally important mineral resource recovery sites, including the loss of loss of 904 acres of MRZ-2 lands by 2035 and the loss of 673 acres of MRZ-2 lands by 2050. Therefore, this impact (MR-1) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures MR-1a and MR-1b would reduce the proposed Plan's significant impacts associated with the loss of availability of known mineral resources and mineral resource recovery sites, but not to a less-than-significant level.

MR-1a Conserve Aggregate and Mineral Resources During Planning and Design of Development Projects.

During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should avoid or reduce impacts on known aggregate and mineral resources and locally important mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize direct and indirect impacts on these lands. Aggregate and mineral resource areas, especially MRZ-2 areas, should be maintained in open space or other general plan land use designations and zoning that allow for extraction of mineral resources.

MR-1b Conserve Aggregate and Mineral Resources During Planning and Design of Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, avoid loss of known aggregate and mineral resources and locally important mineral resource recovery sites, where feasible. Where avoidance is infeasible, SANDAG shall, and other transportation project sponsors can and should, minimize direct and indirect impacts on the availability of known resources and recovery sites through measures that include, but are not limited to, the following:

- Designing transportation network improvements in a manner (such as buffer zones or the use of screening) that do not preclude adjacent or nearby extraction of aggregate and mineral resources following completion of the improvement and during long-term operations.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures MR-1a and MR-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally important mineral resource recovery sites. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures MR-1a and MR-1b would reduce significant impacts related to loss of availability of known aggregate or other mineral resources, as well as the loss of availability of locally important mineral resource recovery sites. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (MR-1) remains significant and unavoidable.

C-MR-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO MINERAL RESOURCES.

Significant Impact

By 2035 and 2050, cumulative mineral resources impacts throughout the Southern California and Northern Baja region would be significant, and because the proposed Plan's impacts on these resources are significant, the proposed Plan's incremental contributions to significant cumulative impacts on mineral resources are also cumulatively considerable and thus significant.

Mitigation Measures

Implementation of mitigation measures MR-1a and MR-1b, as discussed above, would conserve aggregate and mineral resources through avoidance of aggregate and mineral resources or through incorporation of appropriate design features to reduce impacts on resources when avoidance is not feasible. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on the availability of known mineral resources would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures MR-1a and MR-1b have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant mineral resource impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures MR-1a and MR-1b would reduce the proposed Plan's significant mineral resource impacts. However, while these mitigation measures reduce the proposed Plan's significant mineral resource impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds

that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant mineral resource impacts to less-than-significant levels, these impacts (MR-1) remain cumulatively considerable post-mitigation.

K. Noise (EIR Section 4.13)

NOI-1 GENERATION OF A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES; OR GENERATE A SUBSTANTIAL ABSOLUTE INCREASE IN AMBIENT NOISE.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use change and transportation network improvements, could increase noise levels throughout the region, resulting in new or increased noise impacts that exceed applicable standards or represent substantial increases in ambient noise levels. Therefore, this impact (NOI-1) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures NOI-1a, NOI-1b, and NOI-1c would reduce the proposed Plan's significant impacts associated with construction noise levels and exposure of sensitive receptors to excessive transportation and stationary noise levels, but not to a less-than-significant level.

NOI-1a Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements.

During project-level CEQA review and during construction of development projects and transportation network improvements, local jurisdictions and transportation project sponsors can and should, and SANDAG shall, implement construction noise reduction measures to substantially lessen the exposure of noise-sensitive receptors to construction noise levels to achieve applicable noise standards or prevent substantial temporary increases in noise levels in the planning, design, project-level CEQA review, and construction of development projects or transportation network improvements. These measures should consist of, but are not limited to, the following.

- Maintain construction equipment and vehicles per manufacturers' specifications and fit equipment with noise-suppression devices (e.g., improved mufflers, equipment redesign, intake silencers, wraps, ducts, engine enclosures).
- Minimize construction equipment idling when equipment is not in use.
- Provide buffer zones or other techniques between stationary equipment (such as generators, compressors, rock crushers, and cement mixers) and the noise receptor.
- For impact tools (e.g., jack hammers, pavement breakers, rock drills), use hydraulically or electrically powered tools; where use of pneumatic tools is unavoidable, use an exhaust muffler on the compressed air exhaust. Use external jackets on the tools themselves. Use quieter procedures, such as drills rather than impact equipment.
- For rock-crushing or screening operations, place material stockpiles as a noise barrier blocking line-of sight between the operations and receptors.

In addition, to substantially lessen the exposure of noise-sensitive receptors to construction noise levels from pile driving or other activities generating noise levels greater than 90 dBA equivalent sound level (L_{eq}) at 50 feet during construction of development projects or transportation network improvements, local jurisdictions and other transportation project sponsors can and should, and SANDAG shall, implement noise reduction measures to

achieve applicable noise standards or prevent substantial increases in noise levels. These measures should consist of, but are not limited to, the following.

- Erect temporary noise barriers around the noise-generating activities, particularly adjacent to residential buildings. When installed properly, acoustic barriers can reduction construction noise levels by approximately 8 to 10 dBA (EPA 1971).
- Implement "quiet" pile-driving technology (such as predrilling of piles, the use of more than one pile driver to shorten the total pile-driving duration) or vibratory pile driving, where feasible, in consideration of geotechnical and structural requirements and conditions.
- Monitor the effectiveness of noise-attenuation measures by performing compliance noise monitoring at noise-sensitive receptors during construction.

NOI-1b Implement Operational Noise Reduction Measures for Transportation Network Improvements.
During the planning, design, and project-level CEQA review and construction of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, implement operations noise-reduction measures to substantially lessen the exposure of noise-sensitive receptors to noise levels to achieve applicable noise standards or prevent substantial permanent increases in noise levels. These measures should consist of, but are not limited to, the following.

- Utilize techniques such as grade separation, buffer zones, landscaped berms, sound walls, reduced-noise paving materials, building insulation, and traffic calming measures.

In addition, for railway projects, SANDAG shall, and other transportation project sponsors can and should, implement measures to substantially lessen noise levels to achieve FTA/FRA railway noise-exposure thresholds during planning, design, and project-level CEQA review. These measures should consist of, but are not limited to, the following.

- Use wheel treatments, such as damped wheels and resilient wheels.
- Use vehicle treatments, such as vehicle skirts and under car acoustically absorptive material.
- Establish sufficient buffer zones between railroad and receptors.
- Use sound-reduction barriers, such as landscaped berms.
- Install sound insulation treatments for impacted structures.
- Implement FRA "quiet zone" requirements in cooperation with local jurisdictions (i.e., reducing or eliminating the requirement for train locomotives to blast their horns) for Plan improvements at new and existing at-grade rail crossings.
- Conduct project-level noise analysis for new and expanded rail corridors and features such as new rail tracks and double-tracking to ensure that measures are implemented to substantially lessen noise levels that exceed applicable standards.

NOI-1c Implement Operational Noise Reduction Measures for Development Projects.
During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other local jurisdictions can and should implement noise reduction measures to meet local noise standards, consisting of, but not limited to, the following.

- Use land use measures, such as zoning, site design, and buffers, to ensure that future development is noise compatible with adjacent transportation facilities and land uses.
- Site noise-sensitive land uses away from noise-generating facilities. Once sited, orient outdoor use areas of land uses (e.g., backyards) away from adjacent noise sources to shield area with buildings, or construct noise barriers to reduce exterior noise levels.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-1a, NOI-1b, and NOI-1c have been required in, or incorporated into, the proposed Plan to reduce this significant impact of generating noise levels in excess of applicable standards. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-1a, NOI-1b, and NOI-1c would reduce significant impacts related to generating noise levels in excess of applicable standards. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts would be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (NOI-1) remains significant and unavoidable.

NOI-2 GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS.

Significant Impact

By 2035 and 2050, improvements associated with regional growth, land use development, and transportation network improvements under the proposed Plan would increase. Improvements associated with implementation of the proposed Plan, including regional growth and land use changes and transportation network improvements, could generate substantial increases in ground vibration or groundborne noise levels during construction and operation. Although adherence to local, state, and federal regulations and standards, which typically prohibit vibration-intensive projects within incompatible zones, would be required, vibration impacts associated with the proposed Plan could exceed applicable thresholds and thus be excessive. Therefore, this impact (NOI-2) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures NOI-2a and NOI-2b would substantially reduce significant vibration impacts caused by exceedances in ground vibration or groundborne noise levels during construction and operation, but not to a less-than-significant level.

NOI-2a Implement Construction Groundborne Vibration and Noise Reduction Measures.

SANDAG shall, and other public agencies and transportation project sponsors can and should, implement measures during design, project-level CEQA review, and construction of transportation network improvements and development projects, to reduce groundborne vibration and noise levels generated by on site construction equipment consisting of, but not limited to, the following:

- Where feasible, use soil mix wall for excavation.
- Incorporate a comprehensive construction vibration specification into all construction bid documents.
- Require a contractor to assess the potential for damage to buildings within 88 feet of areas where excavation requires the use of driven piles either by impact or vibratory methods.
- To prevent structural damage, minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving) for the purpose of preventing damage to nearby structures shall be established based on the proposed activities and locations, once determined. Factors to be considered shall include the specific nature of the vibration-producing activity (e.g., type and duration of pile driving), the proximity of existing structures, and the fragility/resiliency of nearby structures. Established setback requirements can be breached if a project-specific, site-specific vibration analysis is conducted by a qualified

geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.

- If crack-and-seat operations, pile driving, or other vibration-generating construction activities are to occur within 210 feet of a fragile building (e.g., based on building/structural category under Caltrans Guideline Vibration Damage Potential Threshold Criteria [Caltrans Transportation and Construction Vibration Guidance Manual, Table 19]) that would likely be damaged by exceeding the applicable vibration threshold, implement measures to reduce vibration, consisting of, but not limited to, the following:
  - Retain a structural engineer or other appropriate professional to determine threshold levels of vibration and cracking that would damage any fragile structure, and design construction methods to not exceed the thresholds.
  - Require groundborne-vibration monitoring of nearby fragile structures. Implement a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for vibration damage to historic structures.
- To prevent disturbance to sensitive land uses associated with construction activity within the impact distances shown in Table NOI-2a below, the following measures shall be implemented:
  - Alternatives to impact pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles) shall be considered and implemented where feasible to reduce vibration levels.
  - Phase pile driving and other high-impact activities (i.e., equipment or activity with a reference peak particle velocity (PPV) of 0.20 in/sec at 25 feet or higher, the FTA threshold for structural damage to non-engineered timber and masonry buildings) so as not to occur simultaneously with other construction activities, to the extent feasible, to reduce total vibration from construction sources.
  - Construction operations that include high-impact activities (i.e., the use of equipment or activity with a reference PPV of 0.20 in/sec at 25 feet or higher) shall be limited to daytime hours, with daylight hours being defined by the applicable jurisdiction or agency.

Table NOI-2a Construction Equipment Vibration Levels and Impact Distances[1]

Equipment Item	Reference PPV (in/sec) at 25 feet	Distance to Human Response (feet), Distinctly Perceptible Threshold[2]
Crack-and-seat operations	2.4	1,034
Impact pile driver	0.65	316
Vibratory pile driver	0.65	316
Hydraulic breaker	0.24	128
Vibratory roller	0.21	113
Large bulldozer	0.089	52
Caisson drilling	0.089	52
Jackhammer	0.035	23
Small bulldozer	0.003	3

Notes: PPV = peak particle velocity; in/sec = inches per second.

[1] Distances are calculated using the Reference PPV (PPV_{ref}) at 25 feet. The equation used to calculate these distances is $PPV = PPV_{ref} * (25/D)^n$ (Caltrans 2020a).

[2] Caltrans threshold of 0.04 in/sec PPV applied as distinctly perceptible threshold.

Sources: Caltrans 2020a; FTA 2018.

NOI-2b Implement Groundborne-Vibration and Noise Reduction Measures for Rail Operations.
SANDAG shall, and other transportation project sponsors can and should, implement vibration-reducing measures to meet FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, consisting of, but not limited to, providing special track support systems, such as floating slabs, resiliently supported ties, high-resilience fasteners, and ballast mats.

In addition, rail operators can and should implement groundborne-vibration and noise-reducing measures to meet FTA vibration guidelines (FTA 2018) during the planning, design, project-level CEQA review, construction, and operation of rail projects, consisting of, but not limited to, the following:

- Conduct rail grinding on a regular basis to keep tracks smooth.
- Conduct wheel truing to recontour wheels to provide a smooth running surface and removing wheel flats.
- To reduce groundborne noise, achieve vibration isolation of the track from underlying surface using the following:
  - highly resilient direct fixation fasteners
  - tail suspended fastener system
  - isolated slab track system
  - floating slab track system

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-2a and NOI-2b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial increases in groundborne vibration or groundborne noise levels from construction relating to implementation of the proposed Plan, including both regional growth and transportation network improvements, and to operation of transportation network improvements. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-2a and NOI-2b would reduce significant impacts related to substantial increases in groundborne vibration or groundborne noise levels from construction relating to implementation of the proposed Plan, including both regional growth and transportation network improvements, and to operation of transportation network improvements. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts would be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (NOI-2) remains significant and unavoidable.

C-NOI-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO NOISE AND VIBRATION.

Significant Impact

By 2035 and 2050, cumulative noise and vibration impacts throughout the San Diego and Northern Baja California region would be significant, and because the proposed Plan's noise and vibration impacts (NOI-1 and NOI-2) are significant, the proposed Plan would contribute to a cumulatively considerable noise and vibration impact in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures NOI-1a, NOI-1b, and NOI-1c, as discussed above, would reduce impacts from construction noise and permanent noise levels during operations for transportation network improvements and development projects, respectively. Additionally, mitigation measures NOI-2a and NOI-2b, as discussed above, would reduce impacts from through groundborne vibration-reduction and groundborne noise-reduction measures during construction activities and operation. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on noise and vibration would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures NOI-1a, NOI-1b, NOI-1c, NOI-2a, and NOI-2b have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative noise and vibration impacts. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures NOI-1a, NOI-1b, NOI-1c, NOI-2a, and NOI-2b would reduce the proposed Plan's significant cumulative noise and vibration impacts. However, while these mitigation measures reduce the proposed Plan's significant noise and vibration impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant noise and vibration impacts to less-than-significant levels, these impacts (NOI-1 and NOI-2) remain cumulatively considerable post-mitigation.

L. Population and Housing (EIR Section 4.14)

POP-1 INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH TO AREAS OF THE REGION EITHER DIRECTLY (E.G., BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (E.G., BY EXTENDING ROADS AND OTHER INFRASTRUCTURE).

Significant Impact

By 2035 and 2050, implementation of the proposed Plan's transportation network improvements, but not regional growth and land use change, would induce unplanned growth in some areas of the San Diego region. Therefore, this impact (POP-1) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure POP-1a would reduce the proposed Plan's significant impacts from induced unplanned population growth, but not to a less-than-significant level.

POP-1a Coordinate with Local Jurisdictions to Reduce Substantial Unplanned Population Growth.

Implementation of the proposed Plan through 2050 would indirectly induce unplanned population growth in areas of the region that are currently not developed or are underdeveloped. SANDAG shall, and other transportation project sponsors can and should:

- implement early coordination with local jurisdictions to anticipate and plan for substantial unplanned growth impacts resulting from transportation network improvements
- work with local jurisdictions to identify opportunities to develop housing as part of transportation projects.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure POP-1a have been required in, or incorporated into, the proposed Plan to reduce this significant impact of unplanned population growth on local housing infrastructure. SANDAG has no control over the amount or exact location of growth the region would experience during the implementation of the proposed Plan. The regional growth and land use change forecasted in the proposed Plan would be implemented by local jurisdictions through local plans and individual development projects, and most transportation network improvements would be implemented by transportation project sponsors other than SANDAG. The proposed Plan has been developed to accommodate forecasted regional growth and failing to do so would be inconsistent with the federal and State requirements for regional transportation plans (RTPs). In addition, precluding growth would conflict with the requirements to provide sufficient housing for the region's population contained in SB 375. As discussed in Section 4.14.2, Regulatory Framework, of the EIR, Government Code Section 65080(b)(2)(B)(ii) requires that the RTP/SCS must house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives are available to reduce the impact to a less-than-significant level, this impact (POP-1) remains significant and unavoidable.

POP-2 DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE OR HOUSING UNITS, WHICH WOULD NECESSITATE THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE.

Significant Impact

By 2035 and 2050, development associated with implementation of the proposed Plan, including regional growth and land use change and planned transportation network improvements, could displace a substantial number of people and existing housing units, necessitating the construction of replacement housing elsewhere. Therefore, this impact (POP-2) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures POP-2a and POP-2b would reduce the proposed Plan's significant impacts associated with the displacement of people and housing units, but not to a less-than-significant level.

POP-2a Design Development Projects to Reduce Displacement.

During planning, design, and project-level CEQA review of land development projects, the County of San Diego, cities, and other local jurisdictions can and should develop design strategies to avoid or reduce substantial displacement of people or housing units, including affordable housing units, where consistent with overall goals to promote housing growth, including the provision of affordable housing. For development projects that would displace people or housing units, alternative designs to retain existing housing on-site, alternative project site locations and provision of replacement housing as a mitigation measure can and should be evaluated. While displacement should be considered during project evaluations, avoidance or reduction of displacement should not be employed where it would undermine achievement of housing goals, including the development of transit-oriented development and the provision of affordable housing.

POP-2b Design Transportation Network Improvement Projects to Reduce Displacement.

SANDAG shall, and other transportation project sponsors can and should, identify feasible project alignments during planning, design, and project-level CEQA review that avoid or reduce permanent property acquisitions that would result in the substantial displacement of people or housing units. Where avoidance is not feasible, measures to reduce substantial displacement should be considered including, but not limited to, the following:

- selecting alignments within existing public rights-of-ways (ROWs)
- designing sections above- or below-grade to avoid property acquisition that would cause displacement of people or housing units, including affordable housing

- selecting alignments in properties that result in the least amount of displacement; for example, acquiring vacant or undeveloped portions of property rather than portions occupied by housing units
- working with local jurisdictions to identify opportunities to develop housing as part of transportation projects.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures POP-2a and POP-2b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures POP-2a and POP-2b would reduce significant impacts related to displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, there is no guarantee that significant displacement impacts would be reduced to less-than-significant levels for all projects.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (POP-2) remains significant and unavoidable.

C-POP-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO POPULATION AND HOUSING.

Significant Impact

By 2035 and 2050, cumulative population and housing impacts throughout the Southern California and Northern Baja region would be significant and because the proposed Plan's incremental impacts are significant, the proposed Plan's incremental contribution to cumulatively significant population and housing impacts (POP-1 and POP-2) are also cumulatively considerable in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures POP-1a, POP-2a, and POP-2b, as discussed above, would reduce significant impacts from substantial unplanned growth and displacement. However, as outlined above, even with implementation of the mitigation measures, impacts would be significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures POP-1a, POP-2a and POP-2b have been required in, or incorporated into, the proposed Plan to reduce the significant cumulative population and housing impacts related to unplanned population growth and displacing a substantial number of people and housing units, necessitating the construction of replacement housing elsewhere. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures POP-1a, POP-2a and POP-2b would reduce the proposed Plan's significant population and housing impacts. However, while this mitigation measure reduces the proposed Plan's significant population and housing impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be

guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant population and housing impacts to less-than-significant levels, these impacts (POP-1 and POP-2) remain cumulatively considerable post-mitigation.

M. Public Services, Recreation, and Utilities (EIR Section 4.15)

PS-1 RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF OR NEED FOR NEW OR PHYSICALLY ALTERED (I.E., EXPANDED) PUBLIC FACILITIES, IN ORDER TO MAINTAIN ADEQUATE FIRE AND POLICE PROTECTION, EMERGENCY SERVICES, SCHOOLS, LIBRARIES, AND RECREATION FACILITIES.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use changes, but not planned transportation network improvements, would result in substantial adverse physical impacts associated with the substantial physical deterioration of existing facilities and the construction of new or expanded public facilities. Therefore, this impact (PS-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure PS-1 would reduce the proposed Plan's significant impacts related to the need for new or physically altered public facilities, but not to a less-than-significant level.

PS-1 Implement Mitigation Measures for New/Expanded Public Service Facilities.

During planning, design, and project-level CEQA review of development of public facilities projects, the County of San Diego, cities, and other public service providers can and should implement mitigation measures to avoid or reduce significant environmental impacts associated with the construction of new or expanded public facilities. Mitigation measures should be implemented by public service providers directly responsible for the construction or expansion activities. Significant environmental impacts requiring mitigation may be identified in the following issue areas: agricultural and forestry resources; air quality; biological resources; cultural resources, greenhouse gas emissions; hydrology and water quality; noise and vibration; geology, soils, and paleontological resources; transportation; tribal cultural resources; and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects and transportation network improvements.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure PS-1 have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial adverse impacts associated with the substantial physical deterioration of existing facilities and the construction of new or expanded public facilities. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure PS-1 would reduce significant impacts related to substantial adverse impacts associated with the substantial physical deterioration of existing facilities and the construction of new or expanded public facilities. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project

alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (PS-1) remains significant and unavoidable.

REC-1 INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use changes, would result in increased demand for recreation facilities, leading to accelerated deterioration, while regional growth forecasted by the proposed Plan and transportation network improvements associated with the Plan, combined, would contribute to the expansion of active recreation facilities and the physical removal of 2,031 acres of open space, park, and recreation lands by the year 2035 and a total of 2,547 acres by 2050, which would result in substantial physical deterioration of existing park and recreation facilities and adverse physical impacts related to future facility expansions. Therefore, this impact (REC-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure REC-1 would reduce the proposed Plan's significant impacts related to the need for new or physically altered recreational facilities, but to not a less-than-significant level.

REC-1 Implement Mitigation Measures for Parks and other Recreational Facilities.

During planning, design, and project-level CEQA review of development projects and transportation network improvements and programs, the County of San Diego, cities, other public service providers, and other transportation project sponsors can and should, and SANDAG shall, implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. Mitigation measures could include expanding or improving existing recreation facilities to accommodate additional use or building new recreation facilities.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure REC-1 have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to the adverse physical impacts of facility expansion and deterioration of existing parkland and recreational facilities. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure REC-1 would reduce significant impacts related to substantial adverse physical impacts of facility expansion and deterioration of existing parkland and recreational facilities. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be assured that adequate financial resources would be available to acquire the amount of parkland needed to meet forecasted population growth and offset losses that would occur as a result of transportation improvements. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (REC-1) remains significant and unavoidable.

U-1 RESULT IN THE EXPANSION, RELOCATION, OR CONSTRUCTION OF WASTEWATER COLLECTION AND TREATMENT, STORM WATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES TO ADEQUATELY MEET PROJECTED CAPACITY NEEDS, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Significant Impact

In 2035 and 2050, implementation of regional growth and land use change under the proposed Plan would result in substantial adverse physical impacts associated with the construction and operation of new or expanded utility infrastructure for wastewater collection and treatment, storm water drainage, electric power, natural gas and telecommunications facilities. Transportation network improvements and programs implemented by the year 2035 would cause significant impacts related to stormwater drainage facilities, but not wastewater, electricity, natural gas, or telecommunications infrastructure. Therefore, this impact (U-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures U-1a and U-1b would reduce the proposed Plan's significant impacts associated with the construction and operation of new or expanded utility infrastructure for wastewater collection and treatment, storm water drainage, electric power, natural gas and telecommunications facilities, but not to a less-than-significant level.

U-1a Implement Mitigation Measures for New/Expanded Wastewater, Storm Water, Electrical, Natural Gas, and Telecommunications Facilities Associated with Development Projects.

During planning, design, and project-level CEQA review of development projects, the County of San Diego, cities, and other wastewater, storm water, and telecommunications management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded facilities. Mitigation measures should be implemented by utilities management agencies directly responsible for the approval and construction of new or expanded facilities. Significant environmental impacts requiring mitigation may be identified in the following resource areas: air quality; biological resources; cultural resources; energy; greenhouse gas emissions; hydrology and water quality; noise and vibration; geology, soils, and paleontological resources; transportation; tribal cultural resources; and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.

U-1b Implement Mitigation Measures for New/Expanded Storm Water Facilities Associated with Transportation Network Improvements.

During planning, design, and project-level CEQA review of transportation network improvements, SANDAG shall, and other transportation project sponsors can and should, be required to implement storm water BMPs during planning, design, project-level CEQA review, and project construction. Measures include, but are not limited to, implementation and construction of sand filters, bio strips, bioswales, detention basins, storage vaults, and infiltration basins, which would reduce pollutant runoff into the storm drain system.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures U-1a and U-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of substantial adverse physical impacts associated with the construction and operation of utility systems and facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures U-1a and U-1b would reduce significant impacts related to substantial adverse physical impacts associated with the construction and operation of utility systems and facilities. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's

lack of land use authority over individual projects, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (U-1) remains significant and unavoidable.

U-2 GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE; IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS; OR FAIL TO COMPLY WITH FEDERAL, STATE, AND LOCAL MANAGEMENT AND REDUCTION STATUTES AND REGULATIONS RELATED TO SOLID WASTE.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use change as well as transportation network improvements and programs, would result generate solid waste and construction and demolition (C&D) debris that may not be accommodated by the regional landfills. Although the forecasted growth and network improvements would comply with programs, policies, and practices to reduce the rate of solid waste generation, this impact (U-2) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures U-2a, U-2b, and U-2c would reduce the proposed Plan's significant impacts associated with the generation of solid waste and construction and demolition (C&D) debris, but to not a less-than-significant level.

U-2a Implement Mitigation Measures for New/Expanded Solid Waste Facilities.

During planning, design, and project-level CEQA review of solid waste facility projects, the County of San Diego, cities, and other solid waste management agencies can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded solid waste facilities. Significant environmental impacts requiring mitigation may be identified in the following resource areas: air quality; biological resources; cultural resources; energy; greenhouse gas emissions; hydrology and water quality; noise and vibration; geology, soils, and paleontological resources; transportation; tribal cultural resources; and water supply. Mitigation measures may be similar to those described in this EIR for construction of development projects.

U-2b Reduce Construction Waste.

During planning, design, and project-level CEQA review and prior to the construction or demolition of transportation network improvement projects and development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should, implement measures to reduce construction waste to comply with waste reduction goals identified by the state and local agencies, consisting of, but not limited to, the following:

- Ensure that source reduction techniques and recycling measures are incorporated into project construction and demolition.
- Reuse or recycle construction and demolition waste. This mitigation measure would extend the life of existing landfills and delay the need to construct new or expanded landfills.

U-2c Reduce Operational Waste.

During planning, design, project-level CEQA review and construction of development projects, the County of San Diego, cities, and other local jurisdictions can and should integrate green building waste management measures such as those identified in the U.S. Green Building Council's LEED, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures consist of, but are not limited to, the following:

- Prepare and apply a waste management plan that promotes solid waste diversion.
- Implement source reduction through (1) using materials that are more durable and easier to repair and maintain, (2) designing to generate less scrap material through dimensional planning, (3) increasing recycled content, (4) using reclaimed materials, and (5) using structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- Reuse existing structures and shells in renovation projects.
- Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable building components.
- Develop an indoor recycling program and space.

These mitigation measures would extend the life of existing landfills and delay the need to construct new or expanded landfills.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures U-2a, U-2b, and U-2c have been required in, or incorporated into, the proposed Plan to reduce this significant impact of related to the generation of solid waste and C&D debris that may not be accommodated by the regional landfills. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures U-2a, U-2b, and U-2c would reduce significant impacts related to the generation of solid waste and C&D debris that may not be accommodated by the regional landfills. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (U-2) remains significant and unavoidable.

C-PS-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO PUBLIC SERVICES.

C-U-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO UTILITIES.

C-REC-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO RECREATIONAL RESOURCES.

Significant Impact

By 2035 and 2050, cumulative public services, utilities, and recreational impacts throughout the Southern California and Northern Baja California region would be significant, and the proposed Plan's individual public services and utilities impacts are significant in 2035 and 2050. Therefore, the proposed Plan's incremental contribution to cumulative significant public services, utilities, and recreational impacts (PS-1, REC-1, U-1, and U-2) are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c, as discussed above, would reduce significant public services, utilities, and recreational impacts associated with the construction of new and

expanded public facilities, parkland and recreational facilities, utility systems, and solid waste facilities under the proposed Plan. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts would be less than significant. Thus, these impacts would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant public services, utilities, and recreational impacts associated with the construction of new and expanded public facilities, parkland and recreational facilities, utility systems, and solid waste facilities.

The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures PS-1, REC-1, U-1a, U-1b, U-2a, U-2b, and U-2c would reduce the proposed Plan's significant public services and utilities impacts. However, while these mitigation measures reduce the proposed Plan's significant public services and utilities impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant public services and utilities impacts to less-than-significant levels, these impacts (PS-1, REC-1, U-1, and U-2) remain cumulatively considerable post-mitigation.

N. Transportation (EIR Section 4.16)

TRA-2 CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3 BY NOT ACHIEVING THE SUBSTANTIAL VMT REDUCTIONS NEEDED TO HELP ACHIEVE STATEWIDE GHG REDUCTION GOALS.

Significant Impact

Implementation of the proposed Plan under the year 2030 and 2035 would result in a decrease in VMT per capita of 4.12% and 5.88% below year 2019 conditions, respectively. In 2045 and 2050, implementation of the proposed Plan would result in a decrease in VMT per capita by 7.06% and 9.41% below year 2019 conditions respectively. However, implementation of the proposed Plan would result in an increase of 5.6% in total VMT.

In addition, implementation of the proposed Plan would result in an increase of 2,733,111 daily VMT by 2030, 3,975,434 daily VMT by 2035, 4,225,101 daily VMT by 2045, and 4,724,434 daily VMT by 2050, compared to the Baseline Year 2019 conditions. This would be considered a substantial increase. Therefore, this impact is considered significant.

Mitigation Measures

Implementation of mitigation measure TRA-2, as well as mitigation measures GHG-4a, GHG-4b, GHG-4d, GHG 4e, AQ-2b and TRA-2 as discussed under Impact GHG-4, Impact AQ-2, and Impact TRA-2 would reduce the proposed Plan's significant impacts associated with the increase in VMT per capita, but not to a less-than-significant level.

TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects.
During the project design and project-level CEQA review phases of transportation network improvements or land use development projects, SANDAG shall, and other transportation project sponsors (the Local jurisdictions) can, and should implement project-level VMT reduction measures in addition to those included in the Regional Plan. VMT reducing measures consist of, but are not limited to, the following:

- **Require TDM Strategies:** SANDAG shall, and other transportation project sponsors (the Local jurisdictions) can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible TDM strategies to help offset their impacts. This mitigation measure will further reduce the proposed Plan's VMT because the potential VMT reductions associated with two TDM programs, which include vanpool and carshare were not incorporated into Activity Based Model (ABM3). Strategies, such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can, and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Plan should also be used, including walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, parking programs for EVs and hydrogen fuel cell cars, and bike sharing programs.
- **Reduce Parking Minimums:** Local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 13.7% (CAPCOA 2024).
- **Implement Additional Active Transportation Facilities Not Included in the Proposed Plan:** To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall, and other transportation project sponsors (the Local jurisdictions) can, and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Plan includes funding for Complete Streets investments in areas with a high concentration of transportation options, including implementation of bicycle and pedestrian facilities that provide local connections; however, the associated VMT reductions from this funding have not yet been determined; thus, they were not yet included in the EIR's VMT analysis. Therefore, this mitigation measure would achieve further VMT reductions through the funding of additional, locally based multi-modal facilities that were not assumed in the proposed Plan analysis. The implementation of locally based multi-modal facilities, funded through the proposed Plan, can reduce VMT on the roadway network adjacent to the multi-modal facility by 0.8% for bicycle facilities, and up to 6.4% for pedestrian facilities (CAPCOA 2024).
- **VMT Credit/Banking Program for Local VMT Reducing Infrastructure and Programs:** SANDAG shall participate in and help facilitate a VMT Credit/Banking Program where local jurisdictions can submit and bank VMT reduction credit for VMT reducing infrastructure and/or programs which the jurisdiction has implemented. Local jurisdictions would be able to sell their banked VMT reduction credits to development projects within the region or use the credits to offset their own VMT-related impacts associated with roadway capacity improvements. Revenues received from the program must be used to advance the timing or implementation of new VMT reducing infrastructure. This program may be used to fund and/or prioritize the development of local VMT reducing infrastructure and programs that are not included within the proposed Plan, thereby reducing VMT productions within the San Diego region beyond than what is projected in Tables 4.16-7 through 4.16-10. This program is currently being developed as part of a Caltrans Partnership Grant that was awarded to SANDAG and the County of San Diego.
- **VMT Exchange Program for Local VMT Reducing Infrastructure:** SANDAG shall participate in and help facilitate a regional VMT exchange program that allows local jurisdictions to advertise unfunded VMT reducing in which land use development projects can implement to offset their VMT-related impacts. This will allow land use development projects located in more rural and suburban jurisdictions with limited VMT mitigation options to offset their VMT-related impacts by constructing infrastructure in other local jurisdictions with more VMT reducing opportunities. This program may fund construction of local VMT reducing infrastructure not included in the proposed Plan that not have been funded otherwise. The measure

could thereby reduce VMT production within the San Diego region beyond the reductions projected in Tables 4.16-7 through 4.16-10. Similar to the VMT Credit/Banking Program, this program is currently being developed as part of a Caltrans Partnership Grant that was awarded to SANDAG and the County of San Diego.

The following mitigation measures presented in Section 4.8, Greenhouse Gas Emissions, will further reduce both the total VMT and VMT per capita:

- GHG-4a Allocate Grant Funding to Projects that Reduce GHG Emissions.
- GHG-4b Coordination and Support to SANDAG Member Agencies to Adopt, Update, and Monitor GHG Reduction Plans.
- GHG-4d Implement Measures to Reduce GHG Emissions from Transportation Projects.
- GHG-4e Implement Measures to Reduce GHG Emissions from Development Projects.

The following mitigation measures presented in Section 4.3, Air Quality will further reduce both the total VMT and VMT per capita:

- AQ-2b. Regional Plan VMT Credit/Banking Program.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures TRA-2, GHG-4a, GHG-4b, GHG-4d, GHG 4e, and AQ-2b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of an increase in total annual VMT. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

SANDAG cannot require local agencies implementing development projects, or other transportation project sponsors, to adopt mitigation measures TRA-2, GHG-4a, GHG-4b, GHG-4d, GHG 4e, and AQ-2b, and it is ultimately the responsibility of the CEQA lead agency to determine and adopt mitigation. In addition, the State has indicated that additional State policy actions and funding would be required to close the VMT gap between what the Metropolitan Planning Organizations (MPOs) could achieve through implementation of their SCSs, and reductions needed to meet State goals.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (TRA-2) remains significant and unavoidable.

C-TRA-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS TO TRANSPORTATION.

Significant Impact

By 2035 and 2050, cumulative transportation impacts throughout the southern California and northern Baja California region would be significant, and because the proposed Plan's incremental transportation impacts (TRA-2) are significant in 2035 and 2050, the proposed Plan's incremental contribution to cumulatively significant transportation impacts are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure TRA-2, as well as mitigation measures GHG-4a, GHG-4b, GHG-4d, GHG 4e, and AQ-2b, as discussed above, would reduce significant impacts related to an increase in total annual VMT. However, these mitigation measures would not reduce this impact to a less-than-significant level and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures GHG-4a, GHG-4b, GHG-4d, GHG-4e, AQ-2b, and TRA-2 have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant transportation impacts related to increases in total annual VMT. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures GHG-4a, GHG-4b, GHG-4d, GHG 4e, AQ-2b, and TRA-2 would reduce the proposed Plan's significant cumulative transportation impacts. However, for the reasons stated above, these mitigation measures would not reduce this impact (TRA-2) to a less-than-significant level.

The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant transportation impacts to less-than-significant levels, this impact (TRA-2) remains cumulatively considerable post-mitigation.

O. Tribal Cultural Resources (EIR Section 4.17)

TCR-1 CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE SECTION 21047 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS EITHER (1) LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K); OR (2) DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan would result in regional growth and land use change and transportation network improvements and programs that could cause a substantial adverse change in the significance of a tribal cultural resource (TCR). Therefore, this impact (TCR-1) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures TCR-1a and TCR-1b would reduce the proposed Plan's significant impacts associated with an adverse change in the significance of a TCR, but not to a less-than-significant level.

TCR-1a Implement Tribal Cultural Resources Mitigation Measures for Development Projects and Transportation Network Improvements.

During project-level CEQA review of development projects or transportation network improvements that would cause a substantial adverse change in the significance of a tribal cultural resource, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors, can and should develop project-level protocols and mitigation measures with consulting tribes, consistent with PRC Section 21080.3.2(a) to avoid or reduce impacts on tribal cultural resources during construction and operation of development projects and transportation network improvements. The County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation projects sponsors can and should identify these resources through records searches, survey, consultation, or other means, in order to develop minimization and avoidance methods where possible, and consult with California Native American tribes participating in AB 52

consultation to develop mitigation measures for tribal cultural resources that may experience substantial adverse changes.

To assist AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should comply with the following best practices for complying with AB 52:

- Develop with the consulting tribe(s) identified through AB 52 consultation appropriate identification and evaluation measures for tribal cultural resources, such as the role of tribal cultural monitors in conducting comprehensive cultural resource surveys and developing significance criteria for tribal cultural resources and culturally sensitive areas.
- Develop with the consulting tribe(s) identified through AB 52 consultation appropriate avoidance and preservation measures, focused on identifying: appropriate avoidance, protection in place and buffering measures; protecting tribal cultural resources through fencing, signage and restricted access requirements; and appropriate use of GIS-based sensitivity zones (heat maps) for use in project siting and land use decisions.
- Develop with the consulting tribe(s) identified through AB 52 consultation appropriate construction phase measures including: tribal monitoring requirements; stop work and notification protocols for inadvertent discoveries of tribal cultural resources; and development of protocols for artifact handling, curation, and reburial.
- Develop with the consulting tribe(s) identified through AB 52 consultation protocols for long-term stewardship and monitoring of preserved tribal cultural resource areas.
- Gather relevant cultural resources information, such as California Historical Resources Information System (CHRIS) records search results, prior archaeological or ethnographic studies, Sacred Lands File (SLF) checks, or tribal input, early in the planning process to help identify tribal cultural resources and preserve options for avoidance or preservation in place.
- Build working relationships with tribes that are traditionally and culturally affiliated to the project area or to the agency's geographic area of jurisdiction. In consultation, agencies should deal with officially designated representatives of the tribe who have written designation to speak on behalf of the tribe.
- Avoid inadvertent discoveries of California Native American burials and work with tribes in advance to determine culturally appropriate treatment and disposition if burials are inadvertently discovered.
- Maintain the confidentiality of information shared during consultation, consistent with PRC Section 21082.3(c)(2), unless the tribe provides written consent to disclose. This measure helps prevent looting, vandalism, or damage to tribal cultural resources.
- Implement any mitigation measures agreed upon during AB 52 consultation.

In the absence of any specific mitigation measures agreed upon during AB 52 consultation, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should develop standard mitigation measures as set forth in PRC Section 21084.3(b).

The following are standard mitigation measures for tribal cultural resources:

1. Avoidance and preservation of the resources in place, consisting of, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
2. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, consisting of, but not limited to, the following:
    a. protecting the cultural character and integrity of the resource

b. protecting the traditional use of the resource

c. protecting the confidentiality of the resource

3. Record permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

4. Protecting the resource as agreed upon during the tribal consultation process.

5. Provide tribal cultural resource training for transportation project sponsor staff with oversight for project planning, development, and construction activities.

TCR-1b Implement Monitoring and Mitigation Programs for Development Projects and Transportation Network Improvements.

During project-level CEQA review and during construction of development projects and transportation network improvements, the County of San Diego, cities, and other local jurisdictions can and should, SANDAG shall, and other transportation project sponsors can and should identify and implement monitoring and mitigation measures to reduce impacts on both known and undiscovered tribal cultural resources, during construction and operation activities, as applicable, consisting of but not limited to the following:

- Require tribal cultural resource areas identified in any required monitoring and mitigation plan to be monitored during the grading phase of individual projects by a qualified archaeologist, and tribal monitor who has been approved by the consulting tribe(s) identified through AB 52 consultation.
- Should a previously undiscovered cultural resource be encountered during construction activities that is determined to be a tribal cultural resource by the CEQA lead agency in consultation with California Native American tribes, the qualified archaeologist or tribal monitor shall direct the contractor to temporarily divert all ground-disturbing activities in the area of the discovery. The CEQA lead agency in collaboration with the qualified archaeologist and consulting tribe(s) shall prepare and implement a mitigation plan consistent with, but not necessarily limited to, standard mitigation measures set forth in PRC Section 21084.3(b), in consultation with California Native American tribes.
- Any archaeological testing program or data recovery program must be developed in consultation with the consulting tribe(s) identified through AB 52 consultation.
- No invasive or non-invasive testing or 3D printing of any tribal cultural resources or cultural resources affiliated with the consulting tribe(s) shall occur without prior written consent being given by the consulting tribe(s) identified through AB 52 consultation.
- Any documentation and recording of tribal cultural resources must occur through professional practices approved by the consulting tribe(s) identified through AB 52 consultation; such professional practices may limit documentation and recording to the least impactful process, i.e. a sketch versus a photograph.
- If cultural or tribal cultural materials are curated, the curator of the materials must provide written proof within six (6) months following completion of the monitoring program for the project of the acceptance of said collection by a qualifying institution meeting federal standards for a repository within the county where the curated materials were located or as agreed upon by the consulting tribe(s).
- The qualified archaeologist shall be responsible for ensuring that all records associated with the survey, testing, data recovery, and monitoring of future projects are curated with an appropriate regional information center, such as the South Coastal Information Center (SCIC) at San Diego State University. The construction contractor(s) and lead agency shall assist the tribe(s) with the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the tribe's preferences, excavation of the reburial location, and assisting with the reburial upon written request by a designated representative of the tribe. This shall be completed in consultation with the California Native American representative and does not include California Native American human remains and associated burial items, the disposition of which should be determined in consultation with the designated Most Likely Descendants (MLDs).

- Upon completion of all ground-disturbing activity, the qualified archaeologist shall prepare and submit a draft and final monitoring report to the CEQA lead agency that describes the results, analysis, and conclusions of all phases of the monitoring program, including the provisions for curation and repatriation, if applicable, and copies of any signed curation agreements to verify completion of the required monitoring program. A copy of the final monitoring report, and appendices thereto, will be provided to designated representatives of consulting tribe(s) upon request.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures TCR-1a and TCR-1b have been required in, or incorporated into, the proposed Plan to reduce this significant impact of related to significant impacts on TCRs through construction and ground-disturbing activities, and increased access to TCRs. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures TCR-1a and TCR-1b would reduce significant impacts related to TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, there is no guarantee that significant impacts would be reduced to less-than-significant levels for all projects. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (TCR-1) remains significant and unavoidable.

C-TCR-1 CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS EITHER (1) LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K); OR (2) DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1.

Significant Impact

By 2035 and 2050, cumulative tribal cultural resources impacts throughout the southern California and northern Baja California region would be significant, and because the proposed Plan's incremental tribal cultural resources impacts are significant in 2035 and 2050, the proposed Plan's incremental contribution to cumulatively significant tribal cultural resources impact (TCR-1) is cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures TCR-1a and TCR-1b, as discussed above, would reduce significant impacts on TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on TCRs would be less than significant. The impacts would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures TCR-1a and TCR-1b have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant impacts on TCRs

through construction and ground-disturbing activities, and increased access to TCRs. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures TCR-1a and TCR-1b would reduce the proposed Plan's significant impacts tribal cultural resources TCRs through construction and ground-disturbing activities, and increased access to TCRs. However, while these mitigation measures reduce the proposed Plan's significant impacts on tribal cultural resources, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level cumulative impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant impacts to less-than-significant levels, this impact (TCR-1) remains cumulatively considerable post-mitigation.

P. Water Supply (EIR Section 4.18)

WS-1 Not have Sufficient Water Supplies Available to Serve the Projected Regional Demand During Normal, Dry, and MULTIPLE DRY YEARS.

Significant Impact

By 2050, implementation of regional growth and land use change as a result of the proposed Plan would result in a significant impact on water supplies available to serve the projected demand. The Urban Water Management Plans (UWMPs) prepared by San Diego County Water Authority (SDCWA) and Metropolitan Water District (MWD) indicate that there would be sufficient water supplies to provide for regional growth and land development associated with implementation of the proposed Plan through the year 2045. Subsequent to this time, however, documentation regarding sufficient supplies is unavailable, creating uncertainty about regional water supplies in 2050. Therefore, this impact (WS-1) is significant in 2050.

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, and WS-1c would reduce the proposed Plan's significant impacts on water supplies available to serve the projected demand, but not to a less-than-significant level.

WS-1a Implement Water Conservation Measures for Transportation Network Improvements.

SANDAG shall, and other transportation project sponsors can and should, implement feasible water conservation measures during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements, consisting of, but not limited to, the following:

- Install drip or other water-conserving or weather-based irrigation systems for landscaping.
- Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent state, regional, and local government plans; laws; and policies.
- Incorporate the use of reclaimed water (also known as recycled water) during planning, design, project-level CEQA review, construction, operations, and maintenance of transportation network improvements to reduce the use of potable water.

WS-1b Implement Water Conservation Measures for Development Projects.
The County of San Diego, cities, and other local jurisdictions can and should implement feasible water conservation measures during planning, design, and project-level CEQA review of development projects, consisting of, but not limited to, the following:

- Install native plant species and noninvasive drought-tolerant/low-water-use plants in landscaping, consistent with the most recent state, regional, and local government plans; laws; and policies.
- Install low-flow plumbing fixtures.
- Install water-efficient appliances.
- Incorporate the use of reclaimed water. Measures to incorporate reclaimed water may consist of, but are not limited to, on site water recycling; the use of recycled water to fill lakes, ponds, and ornamental fountains; the use of recycled water for irrigation, to mix concrete, and to control dust at construction sites; the use of recycled water for certain industrial processes and for flushing toilets and urinals in nonresidential buildings; and the use of recycled water for street sweeping purposes.

WS-1c Ensure Adequate Water Supply for Development Projects.
During planning, design, and project-level CEQA review for development projects, the County of San Diego, cities, and other local jurisdictions can and should ensure that adequate water supply will be available to meet or satisfy projected water demands, consistent with applicable UWMPs, master plans, and general plan projections of water supply and demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, an SB 221 Water Supply Verification, or other water supply analysis.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, and WS-1c have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to potentially inadequate water supplies available for 2050. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, and WS-1c would reduce significant impacts related to potentially inadequate water supplies available for 2050. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, there is no guarantee that the mitigation measures would reduce the significant water supply impacts to a less-than-significant level because adequate water supplies have not been identified, and there is uncertainty about insufficient regional water supplies to meet regional water demand, notwithstanding implementation of the listed mitigation measures. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-1) remains significant and unavoidable.

WS-2 SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROPOSED PLAN WOULD IMPEDE SUSTAINABLE MANAGEMENT OF GROUNDWATER BASINS OR OBSTRUCT IMPLEMENTATION OF A SUSTAINABLE GROUNDWATER MANAGEMENT PLAN.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use change, would have the potential to occur on land overlying 23 basins (e.g., the Escondido Valley and Poway Valley Groundwater Basins) that have been identified by the county (County of San Diego 2010a) as currently having an insufficient

level of aquifer storage to ensure sustainability or were projected to have unsustainable storage levels with 2011 General Plan buildout. Therefore, this impact (WQ-2) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure WS-2, as well as mitigation measures WS-1a and WS-1b as discussed under Impact WS-1, would reduce the proposed Plan's significant impacts related to having an insufficient level of aquifer storage to ensure sustainability or were projected to have unsustainable storage levels with 2011 General Plan buildout, but to not a less-than-significant level.

WS-2 Implement Groundwater Measures to Ensure Sustainable Yield for Development Projects.

The County of San Diego, cities, and other local jurisdictions can and should ensure sustainable yield of groundwater basins during planning, design, and project-level CEQA review of development projects, by taking measures consisting of, but not limited to, the following:

- Participate in a groundwater-trading program to enable permanent transfer and potentially long-term and short-term lease of baseline-pumping allocations to allow groundwater users or new development to purchase needed groundwater allocation from others.
- Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimize, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
- Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.
- Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas to prevent conversion of those areas to impervious surface.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, and WS-2 have been required in, or incorporated into, the proposed Plan to reduce this significant impact from associated regional growth and land use changes that would result in population increases that would impede groundwater basin sustainability. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, and WS-2 would reduce significant impacts related to regional growth and land use changes under the proposed Plan that would result in population increases that would otherwise impede groundwater basin sustainability. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-2) remains significant and unavoidable.

WS-3 REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER FACILITIES, THE CONSTRUCTION OR RELOCATION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Significant Impact

By 2035 and 2050, regional growth and land use change and transportation network improvements under the proposed Plan would result in construction of new or expanded water facilities, the construction of which could have significant environmental effects. Therefore, this impact (WS-3) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures WS-3, as well as WS-1a, WS-1b, WS-1c, and WS-2, as discussed under Impacts WS-1 and WS-2, would reduce the proposed Plan's significant impacts associated with the construction of new or expanded water facilities, but to not a less-than-significant level.

WS-3 Implement Measures for New or Expanded Water Facilities.

During planning, design, and project-level CEQA review of development projects and water projects, MWD, SDCWA, the County of San Diego, cities, and other local jurisdictions can and should apply necessary mitigation measures to avoid or reduce significant environmental impacts associated with the construction or expansion of new or expanded water facilities. Mitigation measures should be implemented by the water management agencies directly responsible for the construction of new or expanded water facilities. Significant environmental impacts requiring mitigation may consist of but are not limited to air quality, noise, traffic, biological resources, cultural resources, paleontological resources, tribal cultural resources, energy, greenhouse gas emissions, hydrology and water quality, and water supply.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to construction of new or expanded water facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce significant impacts related to construction of new or expanded water facilities. However, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WS-3) remains significant and unavoidable.

C-WS-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS TO WATER SUPPLY.

Significant Impact

By 2035 and 2050, cumulative water supply impacts throughout the state of California, Lower Colorado River Basin, and northern Baja California region would be significant, and because the proposed Plan's individual water supply impacts are significant in 2035 and 2050, the proposed Plan's incremental water supply impacts (WS-1 in 2050, WS-2 and WS-3) are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3, as discussed above, would reduce the proposed Plan's significant water supply impacts related to the availability of adequate water supplies and construction of new or expanded water treatment and conveyance facilities. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts on water supply would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant water supply impacts related to the availability of adequate water supplies, interference with sustainable groundwater basin management, and construction of new or expanded water facilities. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WS-1a, WS-1b, WS-1c, WS-2, and WS-3 would reduce the proposed Plan's significant water supply impacts. However, while these mitigation measures reduce the proposed Plan's significant water supply impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant water supply impacts to less-than-significant levels, these impacts (WS-1, WS-2 and WS-3) remain cumulatively considerable post-mitigation.

Q. Wildfire (EIR Section 4.19)

WF-1 INCREASE RISK OF WILDLAND FIRE IGNITION AND DIRECTLY OR INDIRECTLY EXPOSE PEOPLE OR STRUCTURES TO SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including associated regional growth, land use development, and transportation network improvements, would increase the risk of wildland fire ignition that would directly or indirectly expose people and structures to a significant risk of loss, injury, or death involving wildland fires. These wildfire ignition risks would be exacerbated in areas classified as High and Very High Fire Hazard Severity Zone (FHSZs) and in the Wildland-Urban Interface (WUI), as humans are responsible for most wildfire ignitions. Therefore, this impact (WF-1) would be significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure WF-1 would reduce the proposed Plan's significant impacts associated with exacerbated wildland fire risks, but not to a less-than-significant level.

WF-1 Reduce Wildfire Risk for Development and Transportation Projects.

During planning, design, and project-level CEQA review of future development and transportation projects located in State Responsibility Areas (SRAs) or Local Responsibility Areas (LRAs) classified by California Department of Forestry and Fire Protection (CAL FIRE) as High and Very High FHSZs, as well as the WUI, SANDAG shall, to the degree allowed by its authority, and other agencies (the County of San Diego, cities, and other local

jurisdictions such as fire protection agencies) can and should ensure that project applicants implement measures to reduce wildfire impacts. Such measures include, but are not limited to, the following:

- Reducing the area and density of allowable development, through general plan updates and other processes, within areas mapped by CAL FIRE as High and Very High FHSZs.
- Establishing site-specific safety measures for new development and transportation projects to protect local resources from wildfire. Such measures may include fire hazard identification (e.g., flammable and combustible materials, ignition sources), hazard controls and safeguards (e.g., setbacks, containment), equipment maintenance, fire protection technology and equipment (e.g., fire alarm, suppression, and shut-off systems), employee/worker training, agency coordination and mutual aid, and other elements.
- Preparing project-specific fire protection plans for new development and transportation projects. Fire protection plans should be developed by the project applicant during project-level CEQA review and identify measures that reduce the risk of structural and human loss from wildfire, such as the use of ignition resistant materials, incorporation of fuel modification techniques and brush clearance, and providing for adequate fire-flow water supply in compliance with applicable fire safety regulations. Fire protection plans should be based on appropriate wildfire modeling that accounts for site-specific conditions related to wildfire.
- Educating residents and businesses regarding local emergency communications and notification systems (e.g., Firewise USA, Community Risk Reduction).
- Adhering to the most current building code requirements for new development and transportation projects, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers. Fire-resistant features could include ember-resistant vents, fire-resistant roofs, and maintenance of defensible spaces around structures.
- Ensuring sufficient emergency water supply and pressure (local water providers) in accordance with the Emergency Water Standards of the SRA Minimum Fire Safe Regulations (CCR Title 14, Division 1.5, Section 1270 et seq) and most current version of the California Fire Code (CCR Title 24, Part 9) for new projects by working with water management agencies.
- Enforcing state and local defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash, and other flammable material away from structures.
- Providing public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
- Planning for and promoting rapid revegetation of burned areas to help prevent erosion and protect bare soils.
- Developing a regulatory mechanism for permitting an aggressive hazardous fuels management program.
- Establishing standards for fuel breaks that can slow or stop a wildfire advancing into a community or into the wildlands. Fuel breaks shall be strategically located to protect a community, structures, or routes of access and egress. Strategic locations may include ridgelines, greenbelts, or other locations to manage embers or support community-level fire suppression tactics.
- SANDAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding fire-wise land management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments.
- SANDAG, in partnership with technical experts and stakeholders, shall launch or continue existing initiatives to help local cities and counties to protect communities and economies in the San Diego region from disruption as a result of wildfire occurrences. Initiatives could include, but would not be limited to, seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-1 has been required in, or incorporated into, the proposed Plan to reduce this significant impact related to the increased risk of wildland fire ignition that would directly or indirectly expose people or structures to significant risk of loss, injury, or death involving wildland fires. The SANDAG Board of Directors finds that specified provisions of this mitigation measure are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-1 would reduce significant impacts related to increased risk of wildland fire ignition that would directly or indirectly expose people or structures to significant risk of loss, injury, or death involving wildland fires.

Mitigation measure WF-1 would reduce this impact by requiring measures to preclude or substantially reduce the risk of wildland fire ignition in High and Very High FHSZs and the WUI. In addition, wildfire ignition risk would be reduced by requiring specific design features for new development per mitigation measure WF-1. However, due to the relatively large area within the San Diego region that is considered at high risk for wildland fires, and because regional growth, land use development, and transportation network improvements could still occur in areas where wildlands are adjacent to urbanized areas and where residences are intermixed with wildlands, the proposed Plan would increase the risk of wildland fire ignition that would directly or indirectly expose people and structures to a significant risk of loss, injury, or death involving wildland fires.

In addition, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be concluded that wildland fire risks and the risks associated with wildfire smoke pollution would be reduced to less than significant in all locations for all future development projects. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Therefore, this impact (WF-1) would remain significant and unavoidable.

WF-2 DUE TO SLOPE, PREVAILING WINDS, AND OTHER FACTORS, EXACERBATE WILDFIRE RISKS, AND THEREBY EXPOSE PROJECT OCCUPANTS TO POLLUTANT CONCENTRATIONS FROM A WILDFIRE OR THE UNCONTROLLED SPREAD OF A WILDFIRE.

Significant Impact

By 2035 and 2050, land development would expand into Very High FHSZs within the LRA, and the SRA. including development in areas with steep slopes, areas subject to strong winds, and other factors. The increased risk of wildfire as a result of the proposed Plan would also expose the region's population to harmful pollutant concentrations in the form of smoke from wildfire and the uncontrolled spread of wildfire. Therefore, this impact (WF-2) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measure WF-1, as discussed under Impact WF-1, would reduce the proposed Plan's significant impacts associated with development in areas with steep slopes, areas subject to strong winds, and other factors exposing the region's population to harmful pollutant concentrations,, but not to a less-than-significant level.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-1 has been required in, or incorporated into, the proposed Plan to reduce this significant impact related to development in areas with steep slopes, areas subject to strong winds, and other factors exposing the region's population to harmful pollutant concentrations The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of

other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure WF-1 would reduce significant impacts related to an increase in the risk of sparking a wildfire due to the expansion of utilities by requiring measures to preclude or substantially reduce the risk of wildland fire ignition in High and Very High FHSZs and the WUI. In addition, wildfire ignition risk would be reduced by requiring specific design features for new development per mitigation measure WF-1. However, given the relatively large area within the San Diego region considered at high risk for wildland fires and the level of uncertainty regarding the location, frequency, and severity of future wildfires, impacts of exacerbated wildfire risks and the risks associated with wildfire smoke pollution may not be reduced to less than significant. When wildfires occur, weather conditions (e.g., strong winds) usually are such that major portions of the regional population are exposed to dangerous pollution concentrations from wildfire smoke. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WF-2) remains significant and unavoidable.

WF-3 REQUIRE THE INSTALLATION OR MAINTENANCE OF ASSOCIATED INFRASTRUCTURE (SUCH AS ROADS, FUEL BREAKS, EMERGENCY WATER SOURCES, POWER LINES OR OTHER UTILITIES) THAT MAY EXACERBATE FIRE RISK OR THAT MAY RESULT IN TEMPORARY OR ONGOING IMPACTS TO THE ENVIRONMENT.

Significant Impact

By 2035 and 2050, implementation of the proposed Plan, including regional growth and land use changes, and transportation projects, would occur in SRAs and Very High FHSZs within LRAs. Land use development requiring the construction or extension of aboveground electrical transmission lines in High and Very High FHSZs and the WUI by 2035 would exacerbate the risk of wildfire ignition in the region. The construction and operation of new overhead transmission lines across natural habitat within High or Very High FHSZs or the WUI would exacerbate wildfire risk. Therefore, this impact (WF-3) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures WF-3 as well as WF-1 as discussed under Impact WF-1 would reduce the proposed Plan's significant impacts related to installation or maintenance of associated infrastructure.

WF-3 Reduce Wildfire Risk Related to New or Expanded Infrastructure Required to Support Regional Growth and Land Use Development.

During planning, design, and project-level CEQA review of future development projects located in SRAs or LRAs classified by CAL FIRE as High and Very High FHSZs, as well as the WUI, (the County of San Diego, cities, other local jurisdictions, and public service and utility providers in the region) can and should ensure that project applicants implement measures to reduce wildfire impacts from new or expanded infrastructure. Such measures include, but are not limited to, the following:

- Establishing site-specific safety measures for new infrastructure and facilities required to provide public services and utilities for new development in order to protect local resources from wildfire. Such measures may include fire hazard identification (e.g., flammable and combustible materials, ignition sources), hazard controls and safeguards (e.g., setbacks, containment), equipment maintenance, fire protection technology and equipment (e.g., fire alarm, suppression, and shut-off systems), employee/worker training, agency coordination and mutual aid, and other elements.
- Preparing project-specific fire protection plans for new infrastructure. Fire protection plans should be developed by the project applicant during project-level CEQA review and identify measures that reduce the risk of structural and human loss from wildfire, such as the use of ignition resistant materials, incorporation of fuel modification techniques and brush clearance, and providing for adequate fire-flow water supply in

compliance with applicable fire safety regulations. Fire protection plans should be based on appropriate wildfire modeling that accounts for site-specific conditions related to wildfire.

- Adhering to wildfire safety and mitigation plans established by local utilities companies, including design and construction standards, inspection schedules, and emergency preparedness.
- Adhering to the most current building code requirements for structures related to public services and infrastructure, including ignition-resistant construction and inclusion of design features that prevent the intrusion of flames and embers. Fire-resistant features could include ember-resistant vents, fire-resistant roofs, and maintenance of defensible spaces around structures.
- Ensuring sufficient emergency water supply and pressure (local water providers) in accordance with the Emergency Water Standards of the SRA Minimum Fire Safe Regulations (CCR Title 14, Division 1.5, Section 1270 et seq) and most current version of the California Fire Code (CCR Title 24, Part 9) for new projects.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WF-1 and WF-3 have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to installation or maintenance of associated utility infrastructure. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Mitigation measure WF-1 would reduce this impact by requiring measures to preclude or substantially reduce wildfire risk in High and Very High FHSZs and the WUI. For example, reducing the area and density of allowable development in areas mapped by CAL FIRE as High and Very High FHSZs would reduce the number of people and structures in these fire-prone zones, potentially reduce areas of WUI, and reduce potential sources of ignition, including those from utility infrastructure to serve new development in fire prone areas. Mitigation measure WF-3, combined with other mitigation measures (e.g., fire hazard assessment, fire-resistant materials and design, vegetation management) identified during project-level CEQA review conducted by the implementing agency, as well as adherence to existing fire prevention regulations and BMPs, would be sufficient to reduce impacts related to utility infrastructure construction to a less-than-significant level. However, land development within areas classified as High and Very High FHSZs as well as the WUI would likely require the construction of aboveground electrical transmission lines. Mitigation measure WF-3 would serve to reduce impacts associated with wildfire ignition risks from new electrical infrastructure, but not necessarily to a less-than-significant level given the significant wildfire risk posed by these transmission lines. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make additional mitigation measures or project alternatives infeasible. Because no feasible mitigation measures or project alternatives have been found to reduce the impact to a less-than-significant level, this impact (WF-3) remains significant and unavoidable.

WF-4 Expose People or Structures to Significant Risks, Including Downslope or Downstream Flooding or Landslides, as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes.

Significant Impact

By 2035 and 2050, Regional growth, land use development, and transportation network improvements associated with the proposed Plan between 2022 and 2050 would exacerbate wildfire risk that would result in increased exposure of people and structures to risk of flooding, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes. Therefore, this impact (WF-4) is significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures WF-4 would reduce the proposed Plan's significant impacts of flooding, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes, but not to a less-than-significant level.

WF-4 Reduce Post-Fire Risks Related to Flooding, Landslides, Slope Instability, or Drainage Changes for Development and Transportation Projects.

During planning, design, and project-level CEQA review of future development projects and transportation network improvement projects located in State Responsibility Areas (SRAs) or Local Responsibility Areas (LRAs) classified by CAL FIRE as High and Very High Fire Hazard Severity Zones (FHSZs), as well as the Wildland-Urban Interface (WUI), SANDAG shall, to the degree allowed by its authority, and other agencies (the County of San Diego, cities, and other local jurisdictions) can and should ensure that project applicants implement measures to reduce post-fire impacts. Such measures include, but are not limited to, the following:

- Treating wildfire burned areas using best practices to control stormwater runoff prior to winter rains.
- Restoring wildfire areas by planting native vegetation cover or encouraging the regrowth of native species using best practices as soon as possible to aid in control of stormwater runoff.
- Reducing potential for future flood hazard by removal of dead, woody vegetation along watercourses following a catastrophic fire to reduce the risk of future catastrophic fires.
- Including fire hazard reduction measures (e.g., prescribed burning, vegetation management) that maintain forest health and reduce flood risks when implementing fuel-reducing activities.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measure WF-4 have been required in, or incorporated into, the proposed Plan to reduce this significant impact related to the potential to increase the risk of flash floods, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measure WF-4 would reduce significant impacts related to the potential to increase the risk of flash floods, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes. However, it is forecast that thousands of acres of land classified as High and Very High FHSZs would be converted from vacant land by land use development and/or transportation network improvements. Climate change is also expected to increase the risk of flooding and landslides in the future due to increased frequency and intensity of extreme precipitation events. Furthermore, as discussed in Section 4.19 of the EIR, climate change may increase the potential for heavy rainfall to occur after wildfire, resulting in potential landslides as flooding washes away soil destabilized from wildfire. These factors together would greatly increase the risks of flash floods, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes, and would likely occur on a scale and in a timeframe that would preclude prevention by implementing mitigation measure WF-4. Because there are no feasible mitigation measures to reduce the increased elevated risk of flash floods, debris flows, and landslides as a result of runoff, post-fire slope instability, or drainage changes to less than significant, this impact would remain significant and unavoidable.

C-WF-1 MAKE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO ADVERSE EFFECTS RELATED TO WILDFIRE.

Significant Impact

By 2035 and 2050, cumulative wildfire impacts throughout the state of California, Lower Colorado River Basin, and northern Baja California region would be significant, and because the proposed Plan's individual wildfire impacts

are significant in 2035 and 2050, the proposed Plan's incremental contribution to cumulatively significant wildfire impacts (WF-1, WF-2, WF-3 and WF-4) are cumulatively considerable and thus significant in 2035 and 2050.

Mitigation Measures

Implementation of mitigation measures WF-1, WF-3, and WF-4, as discussed above, would reduce the proposed Plan's significant wildfire impacts related to exposure of people or structures to a risk of loss, injury, or death involving wildland fires, risk of sparking a wildfire due to expansion of utilities, or exposure of people or structures to risk of flash floods, debris flows, and landslides, as a result of post-fire runoff, slope instability, or drainage changes. However, as outlined above, these mitigation measures would not guarantee that all proposed Plan impacts would be less than significant and would remain cumulatively considerable post-mitigation.

Findings and Rationale

The SANDAG Board of Directors finds that the provisions of mitigation measures WF-1, WF-3 and WF-4 have been required in, or incorporated into, the proposed Plan to reduce the proposed Plan's significant wildfire impacts related to exposure of people or structures to a risk of loss, injury, or death involving wildland fires, risk of sparking a wildfire due to expansion of utilities, or exposure of people or structures to risk of flash floods, debris flows, and landslides in the years following wildfires. The SANDAG Board of Directors finds that specified provisions of these mitigation measures are SANDAG's responsibility to implement, while other provisions are within the responsibility and jurisdiction of other transportation project sponsors, cities, the County, and other public agencies, and that such provisions can and should be adopted by these other agencies.

Implementation of mitigation measures WF-1, WF-3 and WF-4 would reduce the proposed Plan's significant wildfire impacts. However, while these mitigation measures reduce the proposed Plan's significant wildfire impacts, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SANDAG's lack of land use authority over individual projects, it cannot be guaranteed that all future project-level impacts can be mitigated to a less-than-significant level. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make certain mitigation measures or alternatives identified in the EIR infeasible. Because no feasible mitigation measures or alternatives have been found to reduce the proposed Plan's incremental contributions to cumulatively significant wildfire impacts to less-than-significant levels, these impacts (WF-1, WF-2, WF-3, and WF-4) remain cumulatively considerable post-mitigation

V. FINDING REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES (EIR SECTION 6.3)

CEQA requires that an EIR must address any significant irreversible environmental changes that would be caused if the proposed project were implemented (CEQA Guidelines Section 15126.2(c)). An impact would come under this category if (1) the project would involve a large commitment of nonrenewable resources; (2) the primary and secondary impacts of the project would generally commit future generations to similar uses; (3) the project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and (4) the proposed consumption of resources is not justified.

Implementation of the proposed Plan would result in permanent changes to the existing environments, which have been described throughout the EIR. While the proposed Plan focuses on population and employment growth in using a sustainable urban growth models, while also providing transportation investments that support compact land development patterns and reduce sprawl, there will still be some conversion of undeveloped land to urbanized uses. These conversions are considered a permanent irreversible change and would occur directly through construction of development on undeveloped land. Land use changes and transportation network improvements would result in significant irreversible impacts on aesthetics and visual resources, including changes to existing community character and views. Future development projects associated with the proposed Plan would result in a direct irreversible loss of sensitive vegetation communities that supports rare, threatened, or endangered species, and impacts on these resources would be significant and irreversible. The development of

currently undeveloped land and other land use changes would result in significant irreversible impacts on agricultural resources and forest lands, and the availability of known mineral resources. The proposed Plan would substantially induce irreversible population growth and increased density, which would displace existing housing units, and result in additional people that would be susceptible to noise impacts. As development occurs at urban edges, additional people and structures would be at risk from wildland fires.

The proposed Plan's regional growth and land use changes would result in the irreversible consumption of nonrenewable resources. This use will have an incremental and irreversible effect on such resources. The irreversible commitment of limited resources is inherent in any development project or, in the case of the proposed Plan, aggregated development projects. Resources anticipated to be irreversibly committed over the timespan of the proposed Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Development associated with the proposed Plan represents a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating, and cooling of residences and buildings, as well as construction and operation of transit systems.

VI. FINDING REGARDING GROWTH-INDUCING IMPACTS (EIR SECTION 6.1)

The SANDAG Board of Directors has reviewed and considered the information on growth-inducing impacts, including the information provided in comments on the Draft EIR and the responses to those comments in the Final EIR. The CEQA guidelines (Section 15126.2(d)) require a discussion of growth-inducing impacts of a project. A project may be considered growth inducing when it:

- Fosters economic growth, population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment;
- Removes obstacles to population growth or additional housing;
- Burdens existing community service facilities beyond current/projected capacities; or
- Encourages or facilitates other activities that could significantly affect the environment.

Growth inducement would be caused by the provision or extension of utilities and public services. For example, the development of water, wastewater, fire, or other services in previously underserved areas; the extension of transportation routes into undeveloped areas; and the establishment of major new employment opportunities would all induce growth. The proposed Plan is considered growth-inducing for the following reasons.

From 2022 to 2050, the regional population is forecasted to increase by over 112,944 people (3.4%), adding over 202,819 housing units (16.4%) and over 170,757 jobs (10.6%). The proposed Plan's objectives include focusing population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas, and providing transportation investments that support compact land development patterns.

The proposed Plan focuses population, housing units, and employment growth near existing and planned transportation infrastructure and in areas with existing utilities and municipal or public services. This growth pattern would more effectively preserve natural resources, open space, and agricultural lands.

Development to accommodate regional growth and land use change would be constructed throughout the region. However, the proposed Plan forecasts a general intensification of existing land uses in urban communities and along key transportation corridors. Most of these areas have established roadways and utilities, as well as water and sewer services. The placement of additional housing units in established areas would require upgrading and resizing of existing infrastructure, including water facilities. The upgrading of these facilities would further remove obstacles to the construction of additional housing within and adjacent to these areas. Chapter 2, Project Description, and Section 4.14, Population and Housing, of the EIR, further describe forecasted population, housing units, and job growth within the region.

The planned transportation network improvements of the proposed Plan are intended to expand upon the current transportation network by providing transportation investments that support compact land development patterns and decrease sprawl while reducing greenhouse gas (GHG) emissions and other environmental impacts. These transportation network improvements would remove obstacles to growth in some areas of the region, which would support additional housing, population, and economic growth. Section 4.14, Population and Housing, of the EIR, discusses forecasted regional population and employment growth associated with the proposed Plan.

VII. FINDINGS REGARDING ALTERNATIVES EVALUATED IN EIR

The SANDAG Board of Directors (Board) has reviewed and considered the information on alternatives provided in the EIR, including the information provided in comments on the Draft EIR, the responses to those comments in the Final EIR, and all comments received up to the date of adoption of these findings.

A. Legal Requirements for Alternatives

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives…which would substantially lessen the significant environmental effects of such projects." "Feasible" means "capable of being accomplished in a reasonable period of time taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364).

The concept of feasibility also encompasses whether a particular alternative promotes the proposed Plan's underlying goals and objectives, and whether an alternative is impractical or undesirable from a policy standpoint. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

The issue of alternatives feasibility arises twice in the CEQA process, once when the EIR is prepared, and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is "potentially" feasible. Potentially feasible alternatives are suggestions by the EIR preparers that may or may not be adopted by lead agency decision-makers. The fact that an alternative is more costly, or that budgets and funding priorities would need to be revised to implement an alternative, does not automatically mean that an alternative is financially infeasible for purposes of EIR evaluation.

When CEQA findings are made after EIR certification, the lead agency decision-making body independently evaluates whether the alternatives are actually feasible, including whether an alternative is impractical or undesirable from a policy standpoint. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.) In making this determination, the decision-making body considers information in the Draft EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3)). Where the feasibility of alternatives evaluated in the EIR is dependent upon changes in existing laws, regulations, or funding patterns, the decision-making body must consider the likelihood that such changes will occur within the time frame for implementation of the proposed project.

An EIR must only evaluate reasonable alternatives to a project that could feasibly attain most of the project objectives and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6(a)). In all cases, the consideration of alternatives is to be judged against a rule of reason. The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative is infeasible.

B. Project Objectives

Project alternatives, as described in Chapter 5 of the EIR, were intended to achieve the following basic objectives of the proposed Plan:

1. Focus population and employment growth to protect sensitive habitat and natural resource areas.
2. Provide transportation investments that support compact land development patterns and reduce vehicle miles traveled.

3. Meet greenhouse gas emissions targets established for the San Diego region by the California Air Resources Board.
4. Provide transportation investments and land use patterns that promote social equity.
5. Provide transportation investments and a land use pattern that improves air quality.
6. Provide multimodal access to employment centers and key destinations for all communities.
7. Enhance the efficiency of the transportation network for moving people and goods through the deployment of new technologies.

C. Alternatives Analyzed in the EIR

The EIR considered in detail the following alternatives to the proposed Plan:

1. No Project Alternative
2. Focused Growth, Higher Parking Pricing, and Arterial and Freeway Speed Reductions
3. Focused Growth, Higher Parking and Managed Lane Pricing, and Free Transit

These three alternatives are summarized in the text and Table 1 below, and are described in detail in Chapter 5 of the EIR. EIR Table 5-1 provides a comparison of the components of each of the alternatives considered in detail.

Table 1 Summary of Alternatives Considered in the EIR

Components	Alternative 1: No Project	Alternative 2: Focused Growth, Higher Parking Pricing, and Arterial and Freeway Speed Reductions	Alternative 3: Focused Growth, Higher Parking and Managed Lane Pricing, and Free Transit
Land Use Pattern	Amended 2021 Regional Plan	Land use pattern focuses new growth in areas with available multimodal transportation	Land use pattern focuses new growth in areas with available multimodal transportation
Transportation Network	"No Build" Projects	Same as proposed Plan	Same as proposed Plan
Parking Pricing	Amended 2021 Regional Plan	Increases parking costs by 100% compared to proposed Plan	Increases parking costs by 100% compared to proposed Plan
Managed Lane Pricing	Amended 2021 Regional Plan	Same as proposed Plan	Increases managed lane pricing by 100% compared to proposed Plan
Speed Reductions	No	Reduces speeds on arterials and freeways by 5 mph	No
Free Transit	No	No	Yes
Funding	Committed funding	Same as proposed Plan	Same as proposed Plan

Table 5-3 of the EIR provides a list of impacts and their level of significance for Alternatives 1, 2, and 3, with a comparison of the impacts of each alternative to those of the proposed Plan. Calculations for the alternatives analysis are provided in Appendix M of the EIR. The designation "significant impact" in Table 5-3 refers to the level of significance of the impact identified for the proposed Plan as analyzed in the EIR. Within the parentheses there is a comparison of the magnitude of the alternative's impact to the magnitude of the proposed Plan's impacts (i.e., same, increased, decreased). The level of significance may be the same for the proposed Plan and an alternative for a given threshold, but the impacts from an alternative may be relatively increased or decreased without changing the significance determination. For these reasons, this alternative has been excluded from further consideration.

ALTERNATIVE 1: NO PROJECT

Description

CEQA requires a No Project Alternative to be analyzed in the EIR. The No Project Alternative assumes that the proposed Plan would not be adopted or implemented.

The proposed Plan involves updating the existing plan, the Amended 2021 Regional Plan. The No Project Alternative therefore reflects continuation of the existing plan. [CEQA Guidelines Section 15126.6(e)(3)(A)] The No Project Alternative assumes the Series 15 Regional Growth Forecast with the Amended 2021 Regional Plan land use pattern. Alternative 1 would result in more concentrated development patterns than the proposed Plan because Alternative 1's land use pattern focused growth primarily in mobility hubs, resulting in a denser development pattern than the proposed Plan. The total population, number of housing units, and number of jobs by 2050 would likely be the same as the proposed Plan under this alternative. Table M-2 (Appendix M of the EIR) provides a comparison of the population, housing, and employment for the proposed Plan and the alternatives. The No Project Alternative includes "No Build" transportation projects likely to be implemented if the proposed Plan were not adopted. A list of No-Build projects is included in Appendix M of the EIR. Future project development and implementation under the No Project Alternative would be limited as SANDAG would fall out of compliance with the state and federal funding requirement of an adopted RTP and SCS in January 2026.

Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 1 infeasible and rejects this alternative for the reasons explained below.

First, this alternative would not reduce any other of the plan's significant impacts to less-than-significant levels. Rather this alternative will result in greater significant impacts for issue areas such as air quality, GHG, and transportation.

Second, Alternative 1 fails to meet any of the basic project objectives, except for first objective which is to focus population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas. This alternative would not meet these basic objectives because future project development and implementation under the No Project Alternative would be limited as SANDAG would fall out of compliance with the state and federal funding requirement of an adopted RTP and SCS in January 2026. The absence of the proposed Plan's transportation improvements and land use development would likely cause the region to not meet the GHG emissions targets established for the San Diego region by CARB and the SANDAG Board of Directors (objective 3) and not be able to reduce vehicle miles travelled (objective 2). This alternative would not meet the objectives to provide transportation investments that improves air quality (objective 4) because more people would drive alone increasing vehicle miles travelled and air quality emissions.

This alternative would fail to provide multi-modal access to jobs and key destinations for all communities (objective 5) because compared to the proposed Plan it would result in higher daily vehicle delay per capita; peak-period travel time to work would be slower for drive alone, transit, and carpool modes; travel times to and from neighboring counties and military bases would be slower; fewer people would be within 30 minutes of jobs and higher education using transit; fewer people would be within 15 minutes of retail, health care, active parks, and active beaches using transit; and fewer people would be within 15 minutes of an active beach driving alone. See Appendix M of EIR.

Alternative 1 would not enhance the efficiency of the transportation network through the deployment of new technologies (objective 6). New technologies to make travel more reliable and convenient would not be employed, nor would the efficiency of the transportation system be managed to improve traffic flow to the same degree as offered by the proposed Plan.

Third, Alternative 1 is legally infeasible. It does not meet the requirements of federal transportation planning law. Pursuant to 23 USC Section 134(i), SANDAG is required to "prepare and update" its RTP every 4 years if it is in an

area designated as nonattainment under the federal Clean Air Act. Alternative 1 would also not meet the requirements of 23 USC Section 134(h)(1) which requires that the RTP contain projects and strategies that will:

(A) support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;

(B) increase the safety of the transportation system for motorized and nonmotorized users;

(C) increase the security of the transportation system for motorized and nonmotorized users;

(D) increase the accessibility and mobility of people and for freight;

(E) protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns

(F) enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;

(G) promote efficient system management and operation; and

(H) emphasize the preservation of the existing transportation system.

ALTERNATIVE 2: FOCUSED GROWTH, HIGHER PARKING PRICING, AND ARTERIAL AND FREEWAY SPEED REDUCTIONS

Description

Alternative 2 is the same as described in Chapter 5, *Alternatives Analysis*. Alternative 2 incorporates and adapts elements of the proposed Plan, such as the proposed Plan transportation network and many policies and programs. Unlike the proposed Plan, Alternative 2 would include a land use pattern with more focused growth in areas with available multimodal transportation, higher parking pricing than what is included in the proposed Plan, and speed reductions on arterials and freeways not included in the proposed Plan. This alternative could feasibly accomplish most of the basic objectives of the project and could substantially lessen one or more of the significant effects.

This alternative could feasibly accomplish most of the basic objectives of the project and could substantially lessen one or more of the significant effects. This alternative increases mode shift to transit and other non-solo driving transportation modes due to higher parking pricing and reduces GHG emissions due to speed reductions on arterials and freeways. Percent of work trips during peak period for modes other than solo driving increases by 2.7% in 2035 and 3.7% in 2050 for Alternative 2 (see Appendix M). Per capita GHG emissions reductions from 2005 levels are 23.6% in 2035 and 24.6% in 2050 for Alternative 2, compared to 19.32% in 2035 and 19.51% in 2050 for proposed Plan (see Appendix M). Land use in Alternative 2 would focus all growth in areas with available multimodal transportation and expect new growth to only be found in such locations. The land use pattern in Alternative 2 increases capacity for density only in locations with existing multi-family, commercial and office land uses. Alternative 2 includes the same transportation network as the proposed Plan, and funding for Alternative 2 would be the same as described for the proposed Plan.

Alternative 2 could substantially lessen one or more of the significant effects. As shown in Table 5-3 in Chapter 5, AQ-2 in 2035 is the only significant impact that would be reduced to less than significant levels. Significant impacts that would be reduced (but not necessarily to a less-than-significant level) under Alternative 2 are:

- AES-1 (2035, 2050)
- AES-2 (2035, 2050)
- AES-3 (2035, 2050)
- AES-4 (2035, 2050)
- C-AES-1 (2035, 2050)
- AG-1 (2035, 2050)
- AG-2 (2035, 2050)
- FR-1 (2035, 2050)

- C-AG-1 (2035, 2050)
- AQ-4 (2035, 2050)
- AQ-5 (2035, 2050)
- AQ-6 (2035, 2050)
- C-AQ-1 (2035, 2050)
- BIO-1 2035, 2050)
- BIO-2 (2035, 2050)
- BIO-3 (2035, 2050)
- BIO-4 (2035, 2050)
- C-BIO-1 (2035, 2050)
- CULT-1 (2035, 2050)
- C-CULT-1 (2035, 2050)
- EN-1 (2035, 2050)
- EN-2 (2035, 2050)
- C-EN-1 (2035, 2050)
- GEO-5 (2035, 2050)
- C-PALEO-1 (2035, 2050)
- GHG-1 (2035, 2050)
- GHG-2 (2035)
- GHG-3 (2035, 2050)
- GHG-4 (2035, 2050)
- C-GHG-1 (2035, 2050)
- HWQ-1 (2035, 2050)
- HWQ-2 (2035, 2050)
- HWQ-3 (2035, 2050)
- HWQ-4 (2035, 2050)
- C-HWQ-1 (2035, 2050)
- MR-1 (2035, 2050)
- C-MR-1 (2035, 2050)
- NOI-1 (2035, 2050)
- NOI-2 (2035, 2050)
- C-NOI-1 (2035, 2050)
- PS-1 (2035, 2050)
- REC-1 (2035, 2050)
- U-1 (2035, 2050)
- U-2 (2035, 2050)
- C-PS-1 (2035, 2050)
- C-REC-1 (2035, 2050)
- C-U-1 (2035, 2050)
- TRA-2 (2030, 2035, 2045, 2050)
- TRA-4 (2035, 2050)
- C-TRA-1 (2030, 2035, 2045, 2050)
- TCR-1 (2035, 2050)
- C-TCR-1 (2035, 2050)
- WS-1 (2035, 2050)
- WS-2 (2035, 2050)
- WS-3 (2035, 2050)
- C-WS-1 (2035, 2050)
- WF-1 (2035, 2050)
- WF-2 (2035, 2050)
- WF-3 (2035, 2050)
- WF-4 (2035, 2050)
- C-WF-1 (2035, 2050)

Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 2 infeasible and rejects this alternative for the reasons explained below.

First, Alternative 2 only reduces one of the Plan's significant impacts to less than significant levels And compared to the proposed Plan's significant impacts, Alternative 2 would have increased impacts for the following resource areas: land use and population and housing.

Under Alternative 2, implementation of the planned transportation improvements may result in population growth that would exceed what is anticipated in local general plans, leading to unplanned population growth in areas of the region that are currently not developed or underdeveloped in the years 2035 and 2050. In addition, the more

compact land use patterns proposed under Alternative 2 would result in greater displacement compared to the proposed Plan.

Second, Alternative 2 is undesirable from a policy perspective. The proposed Plan already includes increased parking pricing and new priced parking areas in more locations throughout the region. Higher parking pricing as included in Alternative 2 would have been an additional revenue source for implementing the proposed Plan; however, the region's residents would bear this increased cost in addition to the economic challenges posed in recent years, including market instability and increased inflation. The percentage of income consumed by out-of-pocket transportation costs under the proposed Plan is 9.0% and 9.4% in 2035 and 2050, respectively. Under Alternative 2, the percentage of income consumed by out-of-pocket transportation costs are 9.8% and 10.2% for 2035 and 2050. Furthermore, the change in percentage of income consumed by out-of-pocket transportation costs is -.2% and.2% for the proposed Plan in 2035 and 2050, as compared to.6% and 1.0% for Alternative 2 in those same years. Alternative 2 results in a 400% increase in the percentage of income consumed by out-of-pocket transportation costs in 2035 and a 300% increase in 2050. See Appendix M of EIR.

Additionally, Alternative 2 achieves objective 4 to a lesser extent than the Plan, also making this alternative undesirable from a policy standpoint. Objective 4, providing transportation investments and land use patterns that promote social equity, would be met to a lesser extent because, compared to the Plan, Alternative 2 would result in a higher out of pocket transportation cost and greater displacement as described above. Also, Alternative 2 is undesirable from a policy standpoint because the land use pattern focuses growth in areas with available multimodal transportation without consideration of the state housing objectives under the Regional Housing Needs Allocation (RHNA) process. Under Government Code Section 65584, the RHNA Plan must further five objectives, which include among others, increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, and affirmatively furthering fair housing.

In developing the 6th Cycle RHNA Plan, SANDAG reviewed the California Tax Credit Allocation Committee (TCAC) 2019 Opportunity Map for the San Diego region. The TCAC map demonstrates how public and private resources are spatially distributed within the region. Areas of "low resource" and "high segregation and poverty" on the TCAC maps are also many of the same areas with a high concentration of low-income households in the San Diego region. The RHNA Plan addresses the disparities in access to resource-rich areas by providing housing opportunities for people in all income levels to reside in any given community. The land use pattern in Alternative 2, however, would result in more focused growth in areas with available multimodal transportation without explicitly considering the housing objectives outlined in state law. Therefore, it would be undesirable from a policy perspective as not achieving state housing objectives to the same extent as the proposed Plan land use pattern.

ALTERNATIVE 3: FOCUSED GROWTH, HIGHER PARKING AND MANAGED LANE PRICING, AND FREE TRANSIT

Description

Alternative 3 is the same as described in Chapter 5, *Alternatives Analysis*. Alternative 3 incorporates and adapts elements of the proposed Plan, such as the proposed Plan transportation network and many policies and programs, a land use pattern similar to the proposed Plan that concentrates growth in areas with available multimodal transportation to provide convenient, and increased mode shift to low VMT options for moving around the region. Unlike the proposed Plan, Alternative 3 would include a land use pattern with more focused growth in areas with available multimodal transportation, higher parking and managed lane pricing policies than what is included in the proposed Plan, and availability of free transit not included in the proposed Plan. This alternative could feasibly accomplish most of the basic objectives of the project and could substantially lessen one or more of the significant effects.

This alternative increases mode shift to transit and other non-solo driving transportation modes and reduces GHG emissions due to higher parking pricing, higher managed lane pricing, and access to free transit. Percent of work trips during peak period for modes other than solo driving increases by 2.6% in 2035 and 3.6% in 2050 for Alternative 3 (see Appendix M). Per capita GHG emissions reductions from 2005 are 22.2% in 2035 and 22.9% in 2050 for Alternative 3, compared to 19.32% in 2035 and 19.51% in 2050 for the proposed Plan (see Appendix M)]. Like Alternative 2, land use in Alternative 3 would focus all growth in areas with available multimodal transportation and expect new growth to only be found in such locations. The land use pattern in Alternative 3 increases capacity for density only in locations with existing multi-family, commercial and office land uses. Alternative 3 includes the same transportation network as the proposed Plan, and funding for Alternative 3 would be the same as described for the proposed Plan. Table 5-1 provides a comparison of the components of each of the alternatives considered in detail.

Alternative 3 could substantially lessen one or more of the significant effects. As shown in Table 5-3 in Chapter 5, AQ-2 in 2035 is the only significant impact that would be reduced to less than significant levels. Significant impacts that would be reduced (but not necessarily to a less-than-significant level) under Alternative 3 are:

- AES-1 (2035, 2050)
- AES-2 (2035, 2050)
- AES-3 (2035, 2050)
- AES-4 (2035, 2050)
- C-AES-1 (2035, 2050)
- AG-1 (2035, 2050)
- AG-2 (2035, 2050)
- FR-1 (2035, 2050)
- C-AG-1 (2035, 2050)
- AQ-4 (2035, 2050)
- AQ-5 (2035, 2050)
- AQ-6 (2035, 2050)
- C-AQ-1 (2035, 2050)
- BIO-1 2035, 2050)
- BIO-2 (2035, 2050)
- BIO-3 (2035, 2050)
- BIO-4 (2035, 2050)
- C-BIO-1 (2035, 2050)
- CULT-1 (2035, 2050)
- C-CULT-1 (2035, 2050)
- EN-1 (2035, 2050)
- C-EN-1 (2035, 2050)
- GEO-5 (2035, 2050)
- C-PALEO-1 (2035, 2050)
- GHG-1 (2035, 2050)
- GHG-2 (2035)
- GHG-3 (2035, 2050)
- GHG-4 (2035, 2050)
- C-GHG-1 (2035, 2050)
- HWQ-1 (2035, 2050)
- HWQ-2 (2035, 2050)
- HWQ-3 (2035, 2050)
- HWQ-4 (2035, 2050)
- C-HWQ-1 (2035, 2050)
- MR-1 (2035, 2050)
- C-MR-1 (2035, 2050)
- NOI-1 (2035, 2050)
- NOI-2 (2035, 2050)
- C-NOI-1 (2035, 2050)
- PS-1 (2035, 2050)
- REC-1 (2035, 2050)
- U-1 (2035, 2050)
- U-2 (2035, 2050)
- C-PS-1 (2035, 2050)
- C-REC-1 (2035, 2050)
- C-U-1 (2035, 2050)
- TRA-2 (2030, 2035, 2045, 2050)
- TRA-4 (2035, 2050)
- C-TRA-1 (2030, 2035, 2045, 2050)
- TCR-1 (2035, 2050)

- C-TCR-1 (2035, 2050)
- WS-1 (2035, 2050)
- WS-2 (2035, 2050)
- WS-3 (2035, 2050)
- C-WS-1 (2035, 2050)
- WF-1 (2035, 2050)
- WF-2 (2035, 2050)
- WF-3 (2035, 2050)
- WF-4 (2035, 2050)
- C-WF-1 (2035, 2050)

Findings and Rationale

The SANDAG Board finds that specific economic, financial, legal, social, technological or other considerations make Alternative 3 infeasible and rejects this alternative for the reasons explained below.

First, there are not reasonably foreseeable revenues to implement free transit for the Plan, therefore Alternative 3 is economically infeasible. The financial plan does not include sufficient funding for both free transit and the proposed Plan's constrained network. In accordance with federal fiscal constraint requirements (23 USC Section 134(i)(2)(E)). The Funding and Revenue Appendix (Appendix I) for the proposed Plan identifies how much money SANDAG expects will be reasonably available to support our region's surface transportation investments over the proposed Plan planning horizon. Final EIR Global Response 4 provides additional details on funding source constraints preventing acceleration of funding timing and switching funding to different transportation modes.

Second, Alternative 3 only reduces one of the Plan's significant impacts to less than significant levels and compared to the proposed Plan's significant impacts, Alternative 3 would have increased impacts for the following resource areas: land use and population and housing.

Under Alternative 3, implementation of the planned transportation improvements may result in population growth that would exceed what is anticipated in local general plans, leading to unplanned population growth in areas of the region that are currently not developed or underdeveloped in the years 2035 and 2050. In addition, the more compact land use patterns proposed under Alternative 3 would result in greater displacement compared to the proposed Plan.

Third, Alternative 3 is undesirable from a policy perspective. The Plan already includes increased parking pricing and new priced parking areas in more locations throughout the region. Higher parking pricing and increased managed lane pricing as included in Alternative 3 would have been an additional revenue source for implementing the Plan, however, the region's residents would bear this increased cost in addition to the economic challenges posed in recent years, including market instability and increased inflation.

Additionally, this alternative achieves objective 4 to a lesser extent than the Plan, also making this alternative undesirable from a policy standpoint. Objective 4, providing transportation investments and land use patterns that promote social equity, would be met to a lesser extent because, compared to the Plan, Alternative 3 would result in a higher out of pocket transportation cost and greater displacement as described above. The percentage of income consumed by out-of-pocket transportation costs under the proposed Plan is 9.0% and 9.4% in 2035 and 2050, respectively. Under Alternative 3, the percentage of income consumed by out-of-pocket transportation costs are 9.5% and 9.9% for 2035 and 2050. Furthermore, the change in percentage of income consumed by out-of-pocket transportation costs is -.2% and.2% for the proposed Plan in 2035 and 2050, as compared to.4% and.7% for Alternative 3 in those same years. Alternative 3 results in a 300% increase in the percentage of income consumed by out-of-pocket transportation costs in 2035 and a 250% increase in 2050. See Appendix M of EIR. Also, Alternative 3 is undesirable from a policy standpoint because the land use pattern focuses growth in areas with available multimodal transportation without consideration of the state housing objectives under the Regional Housing Needs Allocation (RHNA) process. Under Government Code Section 65584, the RHNA Plan must further five objectives, which include among others, increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, and affirmatively furthering fair housing.

In developing the 6th Cycle RHNA Plan, SANDAG reviewed the California Tax Credit Allocation Committee (TCAC) 2019 Opportunity Map for the San Diego region. The TCAC map demonstrates how public and private resources are spatially distributed within the region. Areas of "low resource" and "high segregation and poverty" on the TCAC maps are also many of the same areas with a high concentration of low-income households in the San Diego region. The RHNA Plan addresses the disparities in access to resource-rich areas by providing housing opportunities for people in all income levels to reside in any given community. The land use pattern in Alternative 3, however, would result in more focused growth in areas with available multimodal transportation without explicitly considering the housing objectives outlined in state law. Therefore, it would be undesirable from a policy perspective as not achieving state housing objectives to the same extent as the proposed Plan land use pattern.

D. Alternatives Considered in the EIR but Rejected (Section 5.5)

This section discusses several alternatives that were considered by SANDAG decision makers or raised by the public during the planning process for the proposed Plan, or that were raised in public comments on the NOP for the EIR but were rejected from detailed consideration in the EIR. Reasons for rejecting these alternatives include the following:

- Major elements of the alternative are already included in the proposed Plan or one of the alternatives evaluated in detail in the EIR.
- The alternative is infeasible due to economic, legal, or other considerations.
- The alternative fails to reduce any of the proposed Plan's significant environmental impacts.
- The alternative fails to meet most of the basic project objectives.
- The alternative is for individual project components rather than the proposed Plan as a whole.

D.1 LA PLAYA PLAN

This alternative was introduced in NOP comment letter dated January 8, 2023, where Katheryn Rhodes requested that the proposed Plan include analysis of an alternative La Playa Plan (LPP) for a Full Tidelands Reclamation project, suggesting this alternative would significantly reduce GHG emissions impacts in the SANDAG region. The LPP alternative suggests several projects already included in the proposed Plan (enhanced active transportation corridors and improved fleet connectivity to San Diego International Airport [SDIA] facilities). Funding for the LPP would be subject to confirmation that SDIA is a Grandfathered Airport, which would allow normally restricted Federal Aviation Administration airport revenue to be diverted towards airport transportation projects, including the proposed annexation of port tidelands.

Reasons for Rejection

The LPP alternative focuses on a limited geographical portion of the region. In addition, most of the major elements of the LPP alternative are already included in the proposed Plan and/or Alternatives 2 and 3 analyzed in the EIR, such as enhanced active transportation corridors and improved fleet connectivity to SDIA facilities.

The LPP alternative is an individual project in a limited geographical portion of the region rather than an alternative for the proposed Plan as a whole, and CEQA does not require analysis of alternatives to individual components of a project (see *California Oak Foundation v. Regents of University of California* (2010) 188 Cal. App. 4th 227, 276–277). Because it is limited, this alternative would not avoid or substantially reduce any of the proposed Plan's significant impacts nor would it meet most of the project objectives. For these reasons, this alternative has been excluded from further consideration.

D.2 ACCELERATED PLAN IMPLEMENTATION

As discussed in Section 4.16, Transportation and Section 4.8, Greenhouse Gases of the EIR, implementation of the proposed Plan would result in significant VMT and GHG impacts. The proposed Plan includes land use growth and transportation improvements that, when implemented, would reduce VMT. However, to further reduce VMT and GHG impacts for years 2035 and 2050, greater transit ridership would need to be achieved earlier than projected. To accomplish this the implementation of the transportation network improvements in the proposed Plan would need to be accelerated and the projects would need to be constructed sooner than contemplated in the proposed Plan.

Reasons for Rejection

Implementation of the proposed Plan is constructed as a system of integrated land use growth and transportation improvements. Several of the transportation improvements are directly related to increases in land use growth. VMT and GHG reductions under the proposed Plan result from the increasing land uses and resident populations in compact transit-oriented development. Both the land use changes, and transportation improvements are essential for the system to work. Under SB 375, an SCS cannot supersede the land use authority of the cities and counties within the region. Therefore, SANDAG does not have the authority to accelerate land use concentration in the region and so several of the transportation improvements cannot be accelerated until the corresponding land use growth occurs.

In addition, funding is not available to accelerate the construction of the proposed Plan. The funding strategy for the proposed Plan considers all reasonably anticipated revenues to be received out to 2050. These funds will come with constraints. A majority of the anticipated funds will be tied to certain types of projects (for example, transit infrastructure or highway operations and maintenance), and SANDAG does not have the authority to interchange them. These constraints include requirements from Congress or the State Legislature, and the investment strategy for the proposed Plan is aligned with those rules. SANDAG is also constrained by when funds will become available over the 25-year life of the proposed Plan. Two-thirds of anticipated revenues are not expected to become available until the 2036–2050 timeframe. Final EIR Global Response 4 provides additional details on funding source constraints preventing acceleration of funding timing and switching funding to different transportation modes. Accelerating Plan implementation ahead of this timeframe, and in light of the funding constraints, would not allow SANDAG to accomplish the Alternative within a reasonable period of time, taking into account economic and logistical factors. Thus, the Alternative would be infeasible.

D.3 FOCUSED GROWTH, HIGHER PARKING PRICING, AND ROAD USAGE CHARGE

SANDAG received comments during the scoping period about the use of focused growth and pricing to reduce VMT and GHG impacts in the region. As discussed in Section 4.16, Transportation of the EIR, implementation of the proposed Plan would result in significant VMT and GHG impacts. Therefore, SANDAG evaluated the effect of focused growth, higher parking pricing, and a road usage charge on the proposed Plan's significant impacts.

This analysis includes the proposed Plan transportation network, a land use pattern that concentrates growth in areas with available multimodal transportation to provide convenient, low-VMT options for moving around the region, higher parking pricing than what is included in the proposed Plan, a road usage charge and the same funding availability as the proposed Plan.

Reasons for Rejection

Major elements of this alternative are already included in Alternatives 2 and 3, evaluated in detail in the EIR. Alternative 2 achieves greater reductions in the proposed Plan's impacts than this alternative and is still environmentally superior to the Focused Growth, Higher Parking Pricing, and Road Usage Charge Alternative. An EIR need not consider additional alternatives that are permutations of alternatives already evaluated in detail. *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal. App. 3d 1022, 1028.

Similar to Alternatives 2 and 3 analyzed in the EIR, this alternative also meets the project objectives for the proposed Project. However, the combination of focused growth, higher parking pricing, and a road usage charge would not reduce any of the proposed Plan's significant impacts to less-then-significant levels. Regional PM_{10} emissions would be slightly lower compared to the proposed Plan, but would result in a similar significant impact In addition, GHG emissions would be lower than the proposed Plan, but would not meet the reduction target reference points for 2030, 2045, and 2050 and thus would result in a similar significant impact as the proposed Plan. VMT would also be lower than the proposed Plan, but the alternative would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals. This alternative would not avoid or substantially lessen a number of significant environmental impacts of the proposed Plan. (Guidelines, Section 15126.6(a), (c)(iii).)

As a financial strategy, higher parking pricing coupled with a road usage charge would provide an additional revenue source for the region. However, the region's residents, including those in disadvantaged communities, would bear these increased costs in addition to other existing economic challenges like the recent rise in inflation.

Compared to the proposed Plan, the percentage of income consumed by out-of-pocket transportation costs would be substantially greater in 2035 and 2050. This makes this alternative undesirable from a policy standpoint, and therefore infeasible.

For these reasons, this alternative has been excluded from further consideration.

D.4 WOLFORD BRIEF

This alternative was introduced in a NOP comment letter dated February 20, 2023, where Albert Perdon submitted the Wolford Brief as an alternative to the 5 Big Moves of the 2021 Regional Plan and an alternative to the proposed Plan. The Wolford Brief proposes setting new population, housing and economic growth targets for the year 2123 (from 3.4 million people to 9.1 million people), densifying land use including the development of four or more megacities for populations of two million each, developing transit corridors including 200+ mph high-speed train/Maglev plus connected local transit and integrated 24-city/800-mile high-speed trains, building a new integrated airport/high-speed train/housing complex at Miramar, and implementing a benefit assessment-based funding plan. The letter presents the Wolford Brief as an effective alternative to the proposed Plan, suggesting it would significantly reduce VMT and GHG emissions impacts in the SANDAG region.

Reasons for Rejection

The population and employment projections for the proposed Plan are a forecast rather than a target, as required by state and federal law and regulations (See 23 CFR 450.324 (e) and California Government Code Section 65080(b)(2)(B)(ii)). The Series 15 Growth Forecast meets the legal requirements of SB 375 and aligns with the State of California Department of Finance and the U.S. Census Bureau projections. A full description of the process for developing the Series 15 Growth Forecast population, housing, and jobs numbers can be found in Appendix F to the proposed Plan. SANDAG is legally required to provide a transportation plan for at least a 20-year time horizon consistent with its population and employment forecasts. Implementation of the Wolford Brief Alternative on the proposed 100-year time horizon is remote and speculative and would be increasingly speculative the further out that SANDAG forecasted. (Guidelines, Section 15126.6(f)(3)) Based on the Series 15 Growth Forecast, the population of San Diego County is expected to be 3.4 million by 2050, which is inconsistent with the megacities and supporting transit corridors proposed in the Wolford Brief. The Wolford Brief asks that SANDAG accelerate construction of high-speed rail in San Diego County. The proposed Plan does include high speed rail consistent with state planning assumptions. However, SANDAG is not the implementing agency for high-speed rail, and the Wolford Brief includes high speed rail implementation assumptions that are inconsistent with current state planning assumptions, Therefore, it is not feasible for SANDAG to implement high speed rail in a manner consistent with the Wolford Brief.

The proposed population target upon which the alternative is based is inconsistent with state and federal law and regulations. While this alternative might meet some of the project objectives for the proposed Plan, forecasting

population and employment growth for 100 years is remote and speculative. For these reasons, this alternative was excluded from further consideration.

VIII. FINDINGS REGARDING ALTERNATIVES PROPOSED IN COMMENTS

Some comments on the Draft EIR suggested additional project alternatives. Where the suggestions requested minor modifications in alternatives or components of alternatives analyzed in the Draft EIR, or requested alternatives that were too vague or speculative to be addressed, these requests were declined as unnecessary. The SANDAG Board of Directors adopts and incorporates by reference the specific reasons for declining such alternatives contained in the responses to comments in the Final EIR as one ground for rejecting these alternatives.

Additionally, alternatives suggested in comments could reduce impacts, but implementation of these alternatives would be infeasible. The SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the following mitigation measures or project alternatives identified in the final EIR, for the reasons explained below.

Further evidence and analysis supporting these findings on alternatives suggested in Draft EIR comments is included in Final EIR Global Response 1 (alternatives) and individual responses to comments.

The EIR evaluated a reasonable range of alternatives to the Plan. As discussed in Chapter 5, "Alternatives Analysis," of the EIR, three alternatives to the proposed Plan were evaluated in detail. In addition to the No Project alternative, the alternatives evaluated in detail included an alternative that consists of a land use pattern with more focused growth in areas with available multimodal transportation, higher parking pricing than what is included in the proposed Plan, and speed reductions on arterials and freeways not included in the proposed Plan (Alternative 2), as well as an alternative with a land use pattern that concentrates growth in areas with available multimodal transportation, higher parking and managed lane pricing, and free transit (Alternative 3).

Alternatives suggested by commenters that are discussed in this section of these Findings include, but are not limited to:

- Scenarios aligned with the San Diego County General Plan land uses, and rural mobility strategies
- An alternative similar to Alternative 2 that excludes "zombie road projects" and supports larger and more-timely investments in transit and non-motorized travel ("zombie road projects" are road projects alleged to no longer have a rationale and to be inconsistent with SB 743 VMT metrics);
- Alternatives that reduce GHG emissions, discourage urban sprawl, and benefit public transit through a variety of measures;
- Alternatives that improve the connectivity and function of preserves and wetlands; and,
- Alternatives that exclude three specific projects alleged to be harmful to biodiversity.

When considering whether the range of alternatives evaluated in the EIR is adequate, several principles apply. The "discussion of alternatives need not be exhaustive," and the requirement to discuss alternatives is "subject to a construction of reasonableness." (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3d 274, 286.) "An EIR need not consider every conceivable alternative to a project." (CEQA Guidelines Section 15126.6(a).)

Under CEQA, absolute perfection is not the standard governing a lead agency's proposed range of project alternatives. Rather, in preparing an EIR, a lead agency need only make an objective, good faith effort to provide information permitting a reasonable choice of alternatives that would feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening the project's significant adverse environmental impacts. (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal. App. 4th 227, 275-276.)

A. Scenarios aligned with the San Diego County General Plan land uses, and rural mobility strategies

A commenter suggested that the proposed Plan should be aligned with buildout of the San Diego County General Plan. The Series 15 model used for the proposed Plan is aligned with and incorporates the County's parcel-level land use assumptions.

FINDINGS AND RATIONALE

The SANDAG Board of Directors finds that the proposed Plan is consistent with the County's adopted General Plan assumptions. As such the proposed Plan is consistent with the County General Plan land uses. Therefore, a new alternative aligned with the County's General Plan Land Uses is not required. Moreover, the SANDAG Board finds that there is no evidence that suggested alternative would substantially lessen the proposed Plan's significant environmental impacts, Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

B. Alternative 2 that Excludes "Zombie Road Projects" and Supports More and Earlier Transit and Non-motorized Travel

A commenter suggested that an alternative to Alternative 2 be considered that focused growth, high parking, arterial and freeway speed reductions, and excludes "zombie road projects" such as programmed freeway and managed lanes projects.

FINDINGS AND RATIONALE

With regards to the zombie road project, there are no new general purpose freeway lanes in the proposed Plan. However, there are two interchanges with general purpose lane connections. Additionally, the proposed network analyzed in the EIR includes managed lanes and managed land connectors. The improvements for SR94/125 interchange and I-5/SR78 interchange both are necessary improvements for either safety or help reduce environmental impacts such as improved air quality. For managed lanes, where possible, the proposed Plan repurposes general purpose lanes or existing right of way to accommodate new managed lanes rather than constructing new roadway. Most of the proposed Plan managed lane and managed lane connector projects serve existing or planned transit. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit in reducing VMT and other impacts of the proposed Plan.

Also, funding source constraints limit the ability of SANDAG to reprogram significant funds allocated to roadway projects to earlier transit investments. Final EIR Global Response 4 provides additional details on funding source constraints preventing acceleration of funding timing and switching funding to different transportation modes.

This alternative was not included for detailed evaluation in the EIR for several reasons. First, this suggested alternative is a variation of Alternative 2, which includes many components of the suggested alternative; CEQA does not require an EIR to consider multiple variations on the alternatives analyzed in an EIR. Second, this alternative is legally infeasible because, to be legally adequate under federal and state transportation law, the proposed Plan is required to address transit projects, highway projects, and sustainable land use patterns in an integrated manner. The proposed alternative does not take an integrated approach. Third, it is financially infeasible because funding source constraints limit the ability of SANDAG to reprogram significant funds allocated to roadway projects to earlier transit investments. Final EIR Global Response 4 provides additional details on funding source constraints preventing acceleration of funding timing and switching funding to different transportation modes. Lastly, an EIR need not evaluate in detail alternatives that would not substantially lessen the proposed project's significant environmental impacts, and there is no evidence that this alternative would substantially lessen the proposed Plan's VMT, GHG, or other environmental impacts. Therefore, the SANDAG

Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

C. Alternatives That Reduce GHG Emissions, Discourage Urban Sprawl, and Benefit Public Transit

A commenter suggested that alternatives be considered that include the removal of general-purpose lanes and interchanges; removal of new managed lanes and managed connectors; elimination of high GHG emissions and sprawl-inducing projects; expand public transit; expanding bus rapid transit; redirecting funding to expand active transportation; and building complete streets.

FINDINGS AND RATIONALE

The EIR did include alternatives that substantially reduced GHG emissions, biological impacts, and VMT, the objectives of the proposed alternatives. As discussed in the EIR, Alternative 2 would decrease impacts to greenhouse gas emissions and biological resources compared to the proposed Plan. Both Alternatives 2 and 3 analyzed in the EIR include a land use pattern with more focused growth in areas with available multimodal transportation. The focused growth reduces the footprint of the plan area and focuses growth in urban areas, which reduces sprawl and decreases impacts such as biological resources, greenhouse gas emissions, etc. The commenter's suggested alternatives are alternatives to individual components of the proposed Plan; an EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal. App. 4th 957,993. Some elements of these alternatives are already incorporated into the proposed Plan or alternatives, some of these alternatives are considered infeasible, and some of these alternatives are undesirable from a policy standpoint; see Final EIR responses to comments B-4.5 through B-4.11 for details on why each of these alternatives was not included in the EIR for detailed evaluation. For these reasons, these alternatives need not be added to the EIR for detailed evaluation. Further, a hypothetical alternative that combined all these suggestions into one alternative would share similar defects regarding overlap with the proposed Plan, infeasibility, and no evidence of substantially lessening the proposed Plan's significant impacts. Additionally, such an alternative would require redirection of funding, which is financially infeasible due to funding source constraints. Final EIR Global Response 4 provides additional details on funding source constraints preventing acceleration of funding timing and switching funding to different transportation modes. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternatives suggested above.

D. Alternatives That Improve Connectivity and Function of Preserves and Wetlands

A commenter requested that SANDAG include prioritization of projects and alternatives that have the opportunity to improve the connectivity and function of regional preserves and wetlands.

FINDINGS AND RATIONALE

As discussed in Section 4.4, "Biological Resources," of the EIR the impact on biological resources were analyzed at a programmatic level based on the best available information. The EIR describes several mitigation measures to be implemented during the project-specific CEQA review and regulatory permitting process that mitigate impacts on sensitive vegetation communities and regulated aquatic resources (Mitigation Measures BIO-1a through 1e for Impact BIO-1), and on special-status species (Mitigation Measures 2a through 2c for Impact BIO-2). Additional analysis will be conducted on a project-specific level under CEQA, including project-specific impact analysis of biological resources and identification of mitigation measures. Mitigation measures will be refined and

implementation methods identified, as required by CEQA, the local jurisdictions, and wildlife agencies on a project-specific level.

The commenter did not provide any specific measures other than for one example project, and the proposed mitigation measures in the EIR already provide for the protection of connectivity and function of preserves and wetlands. The suggested alternative is defective as a result of overlap with the proposed Plan and its mitigation measures, and because there is no evidence the alternative would substantially lessen the proposed Plan's significant impacts. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

E. Alternatives that Exclude Three Specific Projects Alleged to be Harmful to Biodiversity

A commenter requests that the following three projects be removed from the proposed Plan that are harmful to the biodiversity:

- Double-tracking of the LOSSAN rail corridor through Carroll Canyon,
- Transit center at Nobel Drive and I-805, and
- Managed lane connectors at the SR 52/I-805 interchange and widening the I-805 bridge over Rose Canyon.

FINDINGS AND RATIONALE

Section 4.4, "Biological Resources," under significance criteria BIO-1 and BIO-2 discusses impacts of transportation network improvements to sensitive habitats and species and mitigation measures (BIO-1a through BIO-1e and BIO-2a through BIO-2c) are identified to minimize the impacts. The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region; specific details concerning project level mitigation for potential impacts to sensitive species for the projects referenced in this comment (as well a no project alternative) will be evaluated during project-level environmental review.

Additionally, there is no evidence the removal of the three projects suggested in this comment would substantially lessen the proposed Plan's significant biological impacts. In addition, the commenter's suggested alternatives are alternatives to individual components of the proposed Plan; an EIR must discuss alternatives to a project in its entirety but is not required to discuss alternatives to each particular component of a project. See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal. App. 4th 957,993. Finally, eliminating each of these three projects from the proposed Plan would be undesirable from a policy standpoint, as explained in detail in responses to comments B.4-12 through B.12-14. Therefore, the SANDAG Board of Directors finds that specific economic, legal, social, technological, or other considerations make infeasible the alternative suggested above.

IX. FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS TO THE FINAL EIR

Finding: Appendix N of the EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines Section 15088(b). The EIR also incorporates information obtained and produced after the Draft EIR was completed, including additions, clarifications, and modifications. The Board has reviewed and considered the Final EIR and all of this information.

The Board finds that responses to comments made on the Draft EIR and revisions to the Final EIR merely clarify, amplify or make insignificant modifications to the analysis presented in the document and do not constitute "significant new information." Accordingly, these changes do not trigger the need to recirculate per CEQA Guidelines Section 15088.5.

Rationale: CEQA Guidelines Section 15088.5 provides:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification…. "Information" can include changes in the project or environmental setting as well as additional data or other information…."Significant new information" requiring recirculation includes, for example…
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded….

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The Final EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure or alternative considerably different from the Draft EIR previously analyzed that SANDAG declines to adopt and that would clearly lessen the significant environmental impacts of the proposed Plan.

X. FINDING ADOPTING A MITIGATION MONITORING PROGRAM

The SANDAG Board of Directors finds that a mitigation monitoring and reporting program (MMRP) has been prepared for the proposed Plan and has been adopted concurrently with these Findings (Public Resources Code, Section 21081.6(a)(1)). SANDAG will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

XI. FINDING REGARDING LOCATION AND CUSTODIAN OF RECORD

The documents and other materials that constitute the record of proceedings on which SANDAG's Findings of Fact are based are located at 1011 Union Street, Suite 400, San Diego, California 92101. The custodian of these documents is Kirsten Uchitel, Senior Planner. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and 14 Cal. Code Regs. Section 15091(e).

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents, at a minimum:

- The Notice of Preparation and all other public notices issued by SANDAG and in conjunction with the Project.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the 48-day public comment period on the Draft EIR.
- All comments and correspondence submitted to SANDAG with respect to the Project.
- The MMRP for the Project.

- All Findings and resolutions adopted by SANDAG decision makers in connection with the Project, and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by Ascent Environmental, consultants to SANDAG.
- All documents and information submitted to SANDAG by responsible, trustee, or other public agencies, or by individuals or organizations, in connection with the Project, up through the date the SANDAG Board of Directors approved the Project.
- Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by SANDAG, in connection with the Project.
- Any documentary or other evidence submitted to SANDAG at such information sessions, public meetings, and public hearings.
- Matters of common knowledge to SANDAG, including, but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

REFERENCES

Baldauf R.W., R. B. Devlin, P. Gehr, R. Giannelli, B. Hassett-Sipple, H. Jung, G. Martini, J. McDonald, J. D. Sacks, and K. Walker. 2016 (October 28). "Ultrafine Particle Metrics and Research Considerations: Review of the 2015 UFP Workshop." *International Journal of Environmental Research and Public Health* 13(11): 1054. Available: https://pmc.ncbi.nlm.nih.gov/articles/PMC5129264/. Accessed April 14, 2025.

California Air Pollution Control Officers Association. 2025. *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. Available: https://www.caleemod.com/handbook/index.html. Accessed June 13, 2025.

California Air Resources Board. 2017. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*. Available: https://ww3.arb.ca.gov/ch/landuse.htm. Accessed March 19, 2025.

California Department of Transportation. 2016 (December). *I-5 North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (NCC PWP/TREP).* Adopted June 2014; Amended December 2016 (Amendment #2). Available: https://dot.ca.gov/caltrans-near-me/district-11/programs/district-11-environmental/i-5pwp-toc. Accessed March 19, 2025.

———. 2020a. California Takes Bold Step to Reduce Truck Pollution. Available: https://ww2.arb.ca.gov/news/california-takes-bold-step-reduce-truck-pollution#:~:text=This%20new%20rule%20directly%20addresses%20disproportionate%20risks,%E2%80%9Clast%2Dmile%E2%80%9D%20delivery%20trucks%20and%20vans%20by%202040.&text=Statewide%2C%20the%20Advanced%20Clean%20Truck%20regulation%20will%20lower%20related%20premature%20deaths%20by%201%2C000. Accessed March 19, 2025.

California Department of Transportation. 2025. "Chapter 8: Paleontology." *Standard Environmental Reference, Environmental Handbook: Volume 1: Guidance for Compliance*.

California Office of Emergency Services. 2023a. *California State Emergency Plan Coordinating Draft*. Available: https://www.caloes.ca.gov/wp-content/uploads/Preparedness/Documents/2023-SEP-Draft-Public-Review.pdf. Accessed January 3, 2025.

Cal OES. *See* California Office of Emergency Services.

Caltrans *See* California Department of Transportation.

CAPCOA. *See* California Air Pollution Control Officers Association.

Center for Resource Efficient Communities and The Center for the Built Environment. 2021. *Zero-Carbon Buildings in California: A Feasibility Study*. Available: https://www.researchgate.net/profile/Carrie-Brown-12/publication/359931845_Zero-Carbon_Buildings_in_California_A_Feasibility_Study/links/649caec295bbbe0c6efda59e/Zero-Carbon-Buildings-in-California-A-Feasibility-Study.pdf. Accessed June 13, 2025

City of San Diego. 2017 (October). *Final Vernal Pool Habitat Conservation Plan*. City of San Diego Planning Department.

County of San Diego. 2010a. "Appendix D: Groundwater Study." *County of San Diego Final Program Environmental Impact Report for the General Plan Update*. Available: https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/Appn_D_GW.pdf. Accessed January 22, 2025.

———. 2025. *County of San Diego Mitigation Banks*. Available: https://www.sandiegocounty.gov/content/sdc/pds/mitbnks.html. Accessed July 15, 2025.

———. 2025i. Multi-Jurisdictional Hazard Mitigation Plan. Office of Emergency Services. Available: https://www.sandiegocounty.gov/content/sdc/oes/emergency_management/oes_jl_mitplan.html. Accessed January 3, 2025.

EPA. *See* U.S. Environmental Protection Agency.

Federal Transit Administration. 2018 (September). *Transit Noise and Vibration Impact Assessment Manual.* Final. FTA Report No. 0123. Washington, DC. Volpe National Transportation Systems Center, Cambridge, MA. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed December 30, 2024.

FTA. *See* Federal Transit Administration.

National Park Service. 2023. *Historic American Buildings Survey: Guidelines for Historical Reports*. Available: https://www.nps.gov/subjects/heritagedocumentation/upload/HABS-Guidelines-Historical-Reports_508.pdf. Accessed April 11, 2025.

SANDAG. *See* San Diego Association of Governments.

San Diego Air Pollution Control District. 2009 (June 24). *Rule 55: Fugitive Dust Control*. Available: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Prohibitions/APCD_R55.pdf. Accessed March 19, 2025.

San Diego Association of Governments. 2024. *Zero Emission Vehicle Incentive Program Implementation Plan*. Available: https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/innovative-mobility/clean-transportation/incentive-programs/zev-incentive-program-implementation-plan-2025-4-23.pdf. Accessed August 14, 2025.

San Diego County Regional Airport Authority. 2019 (September). *Airport Development Plan San Diego International Airport*. Available: https://www.san.org/Airport-Projects/Environmental-Affairs#1245263-adp-draft-eir. Accessed March 12, 2025.

South Coast Air Quality Management District. 2007. *Mitigation Measure Examples: fugitive Dust from Construction and Demolition*. Available: http://www.aqmd.gov/docs/default-source/ceqa/handbook/mitigation-measures-and-control-efficiencies/fugitive-dust/fugitive-dust-overview.pdf. Accessed March 19, 2025.

SCAQMD. See South Coast Air Quality Management District.

SDAPCD. *See* San Diego Air Pollution Control District.

SDCRAA. *See* San Diego County Regional Airport Authority.

U.S. Environmental Protection Agency. 1971 (December). *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*. Washington, DC. Prepared by Bolt Baranek and Newman

Western Governors' Association. 2006 (September 7). *WRAP Fugitive Dust Handbook*.

WGA. *See* Western Governors' Association.