Appendix N1

Comments and Responses
on the Draft EIR

RESPONSES TO COMMENTS ON THE DRAFT EIR

The Draft Environmental Impact Report (Draft EIR) for the 2025 Regional Plan (the proposed Plan) was distributed for public review on August 26, 2025, for a 49-day public review period that ended on October 13, 2025. The Draft EIR and all appendices were available for review online at https://www.sandag.org/regional-plan/2025-regional-plan; at SANDAG offices located at 1011 Union Street; San Diego, California 92101; and at the San Diego Central Library located at 330 Park Boulevard, San Diego, California 92101. The Central Library facilitates inter-library transfers upon request by a member of the public to provide access to local libraries. Ona case-by-case basis, the San Diego Central Library can also digitize documents and transfer them to other libraries. No such requests were made of the Central Library with respect to the Draft EIR, nor were any requests made of SANDAG with response to providing access to the Draft EIR during the public comment period.

A total of 217 comment letters and website comments were received during the public review period. Table 1 below provides a list of all comments received, including the name of the public agency, organization, individual that submitted the letter and the date of the letter. Each comment letter also has been assigned an identification number in Table 1.

In this appendix, each comment letter is reproduced in its entirety and is aligned side-by-side with the response(s) to the letter. Where comments provide multiple comments, each comment is identified with a bracket and an identifying number in the margin of the comment letter. All comment letters received on the Draft EIR were evaluated for significant environmental issues and written responses to comments on environmental issues were prepared. In addition to comments related to environmental issues, several of the comment letters submitted on the Draft EIR also include individual comments on the content of the Plan itself that are not related to the adequacy of the Draft EIR. Those comments were responded to and referred to the Plan as necessary. For ease of reference, the responses to comments on the Regional Plan is included as Appendix N2 to the Final EIR below.

LIST OF COMMENTERS ON THE DRAFT EIR

Table 1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

Table 1 List of Commenters

Letter No.	Commenter	Date
AGENCIES		
A-1	US Department of the Interior, U.S. Fish and Wildlife Services	9/30/2025
A-2	City of Carlsbad	10/10/2025
A-3	California Coastal Commission	10/13/2025
A-4	Land Use and Environment Group Office, County of San Diego	10/13/2025
A-5	California Department of Fish and Wildlife	10/13/2025
A-6	California Department of Toxic Substances Control	10/15/2025
A-7	North County Transit, San Diego Railroad	10/17/2025
ORGANIZATIONS		
B-1	Barrio Logan College Institute	9/18/2025
B-2	Smart Mobility	10/8/2025
B-3	The San Diego River Park Foundation	10/10/2025
B-4	Sierra Club San Diego Chapter	10/13/2025
B-5	Friends of Rose Canyon	10/15/2025

Letter No.	Commenter	Date
	INDIVIDUALS	
C-1	Jamason, Paul	9/24/2025
C-2	Perdon, Albert	10/6/2025
C-3	Hampson, Mike	10/8/2025
C-4	Kurlan, Lucas	10/14/2025
C-5	Brian Hoffman	8/27/2025
	WEBSITE COMMENTS	
W-1	Clytie Koehler	
W-2	Lilian V	
W-3	Blanca Roldán	
W-4	Jeannette Aguilar	
W-5	Joana del Prado	
W-6	Veronica Martinez	
W-7	Beatriz Arballo	
W-8	Marisela Moreira	
W-9	Maria Mendoza	
W-10	Talpa Valenzuela	
W-11	Sara Guzman	
W-12	Maria Armenta	
W-13	No name given	
W-14	Carolina Paez	
W-15	No name given	
W-16	Jose A. Cruz	
W-17	No name given	
W-18	No name given	
W-19	Juanita Lopez	
W-20	No name given	
W-21	Leticia Zepeda	
W-22	Luisa Mendez	
W-23	No name given	
W-24	No name given	
W-25	No name given	
W-26	Luis Alatorre	
W-27	Juana Ortiz M.	
W-28	Rosy S. Torres	
W-29	Narayan Gopinathan	
W-30	No name given	
W-31	No name given	
W-32	No name given	
W-33	No name given	
W-34	Marisol Rodriguez	

Letter No.	Commenter	Date
W-35	Jorge Barrios	
W-36	Ana Chavarría	
W-37	Irma Zepeda	
W-38	Wendy Barrientos	
W-39	No name given	
W-40	No name given	
W-41	Ana Ramos	
W-42	No name given	
W-43	Griffin Howell	
W-44	No name given	
W-45	Tate Keller	
W-46	Peter Lingat	
W-47	Jonathan Rosen	
W-48	Timothy Moses	
W-49	James Krakowski	
W-50	No name given	
W-51	Zach Woods	
W-52	Travis	
W-53	No name given	
W-54	Teague Sangster	
W-55	Megan Nguyen	
W-56	No name given	
W-57	Joseph Hajjar	
W-58	Laura Redo	
W-59	Adam Carlin	
W-60	No name given	
W-61	Jillian Quint	
W-62	No name given	
W-63	Aiden Tabrizi	
W-64	No name given	
W-65	No name given	
W-66	Thomas Waldmann	
W-67	Ryan Newton	
W-68	Peighton Lende	
W-69	Peighton Lende	
W-70	Karen Frazier	
W-71	Hsuan Hung Lin	
W-72	Callie Fleckner	
W-73	Tyler Nelson	
W-74	Stephen	

Letter No.	Commenter	Date
W-75	Andrew Hanna	
W-76	Janelle Mendoza	
W-77	No name given	
W-78	Lexie H	
W-79	No name given	
W-80	No name given	
W-81	No name given	
W-82	No name given	
W-83	Miles Wakeham	
W-84	McGarrah Wilson	
W-85	Sofia Carrasco	
W-86	ML	
W-87	Eric Limonadi	
W-88	No name given	
W-89	No name given	
W-90	No name given	
W-91	No name given	
W-92	No name given	
W-93	No name given	
W-94	No name given	
W-95	No name given	
W-96	No name given	
W-97	No name given	
W-98	No name given	
W-99	No name given	
W-100	No name given	
W-101	No name given	
W-102	Irma Serna	
W-103	Blanca Roldan	
W-104	Charito Arana	
W-105	Tung Tran	
W-106	No name given	
W-107	Cecy Boisson	
W-108	Pcasas@ csbcs.org	
W-109	Norma Avila	
W-110	Aurora Kolbe	
W-111	No name given	
W-112	No name given	
W-113	Gail Friedt	
W-114	hom.alyssa@gmail.com	
W-115	Marissa Acosta	

Letter No.	Commenter	Date
W-116	Casey Heintz	
W-117	Anisah E	
W-118	Isaac Caballero	
W-119	Emma Smith	
W-120	Maria Mendoza	
W-121	Ana Contreras	
W-122	Anita Mendoza	
W-123	No name given	
W-124	Martha Zepeda	
W-125	Aurora Nidome	
W-126	No name given	
W-127	Maria Hernandez	
W-128	Ernestina Ramirez	
W-129	Brenda Hernandez	
W-130	Tina Lawson	
W-131	Curran Walton	
W-132	No name given	
W-133	Miranda	
W-134	No name given	
W-135	Vanessa Ramirez	
W-136	No name given	
W-137	No name given	
W-138	ajro21@icloud.com	
W-139	No name given	
W-140	Walter Wittel	
W-141	Yosuf Mansour	
W-142	No name given	
W-143	No name given	
W-144	Marina Varano	
W-145	Cassie Berta	
W-146	Carly Keen	
W-147	Morgen Ruby	
W-148	No name given	
W-149	Vicky Bond	
W-150	Joel Rodiel	
W-151	Alexa Lewis-Rosenfeld	
W-152	Kate Walker	
W-153	No name given	
W-154	Madelyn Hodge	
W-155	Basil Aruin	

Letter No.	Commenter	Date
W-156	Lisa Celeste	
W-157	Richard Stakelum	
W-158	No name given	
W-159	No name given	
W-160	No name given	
W-161	No name given	
W-162	Patricia Rojano	
W-163	Giovanna Ballesteros	
W-164	Aldo Jimenez	
W-165	Charito Arana	
W-166	No name given	
W-167	Mackenzie Kerwin	
W-168	Susan Patch	
W-169	Mary	
W-170	No name given	
W-171	Chris Geremia	
W-172	Adriana Mora	
W-173	No name given	
W-174	Marcos Sigala	
W-175	No name given	
W-176	No name given	
W-177	Yolanda Araujo	
W-178	No name given	
W-179	No name given	
W-180	No name given	
W-181	No name given	
W-182	No name given	
W-183	Michael Hamilton	
W-184	Thomas Shober	
W-185	Kimball Banwell	
W-186	Elijah Walulik	
W-187	No name given	
W-188	Sophia Perez	
W-189	Oscar Leija	
W-190	No name given	
W-191	Mikha Alcantara	
W-192	Jacob Ryan	
W-193	No name given	
W-194	Sami Ryan	
W-195	Francis Redublado	
W-196	No name given	

Letter No.	Commenter	Date
W-197	Simon Andrews	
W-198	Cindy Pencek	
W-199	Nastassia Patin	
W-200	Nicholas Tchiprout	

GLOBAL RESPONSES

Several comments raised similar issues. Rather than responding individually, global responses have been developed to address the comments comprehensively. SANDAG has prepared the following Global Responses dealing with common themes raised in the comment letters:

- Global Response 1: EIR Evaluates a Reasonable Range of Alternatives,
- Global Response 2: Mitigation Measures that Other Agencies "Can and Should" Implement,
- Global Response 3: Construction and Operations Impacts to Special-Status Species and Wildlife Movement, and
- Global Response 4: Funding and Financial Constraints.

The text of each Global Response is provided below. Individual responses reference the Global Response number when all or part of a response is included within a Global Response (e.g., "Please see Global Response 1").

Global Response 1: EIR Evaluates a Reasonable Range of Alternatives

INTRODUCTION

Comments assert that the range of alternatives evaluated in the EIR does not meet the California Environmental Quality Act's (CEQA's) requirement to evaluate a reasonable range of potentially feasible alternatives that would avoid or substantially reduce the project's significant environmental impacts. Alternatives suggested in Draft EIR comment letters include scenarios aligned with the San Diego County General Plan and 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; alternatives that reduce GHG emissions, discourage urban sprawl, and benefit public transit through a variety of measures; and alternatives that exclude three specific projects alleged to be harmful to biodiversity.

As explained below, the EIR does evaluate a reasonable range of alternatives that achieve most of the basic project objectives, that are potentially feasible, and that reduce the proposed Plan's significant impacts, as required by CEQA. The discussion also explains why the EIR was not required to consider four alternatives suggested by commenters, described below.

CEQA REQUIREMENTS FOR EIR ALTERNATIVES

CEQA requirements for alternatives are described in the EIR, Section 5.1 (page 5-1). In summary, Section 15126.6(a) of the CEQA Guidelines requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

Additionally, the CEQA Guidelines state the following:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. [Section 15126.6(a), (c)].
- "Feasible" means capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. [Section 15364]. Factors taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. [Section 15126.6(f)].

Also, CEQA case law provides that 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.

RANGE OF ALTERNATIVES

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). The three alternatives evaluated in detail are described in EIR Section 5.2 (pages 5-2 through 5-5).

They are as follows:

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

EIR Section 5.5 (pages 5-6 to 5-9) explains why four other alternatives considered by SANDAG were not evaluated in detail in the EIR, because they did not meet most of the basic project objectives, they failed to reduce any of the proposed Plan's significant impacts, they were infeasible, they were similar to the proposed Plan or alternatives already evaluated in detail., and/or they were alternatives for individual project components. The rejected alternatives were the La Playa Plan; Accelerated Plan Implementation; Focused Growth/ Higher Parking Pricing, and Road Usage Charge; and the Wolford Brief.

ALTERNATIVES RESPONSIVE TO PUBLIC CONCERNS EXPRESSED DURING SCOPING

As the EIR explains (p. 5-1), SANDAG listened to public input expressed during the EIR scoping process and used it to develop a reasonable range of alternatives. Public input requested alternatives that reduce GHG emissions, air quality impacts, biological resource impacts, land use impacts, and vehicle miles travelled (VMT). The action alternatives selected for detailed consideration incorporate many of the major transportation investments and policy options that commenters suggested, such as providing more compact land use patterns, substantially lowering transit fares, and increasing parking costs.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Plan. Courts have noted that for complex projects with a wide scope, "it is practically impossible to imagine an alternative that would provide substantial environmental advantages in all respects" (*Sierra Club v. City of Orange* (2008) 163 Cal. App. 4th 523).

FEASIBILITY OF ALTERNATIVES EVALUATED IN DETAIL

The feasibility of alternatives is considered twice in the CEQA process. At the outset, the EIR considered a reasonable range of alternatives that are "potentially feasible" (CEQA Guidelines Section 15126.6(a)). At the conclusion of the EIR process, the decision-makers (in this case the SANDAG Board of Directors) make final determinations as to the feasibility of alternatives, considering information in the EIR, additional information in the Final EIR and elsewhere in the administrative record, and policy factors. (See Guidelines Section 15091(a)(3).)

This final determination of feasibility may include policy considerations. Where the feasibility of alternatives evaluated in the EIR is dependent upon changes in existing laws, regulations, or funding patterns for transportation improvements, the SANDAG Board must consider the likelihood that such changes will occur within the time frame for implementation of relevant elements of the proposed Plan.

ABILITY OF DRAFT EIR ALTERNATIVE TO REDUCE PROPOSED PLAN'S SIGNIFICANT IMPACTS

As shown by EIR Table 5-3, Alternatives 2 and 3 each reduce several of the proposed Plan's significant impacts, as required by CEQA. As discussed in EIR section 5.4, Alternatives 2 and 3 achieve meaningful reductions in the proposed Plan's significant impacts to GHG emissions, VMT, air quality, and biological resources. For example, Alternatives 2 and 3 would reduce impacts to sensitive habitats by avoiding and minimizing growth and transportation projects in these areas through the adoption of a more compact land use pattern that limits growth in previously undeveloped areas, relative to the proposed Plan. While these impacts would remain significant, they would be reduced relative to the proposed Plan, such that Alternative 2 would offer substantial environmental advantages. Among the range of alternatives analyzed, Alternative 2 is the environmentally superior alternative.

ALTERNATIVES SUGGESTED BY COMMENTERS

Alternatives suggested by commenters 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.

Scenarios Aligned with the San Diego County General Plan

A commenter suggests that the proposed Plan should be aligned with buildout of the San Diego County General Plan. The Series 15 model used of for the proposed Plan is aligned with and incorporates the County's parcel-level land use assumptions. Therefore, the proposed Plan is consistent with the County's adopted General Plan assumptions. Please refer to response to comments A-4.11, A-4.13, A-44.17, and A-4.26 for more detailed responses related to the growth and land use assumptions used in the Series 15 model for the proposed Plan. 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.

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

A commenter suggests 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. Response to comment B-2.33 provides a more detailed response to the specific of this suggested alternative. In summary, 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. As further discussed in response to comment B-2.33, 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.

The majority of project funding comes with constraints. SANDAG does not have the discretion to move funds designated for roadway projects to fund transit or active transportation investments. Similarly, SANDAG cannot take funds designated by the funding agency for roadway projects and utilize them to advance phasing of transit projects. See Global Response 4 for a discussion of funding constraints for the proposed Plan.

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 federal transportation law requires the proposed Plan to include system-level estimates of costs and revenue sources to adequately operate and maintain the Federal-aid highways [23 CFR 450.324(f)(11)(i)]. 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. 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.

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

A commenter suggests that the EIR failed to include alternatives that reduced GHG emissions, protcete4d biodiversity, and reduced vehicle trips. In summary, the commenter requests 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. Please refer to responses to comment B-4.5 through B-4.14 for a direct response to each suggestion.

The EIR did include alternatives that substantially reduced GHG emissions, biological impacts, and VMT. As discussed in the EIR, page 5-5, Alternative 2 would decrease impacts to greenhouse gas emissions and biological resources compared to the proposed Plan. (EIR, pp. 5-5, 5-18 to 20 [describing decreased impacts to biological resources], 5-26 to 29 [describing decreased impacts to GHG emissions.]) 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, and some of these alternatives are considered infeasible (see responses to comments B-4.5 through B-4.14 for details). The

commenter provided no evidence that the proposed alternatives would substantially lessen the proposed Plan's significant impacts. 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.

Alternatives That Improve Connectivity and Function of Preserves and Wetlands

A commenter requests that SANDAG include prioritization of projects and alternatives that have the opportunity to improve the connectivity and function of regional preserves and wetlands. For example, it mentions opportunities to reduce impacts on Los Peñasquitos Lagoon a part of the San Diego Rail Realignment Project.

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. Response to comment A-1.10 provides a more detailed response to the commenter's suggestion.

The comment does 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. Therefore, no new alternative for detailed evaluation has been added to the EIR in response to this comment.

Exclude Three Specific Projects 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, and
- Transit center at Nobel Drive and I-805.

Managed lane connectors at the SR 52/I-805 interchange and widening the I-805 bridge over Rose Canyon. Responses to comments B-4-12 through B-4.14 provide detailed responses to proposed removal of the specific projects. 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. Thus, the commenter's alternative does not need be included for detailed evaluation in the EIR.

Global Response 2: Mitigation Measures that Other Agencies "Can and Should" Implement

INTRODUCTION

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the Plan include site-specific transportation network improvements and development projects. Many EIR mitigation measures for second-tier projects recognize that agencies other than SANDAG (e.g., local governments, transit districts, and the California Department of Transportation [Caltrans]) are responsible for implementation and recommend that that such agencies "can and should" implement them.

Comments asserted that these mitigation measures lack enforcement mechanisms. Comments state that there is no guarantee these agencies will actually implement these mitigation measures, question whether they will be imposed on second-tier projects, and recommend that, to the extent SANDAG has any discretion over awarding funds for such projects, SANDAG must require the mitigation measures as conditions of approval. Some comments asserted that "can and should" is discretionary language and makes the mitigation measure non-enforceable, and that SANDAG should mandate implementation of mitigation measures for its own projects and for other agencies implementing projects under the Regional Plan electing to tier CEQA review to the Regional Plan EIR.

As discussed in the EIR (page 4-4), SANDAG is responsible for implementing those mitigation measures within its responsibility, jurisdiction, and statutory authority. Mitigation can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines Section 15091 (a)(2)). In many instances, mitigation measures included in the EIR that would avoid or substantially lessen significant impacts of the proposed Plan fall under the responsibility and jurisdiction of other implementing agencies, such as cities, the County, Caltrans, public transit agencies, or other special districts. In other words, SANDAG will not be the lead agency for the majority of the second-tier projects that implement the proposed Plan. Because other project agencies would be responsible for certain mitigation measures identified in this EIR, SANDAG in its CEQA findings has stated that those measures, if feasible, can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2)). Details, including timing and the responsible implementing t agencies, as well mitigation monitoring and reporting procedures will be provided in a separate Mitigation Monitoring and reporting program (MMRP) that the SANDAG Board of Directors will consider for approval in conjunction with approval of the proposed Plan.

EIR MITIGATION APPROACH

When CEQA findings are adopted, SANDAG will commit to those mitigation measures that are within its responsibility and jurisdiction by making the finding that its mitigation measures "have been required in, or incorporated into, the project" (Public Resources Code Section 21081(a)(1); CEQA Guidelines Section 15092(a)(1)). As discussed in the EIR (page 4-4), for second-tier transportation projects, *SANDAG will implement mitigation measures for those projects that SANDAG directly approves or carries out as the CEQA lead agency or where discretionary TransNet funds are used* (emphasis added).[1] Thus, SANDAG does mandate implementation of mitigation measures for "its own projects," where SANDAG is the CEQA lead agency. Further, when using discretionary TransNet funds, which support TransNet grant programs funding local agency capital projects, SANDAG will require as a grant condition CEQA compliance, including the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded. (see EIR p. 4.4) Where SANDAG acts as a pass-through agency for funding, it is the funding agency's responsibility to place conditions on grant funding; SANDAG has no authority to condition these pass-through funds. Therefore, the assertion from comments that "can and should" language is unenforceable and should be removed is not accurate, because SANDAG would

[1] SB 1703 consolidated the region's transit capital construction with SANDAG from the two transit operators. SANDAG also coordinates with Caltrans as the lead agency for highway projects. Local jurisdictions construct arterial and local roadway projects.

require CEQA compliance or enforce these measures by requiring them as grant conditions for transportation projects whenever it has discretionary authority to do so.

When SANDAG makes "can and should" findings at the end of the CEQA process, there is no further requirement that SANDAG find that mitigation measures that are solely within the responsibility and jurisdiction of another agency have been incorporated into the project (Public Resources Code Section 21081; CEQA Guidelines Section 15091(a)(2)). Nevertheless, as discussed below, it is reasonable to expect that the other agencies will implement the mitigation measures assigned to them, and any mitigation measures incorporated into project-specific CEQA documents are required to be enforceable.

Regarding second-tier documents prepared by agencies implementing projects under the Regional Plan that tier CEQA review to the Regional Plan EIR, CEQA already requires these agencies to incorporate feasible mitigation measures in the Program EIR to later activities in the program. (CEQA Guidelines Section 15168(c)(3).) Although second-tier lead agencies routinely implement the types of mitigation measures assigned to them during project design, CEQA review, and/or project construction, the EIR recognizes that, due to project- or site-specific circumstances, it may not be feasible for individual lead agencies to implement all of the "can and should" mitigation measures listed for a particular significant impact; in this case, the Regional Plan EIR's programmatic mitigation measures still meet CEQA requirements. However, in this case the later project-specific CEQA review, the Regional Plan EIR could not be used as a first-tier Program EIR for the significant impact proposed for mitigation.

The EIR (pages 4-3 through 4-4) describes the general approach to the mitigation measures in the EIR.

> "The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement."
>
> "While the EIR provides as much detail as needed in the mitigation measures to evaluate their ability to avoid or substantially lessen impacts, some flexibility must be maintained to present mitigation approaches for impacts occurring under different circumstances. Many of the mitigation measures include lists of mitigation actions that can be implemented in connection with individual future transportation and development projects that would implement the proposed Plan; development projects would be undertaken under the land use authority of local governments. These individual future projects will occur over a wide and diverse geographic scope over the 30-year time span addressed in the proposed Plan. Some will require approvals from multiple public agencies, each with different legal, regulatory, or other authority relevant to the proposed Plan. Although generally feasible for many projects, the mitigation actions may not be feasible for specific projects because the nature of individual future projects, resources, legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances."

Transportation Project Mitigation

SANDAG has limited authority to approve individual second-tier transportation network improvement projects in the RTP. Many individual transportation projects in the RTP would be implemented by Caltrans and local governments. For example, Caltrans would implement most of the managed lane projects, and local governments would implement the arterial projects shown on Figures 2-9 through 2-11 of the EIR. As required by CEQA and agency-specific CEQA procedures (e.g., the Caltrans Standard Environmental Reference (Caltrans 2025a)), these agencies routinely implement the specified types of mitigation measures during project design, CEQA review, and/or project construction (see SER Chapter 39 - Incorporating Environmental Commitments into Design), and

the EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will implement them. Additionally, SANDAG is the direct source of funding (versus a pass-through agency) for TransNet grant programs funding local agency capital projects and so will require as a grant condition CEQA compliance, or the implementation of all feasible EIR mitigation measures that are applicable to the project type being funded.

Land Use Plan and Project Mitigation

SANDAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS. SB 375 specifically provides that nothing in SB 375 supersedes the land use authority of cities and counties, and that cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS (Government Code Section 65080(b)(2)(K)). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the SCS, and SANDAG has no concurrent authority to mitigate the impacts of land use plans and policies. Local governments routinely implement the specified types of mitigation measures during project design, CEQA review, and/or project construction, and the EIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them.

Two recent, relevant examples of local government (Midway Rising Specific Plan Subsequent EIR and Port Master Plan Update Final Program EIR) implementation of mitigation measures similar to EIR Mitigation Measures AQ-3b and AQ-3c, addressing diesel particulate emissions from second-tier land use projects, are provided below.

- **MM AIR 5.9-2: Construction Equipment Emissions Standards.** Prior to issuance of a grading permit for each phase of construction, the construction contractor shall submit verification that the on-site diesel construction fleet shall include at least 50 percent equipment with engines that meet, at a minimum, the Tier 4 Final California Emissions Standards, satisfactory to the City of San Diego Development Services Department's Mitigation Monitoring Coordination staff. Alternatively, additional electric-powered equipment may be used, such that at least 50 percent of the construction fleet meets or exceeds Tier 4 Final California Emissions Standards for particulate matter emissions (City of San Diego 2025).
- **MM-AQ-3: Implement Diesel Emission-Reduction Measures During Construction of All Future PMPU-Consistent Projects.** To reduce ROG, NOx, and PM10 emissions during construction of future development under the proposed PMPU, the project proponent shall implement the following measures during construction of the project, and shall provide verification to the District, prior to commencement of construction activities. Prior to the commencement of future construction activities, the project proponent shall submit a list of equipment to be used and the equipment's specifications (model year, engine tier, horsepower) to the District to ensure the construction equipment is consistent with the following requirements. No changes shall be made to the list of equipment without the District's prior approval. Within 30 days after the completion of construction, the project proponent/operator and/or its contractor(s) shall provide written evidence to the District that the construction was consistent with the following requirements.
    - For all construction activities, equip all off-road diesel equipment engines over 25 horsepower with EPA Tier 4 or cleaner engines unless Tier 4 construction equipment is not commercially available (defined below) within 100 miles of the project site. The project proponent shall submit written evidence to the District prior to commencement of construction activities that Tier 4 or cleaner equipment shall be used, or that Tier 4 or cleaner equipment is not available for use during the entire duration of that project's construction period beyond 2025. The provided evidence shall include details of the project proponent's effort to secure Tier 4 or cleaner equipment, including suppliers contacted and their responses, subject to the District's concurrence.
    - Use renewable diesel fuel in all heavy-duty off-road diesel-fueled equipment. Renewable diesel fuel must meet the most recent ASTM D975 specification for Ultra Low Sulfur Diesel and have a carbon intensity no greater than 50 percent of diesel with the lowest carbon intensity among petroleum diesel fuels sold in California.

- Use zero or near-zero emissions equipment in lieu of diesel- or gasoline-powered equipment where such zero or near-zero equipment is commercially available. Commercially available means available within 100 miles, for purchase or lease by the project proponent or any contractors that may be retained by the project proponent.
- Use diesel particulate filters (or the equivalent) if permitted under manufacturer's guidelines for on-road and off-road diesel equipment. (San Diego Unified Port District 2023.)

Greenhouse Gas Emissions Mitigation

Draft EIR comments criticized the Draft EIR's approach to GHG emissions mitigation for second-tier projects. Comments also provided suggestions for specific mitigation measures to be implemented for second-tier projects. Responses to specific suggestions are provided in the responses to individual comments.

The EIR's GHG mitigation measures meet CEQA requirements, in that they are feasible, enforceable, and help reduce the proposed Plan's significant impacts; they also have sufficient performance standards. The program-level mitigation measures (GHG-4a, 4b, and 4c) were not qualified for effectiveness in the EIR, as their effectiveness would be determined by the specific nature, scale, and timing of funded projects.

> The EIR (pages 4.8-42 and 4.8-47) explains the EIR's general approach to GHG mitigation. "Many features currently included in the proposed Plan (e.g., the SCS, increased transit, and active transportation investments) have the effect of reducing GHG emissions that might otherwise occur. Mitigation measures presented in this section are additional feasible GHG reduction measures not included in the proposed Plan that SANDAG has committed to implement for its projects and which other transportation project sponsors can and should implement for their projects."
>
> "While SANDAG has the authority to implement the mitigation measures it has committed to, it has no legal or jurisdictional authority to require other transportation project sponsors or local jurisdictions to implement mitigation measures for specific projects for which they have responsibility and jurisdiction. As explained in the Analysis Methodology under Chapter 4, mitigation can include measures that are within the responsibility and jurisdiction of another public agency. SANDAG in its CEQA findings may find that those measures assigned to other agencies can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2))."

VMT Mitigation

Draft EIR comments criticized the Draft EIR's approach to VMT mitigation measures. Comments also provided suggestions for specific mitigation measures to be implemented for second-tier projects. Responses to specific suggestions are provided in the responses to individual comments.

CEQA Guidelines Section 15126.4 requires that mitigation measures be feasible, enforceable, and capable of reducing or avoiding a significant environmental impact, and the EIR's VMT mitigation measure meets these requirements. The EIR's VMT mitigation measures also have sufficient performance standards. CEQA does not require that the effectiveness of every mitigation measure be quantified as suggested by comments. However, lead agencies must support with substantial evidence in the record the mitigation will be effective. CEQA allows for measures to be incorporated into plans that will set the policy framework for later projects implementing the plans.

Biological Resources Mitigation

Commenters criticized the Draft EIR's approach to biological resources mitigation for second tier projects. Comments also provided suggestions for specific mitigation measures to be implemented for second-tier projects. Responses specific suggestions are provided in the responses to individual comments.

The EIR's biological resources mitigation measures meet CEQA requirements, in that they are feasible, enforceable, and help reduce the p[reopposed Plan's significant impacts. As explained in EIR Chapter 4, "Environmental Impact

Analysis Approach," (EIR pages 4-1 to 4-2) and the EIR Mitigation Approach section above, this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts or proposed mitigation measures for individual projects. Section 4.4, "Biological Resources," of the EIR appropriately identifies mitigation measures meeting CEQA requirements at a programmatic level.

Global Response 3: Construction and Operations Impacts to Special-Status Species and Wildlife Movement

INTRODUCTION

Commenters expressed concern about project construction and operations impacts to special-status plants and wildlife and habitat and questioned the adequacy of the EIR's biological resources mitigation measures and determinations regarding level of significance after mitigation measures. Comments also suggested additional biological resources mitigation measures. Other comments recommended updating the status of special status species. Operational impacts on biological resources are addressed on a project-specific level during consultation with the wildlife agencies.

Further, commenters also expressed concerns about the adequacy of the EIR's wildlife movement impact analyses and mitigation measures. Commenters asserted that the EIR limited certain wildlife corridor linkages found in additional data sources, and recommended these be added to the Final EIR.

Some Draft EIR comments recommended that the EIR present additional detailed information on the biological resources environmental setting or impacts. However, a lead agency is not required to perform all research or studies requested by Draft EIR comments. An EIR need not provide all the information reviewers request, as long as the EIR, when looked at as a whole, reflects a good faith effort at full disclosure. [CEQA Guidelines Section 15204(a)].

As explained below, the EIR addressed mitigation of operational impacts and fully evaluated impacts to special status species and provided feasible mitigation measures to reduce any significant impacts on these species, consistent with CEQA requirements. Similarly, the EIR fully evaluated impacts to wildlife movement and provided feasible mitigation measures to reduce any significant impacts, consistent with CEQA requirements.

Mitigation of Operational Impacts

While SANDAG plans, designs, and constructs regional transportation network improvements, ownership of these facilities transfers to the operating agency (a local city, San Diego County, or a state agency) once they are built. After that transfer, it is the responsibility of the operating agency to preserve and maintain it, including implementing any needed project-specific mitigation for operation and maintenance impacts. However, certain EIR mitigation measures for biological resources include operational and maintenance measures. For example, consistent with Mitigation Measure BIO-1b, "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." Similarly, consistent with Mitigation Measure BIO-1e, SANDAG shall, and other implementing agencies can and should, "[p]rohibit 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."

Impacts to Special-Status Species were Evaluated Consistent with CEQA Requirements

As discussed in Section 4.4, "Biological Resources," of the EIR (Impacts BIO-1 and BIO-2), implementation of the proposed Plan's regional growth and land use change as well as transportation improvements and programs would affect a variety of federally or state-listed plant and animal species, and non-federally listed special-status plant and animal species, including 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 (please refer to Table 4.4-2, in Section 4.4 of the EIR) that have the potential to occur in the San Diego Region due to the presence of suitable habitat (please refer to Table 4.4-3, in Section 4.4 of the EIR). Impacts to special-status plant and animal species are discussed below.

On August 13 and 14, 2025, the California Fish and Game Commission designated the federally listed Quino checkerspot butterfly (*Euphydryas editha quino*) as a candidate species under the California Endangered Species Act. The CDFW treats candidate species as protected during the status review time. This change was reflected in the Table 4.4-3 of the Final EIR. Furthermore, Table 4.4-3 of the EIR was revised to response to the a comment from USFWS and now includes the updated status for four species proposed for federal listing: 1. western spadefoot is proposed threatened for Southern distinct population segment; 2. southwestern pond turtle is proposed threatened; 3. monarch butterfly is proposed threatened; and 4. California spotted owl is proposed endangered for the coastal southern California distinct population segment.

Direct impacts to special-status species and their habitats would occur where potential habitat exists and intersects with the individual project footprint. As discussed in Section 4.4, "Biological Resources," of the EIR, the impacts on biological resources were analyzed at a programmatic level based on the footprint developed for the proposed Plan, and available information of occurrences and distribution of biological resources. Avoidance, minimization, and mitigation measures were identified accordingly to achieve substantial reductions to impacts. As described on page 4.4-67 through page 4.4-78 of the EIR, project-specific focused surveys and analysis for special-status species and their habitats would need to be conducted when project-level detail is available, to quantify impacts. Project-specific impact analysis of biological resources would also include the identification of project-specific mitigation measures as required in mitigation measures for Impacts BIO-1 and BIO-2.

Special-status species impacts were evaluated programmatically using both available regional GIS data and qualitative methods. The impact analysis described for the regional growth and land use change was based on the biological conservation policies in the regionally adopted NCCPs and included impact calculation within and outside of conservation boundaries per provisions identified in the respective adopted conservation plans. GIS layers were developed for transportation improvements project footprints (see the definition provided in Section 4.4.4, "Environmental Impacts and Mitigation," of the EIR, describing road, transit and bikeway footprints, and "Transportation Network Improvements and Programs" in the analysis methodology for Impact BIO-1), and analyzed using available GIS data on species occurrences (including databases queried from US Fish and Wildlife Service, California Natural Diversity Data Base (CNDDB), County of San Diego SanBIOS, and the San Diego Management and Monitoring Program (SDMMP)) and federally designated critical habitats.

Direct impacts to specific species occurrence data points were not quantified because this information is not uniformly reliable as it only reports species actually encountered and omits species potentially present in locations that were never surveyed or haven't been included in the any of the source databases. However, Appendix D-7 of the EIR identifies qualitatively whether special-status species would potentially be affected by the proposed Plan. This method provides a conservative estimate of impacts on special-status species because it uses the assumption that suitable habitats within 500 feet of identified projects would be occupied by special-status species, which is not always the case and can only be verified on a project-specific basis.

The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan EIR is a programmatic document, and specific details concerning project-level impacts and mitigation will be evaluated during project-level environmental review.

Impacts to Special-Status Species were Mitigated Consistent with CEQA Requirements

By 2035 and 2050, regional growth, land use changes, and transportation network improvements under the proposed Plan would significantly impact special-status species and their habitats. Although adherence to existing laws, regulations, and programs outlined in Section 4.4.2, "Regulatory Setting," would help reduce these impacts, the EIR concludes they nevertheless are significant. Ground-disturbing activities associated with both land use changes and transportation improvements are expected to result in substantial adverse changes to species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by CDFW or USFWS, as well as their habitats.

The Draft EIR described 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). These mitigation measures are:

- BIO-1a Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources. See EIR description of this mitigation measure for a detailed list of measures that would be considered.
- BIO-1b Provide Compensatory Mitigation. See EIR description of this mitigation measure for a detailed description of the compensatory mitigation approach.
- BIO-1c Prepare a Habitat Restoration Plan. See EIR description of this mitigation measure for a detailed description of restoration plan contents.
- BIO-1d Prepare Habitat/Long-Term Management Plans. See EIR description of this mitigation measure for a detailed description of management plan contents.
- BIO-1e Implement Best Management Practice to Avoid Indirect Impacts. See EIR description of this mitigation measure for a detailed description list of measures that would be considered.
- BIO-2a Implement Design, Minimization, and Avoidance Measures for Special- Status Animal Species. See EIR description of this mitigation measure for a detailed list of measures that would be considered.
- BIO-2b Provide Compensatory Mitigation for Special-Status Plant Species. See EIR description of this mitigation measure for a detailed description of the compensatory mitigation approach.
- BIO-2c Provide Compensatory Mitigation for Special-Status Animal Species. See EIR description of this mitigation measure for a detailed description of the compensatory mitigation approach.

As explained in the EIR (page 4.4-78), implementation of Mitigation Measures BIO-1a through BIO-1e and BIO-2a through BIO-2c, would reduce impacts to special status species and their habitats (impact BIO-2). However, there is no assurance that these mitigation measures would be implemented for all projects or be equally effective due to the wide variety of circumstances, complexity of some sites, and complexity of impacts on special status species. Therefore, this impact (BIO-2) would remain significant and unavoidable. See Global Response 2 for further explanation of why programmatic EIR mitigation measures may not apply to every second-tier project, and how they would be enforced.

Also, commenters suggested that SANDAG consider additional mitigation measures for special status species impacts. Please see responses to individual comments regarding each of the suggested mitigation measures.

Impacts to Wildlife Corridors were Evaluated and Mitigated Consistent with CEQA Requirements

The EIR provides a thorough and comprehensive discussion of impacts on wildlife corridors in Impact BIO-3 beginning on page 4.4-78. Direct effects include the permanent conversion or fragmentation of habitats resulting from and from installation of project infrastructure, specifically linear projects such as new roadway and transit construction, adding bridges and lanes, and widening the infrastructure corridor. Indirect construction effects would include changes in increase in human presence (noise, lights, etc.), changes in hydrology, habitat

abandonment, and temporary shifts in foraging patterns or territories. A paragraph was added to the BIO-3 on page 4.4-78 stating the following:

> Impacts to wildlife movement may occur through reducing connectivity and thereby reductions in gene flow that would lead to inferior genetic diversity and population fitness. Habitat fragmentation due to creating impermeable barriers to wildlife movement could also result in direct mortality, increased vulnerability to stochastic events or extreme conditions, decreased ability to recover from disturbance events, decreased resiliency to climate change, and population loss due to blocked access to critical habitats (Spencer et al. 2010).

The impact analysis considered available information on wildlife movement, linkages, and corridors in San Diego County. Information contained in the Las Californias Binational Conservation Initiative and Pacific Flyway did not contain quantitative data, and were analyzed qualitatively. Quantitative GIS data from adopted HCPs core and linkages data layers and the Southern California Climate Resilient Connectivity Linkage Network developed by SDSU were included in the impact analysis. Regarding inclusion of linkages in the draft North and East County HCPs, some of these linkages were included in the database that was used for the EIR impact analysis and are embedded in the map depicted on Figure 4.4-15. No published wildlife corridors or linkages identified in the approved HCPs were omitted.

As discussed on p. 4.4-81 of the EIR, wildlife corridor impacts for regional growth and land use change were analyzed by broadly reviewing the locations of regional growth and land use change, and qualitatively assessing impacts on wildlife movement corridors. The EIR identified impacts on wildlife corridors that occur in areas that would experience extensive land use change and development. Wildlife usually moves across large expanses of the landscape, and site-specific information may overlook comprehensive movement corridors and connections. Therefore, mapped movement corridors from regional datasets, including the MSCP and MHCP Multi-Species Linkages models and SDSU's Southern California Climate Resilient Connectivity Prioritized Linkage Network, were overlaid with the GIS layers for those areas that would be converted to developed land uses for each horizon year. This overlay is used to qualitatively and quantitatively identify where potential conflicts with mapped wildlife corridors could occur and may overestimate impacts on wildlife movement because of the coarse-scaled modeling data.

For transportation network improvements, as described on page 4.4-79 of the EIR, regional corridor impacts were quantitatively analyzed by overlaying the transportation network footprint on the MHCP and MSCP core and linkages data and modeled wildlife movement network of the Southern California Climate Resilient Connectivity Linkage developed by SDSU. The impact analysis using the MHCP cores and linkages data (Table 4.4-11 of the EIR), included the gnatcatcher stepping stones identified in the data layer and in the City of Oceanside's Draft MHCP Subarea (see page 4.4-36). The impact analysis using the MHCP cores and linkages data (Table 4.4-11 of the EIR), included the gnatcatcher stepping stones identified in the data layer and in the City of Oceanside's Draft MHCP Subarea (see page 4.4-82). Subsequently, the intersection of the transportation network improvements with mapped wildlife movement corridors described in Section 4.4.1, "Existing Conditions," were reviewed to calculate where potential conflicts with mapped wildlife corridors could occur. The discussion identifies specific regional corridors that occur in areas with transportation network improvements for each horizon year and quantifies the acreage that could potentially be impacted by the transportation network improvement program's linear projects. On a programmatic level, almost the entire planned transportation network could potentially affect regional wildlife corridors and linkages. It is understood that this is conservative approach as actual project-specific wildlife crossings is an overestimation of impacts to wildlife movement from the proposed Plan's transportation network improvement.

The majority of arterials are existing roads in highly urbanized areas and do not cross canyons or riparian areas that provide movement corridors for wildlife. Bikeways would have relatively little impact on corridors because most are within or directly adjacent to developed areas. However, the planning of new rail corridors, double tracking, and relocation of rail corridors through undeveloped areas, and the construction or widening of transit projects may significantly affect the movement of wildlife species. Widening of existing roads or interchanges

would not necessarily cut off wildlife movement corridors because bridges that would be widened would likely be designed to allow for continued wildlife movement. However, they may make existing crossings less attractive for use by wildlife species, and the greater width may lead to additional highway mortality for terrestrial and avian species that attempt to cross transportation corridors at grade. Projects such as the SR-52/I-805 interchange would include a review the feasibility of project designs that would facilitate wildlife movement, as discussed in the avoidance and minimization measure BIO-3a: Facilitate Wildlife Movement.

Direct impacts to modeled wildlife movement corridors and linkages from the linear transportation network projects are presented in Table 4.4-12. Considering both direct and indirect impacts of both regional growth and land use change, and transportation network improvements, the EIR concluded that the proposed Plan would interfere substantially with fish and wildlife movement, wildlife corridors, and nursery sites.

As discussed in Measure BIO-3a of the EIR (page 4.4-84 through 4.4-8684), project-specific impacts of the project on wildlife movement would be mitigated during planning, design, and project-level CEQA review of transportation network improvements or development projects. Measures included in mitigation measure BIO-3 (Facilitate Wildlife Movement) address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies, including wildlife movement studies, and before-after-control-impact-studies and shall include corridor widths and wildlife crossing structures design, including:

- Incorporate wildlife movement and corridor planning data when planning and siting projects, including large landscape patches and buffers, limiting night-time trail use and noise and light pollution, use native species for landscaping, and install physical barriers to prevent human and predator entry to transportation infrastructure.
- Design wildlife movement crossings following the latest scientific information, including designing, constructing and maintaining undercrossings and wildlife overpasses (restricted to wildlife use only). In response to a Draft EIR comment, Mitigation Measure BIO-3a's measures for fish migration impacts, were revised and strengthened.
- 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.

As explained in the EIR (page 4.4-86), implementation of Mitigation Measure BIO-3a would reduce impacts to wildlife movement) (Impact BIO-3). However, there is no assurance that these mitigation measures would be implemented for all projects or be equally effective due to the wide variety of circumstances, complexity of some sites, and complexity of impacts on them. Therefore, this impact (BIO-3) would remain significant and unavoidable. See Global Response 2 for further explanation of why programmatic EIR mitigation measures may not apply to every second-tier project, and how they would be enforced.

Also, commenters suggested that SANDAG consider further additional mitigation measures for wildlife movement impacts. Please see responses to individual comments regarding each of the suggested mitigation measures.

Global Response 4: Funding and Financial Constraints

Comments were received on the EIR suggesting that the 2025 Regional Plan (proposed Plan) project funding be modified to expand and accelerate implementation of transit projects and eliminate roadway projects. Comments asserted that expenditures in initial years are much more certain than expenditures in later years, and recommended that transit projects be implemented earlier to provide greater assurance they would be funded, with dedicated funding. They also asserted that future revenue streams, especially after 2035, are uncertain.

As part of maintaining, operating, and improving the San Diego region's transportation system, SANDAG manages and distributes funds from dozens of revenue sources at the federal, state, and local levels as described in Appendix I of the proposed Plan. Federal sources of revenue include Federal Transit Administration discretionary funds, Federal Highway Administration funds, and funds from other sources. State revenues include Road

Maintenance and Rehabilitation Account funds, State Highway Operations and Protection Program funds, and funds from other sources. Local sources of revenue include TransNet funding, Managed Lanes tolls, farebox revenues, and general local funds from other sources. Funding under California Senate Bill 1 (Beall 2017) provides additional funds through a gas tax increase and other new fees, however, those revenues are primarily dedicated to a backlog of existing operations and maintenance projects. All of these funds come with constraints which are noted in Appendix I of the proposed Plan; they are typically tied to projects with certain modes of transportation, and they cannot be interchanged. Restrictions from funding sources may specify how funds must be used on certain modes of transportation and how they are distributed.

There are also regulatory constraints on when money becomes available during the lifespan of the proposed Plan, meaning funding programs typically are approved or collected on an annual basis and much of the funding cannot be advanced. In addition, some funding stays with SANDAG and some is distributed directly to other agencies to maintain, operate, and rehabilitate the transportation network. For instance, federal formula funds such as Federal Transit administration (FTA) Section 5307 or Regional Surface Transportation Program (RSTP) funds are apportioned annually. SANDAG can make assumptions about how much can be anticipated in the future based on historical data but has no ability to advance any project(s) that need the funding in years prior to apportionment. Other funds that SANDAG cannot advance and redirect to transit include funds going to other agencies, such as the State Highway and Protection Program (SHOPP) funds, which are managed by the California Transportation Commission and are used for safety, operations, and rehabilitation projects on the state highway system by Caltrans.

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. Historically, regional plans have been drafted with the assumption that some combination of 30-plus revenue sources will pay for implementation. The proposed Plan's financial plan includes both a traditional core revenue forecast comprising existing local, state, and federal sources, and a separate forecast of more innovative, but reasonably available, sources of revenue to implement a program of improvements to keep freight and people moving. The current financial plan will continue to meet the necessary milestones to implement the proposed Plan.

Federal and State laws require SANDAG to develop a regional plan built on reasonable assumptions of the revenues that will be available during the period covered by that plan (Government Code Section 65080(b)(4); 23 CFR 450.322(f)(10)(ii)). New funding sources are revenues that do not currently exist or that may require additional steps before the metropolitan planning organization (MPO) or transit agency can commit such funding to transportation projects (CTC 2024). Strategies for ensuring their availability must be identified and future revenues may be projected based on historical trends, including consideration of past legislative or executive actions (CTC 2024) (). The level of uncertainty in projects based on historical trends is generally greatest for revenues in the "outer years" (10 years or more) of an RTP.

The total revenue identified from potential revenue sources for the 2025 Regional Plan exceeds the total cost estimates presented in the 2025 Regional Plan's Appendix H: Cost Estimation Methodology. The revenue sources described in Appendix I reflect best estimates of what may reasonably be collected from various sources. Table I.4 of Appendix I identifies strategies for assuring the availability of new funding sources. Some of the sources require local, state, or federal legislation to pass before going into effect; others require voter approval. SANDAG is committed to seeking new local funding in addition to pursuing state and federal funding opportunities. Where new funding sources are assumed, the starting dates of those sources are shown as the base year. For existing revenue sources that are assumed to continue, those base year assumptions are 2024. The San Diego region has always excelled at leveraging state and federal funds to maximize the potential of every dollar generated locally. However, state and federal transportation funding has declined in recent years; the federal gas tax has not changed since 1993, and fuel tax receipts have declined due to increased vehicle efficiencies. Recent cuts to federal funding and changes in federal funding priorities have created additional funding challenges.

SANDAG complied with these restrictions and conditions in developing the proposed Plan. As explained, SANDAG cannot redirect funding in a manner inconsistent with these constraints. SANDAG is also limited by what funding types are available and when they are available. Therefore, SANDAG cannot advance transit projects earlier in time without available funding for which transit projects are eligible. Draft EIR comments do not identify any specific major funding sources available for funding eligible transit projects in the early plan years that SANDAG has overlooked.

To safeguard the possibility of implementing projects for which funding hasn't been identified at present, the proposed Plan includes an unconstrained project list found in Table A.7 of Appendix A to the proposed Plan, which includes expanded rail projects, such as the Purple Line expansion, along with additional Rapid and other projects. SANDAG will continue to pursue funding sources for these projects and will look to advance and implement these projects if funding sources can be identified, with additional environmental reviews as needed.

COMMENTS AND RESPONSES

The written individual comments received and the responses to those comments are provided below. The comment letters and website comments are reproduced verbatim in their entirety as page images. No edits have been made to the original comments, and spelling, grammatical, and other errors have been retained.

Agency Letters

Comment Letter A-1: U.S. Department of the Interior, U.S. Fish and Wildlife Service

Comment Letter A-1: U.S Fish and Wildlife Service

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

In Reply Refer to:
2025-0151992-CEQA-SD

September 30, 2025

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San Diego, California 92101

Attention: regionalplanEIR@sandag.org

Subject: Comments on the Draft Environmental Impact Report for the 2025 Regional Plan, San Diego County, California

Dear Kirsten Uchitel:

A-1.1 The U.S. Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (EIR; SANDAG 2025a) for the San Diego Association of Government's (SANDAG) 2025 Regional Plan (proposed Plan; SANDAG 2025b) in San Diego County, California. The comments provided in this letter are based on information provided in the Draft EIR, our knowledge of sensitive and declining species and habitats, and our participation in regional conservation planning efforts.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(l) of the Act.

PROJECT DESCRIPTION

A-1.2 San Diego Association of Government has prepared the Draft EIR in accordance with the California Environmental Quality Act (CEQA) to analyze the significant environmental impacts of the Plan, which is an update to San Diego Forward: The 2021 Regional Plan, adopted in December 2021, and subsequently amended in October 2023 by the SANDAG Board of Directors. The proposed Plan updates the Regional Comprehensive Plan (RCP) for the San Diego region and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The Plan includes a blueprint for a regional transportation system to serve existing and

Response A-1.1

Thank you for the US Fish and Wildlife Service's (USFWS) review of the Draft EIR and participation in the environmental review process. Detailed responses to USFWS' comments are provided below.

Response A-1.2

The summary of the proposed project description is acknowledged. This comment does not address the adequacy of the EIR, and no further response is required.

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projected workers and residents within the San Diego region up to the year 2050. The Plan includes the following objectives:

1. Focus population and employment growth in mobility hubs and existing urban areas 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 (CARB).
4. Provide transportation investments and land use patterns that promote social equity.
5. Provide transportation investments and land use patterns that improve air quality.
6. Provide multi-modal 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.

A-1.2 Cont.

As required by Senate Bill (SB) 375, the regional transportation plan includes an SCS intended to align regional transportation, housing, and land use planning to attain regional greenhouse gas (GHG) emission reductions from passenger vehicle use established by the CARB. The Plan would implement an updated Regional Active Transportation Network, Complete Corridors, and transit investments including rail, light rail, streetcar, a variety of bus options, an Airport Transit Connection, and pricing strategies for transit, Flexible Fleets, and parking throughout San Diego County.

Service Comments

We offer the following comments on the Draft EIR to assist SANDAG in avoiding and minimizing the Plan's potential impacts on sensitive resources:

General Comments

1. SANDAG has been a leader in the development and implementation of regional HCPs in San Diego County. The proposed Plan is an opportunity for SANDAG to continue in that leadership role by supporting the completion of the remaining HCPs and the establishment of regional funding to support implementation of those plans. We recommend that the proposed Plan be updated to include the need to complete and fund finalization and implementation of San Diego's regional HCPs, including incentives for jurisdictions to complete their HCPs and a commitment to address the full need for regional funding. These actions would help offset cumulative impacts associated with regional growth and transportation projects outlined in the proposed Plan.

A-1.3

Response A-1.3

The commenter suggests that the proposed Plan be updated to include the need to complete and fund finalization and implementation of San Diego's regional HCPs to offset cumulative impacts associated with the Plan. This comment primarily relates to the content of the proposed Plan.

As stated in 2025 Regional Plan Appendix Q: Regional Habitat Conservation Vision, SANDAG will continue to coordinate the discussion around how the region can obtain the funding necessary to provide the local jurisdictions' share of the regional habitat conservation plans. Historically, regional habitat conservation plans all envisioned that funding would be provided by multiple sources: a third from new development, a third from state and federal sources, and a third from local jurisdictions. Each local jurisdiction that is signatory to the conservation plan and the Implementing Agreement with the Wildlife Agencies that provides the legal "take" authorizations identified in the conservation plan is obligated to fund local costs for land conservation, acquisition, management, and monitoring. Identifying a regional funding source would provide a means of helping to offset the costs to local jurisdictions.

The TransNet Extension Ordinance and Expenditure plan include a provision that SANDAG would act on a regional funding measure to meet the long-term requirements for implementing habitat conservation plans in the San Diego region to be considered by the voters no later than four years after passage of the TransNet Extension. Along with transit operations and stormwater management, regional funding for habitat conservation was included in a 2016 ballot measure to assist the region in meeting its underfunded infrastructure needs. The 2016 bond measure, referred to as Measure A, failed to achieve the 2/3 voter approval needed for its adoption. leaving the option of regional funding for habitat conservation in question.

SANDAG continues to support and facilitate regional habitat conservation planning. The proposed Plan includes a near-term action to "complete the Regional Habitat Conservation Assessment," which will establish the needs and costs to complete the habitat

conservation plans, and identify possible funding pathways SANDAG has and will continue to work with the local jurisdictions and state and federal agencies, to direct its mitigation efforts to maximize the build out of the regional habitat conservation preserve while meeting all the necessary regulatory permitting requirements. In addition, SANDAG will continue to facilitate regional dialog around impediments and challenges in the planning and implementation of habitat conservation plans.

Finally, please note that the proposed Plan's cumulative impacts related to conflicts with regional conservation plans are not significant. See EIR pages 4.4-93 and 4.4-94. Therefore, no mitigation measures to reduce these cumulative impacts are required.

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A-1.4

2. We recommend that the Draft EIR include an analysis of the potential effects to all the regional HCPs, not just the permitted plans. The conservation design (i.e., preserves and habitat linkages) has been completed for all the Natural Community Conservation Planning Program (NCCP)/HCPs throughout San Diego County.

A-1.5

3. The proposed Plan includes improvements to the railroad corridor, including double tracking the existing Los Angeles to San Diego (LOSSAN) corridor and purchase of additional Coaster train sets (SAN260 in Table 2-11 of the Draft EIR and Table A.5 in the proposed Plan) to allow for more frequent commuter rail service throughout San Diego County. The Federal Railroad Authority (FRA) completed a programmatic Environmental Impact Statement (EIS) for the LOSSAN railroad corridor improvements in 2007, which included double tracking, replacing bridges, and increasing train frequency. As part of this planning effort, the Service completed section 7 consultation pursuant to the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), with the FRA, SANDAG, and the North County Transit District (NCTD) to address potential impacts to federally threatened and endangered species from railroad operations and double tracking through Marine Corps Base Camp Pendleton, consistent with the Programmatic EIS (FWS-SDG-4123.2). However, consultation was never completed to address railroad operations through the remainder of the San Diego County LOSSAN corridor. Since the programmatic EIS was finalized, SANDAG has been spearheading efforts to complete the double tracking of the entire railroad corridor through San Diego County to improve rail service times and frequency. However, because SANDAG does not have oversight of railroad operations, subsequent consultations for individual double tracking projects have not addressed the potential effects to federally listed species that may result from railroad operations and increased train frequency.

On August 5, 2022, the Service completed consultation with the U.S. Army Corps of Engineers (Corps) to address the effects of issuing a permit to SANDAG for construction of the Batiquitos Lagoon Double Track (BLDT) Project. As part of the biological opinion for the BLDT Project (FWS-SD-22-002078-S7-F; BLDT BO), the Service analyzed the effects of projected increases in train frequency on the nesting colonies of the California least tern [*Sternula antillarum browni*; least tern] at Batiquitos Lagoon, which was considered to be an indirect effect of double tracking projects along the LOSSAN corridor. The BLDT BO concluded that existing railroad operations result in decreased least tern reproductive productivity at Batiquitos Lagoon, and projected increases in train frequency are likely to result in addition reductions in productivity.

During the BLDT consultation process, SANDAG and the Corps determined that the Federal action was limited in scope to the issuance of a permit for construction of the project and did not include railroad operations and maintenance. In addition, NCTD, which owns and operates the railroad corridor, and Federal agencies [FRA and Federal Transit Administration (FTA)], that frequently provide funding through grants for railroad operations and maintenance and/or serve as the National Environmental Policy

Response A-1.4

This comment requests that the Draft EIR analyze regional HCPs that have not been permitted. The biology section (pages 4.4-45 and 4.4-46) regulatory setting describes the status of the draft North County and East County MSCPs. However, the CEQA analysis considers potential conflicts with only adopted HCPs, not draft HCPs, consistent with CEQA Guidelines Appendix G question IV.e and Section 15125(d)(e)). See also Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134, 1146 (CEQA does not require EIRs to analyze impacts of a project on unadopted conservation plans. With regards to the analysis of NCCPs, the biology section (pages 4.4-45 and 4.4-46) regulatory setting describes the status of the draft North County and East County MSCPs. However, the Impact BIO-4 impact analysis considers potential conflicts with only adopted HCPs consistent with CEQA guidance (see CEQA Guidelines Appendix G question I.E and Section 15125(d)(e)). See also Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134, 1146 (CEQA does not require EIRs to analyze impacts of a project on unadopted conservation plans).

Response A-1.5

The comment provides an overview of the Section 7 consultation process so far for the LOSSAN rail improvement projects, which will continue to be projects as part of the proposed Plan. The commenter also summarizes past consultation between USFWS, U.S Army Corps of Engineers, and SANDAG regarding the construction of the Batiquitos Lagoon Double Track Project and its effect on the California least tern. The comment does not directly address the adequacy of the EIR.

However, the Draft EIR described 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). For example, Mitigation Measure BIO-1a in Section 4.4, "Biological Resources," of the Draft EIR states that early coordination with the wildlife agencies

and the respective local jurisdictions would be conducted to design alignments that avoid sensitive resources and preserved lands, in this case by FRA and NCTD. Also, Mitigation Masure BIO-2a lists measures that would be undertaken during project-level CEQA-review and permitting to reduce both construction and operations impacts to special status animal species, including federally listed species. The Impact BIO-2 programmatic analysis concludes that the plan may result in significant impacts to federally listed species, including California least tern.

The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a programmatic document, and specific details concerning project-level impacts and mitigation will be evaluated during project-level environmental review and permitting. Moreover, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review and any regulatory permitting and consultation requirements. The lead agency may identify additional feasible mitigation measures for implementation at that time.

Act (NEPA) lead for improvements to the LOSSAN corridor, declined to participate in the BLDT consultation. The effects of increased train trips on the least tern were summarized in our BLDT BO, and conservation measures included in the BO are anticipated to offset many of the impacts associated with the reduction in least tern productivity. However, because FTA, FRA, and NCTD determined they were not required to consult under section 7 of the Act and declined to participate in the BLDT consultation, any incidental take of least terns resulting from the existing operations and increases in train frequency was not exempted in the BLDT BO. We reiterated in a letter to the FRA, FTA, and NCTD (2022-0002078-S7-TA, dated August 5, 2022), that any existing and future incidental take of least terns due to operations of the railroad should be permitted through section 10 of the Act with non-Federal operators of the rail (primarily NCTD), or exempted through consultation with a Federal agency (FTA and/or FRA) pursuant to section 7 of the Act. Our letter also noted that if FTA or FRA provide funding that contributes to train operations that run through Batiquitos Lagoon, purchase of new trains, or maintenance activities that may affect the least tern or other federally listed species, FTA and/or FRA (as appropriate) should consult with the Service pursuant to section 7 of the Act.

A-1.5 Cont.

Based on the information provided in the proposed Plan, SANDAG and NCTD plan to increase train frequency by purchasing two additional train sets with matching Federal funds. Therefore, we recommend that SANDAG work with NCTD and the Federal agencies anticipated to provide funding for double track construction and/or railroad operations to consider the programmatic impacts associated with railroad operations and double tracking throughout San Diego County, and coordinate with the Service on the best approach to address potential impacts to federally listed species.

A-1.6

4. The Draft EIR concludes that even after implementation of the proposed mitigation measures, Regional Growth and Transportation Network Improvements will likely result in significant impacts to sensitive natural communities and wetlands (BIO-1), sensitive and listed species and designated critical habitat (BIO-2), and wildlife movement corridors (BIO-3).

A-1.7

The minimization measures proposed rely heavily on minimizing and mitigating impacts and should place more focus on avoiding impacts to sensitive and listed species and their critical habitats during project planning. The proposed Regional Rail 398 and 598 projects in Appendix D-6 of the Draft EIR include significant impacts to wetland habitat (91.6 acres by 2035 and an additional 66.7 acres by 2050). The Draft EIR should include more details about where these impacts are anticipated to occur and what alternatives have been evaluated to avoid and minimize impacts to sensitive habitats.

A-1.8

We recommend that SANDAG and other project sponsors pursue opportunities to remove or improve existing infrastructure that was built in sensitive areas, such as the coast highway and railroad bridges and berms that span most of the coastal lagoons. The presence of these bridges and berms have contributed to significant hydrological damage to coastal lagoons, many of which now require significant and costly

A-1.9

Response A-1.6

The comment notes that as the proposed Plan would increase train frequency, the commenter suggests working with USFWS, other federal agencies and NCTD to address programmatic impacts associated with railroad operations and double tracking though the County to federally listed species. The comment does not directly address the adequacy of the EIR. The EIR evaluated transit improvement project footprints (including LOSSAN, see Section 4.4.4 on page 4.4-56) and impacts of transit projects, including the double tracking project (page 4.4-81-4.4-82 and 4.4-83). However, please see response to comment A-1.5. Impacts to federally listed species, including the California least tern, were considered in Impact BIO-2 of the EIR and early coordination with the wildlife agencies is included in the mitigation measures, see Mitigation Measure BIO-1a, which includes early coordination with the wildlife agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands; consultation with the wildlife agencies for transit projects, such as individual projects under the LOSSAN program, would occur on a project-specific level rather than programmatically. Also, Mitigation Measure BIO-2a lists measures that would be undertaken during project-level CEQA-review and permitting to reduce both construction and operations impacts to special status animal species, including federally listed species.

Moreover, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review and any regulatory permitting and consultation requirements. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

Response A-1.7

The summary of impacts under BIO-1, BIO-2, and BIO-3 associated with the proposed Plan is acknowledged. The comment does not address adequacy of EIR, and no further response is required.

Response A-1.8

The comment requests that SANDAG evaluate alternatives to avoid impacts to sensitive species and habitats associated with proposed Regional Rail 38 and 598 projects. As discussed in Section 4.4, "Biological Resources," of the Draft EIR impacts on biological resources were analyzed at a programmatic level based on available information. Impacts were analyzed based on the programmatic footprint developed for the 2025 Regional Plan, and mitigation measures were identified accordingly that achieve substantial reductions to impacts.

The Draft EIR described 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). For example, Mitigation Measure BIO-1a specifically lists several impact avoidance measures to be considered by SANDAG and other project proponents such as conducting 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, Bio Mitigation Measure BIO-1a also includes prioritizing the least environmentally constrained site and selecting a design that avoids and minimizes impacts on biological resources and NCCP lands and maintains habitat integrity. Also, Mitigation Measure BIO-2a lists measures that would be undertaken during project-level CEQA-review and permitting to reduce both construction and operations impacts to special status animals species, including federally listed species Mitigation measures would be refined and implementation methods identified on a project-specific level. Please also refer to Global Response 3 regarding the EIR's approach mitigation measures for biological sources.

The EIR prepared for the proposed Plan is a first-tier Program EIR. At this programmatic level, site-specific information such as impacts to wetlands, has been evaluated at a programmatic level based on the proposed Plan's footprint and best available wetland data. Project-specific impacts to wetlands need not be determined at this level. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review providing more detail than the Program EIR. The lead agency may identify additional mitigation measures as applicable for implementation at that time to ensure compliance with applicable regulatory requirements.

With regards to alternatives, the EIR evaluated a reasonable range of alternatives that reduce impacts as compared to the proposed Plan in Chapter 5, "Alternatives." An EIR need not consider alternatives to an individual component of a project, just alternatives to the proposed project as a whole. See California Native Plant Society v. City of Santa Cruz (2009) 177 Cal. App. 4th 957, 993.

Response A-1.9

The commenter recommends that SANDAG remove or improve existing infrastructure that was built in sensitive biological areas such as the coast highway and railroad bridges and berms that span most of the coastal lagoons. It notes specific problems with impacts from existing bridges on San Elijo Lagoon saltmarsh vegetation. Initially, it is important to note that SANDAG has taken steps in coordination with the San Elijo Lagoon manager to address the condition of the saltmarsh vegetation, and it has significantly improved. SANDAG is continuing implementation of these efforts with the lagoon manager.

The Draft 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). For example, Mitigation Measure BIO-1a which specifically requires early coordination with the wildlife agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands. Also, Mitigation Measure BIO-2a lists measures that would be undertaken during project-level CEQA-review and permitting to reduce both construction and operations impacts to special status animal species, including federally listed species. Mitigation measures would be prioritized and further developed on a project-specific level when the design features have been developed, and alternatives have been evaluated. Moreover, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects

that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review and any regulatory permitting and consultation requirements. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

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A-1.9 cont.

management interventions to maintain water quality and tidal connections. This problem has become most evident at San Elijo Lagoon, which experienced a complete die-off of saltmarsh vegetation in 2025 due to the presence of existing bridges near the mouth of the lagoon and lack of adequate funding to support the maintenance needs of the inlet following the lagoon enhancement project.

A-1.10

We recommend that SANDAG include more comprehensive measures in the Final EIR that requires future transportation projects to consider how existing infrastructure can be redesigned or realigned to reduce impacts to coastal lagoons and open space areas, such as removing existing berms and building bridged causeways over wetlands realigning transportation corridors away from open space areas and preserves, and designing new projects to be co-located with existing development and transportation corridors. For example, SANDAG has the opportunity to remove much of the railroad alignment from Los Peñasquitos Lagoon as part of the San Diego Rail Realignment Project, which would allow for enhancement of the lagoon's hydrology, marsh habitat, and populations of sensitive and listed species such as the light-footed Ridgway's rail (*Rallus obsoletus levipes*). In the Final EIR, we encourage SANDAG to include prioritization of projects and alternatives that have the opportunity to improve the connectivity and function of regional preserves and wetlands.

Specific Comments

A-1.11

5. Table 4.4-3, Listed and Candidate Wildlife Species Potentially Occurring within the San Diego Region, page 4.4-15:

   a. Please be advised that the Federal listing status for the following species should be updated:

      i. Western spadefoot is proposed threatened for Southern distinct population segment.

      ii. Southwestern pond turtle is proposed threatened.

      iii. Monarch butterfly is proposed threatened.

      iv. California spotted owl is proposed endangered for the coastal southern California distinct population segment.

A-1.12

6. Figures 4.4-4 through 4.4-8, Federally and State-Listed Species, pages 4.4-19 to 4.4-23:

   a. Titles of these figures should be revised to include "Known Occurrences of" to clarify that these figures are based on documented detections of sensitive species, but do not include all potentially occupied areas.

Response A-1.10

The commenter recommends that SANDAG include more comprehensive measures in the EIR that require future transportation project to consider how existing infrastructure can be redesigned or realigned to reduce impacts to these sensitive areas as well as prioritize projects and alternatives that would improve connectivity and function of regional preserves and wetlands. For example, it mentions opportunities to reduce impacts on Los Peñasquitos Lagoon a part of the San Diego Rail Realignment Project.

Please see Global Response 3, which explains why the biological resources mitigation measures identified in the EIR comply with CEQA requirements. With respect to future transportation projects, the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan EIR does not analyze or mitigate project-specific impacts of future transportation projects.

The Draft EIR described 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). For example, Mitigation Measure BIO-1a includes several impact reduction measures, including "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." Also, Mitigation Measure BIO-2a lists measures that would be undertaken during project-level CEQA-review and permitting to reduce both construction and operations impacts to special status animal species, including federally listed species. For example, the recent NCTD's Los Peñasquitos Lagoon Bridge Replacement Project addressed impacts on and provided mitigation for special-status species and their habitat, such as the federally endangered light-footed Ridgway's rail and coastal salt marsh. Furthermore, SANDAG considered the hydrological and biological functions of San Dieguito

Lagoon in the widening of Interstate 15 and designed a wider bridge span to accommodate the lagoon's future functions. It is therefore expected, as anticipated in Mitigation Measures BIO-1a through 2c, that future projects in this lagoon would also reduce impacts to biological resources. In addition an alternative incorporating the commenter's suggestions need not to be added to the EIR for detailed evaluation for the reasons explained in Global Response 1.

Response A-1.11

In response to the commenter's request to update federal listing status, the text on EIR page 4.4-15 has been revised as follows:

> Out of the 37 species, ~~six~~seven species are categorized as candidate species (~~three~~four federal and three state candidates)~~, including the federal candidates~~. Species proposed for federal listing as threatened include monarch butterfly (*Danaus plexippus*), southwestern pond turtle (*Actinimeys pallida*), and western spadefoot toad (*Spea hammondii*) in the southern distinct population segment. The California spotted owl (*Strix occidentalis occidentalis*) is proposed to be listed as federally endangered for the coastal southern California distinct population segment. Critical habitats for the federal candidate species have not yet been designated. CDFW has declared candidate species status for state listing for~~, and the state candidates~~ Crotch's bumblebee (*Bombus crotchii*), western burrowing owl (*Athene cunicularia* ssp. *hypugaea*), and mountain lion (*Puma concolor*)~~; critical habitats for the federal candidate species have not yet been designated~~. Figures 4.4-4 through 4.4-8 illustrate the results of regional database information for federally and state-listed wildlife species in the San Diego region.

In addition, Table 4.4-3 of the EIR has been revised to reflect these updates.

Response A-1.12

In response to the commenter's request the titles of Figures 4.4-3 through 4.4-8 have been revised to include "Known Occurrences of" as suggested by this comment.

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A-1.13
7. Figure 4.4-15 Regional Wildlife Movement Corridors, page 4.4-34:
   a. The regional linkages identified in the North County MSCP and Focused Conservation Areas identified in the East County Plan should be included in Figure 4.4-15 and described in the text.

A-1.14
8. Natural Community Conservation Planning Program and Habitat Conservation Plans; San Diego Gas and Electric Subregional NCCP, page 4.4-49:
   a. Please be advised that the Service finalized the permit for the San Diego Gas and Electric HCP amendment on October 20, 2023.

A-1.15
9. Mitigation Measure BIO-2a, Implementation Design, Minimization, and Avoidance Measures for Special-Status Animal Species, page 4.4-75:
   a. This measure includes proposed minimization measures for Operations and Maintenance of transportation projects, including minimizing impacts from lighting, conducting vegetation clearing and maintenance outside the nesting season, and minimizing impacts from noise. We recommend that the Final EIR include an analysis of current practices and procedures for conducting operations and maintenance within transportation rights-of-way (ROWs). Projects that include native habitat restoration within transportation ROWs and temporary impact areas should also update maintenance procedures within those areas to avoid ongoing habitat clearing and indiscriminate herbicide application. If ongoing and proposed ROW maintenance is incompatible with the presence of native habitat, any impacts associated with project impacts within the ROW should be considered permanent rather than temporary.

A-1.16
10. Mitigation Measure BIO-3a, Facilitate Wildlife Movement, page 4.4-84:
   a. This mitigation measure recommends using modeling, adopted HCPs/NCCPs, and other studies to identify wildlife corridors. We recommend also including information from HCP/NCCPs that have not yet been adopted to identify wildlife corridors.

A-1.17
11. We recommend that SANDAG prioritize advanced planning to acquire properties that can be restored and conserved to provide appropriate mitigation for project impacts to the specific habitat types and sensitive species listed in Appendices D-6 and D-7. Conservation to offset transit-related projects should be coordinated with regional planning efforts and the regional NCCP/HCPs and subarea plans to prioritize conservation of high-quality habitat that is at risk of development and would not be compatible with the regional growth and transit connections envisioned in the Plan.

A-1.18
12. The proposed Airport Transit Connection Project should be planned to limit additional noise and visual disturbance to the California least tern (*Sternula antillarum browii*, least tern) nesting site at the San Diego International Airport. Least terns nest in the

Response A-1.13

The comment requests revisions to Figure 4.4-15 to include data from the draft North County MSCP and East County Plan. These linkages were included where they occurred as a dataset in the SDSU climate resilient wildlife movement model that was used for the EIR impact analysis. Mitigation Measure BIO-3a calls for identifying project-specific wildlife migration corridors when second-tier projects implementing the proposed Plan are evaluated. When second-tier projects are evaluated in the future, information in draft HCPs may be considered as part of "best available information" already included in this mitigation measure.

Response A-1.14

The EIR revisions requested related to the reference to the San Diego Gas and Electric Subregional NCCP were made. The date of the Services' approval of the SDG&E HCP on page 4.4-49 of the EIR was revised from November 16, 2023 to October 20, 2023.

Response A-1.15

The comment requests that mitigation measure BIO-2a be revised to include minimization measures for operations and maintenance of transportation projects. Operational impacts on biological resources are addressed and would be mitigated as part of project-specific CEQA review It should be noted that while SANDAG plans, designs, and constructs regional transportation network improvements, ownership of these facilities transfers to the operating agency (a local city, San Diego County, or a state agency) once they are built. After that transfer, it is the responsibility of the operating agency to preserve and maintain it. However, certain EIR mitigation measures for biological resources include operational and maintenance measures. For example, consistent with mitigation measure BIO-1b, "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." Similarly, consistent with mitigation measure BIO-1e, SANDAG shall, and other implementing agencies can and should, "[p]rohibit 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."

The comment also requests that the EIR include an analysis of current practices and procedures for conducting operations and maintenance within transportation rights of way. However, these existing practices and procedures are part of the existing conditions baseline and are not directly related to impacts of the proposed Plan.

Response A-1.16

The comment requests that Mitigation Measure BIO-3a_include information from HCP/NCCPs that have not yet been adopted. When second-tier projects are evaluated in the future, this information may be considered as part of "best available information" already included in this mitigation measure. The following text has been added to Mitigation Measure BIO-3a: "When second-tier projects are evaluated in the future, information and linkages identified in draft HCPs may also be considered as part of best available information." Please also see response to comment A-1.13.

Response A-1.17

The comment requests that SANDAG prioritize advanced planning to acquire properties that can be restored to provide for mitigation for project impacts. Notably, preservation of natural habitat land is already a component of the proposed Plan. In 1987, San Diego County voters approved TransNet, a half-cent sales tax to fund a variety of transportation improvements throughout the region. The TransNet Environmental Mitigation Program (EMP) was created as part of the TransNet Extension Ordinance to provide advanced mitigation for transportation infrastructure improvement projects and programs identified in the Regional Transportation Plan. The intent is to satisfy the mitigation requirements for these projects comprehensively rather than on a project-by-project basis to maximize opportunities for acquiring land early and restoring habitats. In turn, this funding enables SANDAG to help implement regional habitat conservation plans by targeting key acquisition areas for conservation, management, and monitoring. The TransNet EMP is unique to the San Diego region and it provides a critical source of funding to protect open space and preserve natural habitats. To date, the program has helped acquire and/or restore more than 9,215 acres of native habitats within the region with a total value of about $164 million, in part by leveraging $33.2 million from conservation partners. (2025 Regional Plan Appendix Q, Q.5). SANDAG has in the past, and will continue as funds allow, to work with the local jurisdictions and state and federal agencies to provide funding assistance with conservation land acquisitions to facilitate transportation project mitigation requirements and implement the local NCCPs. Please also see Response A-1.3.

Response A-1.18

In response to this comment. Table D-7-4; has been revised to identify potential impacts to California least tern as requested by the comment. Regarding reduction of project impacts from the Airport Transit Connection Project on the California least tern, please see Global Response 3, which explains why the biological resources mitigation measures identified in the EIR comply with CEQA requirements. With respect to future transportation projects, the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR does not analyze or mitigate project-specific impacts of future transportation projects.

The Draft EIR described 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). For example, Mitigation Measure BIO-2a includes measures to avoid and mitigate for noise impacts on sensitive and special-status species.

A-1.18 Cont.

sandy ovals adjacent to Taxiways B and D on the southwest side of the airport runway. Table D-7-4 of the Draft EIR should list the least tern as a potentially impacted species which may occur within 500 feet of the Airport Transit Connection project area.

We appreciate the opportunity to comment on the Draft EIR. If you have any questions regarding this letter, please contact Lauren Kershek[1] or Sandra Hamilton[2].

Sincerely,

A-1.19

SUSAN WYNN

Digitally signed by SUSAN WYNN
Date: 2025.09.30 14:55:40 -07'00'

for Jonathan Snyder
Acting Field Supervisor

LITERATURE CITED

[SANDAG] San Diego Association of Governments. 2025a. Draft Environmental Impact Report for the 2025 Regional Plan. August 25.

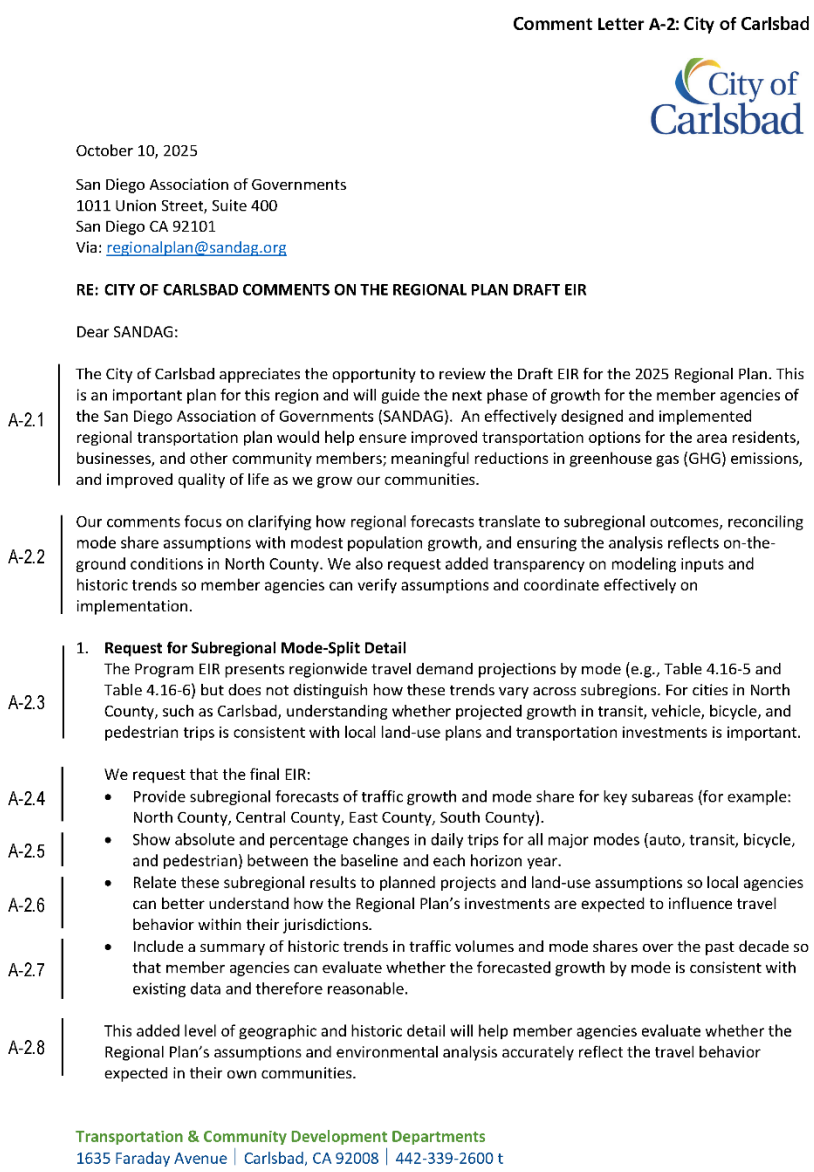
[SANDAG] San Diego Association of Governments. 2025b. Draft 2025 Regional Plan. May 27.

[1] Lauren_Kershek@fws.gov.
[2] Sandra_Hamilton@fws.gov.

Response A-1.19

Thank you for your comments. SANDAG looks forward to future coordination with the US Fish and Wildlife Service.

Comment Letter A-2: City of Carlsbad



Comment Letter A-2: City of Carlsbad

October 10, 2025

San Diego Association of Governments
1011 Union Street, Suite 400
San Diego CA 92101
Via: regionalplan@sandag.org

RE: CITY OF CARLSBAD COMMENTS ON THE REGIONAL PLAN DRAFT EIR

Dear SANDAG:

A-2.1 The City of Carlsbad appreciates the opportunity to review the Draft EIR for the 2025 Regional Plan. This is an important plan for this region and will guide the next phase of growth for the member agencies of the San Diego Association of Governments (SANDAG). An effectively designed and implemented regional transportation plan would help ensure improved transportation options for the area residents, businesses, and other community members; meaningful reductions in greenhouse gas (GHG) emissions, and improved quality of life as we grow our communities.

A-2.2 Our comments focus on clarifying how regional forecasts translate to subregional outcomes, reconciling mode share assumptions with modest population growth, and ensuring the analysis reflects on-the-ground conditions in North County. We also request added transparency on modeling inputs and historic trends so member agencies can verify assumptions and coordinate effectively on implementation.

A-2.3 1. **Request for Subregional Mode-Split Detail**
The Program EIR presents regionwide travel demand projections by mode (e.g., Table 4.16-5 and Table 4.16-6) but does not distinguish how these trends vary across subregions. For cities in North County, such as Carlsbad, understanding whether projected growth in transit, vehicle, bicycle, and pedestrian trips is consistent with local land-use plans and transportation investments is important.

A-2.4 We request that the final EIR:

- A-2.5 Provide subregional forecasts of traffic growth and mode share for key subareas (for example: North County, Central County, East County, South County).
- A-2.6 Show absolute and percentage changes in daily trips for all major modes (auto, transit, bicycle, and pedestrian) between the baseline and each horizon year.
- A-2.7 Relate these subregional results to planned projects and land-use assumptions so local agencies can better understand how the Regional Plan's investments are expected to influence travel behavior within their jurisdictions.
- Include a summary of historic trends in traffic volumes and mode shares over the past decade so that member agencies can evaluate whether the forecasted growth by mode is consistent with existing data and therefore reasonable.

A-2.8 This added level of geographic and historic detail will help member agencies evaluate whether the Regional Plan's assumptions and environmental analysis accurately reflect the travel behavior expected in their own communities.

Transportation & Community Development Departments
1635 Faraday Avenue | Carlsbad, CA 92008 | 442-339-2600 t

Response A-2.1

The comment provides an introduction to the comment letter and does not pertain to the adequacy of the analysis included in the EIR. Therefore, no further response is required.

Response A-2.2

SANDAG appreciates the City of Carlsbad's participation in the environmental review process. Please refer to subsequent responses below for detailed responses to your comments. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response A-2.3

The comment is an introductory statement for the detailed comments attached to the letter. Please refer to subsequent responses below for detailed responses to comments.

Response A-2.4

The comment requests that the EIR provide subregional forecasts of traffic growth and mode share for subareas of the region. The proposed Plan encompasses the entire San Diego Region and accordingly, the EIR identifies and analyzes the impacts of the proposed Plan at the regional level. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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).

Subregional forecasts of traffic growth and mode share for subareas of the region are not included in the EIR.As requested by the City of Carlsbad, SANDAG provided the land use input at the parcel level

and the forecast output at the MGRA level to Carlsbad, as well as the Series 15 Land Use Input Review and the list of Carlsbad's submissions (comments, points, and polygons) with review notes to Carlsbad, on July 21, 2025. SANDAG also met with the City of Carlsbad on October 30, 2025, and discussed this comment. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.5

The comment requests that the EIR show absolute and percentage changes in daily trips for all major modes between the baseline and each horizon year. The absolute changes in daily trips for all major modes (auto, transit, bicycle, and pedestrian) between the baseline and each horizon year are displayed in Table 4.16-6 of the EIR. The percentage change in trips can be calculated independently based on the data provided in Table 4.16-6 of the EIR. See also Response A-2.4. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.6

The comment requests that the EIR relate subregional results to planned projects and land use assumptions. As discussed in Response A-2.4, the proposed Plan encompasses the entire San Diego region and accordingly, the EIR identifies and analyzes the impacts of the proposed Plan at the regional level. Specific analysis of individual facilities and land use changes is not within the scope of the EIR. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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). For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.7

The comment requests that the EIR provide a summary of historic trends in traffic volumes and mode shares over the past decade. A variety of historical data relevant to traffic volume and mode share was used to model and develop the Series 15 Regional Growth Forecast which is an input to ABM3 used to develop the proposed Plan (see Appendices F and M, 2025 Regional Plan). However, the EIR is required to analyze the impacts of the proposed Plan by comparing the proposed Plan horizon years (2035 and 2050) to the 2022 baseline. Historic trends of traffic volumes and mode shares are not relevant to analyzing the potential future impacts of the proposed Plan under CEQA. See also Responses A-2.15, and A-2.17. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.8

The comment expresses the opinion that the geographic and historic detail requested in comment A-2.7 would help member agencies evaluate whether the Regional Plan's assumptions and environmental analysis accurately reflect the travel behavior expected in their own communities. As referenced in Responses A-2.4, A.-2.6, and A-2.7, the proposed Plan encompasses the entire San Diego region and, accordingly, the EIR identifies and analyzes the impacts of the proposed Plan at the regional level. The EIR is required to analyze the impacts of the proposed Plan by comparing the proposed Plan horizon years (2035 and 2050) to the baseline (2022) of the proposed Plan. Historic trends of traffic volumes and mode shares are not relevant to analyzing the potential future impacts of the proposed Plan under CEQA. See also Responses A-2.15, A-2.16, A-2.17, and A-2.18. For these reasons, no changes to the EIR are required in response to this comment.

A-2.8 Cont.

Without this information, the forecasts appear overly optimistic and may overstate the effectiveness of the proposed alternatives.

2. Freeway and Regional Corridor Improvements

Request that the Regional Plan support the City's request to prioritize the I-5/SR-78 interchange project. While the transportation section identifies congestion at key interchanges and evaluates VMT using

A-2.9

SANDAG's ABM3 model, the EIR should specifically:

- Identify the I-5/SR-78 interchange as a major VMT and safety hotspot, and
- Evaluate whether delays at this location undermine regional VMT-reduction goals.

Please clarify whether the analysis accounts for spillover traffic currently diverting to local arterials to bypass this interchange.

3. Context-Sensitive Transit Planning

A-2.10

The Regional Plan / EIR recommends regional transit expansion and smart intersection features but doesn't clearly explain or evaluate how the required changes on local streets such as transit signal priority or bus-only lanes would impact local traffic conditions. The EIR should examine how measures such as signal pre-emption or lane reallocation could affect traffic operations in suburban corridors like Carlsbad's. This would help clearly identify any secondary impacts and address the city's request for early coordination and clarification.

4. Flexible Fleets and Microtransit

A-2.11

The City of Carlsbad continues to request that the Regional Plan evaluate technologies that can improve transit efficiency in suburban areas where fixed-route service is inefficient and fails to meet community travel needs, including previously recommended options such as microtransit and neighborhood shuttles. While the EIR identifies VMT reduction as a significant and unavoidable impact under CEQA, it does not assess how shifting low-ridership bus routes to flexible fleet services could help cut VMT and greenhouse gas emissions. Such an analysis would support the city's recommendation to prioritize cost-effective transit solutions for lower-density areas.

5. Active Transportation and Freeway Interchange Barriers

A-2.12

The EIR should address how the Regional Plan will address freeway interchanges as significant barriers to safe walking and biking, particularly I-5 crossings in Carlsbad. While it highlights regional bikeway expansion and Vision Zero safety strategies, it does not evaluate these interchanges as critical gaps in the active transportation network. The analysis should identify these locations and assess mitigation strategies such as interchange improvements or grade-separated crossings to improve safety and connectivity for pedestrians and cyclists.

6. Greenhouse Gas Inventories and Modeling

A-2.13

The Regional Plan and EIR use a mix of emissions models, specifically EMFAC2017 and EMFAC2021. Section 4.8.4 states that "[t]he 2022 inventory and projections report takes into account existing laws, regulations, programs, and policies in effect as of April 2025 to project future GHG emissions out to 2035 and 2050"; with the 2022 greenhouse gas inventory relying on EMFAC2017 for its inputs, some of these laws, regulations, programs, and policies would not have been incorporated

Response A-2.9

The comment requests that the proposed Plan prioritize the I-5/SR-78 interchange. This is a comment on the proposed Plan and is not a comment on the adequacy of the EIR. As such, no further response is required.

The comment states that the EIR should identify the I-5/SR-78 interchange as a VMT and safety hotspot and evaluate whether delays at this location undermine regional VMT reduction goals. As discussed in Responses A-2.4 and A-2.6, the EIR does not use subregional metrics for its analysis as the analysis area for the proposed Plan encompasses the entire region. Accordingly, quantification of localized VMT emissions is unnecessary and would be inconsistent with the scope of the proposed Plan and the scale of VMT impacts analyzed in the EIR.

The comment also requests clarification on whether the modeling of the proposed Plan accounts for spillover traffic diverting on to local roadways from the I-5/SR-78 interchange. As discussed in Responses A-2.4 and A-2.6, specific analysis of individual facilities and land use changes is not within the scope of the EIR. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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. SANDAG and Caltrans are actively working on the I-5/SR 78 interchange/arterial improvements project (CC081), which is identified in the proposed Plan's 2035 implementation phase. Additionally, SANDAG met with the City of Carlsbad on October 30, 2025, and discussed this comment. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.10

The comment suggests that the EIR should examine how measures like signal pre-emption or lane reallocation could affect traffic operations in suburban corridors like Carlsbad's to identify secondary impacts and address the City of Carlsbad's request for early coordination and clarification.

As discussed in Responses A-2.4 and A-2.6, the proposed Plan encompasses the entire San Diego region and accordingly, the EIR identifies and analyzes the impacts of the proposed Plan at the regional level. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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). The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements such as transit signal priority or bus-only lane projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Additionally, as per California Senate Bill SB 743, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment." Based on the legislative intent of SB 743, the focus of SB 743 is on long-term VMT reductions through land use planning and smart growth, which is consistent with the analysis of the proposed Plan in the EIR. As such, the proposed Plan EIR appropriately does not include analysis or impact assessment of the proposed Plan's effect on roadway or signal operations. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.11

This comment expresses support for microtransit and neighborhood shuttles to improve transit efficiency in suburban areas. This is not a comment on the adequacy of the EIR. As such, no further response is required and no changes to the EIR are required in response to this comment.

Response A-2.12

This comment states that the EIR should address how the proposed Plan addresses freeway interchanges as barriers to safe walking and biking and assess mitigation strategies such as improvements or grade separated crossings to improve safety and connectivity. As discussed in Responses A-2.4, A-2.6 and A-2.9, specific analysis of individual facilities and land use changes is not within the scope of the EIR. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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. SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities. Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway).

The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs. SANDAG met with the City of Carlsbad on October 30, 2025, and discussed this comment. For these reasons, no changes to the EIR are required in response to this comment.

Response A-2.13

The comment states that the Regional Plan and EIR use varying versions of the EMFAC model and requests additional information on the version used for the GHG inventory. The EIR uses the GHG inventory developed for the proposed Plan (Appendix G, 2025 Regional Plan) for its analysis. EMFAC17 was used for federal air quality conformity analysis for the proposed Plan (Appendix C, 2025 Regional Plan) and, for consistency, was also used in the

development of the GHG inventory for the proposed Plan. EMFAC14 was used for the SB375 analysis for the proposed Plan at the direction of the California Air Resources Board (CARB). EMFAC21 was used to estimate mobile source emissions for the EIR air quality analysis. A fuller explanation of the rationale for using multiple versions of EMFAC is provided in Sections 4.8.2 and 4.8.4 of the EIR. See pp. 4.8-29 - 4.8-30 analyzing Impact GHG-1 for a discussion of the use of EMFAC17 in the EIR and pp. 4.8-35 analyzing Impact GHG-2 for a discussion of the use of EMFAC14 in the EIR. See Section 4.3, "Air Quality," for a discussion of the use of EMFAC21 in the EIR. The comment also requests clarification regarding which laws, regulations, programs, and policies were incorporated into the modeling assumptions. To clarify, the GHG inventory and projections only account for existing laws, regulations, programs, and policies in effect as of December 2017 to project future GHG emissions out to 2035 and 2050. The erroneous reference in the Draft EIR to April 2025 as the effective date for laws, regulations, programs, and policies that were incorporated into the analysis has been corrected to December 2017. The updated text in the proposed Final EIR is consistent with the information shown in Appendix G to the proposed Plan, 2022 Greenhouse Gas Emissions Inventory and Projections for the San Diego Region, on p. G.9. As requested in the comment, the footnotes to Tables 4.8-7 and 4.8-8 have been updated to reflect use of EMFAC17 as well as the December 2017 cutoff date for laws, regulations, programs, and policies incorporated into the analysis.

City of Carlsbad Comments on the 2025 Regional Plan Draft EIR
October 9, 2025
Page 3

A-2.13 Cont. into the modeling assumptions. Since multiple modeling years are used, please clarify which modeling year was used when data is presented. For example, Table 4-8.7 shows a decrease in total greenhouse gas emissions in the San Diego region between 2022 and 2035 due to "implementation of statewide fuel efficiency programs"; by including a reference in this table as to which EMFAC year was used, readers would be able to extrapolate which statewide programs were included in the projections.

A-2.14 Mitigation Measure GHG-4b would revive an important service that SANDAG previously provided to its member agencies. While the preparation of any greenhouse gas inventory at no cost would be useful for any local jurisdiction, preparing these on a more frequent basis (e.g., every two years) would greatly support the work of SANDAG's member agencies. If SANDAG is proposing to collect greenhouse gas reduction measure information biannually, which would theoretically include transportation data, greenhouse gas inventories should be prepared at the same cadence.

7. **Appendix M: Mode Share Forecasts and BRT/Rapid Ridership Assumptions**

A-2.15 The mode share forecasts in Appendix M appear inconsistent with the region's projected population and housing growth. Chapter 4.14 shows regional population increasing by only 3.4% from 2022 to 2050, with housing up 16.4% and jobs up 10.6%. In contrast, the transportation forecasts show much larger shifts in travel behavior:

- Transit (peak-period work trips) doubles from 1.4% in 2022 to 2.9% in 2050.
- Bike/walk trips (all trips) increase by more than 20% (from 16.2% to 19.9%).
- Drive-alone trips fall by 5 percentage points for peak work trips (84.5% → 79.0%) and 3 points for all trips (48.0% → 44.8%).

A-2.16 These shifts are disproportionately large compared to modest population and housing growth, and lack historic precedent in the San Diego region.

A-2.17 The forecasts also appear to overestimate Bus Rapid Transit (BRT)/Next Gen Rapid ridership. Daily boardings are projected to grow from ~29,000 in 2022 to more than 250,000 by 2035 and over 400,000 by 2050. Such growth is unlikely given historic declines in bus ridership, limited population growth, and the absence of comparable mode shifts in peer regions.

A-2.18 To evaluate these assumptions, we request that SANDAG provide:

1. Historic mode share trends (auto, transit, bike/walk, carpool) for the past 10–20 years.
2. Historic Rapid/BRT ridership data and peer-region examples used to demonstrate the basis for the projected growth.
3. Clarification on whether additional factors (e.g., visitor travel, cross-border trips, or other external demand) are included, and how those trips would realistically shift to non-auto modes.

A-2.19 If you have any questions related to comments on the transportation network, please contact Tom Frank, Transportation Director/City Engineer, at Tom.Frank@carlsbadca.gov.

Response A-2.14

The comment expresses the opinion that Mitigation Measure GHG-4b would revive an important service that SANDAG previously provided to its member agencies. It also expresses the opinion that preparing greenhouse gas inventories every two years would greatly support the work of SANDAG's member agencies. As described on page 4.8-48 of the EIR, Mitigation Measure GHG-4b includes the collection of greenhouse gas (GHG) reduction measure information on a biannual basis, which would include the collection of data from local jurisdictions. A biannual cadence would not be appropriate for GHG inventories, which often require the collection of emissions data across multiple sectors including electricity generation and use, natural gas, industrial processes, as well as transportation over the course of one year to properly estimate GHG emissions. The preparation of GHG inventories for member agencies every four years as specified in Mitigation Measure GHG-4b would achieve SANDAG's objective to support the monitoring of local Climate Action Plans (CAP), GHG reduction plans, and the San Diego Regional Climate Action Roadmap and would enable local jurisdictions to prepare regionally consistent CAPs and participate in regional CAP monitoring efforts. After adoption of the proposed Plan, SANDAG will formalize its Climate Action task force and will coordinate with its member agencies on the development of climate planning services under Mitigation Measure GHG-4b.

For the reasons stated above, no changes to the EIR are required in response to this comment.

Response A-2.15

The comment states that the mode share forecasts in Appendix M are inconsistent with the population and housing forecasts in Chapter 4.14, Population and Housing. While population and housing forecasts are inputs in ABM3, ABM3 also includes data and assumptions described in more detail below and in Appendix M of the 2025 Regional Plan. For these reasons, the percentage increases across regional population, housing and job projections vary from the percentage shifts in regional mode share. As a result, the mode

share forecasts in Appendix M are not inconsistent with the region's projected population and housing growth.

The travel behavior forecast provided by SANDAG ABM3 uses a variety of data as inputs, including the 2022 Household Travel Behavior Survey (HTS2022) - the latest household travel survey conducted for SANDAG – which uses smartphone-based travel diaries as the primary means of travel data collection. HTS2022 surveyed 2,800 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center. (Appendix M, 2025 Regional Plan at M.72).

In addition, model validation compares base year 2022 model outputs to independent data, not used to estimate or calibrate model parameters, to ensure that the model is ready to be used for forecasting. Estimated traffic volumes from the model are compared with traffic counts and estimated transit ridership is compared with observed transit boardings. SANDAG maintains a traffic count database that is assembled from various sources: Caltrans Performance and Measuring System (PeMS) tool counts, Caltrans District 11 State Highway Traffic Census Counts, and arterial counts from local jurisdictions, among others. Average weekday traffic was derived from PeMS daily counts collected over Fall 2022 — the most reliable count data source for model validation. SANDAG modeling staff went through an extensive effort to create a new PeMS inventory with 564 counts in 2022 which is an improvement over 498 counts in 2019. The new count inventory was built based on observed five-minute data rather than the one-hour data used in the previous count inventory. This improvement provides more accurate observed count inventory for validating traffic flow of each ABM time of day. Combined with other count inventories, the final count inventory has 1,594 counts available for validating traffic flow of main lane freeway. Estimated transit boardings from the model are validated against 2022 daily transit ridership obtained from transit agencies in the region.

SANDAG performed roadway validations at regional, subregional (Major Statistical Areas), and highway corridor levels, segmented by time of day and roadway facility types and by road type and volume group. Overall validation results were satisfactory without unexpected results." (Appendix M, 2025 Regional Plan, M.74.)

The population and housing forecasts in the EIR are based on the Series 15 Growth Forecast (Appendix F, 2025 Regional Plan), which is integrated into the ABM3 model run outputs that are presented in Appendix M to the EIR. At the regional level, SANDAG's forecast framework is built around three core components: population, housing, and jobs. During the model development phase, SANDAG held a series of peer review panels (PRPs) comprised of both SANDAG staff and external experts, including demographers and economists. These panels reviewed the forecast model framework, key assumptions, and model outputs. The feedback provided by the PRPs was essential in refining the models and assumptions used in the forecast. At the subregional level, the subregional allocation model used in forecasting population considers multiple factors, including housing capacity, proximity to employment centers, and shorter travel times, as well as each area's demographic characteristics and how they are expected to evolve. Areas in the region with larger employment centers and stronger connections to the transportation network are more attractive in the model for absorbing growth and thus increasing future population growth.

For the population forecast, as explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern":

> One of the key models influenced by the PRPs' feedback was the Cohort Component Model (CCM), which serves as the primary model used to project population changes. The CCM integrates detailed assumptions related to fertility, mortality, and migration, which are the key drivers of population change.
>
> Based on PRP recommendations, the forecast incorporates assumptions that reflect a trend of declining fertility, stable mortality rates, and migration patterns anticipated to align with historical averages over time and taper off near the forecast's horizon year. These adjustments align with national demographic trends and account for the lingering effects of COVID-19, which has slowed population growth in the region. Despite uncertainties posed by COVID-19 and climate change, the PRP supported a stable mortality

scenario, noting that advancements in healthcare and healthier lifestyles continue to drive modest gains in life expectancy. Consequently, the forecast projects a slower population growth rate compared to previous forecasts. The population forecast also highlights the shift in the drivers of population growth. Historically, natural change (births minus deaths) was the primary contributor to regional population increases, but this trend has been slowing. As Figure 2-2 [cited in the comment] illustrates, both natural change and net migration (the difference between in-migrants and out-migrants) have been declining since 2010. By 2030, natural change is projected to drop below net migration, meaning that net migration will become the primary driver of population growth. These trends reflect broader national patterns of lower birth rates and aging populations.

Throughout the peer review process, various migration scenarios were presented, with a recommended approach based on a return to historical averages from 1991-2020. PRPs suggested that factors such as regional job growth, housing vacancy rates, and the State's annual population estimates influence net migration. As regional employment rises, vacancy rates fall, and the State's population increases, net migration for the region is projected to climb through the mid-years of the forecast. Over time, as these trends slow, and with the State's population growth expected to turn negative, net migration is forecasted to decrease, ultimately turning negative by the forecast's horizon.

In summary, the slowing population growth can be attributed to a combination of declining natural growth (births minus deaths) and fluctuating net migration. Although net migration initially increases, it begins to decline around 2030 and cannot fully compensate for the continued decrease in natural growth. As a result, the population forecast reflects a smaller starting population due to pandemic-related losses and aligns with slower-growth expectations in both state and national projections from the California Department of Finance and U.S. Census Bureau, respectively. (Appendix F, F.3-4.)

For the housing forecast, as explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern":

> Between 2022 and 2050, the San Diego region is expected to grow by approximately 113,000 people, reflecting slower growth than previous forecasts due to shifts in migration patterns and declining birth rates. Despite this slower population growth, the region's existing housing shortages will continue to drive demand for housing and job opportunities, leading to the addition of approximately 203,000 housing units and about 234,000 jobs by 2050. (Appendix F, F.2.)
>
> The housing forecast is developed using a household formation model that applies headship and vacancy rates. The forecast assumes that headship rates (the share of the population identified as heads of households) will gradually return to historical levels, specifically those observed between 2005 and 2009, by 2050. Vacancy rates are assumed to stabilize at healthy levels, with 5% for renters and 2% for homeowners. These assumptions, which were informed by feedback from Peer Review Panels, lead to a projection of 202,819 additional housing units by 2050. This faster housing growth relative to population growth is expected to help reduce overcrowding in the region and aligns with housing trends observed in statewide forecasts. Additionally, the forecast assumes smaller household sizes due to shifting demographics and increased housing availability. (Appendix F, F.6.)

For the reasons stated above no changes to the EIR are required in response to this comment.

Response A-2.16

The comment states that the travel behavior shifts reflected in Appendix M of the EIR are disproportionately large and lack historical precedent. See Response A-2.15.

Response A-2.17 The comment states that Appendix M overestimates Rapid ridership, citing ridership of 29,000 in 2022, more than 250,000 in 2035, and over 400,000 in 2050. The comment further states that this growth is unlikely. The comment correctly states Rapid daily boarding in the proposed Plan for 2022 and 2035, however, it misstates ridership for 2050, which is 261,000 in the proposed Plan. The 400,000 daily ridership referenced in the comment is the 2050 ridership under EIR Alternative 3 (Appendix M, M-6).

SANDAG ABM3 uses a variety of data as inputs to forecast travel behavior, including the 2022 Household Travel Behavior Survey (HTS2022) - the latest household travel survey conducted for SANDAG – which uses smartphone-based travel diaries as the primary means of travel data collection. HTS2022 surveyed 2,800 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center. (Appendix M, M.72).

In addition, model validation compares base year 2022 model outputs to independent data, not used to estimate or calibrate model parameters, to ensure that the model is ready to be used for forecasting. Estimated transit boardings from the model are validated against 2022 daily transit ridership obtained from transit agencies in the region. (Appendix M, 2025 Regional Plan, M.74). See also Response A-2.15. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-2.18

This comment requests that SANDAG provide historic mode share trends for the past 10-20 years, historic Rapid ridership for data and peer region example supportive of the projected ridership growth, and clarification on whether the modeling includes visitor travel, cross-border trips and other external demands and how those demands would realistically shift to non-auto modes. See Responses A-2.7, A-2.8, and A-2.15. In addition, see Appendix M to the proposed Plan for a discussion of the approach used in modeling external demands, including visitor travel and cross-border trips.

This is not a comment on the adequacy of the EIR. As such, no further response is required and no changes to the EIR are required in response to this comment.

Response A-2.19

SANDAG would like to thank the City of Carlsbad for their comments on the EIR and for their participation in the environmental review process.

Sincerely,



TOM FRANK
Transportation Director/City Engineer

cc: Geoff Patnoe, City Manager
Cindie McMahon, City Attorney
Sheila Cobian, Assistant City Manager
Tim Lyons, Assistant City Attorney
Gary Barberio, Deputy City Manager, Community Services
Paz Gomez, Deputy City Manager, Public Works
Mike Strong, Assistant Community Development Director
Eric Lardy, City Planner
Nathan Schmidt, Transportation Planning and Mobility Manager
Jason Geldert, Engineering Manager
Robert Efird, Principal Planner
Scott Donnell, Senior Planner
Katie Hentrich, Senior Program Manager
Alex Patterson, Assistant Planner

Comment Letter A-3: California Coastal Commission

Letter A-3: California Coastal Commission

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *GOVERNOR*

CALIFORNIA COASTAL COMMISSION
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October 13, 2025 SENT VIA EMAIL ONLY

San Diego Association of Governments
1011 Union Street
San Diego, Ca, 92101

Re: Draft Environmental Impact Report for SANDAG 2025 Regional Plan

To Whom It May Concern:

A-3.1 Thank you for the opportunity to provide comments on the SANDAG 2025 Regional Plan (Plan) Draft Environmental Impact Report (DEIR). This 2025 plan is an update to San Diego Forward: The 2021 Regional Plan (the 2021 Regional Plan) as amended in October 2023 by the SANDAG Board of Directors (the Amended 2021 Regional Plan). The proposed 2025 Plan updates the Regional Comprehensive Plan (RCP) for the San Diego region and the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The Plan aims to make travel safer and more efficient, while offering new transit options and more opportunities for active transportation. California Coastal Commission staff (staff) commend SANDAG for its commitment to further prioritize safety and mobility for non-automobile users, increasing the efficiency of existing roadways, and improving transit opportunities in San Diego County.

A-3.2 Given the California Coastal Commission's mandate to protect coastal resources through planning and regulation of the use of land and water within the Coastal Zone, we request that the Final EIR analyze consistency of the Plan with relevant certified Local Coastal Programs (LCPs), updated sea level rise guidance, and possible impacts to coastal resources such as public access.

A-3.3 Several provisions of the Coastal Act work together to require that new development address sea level rise and coastal erosion risks without the use of shoreline protective devices (armoring). Thus, a principal concern of the Coastal Commission is ensuring that new coastal infrastructure is designed to avoid or adapt to the effects of sea level rise for the expected life of the infrastructure, as described in the Commission's 2021 Critical Infrastructure Guidance and 2024 Updated Sea Level Rise Policy Guidance.

The Plan does not include a comprehensive evaluation of how sea level rise would impact existing and planned essential regional infrastructure. Appendix R of the Plan, Resilience and Stormwater, describes flooding, wave run up, storm surge, peak high tides, and coastal hazards, but does not refer to or properly address sea level rise; please revise to address sea level rise planning specifically.

Response A-3.1

This comment summarizes the project objectives and benefits and does not pertain to the adequacy of the analysis included in the EIR. Therefore, no further response is required.

Response A-3.2

The comment requests that the EIR analyze consistency of the proposed Plan with relevant certified Local Coastal Programs, updated sea level rise guidance, and possible impacts to coastal resources such as public access. Consistency of the proposed Plan with relevant Local Coastal Programs is analyzed in Section 4.11, "Land Use and Planning," of the EIR. As described in Section 4.11, local coastal programs are components of local general plans and include specific sea level rise guidance such as identifying the areas at greatest risk of inundation based on the Coastal Commission's sea level rise guidance; relevant infrastructure and community resiliency improvements are prepared by local jurisdictions. Impact LU-2 in Section 4.11 analyzed conflicts with land use plans, policies, and regulations, including local coastal programs and concluded the regional growth and land use change and transportation network improvements and programs would not conflict with local coastal programs. The EIR reviewed sea level rise projections and potential impacts associated with sea level rise within the climate change analyses that are included the EIR's Chapter 4 environmental setting sections for the affected resources.

Regarding the commenter's point about inconsistency with the Coastal Commission's updated sea level rise guidance and possible impacts to coastal resources such as public access, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA. Any site-specific existing conditions, impacts and required mitigation measures pertaining to coastal resources and compliance with the Coastal Commission's updated sea level rise guidance would be identified during that process as applicable.

Response A-3.3

The comment requests that the Plan be updated to include an evaluation of how sea level rise would impact existing and planned regional infrastructure. This comment does not address the adequacy of the EIR. As such, no further response is required. The proposed Plan addresses a number of elements that promote a resilient future, including coordinating with other entities in the region to prepare our communities for the impacts of natural hazards to improve the resilience and reliability of the transportation system. Appendix R of the proposed Plan has been revised to include the following language describing SANDAG's Regional Resilience Framework:

> Adaptation involves taking actions that manage risks and reduce impacts, which over time contribute to a more resilient community. In the San Diego region, adaptation planning focuses on how to best adapt to the coastal storm surge, increased flooding, landslides, extreme temperatures, and wildfires. Adaptation planning builds capacity to better prepare our communities for these impacts and work towards a resilient region. SANDAG has prepared a Regional Resilience Framework that aims to simplify, unify, and streamline the adaptation planning process for the San Diego region.

The Regional Resilience Framework provides step-by-step guidance to adaptation planning, resilience tools for practitioners, and relevant resources for local jurisdictions, including preparation for extreme heat, sea level rise, and other natural hazards influenced by climate change.

Appendix R of the proposed Plan has also been revised to include the following language describing SANDAG's Shoreline Resilience program:

> The San Diego region's beaches and shoreline provide recreational opportunities and are a vital component of the economy while also providing protection from coastal flooding. SANDAG promotes coastal resilience though it's Shoreline Preservation Strategy which focuses on strategies to adapt to environmental hazards such as storm surge through shoreline management. For almost 30 years, SANDAG has monitored the status of the coastal sand sources to identify areas of significant erosion. This monitoring has led to the strategic decision to undergo two regional beach nourishment projects that have placed over 3.6 million cubic yards of sand in critical erosion hotspots. Funded in partnership with federal, state and local governments, this solution provides a natural way to protect critical infrastructure and housing, while promoting recreation and natural resource protection. A third regional beach nourishment project is in the planning phase.

SANDAG and Caltrans developed the San Diego Region Coastal Sea Level Rise Analysis Report (2016) describing future scenarios for sea level rise along the region's coastline based on the latest scientific guidance. The report offers design water level guidance for local projects, an adaptive management strategy, and general recommendations for construction along the North Coast Corridor (NCC).

In 2021 SANDAG completed the Holistic Implementation of Adaptation and Transportation Resilience Strategies (HIATRS) project, which supports local jurisdictions transitioning from planning to implementing their climate change mitigation and adaptation work. HIATRS developed the following resources to assist local planning staff and decision-makers as they implement climate adaptation strategies: Prioritization Tool and Guidebook (providing a toolkit to help local jurisdictions prioritize implementation of adaptation and transportation resilience strategies); Equity-First Approach to Climate Adaptation Guidance (providing resources for local jurisdictions to ensure that adaptation measures are equitable for all in their communities); and Economic Guidance for Climate Adaptation: (providing guidance to help local jurisdictions consider the economic implications of adaptation strategies).

A-3.4 If the Plan recommends infrastructure improvements that are likely to be flooded or perpetually inundated in the next 75 to 100 years, then the Plan should also describe and analyze potential adaptation measures that would minimize adverse impacts to coastal resources and enhance public access to the coast. Staff notes that any such projects moving forward in the Coastal Zone will need to comprehensively analyze and address sea level rise through project siting, design, and mitigation consistent with the findings of the DEIR that the San Diego region may experience sea level rise of up to 1.3 feet by 2050 and 6.7 feet by 2100 (California Coastal Commission Sea Level Rise Policy Guidance, 2024). Even so, the Plan should at a minimum describe generally and acknowledge the threat of sea level rise to vulnerable existing and future infrastructure. We do appreciate a recommended Implementation Action 2.4.5 to: "Update SANDAG coastal resilience policies and strategies, and initiate a beach sand replenishment project to protect critical coastal infrastructure" and Commission staff are eager to work with SANDAG on developing these strategies.

A-3.5 We are pleased to see the planned extension of the California Coastal Trail via construction of Coastal Rail Trail projects through several north county San Diego cities. Altogether, the 2025 Plan sets the stage for important multimodal improvements and significant coastal access improvements.

A-3.6 Although the DEIR refers to the realignment of the LOSSAN tracks through Del Mar by 2035, Figure 2-17, shows the future alignment remaining in place on the blufftop in 2035. Please revise figures throughout the document to reflect SANDAG's realignment planning efforts, or at a minimum include a footnote for clarity. Given the accelerating effects of climate change and sea level rise and the fragility of the Del Mar coastal bluffs, ongoing protection of the LOSSAN tracks in-place would fail to minimize risks from coastal hazards and would continue to require new and expanded bluff stabilization and shoreline protective devices which would result in significant impacts to public access and recreation, visual resources, biological resources, and the natural sand transport system. More specifically, protection of the existing alignment and double-tracking in place would require approximately 1.5 miles of new seawalls on the beach which would encroach directly upon valuable beach space, limit natural bluff erosion, and prohibit the landward migration of the shoreline through natural erosion and sea level rise. Over the long-term, this substantial expansion of bluff stabilization infrastructure and shoreline protective devices would likely result in the permanent loss of the beach in this portion of Del Mar. For these reasons, it is important that the 2025 Regional Plan continue to acknowledge planning for realignment by 2035.

A-3.7 The SANDAG Regional Plan Network Explorer tool does not show connections that are currently planned for the westbound/eastbound State Route 56 and northbound/southbound Interstate 5 interchanges, and the website says these projects remain unfunded. The missing interchanges at these freeway transitions contribute to significant freeway traffic and prolonged vehicle idling times within the ecologically significant Los Peñasquitos Lagoon watershed, which is already a designated impaired waterway. If these interchange connections are not included in the Plan, please provide

Response A-3.4

The comment suggests that the Plan describe and analyze potential adaptation measures that would minimize adverse impacts to coastland resources and enhance public access to the coast if infrastructure improvements from the Plan are likely to be flooded or perpetually inundated. This comment does not address the adequacy of the EIR. As such, no further response is required. See Response A-3.3. Also, SANDAG agrees that projects moving forward within the Coastal Zone would need to comprehensively analyze and address sea level rise through project siting, design, and mitigation. Appendix R of the proposed Plan has been revised to include a discussion of SANDAG's shoreline resilience program, Military Installation Resilience Plan, and Regional Resilience Framework. In addition, text was added to Appendix R to specifically describe work being completed on the LOSSAN Rail Realignment Project:

> SANDAG also incorporates resilience solutions into its rail projects, like the LOSSAN Rail Realignment Project that aims to improve safety, reliability and operational flexibility of the rail corridor by double tracking the segment, minimizing risks from coastal flooding and bluff erosion and providing for greater track capacity and enabling increases in service.

Response A-3.5

This comment recognizes the inclusion of the California Coastal Trail in the proposed Plan. SANDAG appreciates the commenters' support for the planned extension of the California Coastal Trail and the construction of Coastal Rail Trail projects. This is not a comment on the adequacy of the analysis included in the EIR. As such, no further response is required.

Response A-3.6

The comment notes that Figure 2-17 of the Draft EIR shows the alignment of the LOSSAN rail segment through the City of Del Mar remaining along the blufftop in 2035. SANDAG issued an updated Notice of Preparation of a Draft EIR for the LOSSAN Rail Realignment Project on May 16, 2024, describing the project as follows:

> SANDAG proposes to improve resiliency and reliability of the segment of the San Diego Subdivision within the cities of Del Mar and San Diego where the rail line runs along a terrace on the eroding coastal bluffs. This includes double tracking the alignment between the future Special Events Platform that will be constructed as part of the San Dieguito Double Track Project in the City of Del Mar and the north end of Sorrento Valley in the City of San Diego. The improved resiliency and double tracking of the alignment would reduce reliability risks caused by bluff erosion and provide greater track capacity for trains that use the corridor, enabling projected increases in service and minimizing conflicts with pedestrians. The Project may include removal of existing stabilization infrastructure, consistent with the CCC's conditions of approval for the Del Mar stabilization projects.

SANDAG is currently preparing a Draft EIR for the LOSSAN Rail Realignment Project and the possible alternative alignments will be studied in further detail in that project-specific environmental process. A footnote has been added to the description of North County Subregion projects at page 2-73 to clarify the status of that project.

Response A-3.7

This comment requests an explanation for the I-5/SR 56 interchange projects not being included in the proposed Plan. This comment does not address the adequacy of the EIR. As such, no further response is required. The I-5/SR 56 Interchange/Arterial Improvements (West to North and South to East) are included in the Unconstrained Project List, which is Table A.7 of the proposed Plan. The Unconstrained Project List safeguards the possibility of implementing projects for which funding has not been identified at present. SANDAG will continue to pursue funding sources for these projects and will look to advance and implement these projects if funding sources can be identified, with additional environmental reviews as needed. See Global Response 4: Funding and Financial Constraints for a discussion of project funding constraints for the proposed Plan. In addition, including the I-5/SR 56 Interchange/Arterial Improvements (West to North and South to East) would not clearly lessen the significant impacts of the proposed Plan.

October 13, 2025
Page 3

A-3.7 Cont | an explanation as to why not. Exhibit 2-17 shows State Route 56 as a managed lane, but it does not indicate an Interchange/Arterial Improvement with a blue dot, please revise.

A-3.8 | The Coastal Act protects public access to and along California's coastline for all. As the cost of living in California has continued to increase, so has the cost of enjoying a day at the beach, especially for those who must drive to access the coast. Staff did not see equity as a chapter in the 2025 Plan, though references are scattered throughout the document. However, the ability of all to reach the coast from inland communities and to do so affordably is essential. The 2025 Plan should ensure consideration of this essential issue is addressed through the discussions on public transportation and coastal access points. This is of increasing importance as our climate warms and inland residents seek refuge along our coast during extreme heat events in record numbers. For instance, page 117 of Appendix A of the DEIR references "pricing strategies" and such strategies could have the potential to make accessing the coast cost prohibitive for many more Californians. Likewise, to encourage inland residents to use public transit when designing transit routes, consider evaluating efficient non-stop east-west routes with direct access to beach destinations. This will further support lower income residents seeking climate relief who cannot afford increasing parking fees and increasing costs of private car ownership.

A-3.9 | Figure 4.15-2, Impacts to Recreational Facilities, and Flexible Fleets mapping Figure 2-13 indicate potential impacts to coastal recreational facilities in Carlsbad, Encinitas, Solana Beach, Del Mar, San Diego, Coronado, and Imperial Beach. Although Flexible Fleets will improve coastal access for some, it will benefit local residents over visitors who drive in from out of the area and will need parking upon arrival. Flexible Fleet implementation will require the support of other infrastructure improvements to ensure coastal access is maintained for all. To protect coastal access, Flexible Fleet infrastructure planning should maintain or replace in some way, existing parking that serves the public accessing the coast. Overall, the Plan should identify the importance of maintaining public parking along the coast. However, we continue to believe that smart growth and multimodal improvements can enhance non-vehicular transportation while still maximizing coastal public access for all users, including those that come from communities outside the coastal region.

A-3.10 | Section 6.3 of the DEIR discusses the Significant Irreversible Impact of the Plan: "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." While the Plan proposes network improvements that may improve coastal access, the impacts to coastal resources that would result from land use conversions proposed by the Plan would be, as stated in the DEIR, significant, unavoidable, permanent, and irreversible. Sensitive coastal resources, including coastal recreational

3

Response A-3.8

This comment notes the importance of equity when considering access to coastal areas in the region. This comment does not address the adequacy of the EIR. As such, no further response is required. However, coastal access is a key benefit for people living in San Diego, especially for those who live in areas prone to extreme heat in the region. For low-income populations, coastal access via a 30-minute transit trip is 20.8% in the 2022 base year. Comparatively, coastal access for low-income populations in the proposed Plan shows an increase to 26.8% by 2050. The percentage of minority populations with transit access to the coast is 18.8% in the 2022 base year. The proposed Plan projects 24.5% of minority populations having access in 2035 and 25.1% having access in 2050. Details of coastal access under the proposed Plan are shown in proposed Plan Appendix E, Table E.11.

Proposed Plan Appendix E: Title VI Analysis and Engagement analyzes how well the proposed Plan helps people in the region access basic needs and expands access to opportunities for Title VI, senior and low-income populations as well as the region as a whole. The comment notes that many people in the region have limited access to vehicle ownership and that pricing strategies identified in the proposed Plan will impact parking costs. One of the performance metrics used to develop the Proposed Plan was coastal access by multiple modes. Proposed Plan Appendix N: Network Development and Performance analyzes the percentage of the regional population with coastal access within 30 and 45 minutes by microtransit and transit.

Response A-3.9

This comment reflects the commenter's viewpoints regarding flexible fleets, public parking and maximizing coastal public access for all users.

The proposed Plan recognizes that coastal access is a key benefit for people living in San Diego, especially for those who live in areas prone to extreme heat in the region. The proposed Plan not only includes flexible fleet projects to enhance mobility around coastal areas but also includes transit options for coastal access. See also Response A-3.8.

As described on page 2-2420 in Chapter 2, "Project Description" of the EIR, Flexible Fleets are on-demand, shared transportation services that help people reach their destinations or connect to transit. Flexible Fleet implementation aims to improve access to coastal resources and would encourage alternative forms of transportation such as the use of microtransit to connect to these resources. In order to support the implementation of Flexible Fleet projects, SANDAG has proposed several strategies including parking pricing strategies to help manage the number of spots available in high-demand areas, such as coastal communities, including dynamic pricing. As described on page 4.16-45 in Section 4.16, "Transportation," of the EIR, dynamic pricing incentivizes travelers to utilize other modes of travel during peak times, thus potentially reducing Vehicle Miles Traveled. The potential removal of parking would vary depending on the design and the existing parking conditions for individual projects as well as the parking regulations and requirements of the local jurisdiction where the project is located. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures, including the potential preservation or replacement of parking spaces as it relates to public access to the coast, would be identified during that process.

Response A-3.10

This comment restates conclusions of the analysis under Section 6.3 of the EIR and links it with impacts to coastal resources. As discussed in Section 4.11, "Land Use and Planning," of the EIR, the proposed SCS land use pattern is derived from jurisdictions' general plans, those general plan amendments pending at the time of SCS land use pattern development, and more specifically the most recent adopted housing elements approved by Housing and Community Development.

As discussed in Section 4.1, "Aesthetics and Visual Resources," of the EIR, during project level CEQA review, if a project is determined to have the potential to significantly impact visual or aesthetic resources, during project-level CEQA review Mitigation Measures AES-1a through AES-4b would reduce potential impacts to aesthetic and visual resources and would aim to preserve existing views and existing community visual character to the greatest extent feasible.

Similarly, as discussed in Section 4.4, "Biological Resources," of the EIR, during project-level CEQA review Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e minimize potential impacts to sensitive habitats and would provide compensatory mitigation when direct impacts to sensitive habitat communities cannot be avoided. In addition, as discussed in Section 4.15, "Public Services, Recreation, and Utilities," of the EIR, if it was determined that implementation of a project would result in significant impacts to recreational resources, including coastal recreational infrastructure, during project-level CEQA review Mitigation Measure REC-1would avoid or reduce substantial physical deterioration of parks or other recreational facilities, including coastal recreational infrastructure.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential impacts to coastal resources and coastal recreational infrastructure including access to coastal resources.

A-3.10 Cont | infrastructure, already strained by heavy use, age, and sea level rise, will be disproportionately impacted by the land use conversions proposed by this Plan.

A-3.11 | Finally, consider hyperlinking the Table of Contents within the documents for a more user-friendly reading experience for the public.

A-3.12 | Please note that the comments provided herein are preliminary in nature and Coastal Commission staff may have additional comments as the Plan develops. The comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commission itself.

Thank you for the opportunity to comment on the DEIR.

Sincerely,

Melissa Escaron

Melissa Escaron
Senior Transportation Program Analyst

Response A-3.11

Thank you for the comment; the Table of Contents in the EIR has been revised to include hyperlinks.

Response A-3.12

SANDAG would like to thank the California Coastal Commission for the comments on the Draft Regional Plan, EIR, and for their participation in the environmental review process. SANDAG acknowledges that these comments are preliminary in nature and Coastal Commission staff may have additional comments as the Plan continues through the process.

Comment Letter A-4: County of San Diego, Land Use and Environment Group

Comment Letter A-4: Land Use and Environment Group Office, San Diego County

DAHVIA LYNCH
DEPUTY CHIEF ADMINISTRATIVE OFFICER

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858-514-4990

October 13, 2025

Sara Toma
Senior Planner
SANDAG
1101 Union Street, Suite 400
San Diego, CA 92101

Sent via email to: RegionalPlanEIR@sandag.org

RE: COUNTY OF SAN DIEGO COMMENTS ON SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG) 2025 REGIONAL PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Dear Ms. Toma,

A-4.1 The County of San Diego (County) values our continued partnership with the San Diego Association of Governments' (SANDAG) for the draft 2025 Regional Plan (Plan). We recognize the significant effort undertaken to provide feedback consistent with our 2025 Notice of Preparation (NOP) and the 2025 draft Regional Plan comment letters. The County values the importance of collaborative regional planning to ensure equitable, resilient, and sustainable opportunities for all communities, including the unincorporated area, and Tribal Nations, home to more than 500,000 residents, as well as substantial natural open space and working lands, such as agriculture, ranching, and other resources uses.

A-4.2 Ensuring the DEIR adequately evaluates impacts and integrates unincorporated needs, the County is requesting additional clarity and refinement including (detailed comments found in Attachment A):

A-4.3 1) Regional Transportation Strategy: Integrate County Transit Opportunity Areas (TOAs), Vehicle Miles Traveled (VMT) mitigation consistent with the County's Transportation Study Guide (TSG), and the Active Transportation Plan (ATP). Expand analysis of transit expansion, roadway improvements, and freight movement to evaluate coverage, capacity, and potential impacts in the Unincorporated Area (UA).

A-4.4 2) Land Use & Growth Patterns: Reconcile Series 15 land use assumptions with the County General Plan and disclose inconsistencies, particularly for rural and village areas.

A-4.5 3) Environmental Resources & Protection: Expand analysis of biological resources (i.e., Multiple Species Conservation Plan), greenhouse gas (GHG) emissions consistent with State and County Climate Action Plan (CAP) goals, wildfire evacuation, hydrology and binational water quality, and impacts to parks, cultural resources, and County facilities.

A-4.6 4) Rural Equity, Inclusion, & Environmental Justice: Use additional tools such as CalEnviroScreen and SB 535 Disadvantaged Communities to identify environmental justice

Response A-4.1

The commenter states that the County values the continued partnership with SANDAG and recognizes the significant effort undertaken to provide feedback consistent with the County's 2025 NOP comments and 2025 draft Regional Plan comment letters. SANDAG appreciates the County of San Diego's feedback on the EIR and participation in the environmental review process. Please refer to subsequent responses to comments below for detailed responses to comments.

Response A-4.2

The comment is an introductory statement for the detailed comments attached to the letter. Please refer to subsequent responses to comments below for detailed responses to comments.

Response A-4.3

The comment provides an overview of the regional transportation strategy comments further discussed in detail in their attached comments. Please see responses to comments A-4.18 through A-4.25 below.

Response A-4.4

The comment provides an overview of the land, growth patterns, and population comments further discussed in detail in their attached comments. Please see responses to comments A-4.26 through A-4.30 below.

Response A-4.5

The comment provides an overview of the environmental resources and protection comments discussed in detail in their attached comments. Please see responses to comments A-4.31 through A-4.59 below.

Response A-4.6

The comment provides an overview of the rural equity, inclusion, and environmental justice comments further comments discussed in detail in their attached comments. Please see responses to comments A-4.60 through A-4.61 below.

A-4.6 Cont. communities to ensure fair distribution of benefits and burdens across unincorporated, rural communities, and Tribal Nations.

A-4.7 5) Funding Transparency & Mitigation: Provide greater transparency on project selection, funding, and phasing, and ensure mitigation measures are enforceable, measurable, and adequately address cumulative impacts.

A-4.8 The County thanks SANDAG for reviewing its recommendations. We look forward to collaborating further to ensure the final Plan and its EIR fully incorporate the needs of rural, tribal, and unincorporated communities regarding regional mobility, housing, and climate strategies. To maintain consistency, we request that our teams continue working together to align the Regional Plan's methodology assumptions with the County's General Plan updates and community priorities. Finally, please formally consider all County comments previously submitted for the 2025 Notice of Preparation (NOP) and the 2025 draft Regional Plan.

A-4.9 If you have any questions regarding these comments, please contact Ashley Rivero, Senior Environmental Land Use Planner, at (619) 629-4438 or ashley.rivero@sdcounty.ca.gov. The County appreciates the opportunity to provide comments on the draft Environmental Impact Report and consideration of these comments and recommendations.

Thank you for your attention to these matters.

Sincerely,



Dahvia Lynch
Deputy Chief Administrative Officer
Land Use and Environmental Group

Cc: Ebony Shelton, Chief Administrative Officer, County of San Diego
Andrew Strong, Deputy Chief Administrative Officer, Public Safety Group
Kimberly Giardina, Deputy Chief Administrative Officer, Health and Human Services Agency
Brian Albright, Deputy Chief Administrative Officer, Finance and General Government Group
Joan Bracci, Chief Financial Officer, Finance and General Government Group
Vince Nicoletti, Director, Planning & Development Services
Marisa K. Barrie, Director, Department of Public Works
Amy Harbert, Director, Department of Environmental Health and Quality
Jason Hemmens, Director, Department of Parks and Recreation
Eden Brukman, Director, Office of Sustainability and Environmental Justice
Matthew Parr, Director, Economic Development and Government Affairs
Julie Jeakle, Director, Office of Emergency Services
Marko Medved, Director, Department of General Services
David Estrella, Director, Housing and Community Development Services

Attachment A: COUNTY OF SAN DIEGO COMMENTS ON SANDAG 2025 REGIONAL PLAN DEIR

Response A-4.7

The commenter requests that the Draft EIR provide greater transparency on project selection, funding, phasing, and ensuring mitigation measures are enforceable, measurable, and adequately address cumulative impacts. Please see the detailed responses related to comments regarding funding, transparency, and mitigation in responses to comments A-4.62 and A-4.63 below. Please also see Global Response 1 regarding the mitigation measures and Global Response 4 regarding funding.

Response A-4.8

The commenter expresses thanks to SANDAG for reviewing its recommendations and that the County looks forward to collaborating with SANDAG. Thank you for the comments. SANDAG looks forward to future coordination with the County of San Diego. County comments received on the Notice of Preparation were considered during Draft EIR preparation, and comments submitted on the Draft 2025 Regional Plan were considered during Draft Plan preparation.

Response A-4.9

The commenter requests that if SANDAG have any questions regarding these comments, to contact the County. Thank you for the comments. SANDAG looks forward to future coordination with the County of San Diego.

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**COUNTY OF SAN DIEGO COMMENTS ON
SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG)
2025 REGIONAL PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**

GENERAL

A-4.10 The County respectfully requests the draft Environmental Impact Report (DEIR) provide additional clarity in several areas that are critical to evaluating its assumptions and conclusions. First, the County recommends the DEIR incorporate the County's Guidelines for Determining Significance when evaluating potential impacts in the unincorporated area (UA). These thresholds are already applied in local California Environmental Quality Act (CEQA) review and would provide greater predictability and consistency in assessing impacts and mitigation measures across jurisdictions.

A-4.11 A clear crosswalk between Series 15 land use and population assumptions, County General Plan, and adopted local plans would help identify where the DEIR aligns with local policy and where divergences occur. This information is necessary to understand the planning and fiscal implications of any differences, particularly for rural and village areas. Similarly, the DEIR and its technical appendices should explain how the revised $125-130 billion budget was derived, reconcile seeming inconsistencies in cost totals, and identify which projects are fully funded, partially funded, or underfunded. For the County, clarity on projects that directly affect unincorporated communities is especially important in evaluating feasibility of mitigation commitments, project phasing, and long-term planning.

A-4.12 County recommends that SANDAG reconcile projected growth in housing and employment with population forecasts that suggest decline within unincorporated areas and clarify how local General Plan data and unincorporated land use patterns are incorporated into the Plan's modeling assumptions.

A-4.13 The County anticipates additional population and housing growth in the UA, and we welcome additional clarification on SANDAG's projected growth in housing and employment with population forecasts and decline within UAs. Providing additional explanation for these assumptions would help ensure the analysis reflects representative development patterns. We appreciate that the DEIR includes multiple references to the County and UA but recommend that SANDAG apply terminology more consistently throughout the document. In particular, references to "cities" should be revised when describing unincorporated jurisdictions, and distinctions should be made between urban, semi-rural, and rural areas to more accurately reflect the composition of the region.

A-4.14

A-4.15

A-4.16 The County encourages SANDAG to incorporate more refined data from County identified Transit Opportunity Areas (TOAs), villages, and growth strategies unique to the UA. While the DEIR relies on Series 15 forecasts, Regional Housing Needs Allocation (RHNA), and the Sustainable Communities Strategy (SCS), it does not provide a subregional breakdown of housing needs. This additional level of detail would be valuable in aligning future transit projects with projected

Response A-4.10

The comment requests that the EIR incorporate the County's Guidelines for Determining Significance when evaluating impacts in the unincorporated areas. As discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, unless otherwise noted, the significance criteria specifically developed for this EIR are based on the checklist questions in Appendix G of the CEQA Guidelines. In some cases, the EIR has combined checklist questions, edited their wording, or changed their location in the document in an effort to develop criteria that reflect the programmatic level of the impact analysis and the unique nature of the proposed Plan or local conditions. As lead agency, SANDAG has the discretion to select thresholds of significance appropriate for the proposed Plan EIR.

In addition, as discussed in Chapter 4, "Environmental Impact Analysis Approach," the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). As a programmatic document encompassing the entire region, the proposed Plan and its EIR do not analyze project-specific impacts of future development projects implemented by the local jurisdictions or private developers. The significance criteria used meet the requirements of CEQA and are meant to provide a programmatic analysis of proposed Plan. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify the significance guidelines to be used for the subsequent review and additional mitigation measures as applicable for implementation at that time.

Please note that Section 4.3 of the EIR, "Air Quality," does use the County's Guidelines for Air Quality in analyzing the significance of Impact AQ-2, "Result in an operations-related cumulatively considerable net increase in nonattainment or attainment criteria pollutants, including VOC, NO_X, PM_{10}, $PM_{2.5}$, and SO_X." The County's Guidelines for resource-specific impacts inform the discussion of existing conditions in Section 4.4, "Biological Resources," Section 4.7, "Geology, Soils, and Paleontological Resources," Section 4.8,

"Greenhouse Gas Emissions and Climate Change," and Section 4.9, "Hazards and Hazardous Materials," of the EIR.

Response A-4.11

The comment requests information on the population assumptions in the Series 15 Growth Forecast as specifically relevant to the County of San Diego and to understand where the EIR aligns with local policy where divergence occurs. The County previously provided SANDAG with land use assumptions at the parcel level consistent with the County General Plan, which were incorporated into the Series 15 Growth Forecast. In addition to land use assumptions, Series 15 also accounts for multiple factors that influence growth, such as employment trends, price indices, and travel times.

As explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern": ANDAG held a series of peer review panels (PRPs) comprised of both SANDAG staff and external experts, including demographers and economists. These panels reviewed the forecast model framework to review and refine the models and assumptions used in the forecast. One of the key models influenced by the PRPs' feedback was the Cohort Component Model (CCM), which serves as the primary model used to project population changes. The CCM integrates detailed assumptions related to fertility, mortality, and migration, which are the key drivers of population change. Based on the PRP's recommendations, the forecast incorporates assumptions that reflect a trend of declining fertility, stable mortality rates, and migration patterns anticipated to align with historical averages over time and taper off near the forecast's horizon year. These adjustments align with national demographic trends and account for the lingering effects of COVID-19, which has slowed population growth in the region. Despite uncertainties posed by COVID-19 and climate change, the PRP supported a stable mortality scenario, noting that advancements in healthcare and healthier lifestyles continue to drive modest gains in life expectancy. Consequently, the forecast projects a slower population growth rate compared to previous forecasts.

Population is first forecast at the regional level, establishing control totals for population, housing, and employment. These regional totals are then allocated to smaller geographies using a subregional allocation model, as explained in Appendix F to the proposed Plan. The subregional allocation model considers multiple factors, including housing capacity, proximity to employment centers, and shorter travel times, as well as each area's demographic characteristics and how they are expected to evolve. While the unincorporated area provides a significant amount of planned housing capacity, those low-VMT priority locations still compete with other areas in the region with larger employment centers and stronger connections to the transportation network, which are more attractive in the model for absorbing growth and thus increasing future population growth.

Moreover, the EIR discusses the proposed Plan's consistency with County and City local plans in Section 4.11, "Land Use and Planning," under its analysis of Impact 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." Further analysis of the proposed Plan's consistency is included in Section 4.2, "Agricultural and Forestry Resources," Impact AG-2, "Conflict with existing zoning for agricultural use or a Williamson Act contract"; Section 4.6, "Energy," Impact EN-2, "Conflict with or obstruct a state or local plan for renewable energy or energy efficiency"; Section 4.8, "Greenhouse Gas Emissions and Climate Change," Impact GHG-3, "Conflict with or impede the implementation of local plans adopted for the purpose of reducing GHG emissions"; and Section 4.16, "Transportation," Impact TRA-1, "Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities."

Response A-4.12

This comment requests an explanation of the revised budget for the proposed Plan, including reconciliation of unspecified purported inconsistencies in cost totals, and identification of whether projects are fully, partially, or underfunded. This is not a comment on the adequacy of the DEIR. As such, no further response is required. However, additional information can be found in Appendices H and I of the proposed Plan. The Cost Estimation Methodology for the proposed Plan is detailed in Appendix H, while the Funding and Revenues anticipated to support proposed Plan implementation are detailed in Appendix I. For a list of projects proposed in the

unincorporated County, see the subsection titled "East County Subregion and Rural Areas" in section 2.4.6 of this EIR. For a list of projects for which funding has already been programmed, see the 2025 Regional Transportation Improvement Program and its amendments (SANDAG 2024a). For a discussion of funding requirements and constraints for the proposed Plan, see Global Response 4.

Response A-4.13

This comment recommends that SANDAG reconcile projected growth in housing and employment with population forecasts that suggest declining population in unincorporated areas and clarify how unincorporated land use patterns are incorporated into the modeling for the 2025 Regional Plan. As explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern": As explained in Appendix F to the proposed Plan, population is first forecast at the regional level, establishing control totals for population, housing, and employment. These regional totals are then allocated to smaller geographies using a subregional allocation model, which considers multiple factors, including housing capacity, proximity to employment centers, and shorter travel times, as well as each area's demographic characteristics and how they are expected to evolve. While the unincorporated area provides a significant amount of planned housing capacity, those low-VMT priority locations still compete with other areas in the region. Some areas with larger employment centers and stronger connections to the transportation network are more attractive in the model for absorbing growth.

The housing forecast is developed using a household formation model that applies headship (the share of the population identified as heads of households) and vacancy rates. The forecast assumes that headship rates will gradually return to historical levels, specifically those observed between 2005 and 2009, by 2050. Vacancy rates are assumed to stabilize at healthy levels, with 5% for renters and 2% for homeowners. These assumptions, which were informed by feedback from Peer Review Panels, lead to a projection of 202,819 additional housing units by 2050, surpassing the 6th cycle Regional Housing Needs Assessment planning requirement of 171,685 units. This faster housing growth relative to population growth is expected to help reduce overcrowding in the region and aligns with housing trends observed in statewide forecasts. Additionally, the forecast assumes smaller household sizes due to shifting demographics and increased housing availability.

For the Series 15 Growth Forecast the County provided SANDAG with land use assumption at the parcel level, consistent with the County's General Plan, which were incorporated into the Series 15 modeling assumptions. Appendix F, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern," includes the following explanation of how local General Plan data are incorporated into the proposed Plan's modeling assumptions:

> To generate the sub-regional projections that form the SCS Land Use Pattern, the second phase of the Series 15 Regional Growth Forecast allocates forecasted regional population, housing, and job growth to jurisdictions and smaller geographic areas. This follows the first phase, which establishes regional control totals based on demographic trends, economic factors, and policy assumptions. SANDAG begins by collecting base-year (2022) data through its annual land inventory. The 2022 Land Inventory provided detailed parcel-level data on land use, housing units, and planned land use information based on the jurisdictions' general plans. These general plans incorporate spheres of influence adopted by the Local Agency Formation Commission (LAFCO), which define the probable physical boundaries and service areas of local governments. This approach helps guide future annexations and ensures growth is consistent with city plans, as any territory proposed for annexation to an incorporated city must be within the city's sphere of influence and general plan. By using general plans that include spheres of influence, SANDAG ensures that its process aligns with Government Code Section 65080(b)(2)(G), which requires consideration of LAFCO-adopted spheres in developing the SCS.
>
> In addition to the land inventory, SANDAG maintains the Regional Employment Inventory, which includes employment locations sourced from California's Employment Development Department and the Department of Defense's (DOD) DMDC Active-Duty Military Personnel Master File. This base-year data establishes the baseline capacity for

residential and nonresidential development, providing a foundation for understanding existing patterns and identifying growth potential. Once the regionwide forecast totals for population, housing, and jobs were developed, SANDAG collaborated with all 19 regional jurisdictions, including the 18 cities and the County of San Diego. This process involved holding a series of meetings to review and verify the parcel-level capacity data. The capacity data reflects development potential and guides the allocation of forecast totals to subregional areas.

SANDAG's Urban Development Model (UDM) was then used to allocate the forecasted population, housing, and jobs to specific parcels. The UDM considers a wide range of factors, such as historical growth patterns, redevelopment potential, travel impedances, and residential prices, to predict where future growth is likely to occur at a zonal level. During this process, travel impedances were periodically updated by iterating between the land use and transportation models to refine predictions about where growth will take place. Additionally, the model considers factors like accessibility to employment activities and historical development trends when forecasting future growth patterns.

Response A-4.14

The commenter states that the County anticipates population and housing growth in the unincorporated areas of the County and requests additional clarification regarding SANDAG's projected growth in housing and employment with population forecasts and decline in unincorporated areas of the County. Please see responses A-4.11 – A-4.13 regarding Series 15 Growth Forecast population and housing assumptions and projections for the 2025 Regional Plan.

Response A-4.15

The comment requests that the EIR include consistent terminology including references to "cities" that should be revised when describing unincorporated jurisdictions and include distinctions between urban, semi-rural, and rural areas to reflect the composition of the region. As discussed in Chapter 2, "Project Description," the project location analyzed in the EIR includes the entire San Diego region including the 18 incorporated cities and unincorporated areas of the County. The EIR makes a clear distinction between "cities" and "unincorporated jurisdictions" when discussing different land use areas. Figure 2-4 identifies the land use types used in the analysis of the EIR, which include spaced rural, single family, mobile home, and multi-family residential, as well as open space parks, recreation, agriculture, and vacant land use types, among others. While the EIR identifies semirural development in general terms (see, e.g., Section 4.1, "Aesthetics and Visual Resources," p. 4.1-1, discussion of semirural development in foothills of the San Diego region range), the distribution of population density across communities is accurately reflected and analyzed in the EIR notwithstanding the distinctions between the comment's suggested terminology of urban, semi-rural, and rural areas. Therefore, SANDAG believes this comment is already adequately addressed in the EIR and no revisions to the EIR are necessary.

Further, the proposed Plan distinguishes between rural and urban areas to accurately reflect the composition of the region. As discussed in Chapter 2, Section 2.4.6, "Proposed Project List," the proposed Plan divides the regional transportation projects and improvements into four distinct subregions, including rural areas: Central County Subregion, East County Subregion and Rural Areas, North County Subregion, and South County Subregion. The EIR contains the following description of the East County Subregion and Rural Areas:

> The East County Subregion (East County) and Rural Areas generally cover the eastern two-thirds of the county, spanning east of I-15, from Lemon Grove extending to El Cajon and Santee and to the eastern edges of the county. Major transportation routes, such as SR 94, SR 67, I-8, SR 125, and SR 52, connect East County cities and communities with the urban core, job centers to the north and west, and the South County Subregion. SR 94 connects the region to central San Diego and links the subregion to major north–south routes, like I-15 and I-805, providing access to key destinations and employment hubs across the region. Similarly, SR 67 and SR 52 help connect communities within East County to recreational areas, Marine Corps Air Station Miramar, local universities, and shopping centers. Existing transit options, such as the Orange, Green, and Copper Line

Trolleys and various local bus routes, help residents connect to employment centers, schools, and vital services. Proposed projects located in or partially within East County Subregion and rural areas are shown in Figure 2-16 and Table 2-8 below. The proposed projects are categorized by type and organized by phasing periods: 2035 and 2050 within each project type.

Response A-4.16

This comment encourages SANDAG to incorporate County data in its development of the proposed Plan land use pattern and requests a subregional breakdown of housing needs. This is not a comment on the adequacy of the DEIR. As such, no further response is required. However, as stated above, the Series 15 Regional Growth Model incorporated parcel-level data, which the County provided SANDAG. SANDAG then uses its UDM to allocate forecasted population, housing, and jobs to specific parcels based on a wide range of factors. As this data is already refined to a parcel-level of detail, SANDAG believes this comment has been adequately addressed. Moreover, 2025 Regional Plan Appendix F, Tables F.1 through F.2 provide jurisdiction and Unincorporated Area (UA)-specific breakdowns for actual and projected population, housing, and employment trends. Please refer to Responses A-4.11 and A-4.13 for further discussion of how the County General Plan is considered in forecasting assumptions.

A-4.16 Cont. housing growth and understanding how assumptions compare with the County General Plan. The County welcomes the opportunity to review the model land use outputs for the Preferred Plan and

A-4.17 to compare those with the adopted General Plan assumptions, as this would clarify whether land use changes are being assembled beyond what is locally planned.

REGIONAL TRANSPORTATION STRATEGY

A-4.18 The County values its ongoing coordination with SANDAG to strengthen a regional transportation strategy network that aligns with local priorities and state requirements. County staff remain committed to collaboration and encourage the draft 2025 Regional Plan (Plan) and draft Environmental Impact Report (DEIR) to reflect the County's General Plan land use designations, such as the Mobility Element, which includes utilizing and investing in County-identified Transit Opportunity Areas (TOAs), and Active Transportation Plan (ATP). This includes integrating County TOAs into regional Vehicle Miles Traveled (VMT) scenarios, publishing transparent model outputs and assumptions, and evaluating the feasibility of microtransit and Flexible Fleet services to serve rural areas. This collaboration would reduce VMT in the unincorporated areas (UA, ensuring that regional investments align with where the County anticipates growth and mobility

A-4.19 demand. The County also seeks analysis of interjurisdictional congestion impacts on I-15 and adjacent County arterials, along with mitigation strategies that balance regional goods movement with local road capacity and safety.

A-4.20 The County encourages SANDAG to confirm that the Plan's strategies achieve per-capita VMT reductions and State greenhouse gas (GHG) emission targets, noting that the current projections

A-4.21 fall short of Senate Bill (SB) 375 goals. Additional clarification is requested on how cumulative VMT impacts are mitigated, how Assembly Bill (AB) 2097 (parking reforms) and AB 130 (mitigation fee program) will be applied regionally, and Americans with Disabilities Act (ADA)

A-4.22 efforts will be funded and phased. It would be helpful to clarify whether ridership increases are modeled or observed and to update the outdated freight data to reflect current cross-border

A-4.23 volumes. Strengthening coordination with Southern California Association of Governments, Caltrans, and Baja California planning efforts, ensuring investments reach high-VMT subregions, and aligning transit and housing investments with County goals are important priorities.

A-4.24 The County requests confirmation of funding opportunities associated with Mobility Hubs remaining accessible to unincorporated communities and recommends recognizing County VMT

A-4.25 efficient, villages, and infill areas as eligible investment zones. The DEIR should address several minor technical clarifications, including transit mode share formatting, duplicative baseline mileage reporting, and explaining the methodology used to establish the regional VMT threshold.

LAND USE, GROWTH PATTERNS, & POPULATION

A-4.26 The County values the coordination with SANDAG in the Series 15 model development; however, the County recommends that the draft Environmental Impact Report (DEIR) provide greater clarity and consistency on how land use and population assumptions are applied to the UA. Specifically, the DEIR should reconcile differences between Series 15 growth forecast and the County's adopted General Plan, disclose the basis for assembled housing and job growth in areas where population decline is projected, and evaluate an alternative that aligns with the General Plan buildout.

A-4.27 The County also requests a more detailed analysis of how the Plan's alternatives affect unincorporated housing distribution, rural transportation conditions, and cumulative impacts, such as VMT, wildfire risk, and access to transit. While Alternatives 2 and 3 demonstrate overall reductions in GHG emissions and VMT, the DEIR still identifies significant and unavoidable

Response A-4.17

This comment requests clarification on whether the land use assumptions used to model the proposed Plan are consistent with the County's General Plan assumptions. This is a comment on the proposed Plan and not a comment on the adequacy of the EIR. As such, no further response is required. Yes, the County provided its land use assumptions at the parcel level, which were then incorporated into the Series 15 Regional Growth Model. SANDAG looks forward to coordinating with the County in reviewing and updating these assumptions for the next forecast. Please refer to Responses A-4.11 and A-4.13 for further discussion of how the County General Plan is considered in forecasting assumptions.

Response A-4.18

This comment proposes coordination between the County and SANDAG on future regional transportation strategies. The County asks that the proposed Plan reflect the County's General Plan land use designations by integrating County Transit Opportunity Areas (TOAs) into regional Vehicle Miles Traveled (VMT) scenarios and evaluating the feasibility of microtransit and Flexible Fleet services to serve rural areas.

This is not a comment on the adequacy of the EIR. As such, no further response is required. The degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a long range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; The impacts analyzed in the EIR were for the entire San Diego region and as a result the analysis includes the unincorporated areas of San Diego County. It should be noted that the Series 15 Regional Growth Model incorporates the parcel-level data which was provided by the County, therefore adding the County's land use designations to the proposed Plan by integrating County Transit Opportunity Areas into regional Vehicle Miles Traveled scenarios is not necessary. The comment does not identify specific inadequacies in the EIR's analysis or suggest how such impacts should be addressed further. The analysis in the EIR is

adequate, and no further edits are required in response to this comment. See Responses A-4.11 to 4.13, 4.15 to 4.16, and 4.26 for further discussion of subregional analysis and assumptions.

Additionally, as discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, unless otherwise noted, the significance criteria specifically developed for this EIR are based on the checklist questions in Appendix G of the CEQA Guidelines. In some cases, the EIR has combined checklist questions, edited their wording, or changed their location in the document in an effort to develop criteria that reflect the programmatic level of the impact analysis and the unique nature of the proposed Plan or local conditions. As lead agency, SANDAG has the discretion to select thresholds of significance appropriate for the proposed Plan EIR.

With respect to the feasibility of microtransit and Flexible Fleet services in rural areas, the EIR analyzes the impact of increased connectivity on population movement, with the expansion of Flexible Fleets in the East County and Rural Areas region of the Plan potentially facilitating population and economic growth in these areas, thereby increasing their continued feasibility. (See, Section 4.14, "Population and Housing," pp. 4.14-15 through 4.14-17.) Additionally, SANDAG has met with the County to discuss microtransit and looks forward to coordinating with the County in reviewing and updating these assumptions for the next forecast.

The comment also requests that SANDAG publish transparent model outputs and assumptions. Modeling assumptions and outputs are documented throughout the proposed Plan in Appendices B, F, M, and N.

For these reasons, no changes to the EIR are required in response to this comment.

Response A-4.19

This comment requests analysis of interjurisdictional congestion impacts on I-15 and adjacent County arterials, and mitigation strategies balancing regional goods movement with local road capacity and safety. CEQA Guidelines Section 15064.3 requires that, except as provided in Section 15064.3(b)(2) for roadway capacity projects, a project's "effect on automobile delay shall not constitute a significant environmental impact," although automobile delay, or congestion, may still be appropriate for evaluation of projects as part of the planning process. For roadway capacity projects, the CEQA Guidelines specify that agencies have discretion to determine the appropriate measure of transportation impacts consistent with CEQA and other applicable requirements. Further, the degree of specificity required in an EIR corresponds to the degree of specificity involved in the underlying activity (CEQA Guidelines Section 15146). The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning project level mitigation will be evaluated during project-level environmental review. Please refer to Section 4.16, "Transportation," pages 4.16-26 through 4.16-50, for a discussion of transportation impacts and mitigation, and Appendix O, SANDAG Federal Congestion Management Process, of the proposed Plan.

Response A-4.20

This comment requests that SANDAG confirm that the proposed Plan meets California Senate Bill 375 (SB 375) per capita vehicle miles traveled (VMT) and greenhouse gas (GHG) emission reduction targets. As shown by the EIR impact analysis for Impact GHG-2, the proposed Plan meets and exceeds the region's SB 375 target of 19% per capita GHG emissions reduction from cars and light trucks by 2035 relative to 2005 levels. SB 375 does not include a VMT reduction target.

Response A-4.21

This comment requests clarification on how cumulative VMT impacts are mitigated, how California Assembly Bill 2097 (restricting jurisdictions from imposing parking minimums for most land uses if the project is located within one-half mile of public transit) and the California Assembly Bill 130 (requiring the Governor's Office of Land Use and Climate Innovation to develop a mitigation fee program that allows projects to mitigate their associated VMT related impacts by paying a fee to fund transit-oriented development and affordable housing throughout the state) will be applied regionally, and how Americans with Disabilities Act (ADA) efforts will be funded and phased. Section 4.16, "Transportation," includes analysis for VMT impacts. Specifically, as disclosed in the impact analysis conducted for significance criteria TRA-2, the proposed Plan is identified to have

both direct and cumulative significant VMT related impacts, which cannot be feasibly mitigated. The proposed Plan EIR does identify several mitigation measures and strategies that can help to lower VMT generation within the region, including helping to facilitate a regional VMT banking/credit program and regional VMT exchange program with the County of San Diego. However, the participation and effectiveness of these programs cannot be guaranteed, thus, the VMT related impacts would remain significant and unavoidable. Therefore, the EIR adequately discloses how cumulative VMT can be mitigated.

Concerning AB 2097 and AB 130, SANDAG does not play a role in applying either bill regionally. As to the ADA, it is unclear to which efforts the comment refers to. SANDAG ensures its programs and projects comply with the federal ADA, which prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of life. Approximately $4.86 billion of core revenues is estimated from Federal Transit Administration Formula Programs, which include Section 5310 funds that apply to projects providing enhanced mobility to seniors and persons with disabilities. (2025 Regional Plan Appendix I, p. I.13.) Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues. Further information about project phasing is available in Appendix A of the proposed Plan: Transportation Projects, Programs, Policies, and Phasing. Moreover, although there is no law that specifically requires an equity analysis regarding seniors in the context of transportation planning, SANDAG analyzes effects on the senior population as another disadvantaged group and applies social equity principles. (See Appendix E of the proposed Plan: Title VI Analysis and Engagement.) SANDAG complies with the ADA in designing and constructing transportation improvements across the region.

Response A-4.22

This comment asks whether ridership increases are modeled or observed and suggests data related to cross-border freight volumes is outdated and in need of updating.

Ridership is modeled using SANDAG's ABM3 model, which uses a variety of data as inputs, including the household travel survey data referenced in the comment. ABM3 utilizes the 2022 Household Travel Behavior Survey (HTS2022) - the latest household travel survey conducted for SANDAG – which uses smartphone-based travel diaries as the primary means of travel data collection. HTS2022 surveyed 2,800 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center. For accuracy, data from the 2016 household travel survey was used to estimate statistical models when sample size from HTS2022 alone was not high enough. (2025 Regional Plan Appendix M, M.72).

Model validation compares base year 2022 model outputs to independent data, not used to estimate or calibrate model parameters, to ensure that the model is ready to be used for forecasting. Estimated transit ridership is compared with observed transit boardings. Estimated transit boardings from the model are validated against 2022 daily transit ridership obtained from transit agencies in the region. (2025 Regional Plan Appendix M, M.74).

The SANDAG Commercial Vehicle Model used the 2022 SANDAG Commercial Vehicle Establishment and TNC-driver surveys, while the Heavy Truck Model used the Federal Highway Administration Freight Analysis Framework version 5, which is the latest available version of the Framework. The HTM covers long-distance freight movements into and out of San Diego County. The source of the demand in the HTM are commodity flows between shippers and receivers throughout North America, focusing on those with either a trip end (shipper or receiver) in San Diego County or which pass through San Diego County, for example, between Mexico and Los Angeles. Additional information about freight modeling can be found in Appendix M of the proposed Plan.

Response A-4.23

This comment states the County's priorities of coordination with other agencies' planning efforts, ensuring investment in high-VMT subregions and effectively aligning transit and housing investments. This is not a comment on the adequacy of the DEIR. As such, no further response is required.

Response A-4.24

This comment requests confirmation on eligibility for funding opportunities associated with Mobility Hubs and requests that

specific VMT-efficient areas be treated as investment zones. This is not a comment on the adequacy of the DEIR. As such, no further response is required. However, the proposed Plan does not include Mobility Hubs as those were defined in the 2021 Regional Plan. For SANDAG grant programs, SANDAG will continue to work with local jurisdictions to develop eligibility and evaluation criteria that would be proposed to the SANDAG Board of Directors as funding opportunities become available.

Response A-4.25

This comment suggests that the EIR provides minor technical clarifications on transit mode share formatting, duplicative baseline mileage reporting, and explaining the methodology used to establish the regional VMT threshold.

A discussion of how SANDAG's ABM models vehicle miles traveled and mode share for the proposed Plan can be found in Appendix M to the proposed Plan. A detailed description of the background, data sources, methodologies, and outputs associated with ABM3 is available at: https://sandag.github.io/ABM/index.html.

Response A-4.26

This comment requests clarification on the land use and population assumptions for the County's unincorporated areas in the Series 15 Growth Forecast. The comment requests SANDAG reconcile differences between Series 15 and the County's General Plan and evaluate an alternative that aligns with the County's General Plan buildout. See Responses A-4.11 through A-4.14 regarding the population and housing assumptions and projections for the proposed Plan that are analyzed in the EIR. The subregional allocation model used in forecasting population considers multiple factors, including housing capacity, proximity to employment centers, and shorter travel times, as well as each area's demographic characteristics and how they are expected to evolve. While the unincorporated area provides a significant amount of planned housing capacity, those low-VMT priority locations still compete with other areas in the region with larger employment centers and stronger connections to the transportation network, which are more attractive in the model for absorbing growth and thus increasing future population growth in these low-VMT priority locations rather than the unincorporated area. (See Appendix F, 2025 Regional Plan for further details on modeling assumptions for population growth, housing, and employment).

Because Series 15 is aligned with and incorporates the County's parcel-level land use assumptions, the proposed Plan is consistent with the County's adopted General Plan assumptions; thus, there is no need to add an EIR alternative that aligns with General Plan buildout. The alternatives analyzed in the DEIR used a more densified land use pattern than is assumed in the County's adopted General Plan to focus growth in areas with available multimodal transportation. See Global Response 1 for a discussion of the sufficiency of the alternatives analysis in the DEIR.

Response A-4.27

The comment requests analysis of how the Plan's alternatives affect housing distribution, rural transportation conditions, and cumulative impacts such as housing, rural transportation, VMT, wildfire risk, and access to transit in unincorporated areas. The comment also notes that Alternatives 2 and 3 will reduce GHG and VMT impacts, but that impacts for certain resource impacts would remain significant. (See Chapter 5, "Alternatives Analysis.")

Regarding access to transit, improving transit efficiency and access is part of the proposed Plan as discussed in Chapter 2, "Project Description," of the EIR and the alternatives proposed improve transit access by focusing land use growth in areas with available multimodal transportation and increasing mode shifts to transit. In addition, Alternative 3 includes free transit, which will further increase access to transit by making it affordable for all users. Several other impacts areas remain significant and unavoidable as noted in the comment, but as identified in Table 5-3 of Chapter 5, "Alternatives Analysis," several of the impacts (e.g., aesthetics and visual resources, agriculture and forestry resources, biological resources, greenhouse gas emission, transportation, etc.) are decreased as compared to the proposed Plan. Alternatives 2 or 3 would not reduce any of the proposed Plan's significant impacts to less than-significant levels, but they would reduce many of the proposed Plan's significant impacts.

Notably, alternatives do not need to be environmentally superior in all respects to the proposed Project. Courts have noted that for complex projects with a wide scope, "it is practically impossible to imagine an alternative that would provide substantial

environmental advantages in all respects" (Sierra Club v. City of Orange (2008) 163 Cal. App. 4th 523).

Impacts of the proposed Plan were addressed for the entire San Diego region, which includes unincorporated areas of San Diego County. Further, regional transportation projects and improvements were grouped by four distinct subregions, including rural areas: Central County Subregion, East County Subregion and Rural Areas, North County Subregion, and South County Subregion. The proposed Plan's analysis covers the unincorporated areas under the County of San Diego's jurisdiction. The comment does not identify specific inadequacies in the EIR's analysis of housing distribution, rural transportation conditions, and cumulative impacts, such as VMT, wildfire risk, and access to transit in UAs, or suggest how such impacts should be addressed further. The analysis in the EIR is adequate, and no further edits are required in response to this comment. See Responses A-4.11 to 4.13, 4.15 to 4.16, and 4.26 for further discussion of subregional analysis and assumptions.

A-4.27 Cont. impacts in areas such as population and housing, public services, transportation, and land use planning. The County encourages the DEIR to acknowledge how housing affordability contributes to inter-county commuting and growing congestion on County-maintained roads. Greater corridor-specific analysis along State Route (SR)-67, SR-78, SR-79, and SR-94 would help illustrate how growth patterns affect rural mobility and infrastructure needs.

A-4.28

A-4.29 Ongoing coordination will foster consistency with SANDAG's Sustainable Communities Strategy (SCS), Regional Housing Needs Allocation (RHNA), and County planning documents. The County requests strengthened collaboration on RHNA allocation, including consideration of new State requirements for *Acutely Low* and *Extremely Low-Income* housing categories. Expanding coordination on transportation network improvements in UAs will be important to achieving shared housing, mobility, and sustainability goals. The County requests that SANDAG continue to work closely with County staff as Series 15 modeling evolves to ensure unincorporated assumptions are accurate and that potential implications for funding resource allocations are fully understood.

A-4.30

ENVIRONMENTAL RESOURCES & PROTECTION

Aesthetics

A-4.31 The County requests that the DEIR analyze potential direct and indirect visual impacts of transportation projects and mobility hubs on open space, parklands, and wildlife corridors in the UA. Mitigation should minimize light and glare, preserve scenic resources, and incorporate visual simulations for selected sensitive corridors. Alignment with the County's Scenic Highway System, Dark Sky Ordinance, Community Design Review Area Regulations, and Resource Protection Ordinance will strengthen consistency across jurisdictions.

A-4.32

Agricultural and Forestry Resources

A-4.33 The County recommends that the DEIR disclose potential conversion of agricultural and working lands, including any effects on Williamson Act contracts and long-term agricultural viability. Coordination with the County's Purchase of Agricultural Conservation Easements (PACE) program is encouraged to support mitigation measures and maintain the resilience of working lands.

Biological Resources & Conservation

A-4.34 The DEIR should clearly assess cumulative impacts on sensitive habitats, wildlife, linkages, and conservation areas within the UA. The County recommends stronger integration with County Multi-Species Conservation Plan (MSCP) efforts and clarification of terminology, avoiding assumptions that all "Proposed Conserved Habitat Lands" are under conservation restrictions.

A-4.35

A-4.36 The County also encourages inclusion of wildlife crossings, invasive plant control protocols, and updates to reflect recent species listings (e.g., Quino checkerspot butterfly). Coordination with the San Diego Management and Monitoring Program and consideration of the County's draft Butterflies Habitat Conservation Plan will also ensure regional consistency.

A-4.37 The County also requests that the DEIR Chapter 4.4 references to Biological Resources be corrected and cross-checked for accuracy. The County encourages coordination with local conservation plans, ordinances, and Geographic Information Systems (GIS) data to avoid sensitive resources, support mitigation measures, and align project design, California Environmental Quality Act (CEQA) review, and regional planning efforts for biological resource protection.

A-4.38

Response A-4.28

The comment encourages acknowledgment in the EIR that housing affordability contributes to inter-county commuting and congestion on County roads and identifies specific state routes that could be analyzed to understand this issue. As discussed above in Response A-4.19, congestion is not considered a significant environmental impact for purposes of CEQA. However, SANDAG generally agrees that increasing housing affordability in areas with high job capacity would reduce VMT by reducing the commutes of those who would otherwise commute in from areas further away from job centers where the cost of living may be lower. Lack of affordable housing near job centers thus contributes to inter-county commuting and increases the number of passenger vehicles on County-maintained roads. See Section 4.14, "Population and Housing," for a more detailed discussion of affordable housing in the region.

As discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This 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 in the specified corridors 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).

Response A-4.29

This comment requests strengthened collaboration on RHNA allocation. SANDAG agrees with the County and looks forward to continued coordination with County to address the housing needs across the region. This is not a comment on the adequacy of the DEIR. As such, no further response is required.

Response A-4.30

This comment requests coordination on future development of the growth forecast model as applied to unincorporated areas (UAs). SANDAG looks forward to continued coordination with County on future transportation projects and Series 15 modeling efforts in UAs. This is not a comment on the adequacy of the DEIR. As such, no further response is required.

Response A-4.31

This comment requests analysis of potential direct and indirect visual impacts of transportation projects and mobility hubs on open space, parklands, and wildlife corridors in unincorporated areas (UAs), including visual simulations for selected sensitive corridors, and that the EIR requires appropriate mitigation for such impacts. As stated in Response A-4.24, Mobility Hubs are identified in the 2021 Regional Plan, rather than this proposed Plan. Thus, this response focuses on impacts of transportation projects.

As discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, the degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This 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). Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

Applying this methodology, Section 4.1, "Aesthetics and Visual Resources," of the EIR evaluated the potential aesthetic impacts of the proposed transportation network improvements and programs to UAs at a programmatic level, including any potential direct and indirect visual impacts on open space and parklands in the unincorporated County (see pages 4.1-19 through 4.1-24 of the EIR).

The EIR identifies potentially significant impacts from implementation of the proposed transportation network improvements and programs on scenic vistas; scenic resources, including scenic resources in and along a state scenic highway and local scenic routes; visual character and quality in rural and open space areas; and light and glare. The proposed Plan includes the construction of new rail and transit facilities, such as the development of commuter rail service from Mission Valley to the United States–Mexico border via City Heights, National City, and Chula Vista (CR 582) and commuter rail service from Oceanside to Downtown and from Camp Pendleton to Downtown (CR 398). New commuter rail service between Oceanside and Downtown would occur adjacent to and be visible from vehicles traveling on state-eligible scenic highways, such as I-5. Most of the Managed Lane improvements planned by 2035 are in the more urbanized areas of the San Diego region, such as I-5, I-15, segments of I-8 and SR 94, and I-805. Highway improvements would be visible to motorists traveling along SR 52, along SR 125, and in the I-8 and SR 94 rural corridors, which are state-designated and eligible scenic highways. The EIR identifies implementation of regional growth and land use change and transportation network improvements would result in new development and infrastructure affecting scenic resources, in a state scenic highway, and local scenic routes. These potentially significant impacts include those associated with the development of the proposed transportation network improvements and programs in the unincorporated County under both the 2035 and 2050 scenarios. To address these potentially significant impacts, Section 4.1 of the EIR proposes mitigation measures AES-1a through AES-4a specifically for future transportation network improvements and programs.

As discussed in Section 4.4, "Biological Resources," indirect impacts on wildlife corridors would occur as a result of increased human disturbance and/or lighting due to regional growth and land use change. Increased human presence and/or lighting may deter wildlife species from using wildlife corridors, including riparian corridors, and impede use of wildlife nursery sites. Indirect impacts driven by edge effects on corridors vary depending on the scale of the corridor. Most edge effects have a given range of influence from the source. A

given edge effect (e.g., lighting) may affect the entire width of a narrow local corridor and thus seriously impede its function but would reach only a short distance into a wide corridor and thus have a negligible effect on its function. The increased presence of humans in some riparian habitat may alter wildlife behavior relative to current conditions, but many of these areas are already heavily disturbed by human presence. To address the potentially significant impact, Section 4.4 of the EIR proposes Mitigation Measure BIO-3a, specifically for lighting considerations for future development and transportation network improvements. Design measures identified in BIO-3a include incorporation of dimmed, shielded, and directed lighting in areas near corridors that only illuminate the project site; consideration of high-pressure sodium or cut-off fixtures as feasible, provision of vegetative screening to reduce light pollution on corridors, and installation of 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. Implementation of Mitigation Measure BIO-3a would reduce this impact (BIO-3). However, there is no assurance that this mitigation measure would be implemented for all projects or in an equally effective manner due to the wide variety of circumstances, complexity of some sites, and complexity of impacts. These mitigation measures require implementation of various measures to protect public views of scenic vistas; reduce impacts on scenic resources in a State scenic highway and local scenic routes; reduce impacts on visual character; and minimize effects of light and glare.

As discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, unless otherwise noted, the significance criteria specifically developed for this EIR are based on the checklist questions in Appendix G of the CEQA Guidelines. In some cases, the EIR has combined checklist questions, edited their wording, or changed their location in the document in an effort to develop criteria that reflect the programmatic level of the impact analysis and the unique nature of the proposed Plan or local conditions. Potential direct and indirect impacts on wildlife corridors from implementation of the proposed Plan were evaluated under significance criteria BIO-3 in Section 4.4, "Biological Resources," (see pages 4.4-78 through 4.4-86 of the EIR). BIO-3 suggests the proposed Plan would have a significant impact on biological resources if it would "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." As discussed on pages 4.4-78 through 4.4-86 of the EIR:

> Finer-scaled models, including the MSCP cores and linkages maps (County of San Diego 1998) and the climate resilient wildlife movement models developed by SDSU (Jennings et al. 2019) were used for the quantitative analysis described in this EIR.
>
> Regional corridor impacts were quantitatively analyzed by overlaying the transportation network footprint on the modeled wildlife movement network developed by SDSU (Jennings et al. 2019) and by reviewing the intersection of the transportation network improvements with mapped wildlife movement corridors…. The analysis overlays the transportation network project footprints… with the mapped movement corridors to calculate where potential conflicts with mapped wildlife corridors could occur. The discussion identifies specific regional corridors that occur in areas with transportation network improvements for each horizon year and quantifies the acreage that could potentially be impacted by the transportation network improvement program's linear projects. The impact analysis includes wildlife movement corridors that would be used by wildlife to move to and from wildlife nursery sites.
>
> …
>
> As discussed for BIO-1, transportation network improvements are primarily focused within and adjacent to existing urbanized areas along all major highways and in the coastal and western portion of the County. The majority of transportation improvements occur via bikeways and transportation hubs in urban areas that have little direct impacts on wildlife movement. However, additional lanes and highway and rail improvements planned along major highways by 2035 would impact wildlife corridors and linkages. These impacts would include impacts on riparian corridors as a result of bridge crossings or existing bridge widenings or impacts to wetlands buffers. Transportation

network improvements that would impact wildlife corridors are planned for existing highways, rail and transit projects, or arterials that already act as wildlife barriers. New road construction would likely require wildlife over- and underpasses (e.g., the Beyer Boulevard extension for the Southwest Village Specific Plan includes a wildlife overpass). However, they may make existing crossings less attractive for use by wildlife species or result in ecological sinks because migration corridors would be cut off, and the greater width may lead to additional highway mortality for terrestrial and avian species that attempt to cross transportation corridors at grade. Direct impacts to and effects between modeled wildlife movement corridors and linkages from the linear transportation network projects are presented in Table 4.4-11.

Almost the entire planned transportation network could potentially affect regional wildlife corridors and linkages. The majority of arterials are existing roads in highly urbanized areas and do not cross canyons or riparian areas that provide movement corridors for wildlife. Bikeways would have relatively little impact on corridors because most are within or directly adjacent to developed areas.

…

Indirect Impacts

The type and nature of indirect impacts that may occur on wildlife movement by 2035 include impacts from light and noise pollution, development encroachment and edge effects (i.e. wildlife may get lured into dead-ends of vegetated spaces such as parks or greenbelts), poorly designed and installed wildlife underpasses and directional fencing (wildlife may get trapped or discouraged from crossing or may experience effects from lack of food or shelter).

However, given the programmatic nature of these improvements, it cannot be guaranteed that all future project-level impacts related to aesthetics and visual resources can be mitigated to less-than-significant levels. As a result, the EIR concluded that these impacts would remain significant and unavoidable. Impacts of the proposed Plan were addressed for the entire San Diego region, which includes unincorporated areas of San Diego County. The comment does not identify specific inadequacies in the EIR's analysis of potential direct and indirect visual impacts on open space, parklands, and wildlife corridors in the unincorporated County, or suggest how such impacts should be addressed further. The analysis in the EIR is adequate, and no further edits are required in response to this comment. See Responses A-4.11 to 4.13, 4.15 to 4.16, and 4.26 to 4.27 for further discussion of subregional analysis and assumptions.

Thus, given the programmatic nature of the project, the EIR adequately evaluates the potential direct and indirect visual impacts on open space, parklands, and wildlife corridors in the unincorporated County. Accordingly, no changes to the EIR are warranted in response to this comment.

Response A-4.32

The commenter states that adherence to the County's Scenic Highway System, Dark Sky Ordinance, Community Design Review Area Regulations, and Resource Protection ordinance will strengthen consistency across jurisdictions. Section 4.1.2, "Regulatory Setting," in Section 4.1 of the EIR describes the applicable federal, state, and local laws, regulations, plans, and policies related to aesthetics and visual resources. The County's Scenic Highway Program, Dark Sky Ordinance, Community Design Review Area Regulations, and Resources Protection Ordinance are described on pages 4.1-11 through 4.1-18 of the EIR. Additionally, mitigation measures AES-1a through AES-4a stipulate, where applicable, that mitigation measures to address potentially significant effects on aesthetic and visual resources ensure compliance with goals and policies in county and city general plans. This mitigation requirement would provide alignment with the County's goals and policies related to the protection of visual resources. In addition, compliance is assumed in the EIR for existing mandatory regulations because they are required by law. This would include the Dark Sky Ordinance, Community Design Review Area Regulations, and Resources Protection Ordinance, as requested by the commenter. All future development within the unincorporated county would be subject to the County's Scenic Highway Program and the aforementioned regulatory requirements.

Moreover, as noted in Response A-4.31, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that

would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.33

This comment recommends that the EIR disclose potential conversion of agricultural and working lands, including any effects on Williamson Act contracts and long-term agricultural viability, and encourages coordination with the County's Purchase of Agricultural Conservation Easements (PACE) program. The comment does not identify any manner in which the analysis in the EIR is inadequate. Thus, no further response is required. However, the following response summarizes how the existing analysis of impacts to agricultural and working lands, including effects on Williamson Act contracts and long-term agricultural viability, is adequately analyzed and mitigated in the EIR.

Section 4.2, "Agriculture and Forestry Resources," of the EIR included an analysis of the proposed Plan's potential impacts on agricultural resources, including the conversion of agricultural lands and Williamson Act contract lands. Specifically, the EIR's analysis of Impact AG-1 in Section 4.2 analyzed the proposed Plan's impacts on agricultural lands. Impacts were considered significant if any agricultural lands would be converted to nonagricultural uses as a result of the proposed plan.

As detailed on pages 4.2-13 through 4.2-22 of the EIR, impacts associated with the conversion of agricultural land are quantified, and conversion projections include agricultural parcels of all sizes. The acreage of agricultural land that could be converted to nonagricultural use from implementation of the proposed Plan is identified in Tables 4.2-2 through 4.2-5 and depicted on Figures 4.2-4 and 4.2-5 of the EIR. In addition to impacts from direct conversion of land, the analysis also considers indirect effects on the long-term viability of continued agricultural production in areas where regional growth and land use change or transportation network improvements would result in indirect impacts on these resources.

The EIR concluded that, despite the implementation of Mitigation Measures AG-1a and AG-1b, there is no assurance that the impacts of all development and transportation network improvement projects and programs included in the proposed Plan would be reduced to less-than-significant levels as conversion of agricultural land from implementation of the proposed Plan may still occur. Therefore, the Draft EIR concluded that agricultural land conversion impacts would remain significant and unavoidable.

Additionally, the EIR's analysis of Impact AG-2 in Section 4.2 analyzed conflicts with lands zoned for agricultural use and lands under Williamson Act contracts. As detailed on page 4.2-22 of the EIR, a significant impact would occur under AG-2 if any existing lands zoned for agricultural use or with a Williamson Act contract would be designated for a nonagricultural land use as a result of the regional growth and land use change or transportation network improvements under the proposed Plan. The EIR considered impacts significant if any existing lands zoned for agricultural use or with a Williamson Act contract would be designated for a nonagricultural land use as a result of the proposed Plan. For impact AG-2, 100% of the existing land zoned for agricultural use or under Williamson Act contract that would be redesignated as Spaced Rural Residential is identified as a conflict and a direct impact. The acreage of Williamson Act land that the proposed Plan would potentially conflict with is identified in Tables 4.2-6 and 4.2-7 and depicted on Figure 4.2-6 of the EIR. Indirect impacts are analyzed qualitatively and occur when growth near agricultural zoned uses would cause land use conflicts.

The EIR determined that, despite the implementation of Mitigation Measures AG-1a and AG-1b, there is no assurance that the impacts of all development and transportation network improvement projects implementing the proposed Plan would be reduced to less-than-significant levels as conflicts with existing zoning for agricultural use or a Williamson Act Contract from implementation of the proposed Plan may still occur. Therefore, the EIR concluded that conflicts with lands with existing zoning for agricultural use and under Williamson Act contract would remain significant and unavoidable.

To address both impact AG-1 and AG-2, Mitigation Measure AG-1a first requires preserving existing agricultural lands by avoiding agricultural land conversion when feasible. If avoidance is not feasible, Mitigation Measure AG-1a identifies measures to reduce

conversion of agricultural lands to nonagricultural use that consist of, among other things, the use of other commensurate solutions, such as payment of an agricultural resource impact fee made pursuant to an approved in-lieu fee program. As specified in Mitigation Measure AG-1a, possible programs include the PACE Program established by the County of San Diego where the PACE Mitigation Bank can be used to offset impacts.

As demonstrated, the EIR already includes the recommendations in the comment, including a comprehensive, programmatic analysis of impacts associated with the conversion of agricultural lands and Williamson Act contract lands. Mitigation Measure AG-1a explicitly encourages use of the County's PACE program to offset impacts on agriculture resources and maintain the resilience of working lands. Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.34

The comment requests a clear assessment of cumulative impacts on biological resources within the UA, specifically cumulative impacts on sensitive habitats, wildlife, linkages, and conservation areas. Section 4.4, "Biological Resources," of the EIR includes a cumulative impacts analysis (C-BIO-1) (page 4.4-91). This analysis includes a thorough analysis of cumulative effects on biological resources from the proposed Plan in combination with probable future projects and impact projections in adopted plans. As explained, the probable future projects and impact projections in adopted plans would result in a significant cumulative condition.

The proposed Plan would contribute to the cumulative loss of biological resources due to conversion of undeveloped lands to developed lands. Land use changes and transportation network improvements associated with both the proposed Plan and regional projects and plans would allow for more development and redevelopment to occur, and would therefore result in substantial direct and indirect adverse effects on sensitive habitats and special-status and on substantial interference with fish and wildlife movement, wildlife corridors, and nursery sites. Thus, the combination of the proposed Plan and continued growth and development would result in significant cumulative biological resource impacts. Because cumulative biological resource impacts would be significant, and because the proposed Plan's incremental biological resource impacts are significant, the proposed Plan's incremental biological resource impacts are cumulatively considerable and thus significant (Impact C-BIO-1).

The proposed Plan's impacts related to conflicts with adopted policies of HCPs and NCCPs and other local policies and ordinances protecting biological resources, in combination with similar impacts in adopted plans and other cumulative projects, would not cause a significant cumulative impact and the proposed Plan's incremental contribution would not be cumulatively considerable.

The EIR concludes the proposed Plan's incremental contributions to cumulative biological resources impacts are cumulatively considerable (Impact C-BIO-1) for years 2035 and 2050. Mitigation measures BIO-1a through BIO-1e, BIO-2a through BIO-2c, BIO-3a would not reduce the proposed Plan's incremental impacts to less than significant. Therefore, the proposed Plan's incremental contributions to cumulative biological impacts in years 2035 and 2050 would remain cumulatively considerable and thus significant post-mitigation.

The EIR likewise includes a comprehensive analysis of the Project's cumulative impacts on conservation areas. As discussed on pages 4.4-92 and 4.4-94, the proposed Plan's impacts related to conflicts with adopted policies of HCPs and NCCPs and other local policies and ordinances protecting biological resources, in combination with impacts from adopted plans and other cumulative projects, would not cause a significant cumulative impact in 2035 and 2050, and the proposed Plan's incremental contribution would not be cumulatively considerable.

Impacts of the proposed Plan were addressed for the entire San Diego region, which includes unincorporated areas of San Diego County. The comment does not identify specific inadequacies in the EIR's analysis of cumulative impacts on sensitive habitats, wildlife, linkages, and conservation areas in the unincorporated County, or suggest how such impacts should be addressed further. The analysis in the EIR is adequate, and no further edits are required in response to this comment. See Responses A-4.11 to 4.13, 4.15 to 4.16, and 4.26 to 4.27 for further discussion of subregional analysis and assumptions. For these reasons, no changes to the EIR are required in response to this comment.

Response A-4.35

The comment recommends stronger integration with the County's Multi-Species Conservation Plan (MSCP) efforts. The commenter also requests clarification on terminology, avoiding assumptions that all "Proposed Conserved Habitat Lands" are under conservation restrictions. Section 4.4.2 of the EIR, "Regulatory Setting," summarizes the County's MSCPs, including the South County MSCP and the Draft North and East County MSCPs (page 4.4-46). Table 4.4-5 provides a description of the approved County of San Diego MSCP.

Hardline and softline preserve systems are described on pages 4.4-45 to 4.4-46 and defined on page 4.4-47 in Municipal MSCP Subarea Plans as "preserve areas that are identified to contain future preserved lands as part of the Plan's conservation cores and linkages." A hardline preserve system is an area for the conservation of natural and biological resources that has been dedicated for conservation through certain land covenants such as easements, title restrictions or deeds. A softline preserve system is a term in conservation planning for areas with high biological value targeted for conservation or in which conservation will be encouraged through land acquisition, mitigation, and conservation, but where conservation has not yet occurred. In the South County's MSCP, softline preserves are called Pre-Approved Mitigation Areas (PAMA). The purpose of the PAMA is to identify target areas that favor developing outside of the PAMA and mitigating inside the PAMA. These areas may also be targets for acquisition by various entities from willing sellers when funding is available or to establish mitigation banks. The comment references "Proposed Conserved Habitat Lands." While this phrase is not used in the EIR, "Proposed Conserved Habitat Lands" presumably refers to the PAMA and other areas that are dedicated for conservation in the County's approved MSCP (see explanation below).

A description of the analysis methods is provided in the BIO-1 Analysis Methodology section (pages 4.4-57 and 4.4-58). Impacts from the regional growth and land use change and transportation footprint on biological resources in the County's preserve system were analyzed based on the best available information, including the County's MSCP GIS database and the respective conservation allocations in the database.

The EIR recognizes that not all softline preserves are conserved and some can be developed, as illustrated in the Analysis Methodology for BIO-1 (pages 4.4-57 and 4.4-58 and following):

> All MSCP Preserves are considered 90–100% conserved and the MHCP hardline preserves were considered 100% conserved. Softline preserves and Subarea Plan preservation areas were assigned a range of conservation values. For the purpose of the programmatic evaluation of this EIR, the County MSCP PAMA was assigned an 80% conservation value. All other Softline and Subarea Plan preserves were assigned a 75% conservation value, including the MHPA for the City of San Diego and City of Chula Vista MSCP, and MHCP Focused Planning Area [FPA]. The Biological Core and Linkage Area (BCLA) for the MHCP was considered 70% conserved. Major Amendment Areas for the South County MSCP received a 50% conservation multiplier respectively. According to County of San Diego Guidelines, single-family residential development in the unincorporated areas of the County on parcels of 10 acres or less fall within the Minor Amendment Areas of the South County MSCP. According to the County's BMO, the parcels within the PAMA were considered 80% conserved, and outside the PAMA 50% conserved.
>
> The County of San Diego does not assign conservation goals to anything except hardline preserves and evaluates all other development proposals on a case-by-case basis. However, the overall MSCP goal is to conserve approximately 75% of sensitive lands within the PAMA. Major Amendment Areas may be completely developed but require mitigation according to prescribed mitigation ratios identified in the BMO. For the purpose of the programmatic analysis, this analysis assigned an average mitigation ratio of 2:1 to impacts in the Major Amendment Area, which would translate to a 50% conservation goal. The take-authorization areas within the South County MSCP assume that MSCP-covered species and habitats can be developed; therefore,

> this analysis assigned no conservation value to the take-authorization areas. All other developed land use categories are considered 100% developed; that is, the entire parcel would be considered permanently converted from its previous condition to fully developed, with no habitat value. Some preserve designations, specifically the MHCP FPA, the City of Chula Vista MSCP preserve, and City of San Diego MHPA, have varying degrees of conservation percentages. For the purpose of this programmatic analysis, the highest conservation percentages were used where available to calculate impacts from regional growth and land use changes. This method results in an overestimation of impacts, i.e. impacts are estimated to occur to the highest level of conservation when in reality, some impacts may occur to less-regulated habitat or habitat with a lower conservation percentage This is a conservative approach and assumes that impacts on sensitive vegetation communities would be mitigated at approved offsite mitigation banks (assuming several additional wetland mitigation banks would be established in the County), which has become common practice in San Diego County. The rationale and detailed methodology to quantify impacts for each category are described below. Appendix E-5 details which land use classifications are categorized as undeveloped and developed (i.e., spaced rural residential land use and other developed land uses) for purposes of this EIR.

Moreover, the EIR explains that the totals of conserved lands and habitat preserves provided in Tables 4.4-13 and 4.4-14, outlining the "Forecasted Encroachments into Conservation Areas and Lands Designated for Conservation by Regional Conservation Plans within the San Diego Region" between 2026–2035 and 2036-2050, respectively, "are derived from the San Diego County Conserved Lands Database (SDMMP 2025) and include mitigation lands preserved in perpetuity, lands owned or managed by lands trusts (i.e. San Diego Habitat Conservancy) and land conservancies (i.e. San Diego River Park Conservancy, Endangered Habitat Conservancy, etc.), and ecological or wildlife reserves and preserves managed by federal and state wildlife agencies." (EIR, pp. 4.4-88, 89.)

The EIR adequately analyzes the County MSCP efforts and makes well-reasoned and evidence-backed assumptions regarding the percentage of lands under conservation restrictions.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.36

The commenter requests that the EIR's analysis include wildlife crossings, invasive plant control protocols, and updates to reflect recent species listings. The commenter also states that coordination with the San Diego Management and Monitoring Program (SDMMP) and consideration of the County's draft Butterflies Habitat Conservation Plan will also ensure regional consistency.

The EIR provides a thorough and comprehensive discussion of impacts to wildlife corridors in significance criteria BIO-3, beginning on page 4.4-78. Measures included in mitigation measure BIO-3 address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies. To address the County's concern, please also see Global Response 3, Response A-4.31 and Response A-4.34. Moreover, the comment does not identify inadequacies with the EIR's discussion of wildlife corridors. For these reasons, no changes to the EIR are required in response to this comment related to analysis of wildlife crossings.

Invasive plant protocols are addressed in mitigation measure BIO-1e:

> "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."

For these reasons, no changes to the EIR are required in response to inclusion of invasive plant protocols.

In response to this comment and comments from the wildfire agencies, the proposed listing of Quino checkerspot butterfly under CESA was added to the text of the EIR in Section 4.4.1 and Table 4.4-3, and the listing status of four species proposed for ESA listing was updated. Impacts to this species would require CDFW protocol habitat assessments and/or focused species surveys and the

application of an Incidental Take Permit under Section 2081 of the Fish and Game Code. In addition, EIR mitigation measure BIO-1a recommends early consultation with the wildlife agencies to avoid, minimize and mitigate for impacts to sensitive biological resources.

The EIR adequately coordinates with and incorporates the SDMMP into its analysis and mitigation measures. The EIR's description of existing conditions for vegetation communities in the San Diego region, and of suitable habitat for special status species, federally and state-listed plant, invertebrate, reptile and amphibian, bird, and mammal species were derived from the SDMMP. (See, e.g., EIR at pp. 4.4-3, 5, 11, 14, 19, 21, 22, 23.) The SDMMP further informed the analysis of San Diego conservation planning areas and conserved lands (*Id.* at 4.4-48), of the Project's estimated direct impacts on sensitive vegetation communities and regulated aquatic resources within the San Diego Region (*Id.* at 4.4-59, Table 4.4-7; 4.4-61, Table 4.4-8), and of the Project's impacts on wildlife movement. (*Id.* at 4.4-78.)

As described on page 4.4-3, and illustrated in Figure 4.4-1:

> The description of existing conditions for vegetation communities in the San Diego region is based on a compilation of regionally collected vegetation data, which are aggregated in a geographic information system (GIS) data layer of existing vegetation and administered by the County of San Diego (SDMMP 2021) and by the San Diego Management and Monitoring Program (SDMMP) (2021). This dataset covers the entire San Diego region and uses the modified Holland classification system (Holland 1986; Oberbauer et al. 2008). The data were collected mostly for the development of the MSCP and MHCP and have been modified and updated over the years from a variety of sources and cataloged by SANDAG and the County of San Diego; the most recent update reflected in this EIR is from 2021 (SDMMP 2021).

As described on page 4.4-11:

> …Suitable habitat for special-status species was ascertained from the 2025 SDMMP vegetation layer. USFWS-designated critical habitat boundaries (USFWS 2025b) were used to identify areas likely to contain suitable habitat for federally listed species; however, the presence of critical habitat does not necessarily mean the associated listed species is present. Additional project-level analysis would be conducted in these areas to determine the presences of listed species.

As described on page 4.4-49:

> The SDMMP, established in 2008, facilitates and assists SANDAG, local jurisdictions, wildlife agencies, and other regional stakeholders and land managers in the implementation of conservation management and monitoring within the San Diego region. This region-wide effort was created to implement long-term management strategies identified in the San Diego NCCPs and is partially funded through SANDAG's EMP. The SDMMP's goal is to assist with the alignment of regional efforts to implement activities identified in the Management Strategic Plan (MSP) (SDMMP 2017). The MSP identifies priority species, and has developed and is currently developing, best management practices (BMPs) and protocols for sensitive plants and animals, wildlife movement, fire management, and grazing management. The SDMMP developed and maintains a conserved lands and species database (Master Occurrence Matrix, MOM) that is frequently updated (Figure 4.4-17) and a library containing studies and reports relevant to the regional conservation efforts funded by the TransNet Program.

Coordination with the SDMMP is further addressed in mitigation measures BIO-1d and BIO-3a. BIO-1d requires that SANDAG must, and other lead agencies can and should, prepare and implement long-term management plans for impacts on regulated waters, or an HMP or resources management plan 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." (EIR, p. 4.4-66). BIO-3a requires that design measures "Incorporate wildlife movement and corridor planning data and utilize data generated by SDMMP into project design." (EIR, p. 4.4-85).

The EIR adequately incorporates coordination with the SDMMP. For these reasons, no changes to the EIR are required in response to this comment.

With regards to the analysis of the County's Draft Butterflies Habitat Conservation Plan, the EIR addresses draft HCPs when the respective jurisdiction implements the Draft HCPs through ordinances, planning guidelines, or local directives, or when there are signed agreements between the jurisdiction and the Wildlife Agencies. However, the CEQA analysis considers potential conflicts with only adopted HCPs consistent with CEQA Guidelines Appendix G question IV.e and Section 15125(d)(e)). See also Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134, 1146 (CEQA does not require EIRs to analyze impacts of a project on unadopted conservation plans.) Moreover, there is no publicly available draft of the County's Draft Butterflies Habitat Conservation Plan, which the County seems to still be drafting. Thus, consideration of the Plan in this EIR is neither feasible nor necessary. For these reasons, no changes to the EIR are required in response to this comment.

Response A-4.37

The commenter requests that references for Chapter 4.4 of the EIR be reviewed and cross-checked for accuracy. The entire Section 4.4 of the EIR has been cross-checked for accuracy and corrections have been made in Section 4.4 and the References section of the EIR.

Response A-4.38

The commenter encourages coordination with local conservation plans, ordinances, and GIS data to avoid sensitive resources, support mitigation measures, and align project design, CEQA review, and regional planning efforts related to biological resources protection.

The EIR includes an analysis of the proposed Plan's consistency with adopted HCPs. The EIR assessed impacts to all adopted NCCPs in Impact BIO-4 of Section 4.4, "Biological Resources," of the EIR and concluded that the proposed Plan would not cause a significant impact in the 2035 and 2050 plan years. Project-specific planning, review by local agencies, regulatory agencies, and wildlife agencies, and CEQA review of land use and transportation projects would minimize or remove any potential conflict with policies and ordinances protecting biological resources because of built-in provisions in the NCCP implementation policies and ordinances to avoid impacts to the preserve system. Please see response to comment A-4.36 (4) which explains why the EIR conflicts with only adopted HCPs pursuant to CEQA guidelines. Please also refer to Global Response 3, and Responses A-4.35 and 36, which further explain HCPs, local plans, and GIS data analyzed in the EIR. As discussed in A-4.36, GIS data from the SDMMP informed the CEQA review and mitigation of impacts to biological resources. (See, e.g., EIR at pp. 4.4-3, 5, 11, 14, 19, 21, 22, 23.) The SDMMP further informed the analysis of San Diego conservation planning areas and conserved lands (*Id.* at 4.4-48), of the Project's estimated direct impacts on sensitive vegetation communities and regulated aquatic resources within the San Diego Region (*Id.* at 4.4-59, Table 4.4-7; 4.4-61, Table 4.4-8), and of the Project's impacts on wildlife movement. (*Id.* at 4.4-78.)

The programmatic biological resources analysis in the EIR was conducted using publicly available and published GIS data, including SDMMP and County of San Diego vegetation communities data (page 4.4-3; 4.4-70, 71), SDMMP, USFWS and CNDDB data for special-status species distributions (page 4.4-12), a compilation of MSCP, MHCP and SDSU modeled data for wildlife movement corridor depictions (page 4.4-33, 4.4-79), and the MSCP and MHCP databases to identify conserved lands in San Diego County page 4.4-90). Impacts were evaluated by overlaying the transportation improvement project footprints and regional growth and land use change with GIS baseline biological dataset (page 4.4-59 and 60). More refined GIS analysis for the purpose of avoiding sensitive resources would be conducted for second-tier projects when a project footprint is defined and biological field survey data would be overlaid in GIS to identify sensitive resources to avoid, calculate impacts and identify potential mitigation measures. GIS would also be used to identify conservation and preserve boundaries of the regional NCCPs and evaluate a project's consistency with the regional NCCP within the area of the project's influence.

For these reasons, no changes to the EIR are required in response to this comment.

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Energy

A-4.39 The County requests recognition of the San Diego Regional Energy Network (SDREN), which is administered jointly by the County and San Diego Community Power. SDREN will deliver regional energy efficiency and clean energy programs, prioritizing hard-to-reach communities across the region.

A-4.40 Coordination with the County's Climate Action Plan (CAP) and Regional Decarbonization Framework (RDF) will further strengthen alignment on energy-related mitigation measures.

Geological Resources

A-4.41 The County recommends coordination with its septic system program (Onsite Wastewater Treatment Systems Ordinance and Local Agency Management Program for Onsite Wastewater Treatment Systems, Grading Ordinance, and the General Plan Safety and Conservation Elements). Ensuring consistency with these regulatory frameworks will support resilient development in the UA.

Greenhouse Gas Emissions and Climate Change

A-4.42 The County supports the Plan's emphasis on reducing GHG emissions through mode shift, VMT reduction, and transit investment. To strengthen this alignment, the County recommends extending modeling beyond 2035, clarifying methodology for assessing consistency with the County CAP (i.e., Table G-1), addressing impacts to the UA, and incorporating programmatic mitigation opportunities, such as the County's RDF and carbon sequestration and resilience

A-4.43 through equitable investment opportunities. Investments in heat and storm-resilient infrastructure, equitable criteria for GHG-related funding, and localized metrics for the UA will help ensure

A-4.44 regional benefits are equitably distributed. The reference to the Zero-Emission Vehicle Incentive Program should be updated to reflect its current launch date of 2026.

Noise, Vibration, and Construction Standards

A-4.45 The County appreciates the inclusion of the County's General Plan Noise Element and Vibration and Construction Noise Standards. The County recommends continued coordination and collaboration to ensure mitigation of construction and operational impacts on regional planning for noise and vibration impacts regarding transportation network improvements in the UA communities.

Wildfire, Hazards, and Hazardous Materials

A-4.46 The County urges expanded coordination and collaboration efforts for regional emergency planning and evaluation of project alignment mapping for flood mitigation and prevention with Federal Emergency Management Act (FEMA) compliance, and wildfire evacuation access,

A-4.47 utilizing wildfire risk language, and hazardous material risks, particularly in the UA. Project timing, prioritization, and level of risk should reflect wildfire vulnerability and evacuation needs. The County requests consistency with the County's Emergency Operations Plan, Operational Area Recovery Plan, Multi-Jurisdictional Hazard Mitigation Plan, coordinating with the County's Certified Unified Program Agency (CUPA) for the State's Hazardous Waste Control Law, the Site Assessment and Mitigation Program, the Underground Storage Tank Program, and the Hazardous Materials Area Plan.

A-4.48 The County recommends that the section titled, *'Hazards/Emergency Preparedness'* of the DEIR be updated to reference the San Diego Multi-Jurisdictional Hazard Mitigation Plan, which includes climate change considerations. In addition, we are requesting clarification that the County Office

A-4.49 of Emergency Services (OES) coordinates the overall disaster response, that the Unified Disaster Council (UDC) governs regional emergency planning, and that evacuation decisions be made at

Response A-4.39

The commenter requests recognition of the San Diego Regional Energy Network (SDREN) in the Energy section of the EIR. SANDAG acknowledges this comment and a discussion of SDREN and its role in the region has been added to Sections 4.6, "Energy," and 4.8, "Greenhouse Gas Emissions and Climate Change," in response to this comment.

As shown on pages 4.6-15 and 4.8-26, the following addition has been added to Sections 4.6, "Energy," and 4.8,"Greenhouse Gas Emissions and Climate Change":

> ### San Diego Regional Energy Network
>
> The San Diego Regional Energy Network (SDREN) operates as a locally administered portfolio of programs addressing the varied needs of the public, residential, commercial and cross-cutting sectors across San Diego County. In August 2024, the California Public Utilities Commission approved SDREN's 2024-2031 Business Plan and 2024-2027 Portfolio Application. Administered by San Diego Community Power, in partnership with the County of San Diego (County), SDREN will deliver regional energy efficiency and clean energy programs, prioritizing hard-to-reach communities across the region.

Response A-4.40

The commenter notes that coordination with the County's Climate Action Plan (CAP) and Regional Decarbonization Framework (RDF) will further strengthen alignment on energy-related mitigation measures. SANDAG recognizes the role of the County's CAP and RDF in addressing energy use and GHG emissions in the region. As stated on page 2-40 of the EIR, one of the implementation actions for the proposed Plan is continuing to support CAP implementation and monitoring. As discussed in Chapter 4, "Environmental Impact Analysis Approach," the proposed Plan's cumulative impact analysis considers, among other local plans, the County's CAP (EIR, pp. 4-8 to 4-9.) The County's CAP and RDF are specifically discussed in Section 4.8, "Greenhouse Gas Emissions and Climate Change," starting on page 4.8-37 through 4.8-38 under Impact GHG-3, "conflict with or impede the

implementation of local plans adopted for the purpose of reducing GHG emissions." As discussed in Impact GHG-3, the proposed Plan would not conflict with the implementation of the local measures adopted by SANDAG's partner municipalities. This is further detailed in Appendix G, "CAP Consistency." SANDAG's commitment to facilitating local GHG reductions, through CAPs or GHGRPs, is further iterated in Mitigation Measure GHG-4a, "Allocate Grant Funding to Projects that Reduce GHG Emissions," which stipulates that SANDAG shall provide grant funding for underfunding GHG-reducing projects within the SANDAG region (EIR, pp. 4.8-44 to 4.8-45). As also discussed in Section 4.8.5 under Impact C-GHG-1, "make a cumulatively considerable contribution to adverse effects related to ghg emissions," implementation of Mitigation Measure GHG-4a, in combination with Mitigation Measures GHG-4b through GHG-4e, would reduce SANDAG's contribution to global climate change; however, the EIR concludes that the proposed Plan would result in a cumulatively considerable contribution to climate change.

The EIR evaluates the proposed Plan's impacts to energy based on Section VI of Appendix G of the CEQA Guidelines. For Impact EN-2, impacts were evaluated with respect to SANDAG's Regional Energy Strategy, SANDAG's Priority Climate Action Plan, local CAPs, the 2022 Scoping Plan, and applicable sections of general plans. An analysis of the proposed Plan's potential to conflict with the County's CAP has been added to Appendix G to the EIR on pages G-28 through G-31. As described in Appendix G and Section 4.8, "Greenhouse Gas Emissions and Climate Change," implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan would not conflict with or impede the implementation of adopted CAPs, including the County's CAP. No additional edits were made to the EIR in response to this comment and the conclusions of the EIR remain unchanged.

Response A-4.41

The commenter recommends coordination with the County's regulations and ordinances. Section 4.7.2, "Regulatory Setting," in Section 4.7 of the EIR describes the applicable federal, state, and local laws, regulations, plans, and policies related to geology and soils, including those specific to onsite wastewater treatment systems (OWTS) (i.e., septic tanks). The County's septic tank regulations, which include the updated OWTS ordinance and Local Agency Management Program (LAMP) for OWTS, as well as the County's Grading Ordinance and applicable general plan policies are described on pages 4.7-7, 4.7-19 through 4.7-23, 4.7-36, 4.10-27 and 4.10-28 of the EIR.

As discussed under Impact GEO-4:

> Regional growth and land use change associated with the proposed Plan would have the potential to occur on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. However, regional growth and land use change associated with the proposed Plan would be required to adhere to design standards described in the CBC and all standard design, grading, and construction practices to avoid or reduce adverse groundwater impacts associated with expansive soils, or soils incapable of adequately supporting the use of septic tanks and alternative wastewater disposal systems, as described in Section 4.7.2, "Regulatory Setting." Specifically, the CBC requires provisions to classify soils as expansive and measures to address expansive soils' potential impacts on structures, such as septic tanks. SWRCB Resolution No. 2012-0032 establishes siting, construction, performance requirements, corrective action requirements, monitoring requirements, and waste discharge requirements, which would ensure that septic tanks or OWTS would not affect groundwater or surface water to a degree that makes it unfit for drinking water or other uses. In addition, the San Diego County 2025 LAMP for OWTS, effective February 1, 2025, establishes an installation permitting process and prescribes standards to protect groundwater sources and surface water bodies from pollution through the proper siting, design installation, operation, and maintenance of individual new and replacement OWTS and other sanitation facilities. All future development within the unincorporated county that proposes the use of OWTS would be subject to these regulatory requirements.
>
> Corrective measures would be applied to the design of individual future projects. All site designs would be reviewed and approved by the appropriate agencies and consistent with regulatory requirements, which would minimize risks that new septic tanks or alternative wastewater disposal systems associated with regional growth and land use change would

result in adverse groundwater impacts due to unsuitable soils. The impact would be less than significant.

Moreover, as noted in Response A-4.31, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time to ensure compliance with applicable regulatory requirement. In addition, compliance is assumed in the EIR for existing mandatory regulations because they are required by law.

Together, this analysis ensures the requested coordination with County septic system regulatory frameworks. Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.42

The comment expresses support for the proposed Plan's emphasis on reducing GHG emissions through mode shift, VMT reduction, and transit investment. The comment further suggests that modeling for the proposed Plan's analysis be extended beyond 2035, clarification be provided regarding the EIR's methodology for assessing consistency with the County's CAP, impacts to the unincorporated area be addressed, and programmatic mitigation opportunities such as the County's RDF and carbon sequestration and resilience be incorporated.

The proposed Plan's analysis in Section 4.8, "Greenhouse Gas Emissions and Climate Change," does extend beyond 2035. Impacts are addressed for 2035 and 2050 under Impact GHG-1. As stated on page 4.8-29, "This analysis compares regional GHG emissions projections for 2035 and 2050 to 2022 baseline regional GHG emissions to determine whether implementation of the proposed Plan would directly or indirectly result in an increase in GHG emissions compared to existing conditions (2022)." Thus, modeling of GHG emissions extends beyond 2035 to analysis year 2050.

Impact GHG-2 considers a GHG impact significant if it would "Conflict with the SANDAG region's achievement of SB 375 GHG emissions reduction targets for 2035." CARB has not established a post-2035 target, such that project emissions beyond 2035 are not relevant to the threshold question under Impact GHG-2. However, Impact GHG-4 also analyzed GHG impacts for 2030 and 2045. Impact GHG-4, which considers a GHG impact to be significant if it would "[b]e inconsistent with the state's ability to achieve the 2030 reduction target of SB 32 and 2045 reduction goal of AB 1279." "To perform this analysis, SANDAG identified estimated emissions reduction reference points for the region for 2030 and 2045 based on the target levels and dates from SB 32 and AB 1279. Emissions for 2050 have also been included for informational purposes to demonstrate the SANDAG region's projected emissions." (EIR, 4.8-37.)

Thus, the EIR has already extended modeling of GHG emissions beyond 2035. Further details related to GHG emissions modeling can be found in Appendix G of the proposed Plan, "2022 Greenhouse Gas Emissions Inventory and Projections for the San Diego Region." Thus, the proposed Plan's impacts have been addressed adequately for various analysis years, and no further edits are required to the EIR.

The EIR, on page 4.8-37, explains the methodology for assessing consistency with the County CAP:

> Section 4.8.2, "Regulatory Setting," describes adopted CAPs, GHG reduction plans, or sustainability plans relevant to the proposed Plan. Eighteen of SANDAG's nineteen member jurisdictions have adopted CAPs, GHG reduction plans, or sustainability plans that set goals and targets for the reduction of GHG emissions, and outline policies or measures to achieve those goals and targets. Generally, these local targets are developed in consideration of the state's long-term GHG-reduction goals by legislatively significant benchmark years (i.e., 2030 and 2045). There are two primary types of GHG reduction plans: plans that serve as policy documents and plans that are qualified for tiering under CEQA. For purposes of this EIR, all plans developed by SANDAG member agencies related to GHG reductions are evaluated.
>
> The proposed Plan is generally evaluated against the goals, measures, and implementing actions of local CAPs and GHG-reduction plans to determine any conflicts in this analysis. A detailed CAP consistency analysis by jurisdiction is provided in Appendix E: Appendix G to the Regional Plan. The analysis

of the proposed Plan and local CAPs is provided for 2035 and 2050. Several adopted local CAPs and GHG-reduction plans address the 2045 statewide carbon neutrality goal. This analysis addresses potential conflicts between the proposed Plan and such adopted plans in 2050 because 2050 constitutes the horizon year of the proposed Plan. This comparison is appropriate because adopted CAPs and GHGRPs that include 2045 targets align with AB 1279 and plan for a more ambitious target based on the goals of AB 1279. As discussed above, AB 1279 requires achieving carbon neutrality no later than 2045 and negative emissions thereafter, and an 85% reduction in 1990 anthropogenic emissions level by 2045. The implementation of the proposed transportation improvement projects and land use development pattern of the proposed Plan would achieve GHG reductions over time; these components of the proposed Plan would not interfere with local jurisdictions implementing their identified measures to reduce local GHG emissions (as detailed in Appendix E: Appendix G to the Regional Plan). Because the local CAPs establish goals, objectives, and policy measures for both regional growth and land use change and transportation network improvements, the analysis of conflicts with local climate action plans does not separate the two categories. The impact assessment addresses both forecast regional growth and land use change and the planned transportation network improvements and programs.

Pursuant to this comment, an analysis of the proposed Plan's potential to conflict with the County's CAP has been added to Appendix G to the EIR on pages G-28 through G-31. As described in Appendix G and Section 4.8, "Greenhouse Gas Emissions and Climate Change," implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan would not conflict with or impede the implementation of adopted CAPs, including the County's CAP. The proposed Plan would not alter or affect SANDAG's regional partners' ability to implement measures from local CAPs or GHGRPs. Moreover, measures of the proposed Plan would support the measures of local CAPs and GHGRPs (e.g., investments in HOV lanes, investments in ZEV infrastructure). No additional edits were made to the EIR in response to this comment and the conclusions of the EIR remain unchanged.

Impacts of the proposed Plan were addressed for the entire San Diego region, which includes unincorporated areas of San Diego County. Further, regional transportation projects and improvements were grouped by four distinct subregions, including rural areas: Central County Subregion, East County Subregion and Rural Areas, North County Subregion, and South County Subregion. The proposed Plan's analysis covers the unincorporated areas under the County of San Diego's jurisdiction. The comment does not identify specific inadequacies in the EIR's analysis of GHG impacts in UAs, or suggest how such impacts should be addressed further. The analysis in the EIR is adequate and no further edits were made in response to this comment.

The comment suggests incorporating programmatic mitigation opportunities through equitable investment opportunities, such as the County's RDF and carbon sequestration and resilience. Mitigation measure GHG-4a provides programmatic mitigation would allocate grant funding to projects that reduce GHG emissions through measures in local jurisdiction CAPs or GHG reduction plans. Further Mitigation measure GHG 4b would provide support for SANDAG member agencies to adopt, update, and monitor GHG reduction plans. Projects aligned with the County's RDF and other carbon sequestration and resilience opportunities could be addressed through these mitigation measures, provided the projects meet SANDAG's grant and other requirements.

Response A-4.43

The comment suggests that investments in heat and storm-resilient infrastructure (i.e., climate adaptation and resiliency strategies rather than emissions mitigation strategies), equitable criteria for GHG-related funding, and localized metrics for the unincorporated area (UA) will help ensure regional benefits are equitably distributed. As described in the response to comment A-4.42, Mitigation measures GHG-4a and 4b would provide funding and/or support for various GHG reduction projects in the San Diego region. Moreover, as summarized on page 4.8-46, SANDAG's Final Program Budget for Fiscal Year 2026 allocates funding for climate adaptation planning in the form of regional shoreline management planning (Work Element 3200200) and a cross-border resiliency plan (Work Element 3402101). Projects providing resilient infrastructure in UAs could receive funding through these mitigation measures, provided the projects

meet SANDAG's grant and other requirements. The comment does not specify how or which specific equitable criteria should be incorporated into GHG-related funding. The EIR provides three programmatic mitigation measures that provide for equitable investment in GHG reducing strategies throughout the SANDAG region. Mitigation Measure GHG-4a establishes a grant program to allocate funding for GHG-reducing projects that implement the strategies or measures of a local CAP or GHGRP. Mitigation Measure GHG-4b establishes a Climate Planning Services program for member agencies to adopt, update, and monitor CAPs and GHGRPs. Mitigation Measure GHG-4c directs SANDAG to invest in EV infrastructure within the SANDAG region to facilitate the transition to zero-emissions vehicles. These three measures would be implemented equitably throughout the SANDAG region.

The comment suggests that localized metrics be used for the unincorporated area. As discussed in Response A-4.10, A-4.19, and A-4.31, the level of specificity in the EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). ab Moreover, GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs). Criteria air pollutants and TACs occur locally or regionally, and local concentrations respond to locally implemented control measures. However, the long atmospheric lifetimes of GHGs allow them to be transported great distances from the original emissions source. GHG emissions and global climate change therefore represent cumulative impacts; that is, GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. (EIR, 4.8-1; see also, 4.8-53.) Accordingly, quantification of subregional GHG emissions through localized metrics is unnecessary and would be inconsistent with both the scope of the proposed Plan and the scale of GHG impacts. Further details related to GHG emissions modeling can be found in Appendix G of the proposed Plan, "2022 Greenhouse Gas Emissions Inventory and Projections for the San Diego Region." The comment does not identify inadequacies in the GHG analysis. No edits were made to the EIR in response to this comment.

Response A-4.44

The comment suggests that the reference to the Zero-Emission Vehicle Incentive Program be updated to reflect its current launch date of 2026. This comment references the following language on page 4.8-26 of the EIR:

> SANDAG currently has two incentive programs that promote the purchase of ZEVs in the San Diego region. The Zero-Emission Vehicle Incentive Program will help reduce the cost of buying a ZEV for residents in low-income and underserved communities in San Diego County. As of March 2025, SANDAG is in the process of designing this program, and the program is planned for launch sometime in 2025.

The text in Section 4.8, "Greenhouse Gas Emissions and Climate Change," has been updated to reflect this launch date and additional new information. The text now reads:

> SANDAG currently has ~~two~~ one incentive programs that promote<u>s</u> the ~~purchase of~~ <u>transition to</u> ZEVs in the San Diego region. ~~The Zero-Emission Vehicle Incentive Program will help reduce the cost of buying a ZEV for residents in low-income and underserved communities in San Diego County. As of December 2025, SANDAG is in the process of designing this program, and the program is planned for launch sometime in 2026. The EV Charger Rebate Program provides rebates to property owners who install publicly accessible charging stations throughout the region.~~ <u>The San Diego County Incentive Project is an EV charger rebate program that provides rebates to property owners who install workplace and publicly accessible charging stations throughout the region. SANDAG co-funds the program with SDAPCD and the California Energy Commission.</u> As of April 2024, 56% of program funds have gone toward installations in low-income and disadvantaged communities. The program is no longer accepting new applications (SANDAG 2025b). <u>SANDAG also prepared an implementation plan to establish a regional ZEV incentive program that will help reduce the cost of buying a ZEV for residents in low-income and underserved communities in San Diego County. As of September 2025, SANDAG is exploring ways to fund this program in the future.</u>

These text changes do not alter the findings of the EIR, and no further response is required.

Response A-4.45

The commenter expresses their appreciation for including the County's General Plan Noise Element and Vibration and Construction Noise Standards and recommends continued coordination and collaboration to ensure mitigation of construction and operational impacts regarding transportation network improvements in unincorporated area communities. The comment does not address the adequacy or conclusions of the EIR; therefore, no further response is required. However, SANDAG looks forward to coordinating and collaborating with County staff prior to developing projects that could affect County properties and facilities from noise and vibration related to implementation of the proposed Plan in unincorporated area communities.

Response A-4.46

The commenter requests expanded coordination and collaboration efforts for regional emergency planning and evaluation of project alignment mapping for flood mitigation and prevention with Federal Emergency Management Act (FEMA) compliance, wildfire evacuation access, utilizing wildfire risk language, and hazardous material risks, particularly in the Unincorporated Area. SANDAG looks forward to coordinating and collaborating with County staff on regional emergency planning and evaluation efforts prior to developing projects that could affect County properties and facilities. The comment does not address the adequacy or conclusions of the EIR; therefore, no further response is required.

Response A-4.47

The commenter states that project timing, prioritization, and level of risk should reflect wildfire vulnerability and evacuation needs and requests that the Draft EIR be consistent with the County's Emergency Operations Plan, Operational Area Recovery Plan, Multi-Jurisdictional Hazard Mitigation Plan, the Certified Unified Program Agency (CUPA) for the State's Hazardous Waste Control Law, the Site Assessment and Mitigation Program, the Underground Storage Tank Program, and the Hazardous Materials Area Plan. Section 4.9.2, "Regulatory Setting," in Section 4.9 of the EIR describes the applicable federal, state, and local laws, regulations, plans, and policies related hazards and hazardous materials. In addition, local General Plan policies related to wildfire are summarized in Table B-2 of Appendix B of the EIR. The EIR discusses evacuation and wildfire risk on pages 4.9-9 through 4.9-11 and pages 4.9-33 through 4.9-38. The County's Emergency Operations Plan, Operational Area Recovery Plan, Multi-Jurisdictional Hazard Mitigation Plan, coordinating with the County's Certified Unified Program Agency (CUPA) for the State's Hazardous Waste Control Law, the Site Assessment and Mitigation Program, the Underground Storage Tank Program, and the Hazardous Materials Area Plan are all described on pages 4.9-20 through 4.9-23 of the EIR. Consistency with these plans is analyzed on pages 4.9-33 through 4.9-48. The EIR considered each of these regulations in its evaluation of the proposed Plan's impacts related to hazards, hazardous materials, and emergency response and evacuation.

However, as stated in Response A-4.31, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review, at which time consistency and compliance with the above regulations would be evaluated at the project-level. In addition, compliance is assumed in the EIR for existing mandatory regulations because they are required by law.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.48

The commenter requests that the Section titled "Hazards/Emergency Preparedness" of the EIR be updated to reference the San Diego Multi-Jurisdictional Hazard Mitigation Plan. The section cited by the commenter, "Hazards/Emergency Preparedness," does not appear in the EIR. However, the EIR includes a description of the County's Multi-Jurisdictional Hazard Mitigation Plan and its jurisdiction-specific annexes on pages 4.9-23, 34, 38, and 41 in Section 4.9, "Hazards and Hazardous Materials"; pages 4.10-27 and 47 in Section 4.10, "Hydrology and Water Quality"; and pages 4.19-2, 13 and 14 in Section 4.19, "Wildfire." Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.49

The commenter requests clarification that the County Office of Emergency Services coordinates the overall disaster response, the

Unified Disaster Council governs regional emergency planning, and evacuation decisions be made at the local jurisdictional level. The commenter specifies that the text should be updated to reflect that the Operational Area Emergency Operations Center (OA EOC) provides situational awareness but does not override the authority of the field Incident/Unified Commander, and that each jurisdiction/special district in the OA maintains its own Emergency Operations Plan (EOP).

The current discussion of the agencies responsible for emergency response and evacuation in Section 4.9, "Hazards and Hazardous Materials," generally includes the clarifications requested by the commenter on page 4.9-9 of the EIR. However, additional clarification has been provided on pages 4.9-9 and 4.9-10 of the EIR to specify the role of the Operational Area Emergency Operations Center and that each jurisdiction/special district in the Operational Area maintains its own Emergency Operations Plan. Pages 4.9-9 and 4.9-10 of the EIR have been revised as follows:

> In the San Diego region, the County of San Diego Office of Emergency Services (OES) and the Unified Disaster Council (UDC) play a central role in the preparation and execution of emergency response and evacuation plans. OES alerts and notifies appropriate agencies when disaster strikes, coordinates overall disaster response among all responding agencies, ensures resources are available and mobilized, develops plans and procedures for response and recovery, and develops and provides preparedness materials for the public (County of San Diego 2025g). The UDC is the governing body of the Unified San Diego County Emergency Services Organization for regional emergency planning. The UDC is composed of the Chair of the County of San Diego Board of Supervisors, who serves as Chair of the UDC, and representatives from the 18 incorporated cities (County of San Diego 2025h). The primary purpose of the UDC and the County OES is to coordinate the plans and programs designed for the protection of life and property in the San Diego region.
>
> If evacuation is required, local jurisdictions work with the Operational Area Emergency Operations Center (OAEOC), operated by OES law enforcement officials, Caltrans, the California Highway Patrol (CHP), the County's Department of Public Works, and other applicable agencies and departments to make evacuation decisions, such as identifying evacuation points and transportation routes. In addition, transportation points are identified to collect and transport people without transportation resources to evacuation points. Response is coordinated by the OAEOC (USDCESO and County of San Diego 2022). The OAEOC provides situational awareness but does not override the authority of the field Incident/Unified Commander.
>
> Any large-scale response to an incident, including incidents resulting in the evacuation of more than two impacted communities, is coordinated through the OAEOC operating under a unified command (USDCESO and County of San Diego 2022). The coordinator of emergency services manages the overall multijurisdictional evacuation effort, and the operational area law enforcement coordinator is responsible for coordinating operational, area-wide evacuation activities. Evacuation operations in the field are conducted by law enforcement agencies, highway/road/street departments, and public and private transportation providers. The following interstates and state highways are identified in the San Diego County Operational Area Emergency Operations Plan (EOP) as the primary transportation routes for an evacuation effort in the San Diego region: I-5, I-8, I-15, I-805, SR 52, SR 54, SR 56, SR 67, SR 75, SR 76, SR 78, SR 94, SR 125, SR 163, and SR 905 (USDCESO and County of San Diego 2022) (Figure 4.9-3). The County Operational Area EOP is intended to be used by the county and all cities within the county to respond to major emergencies and disasters. Each jurisdiction/special district in the Operational Area maintains its own EOP, which the County Operational Area EOP is intended to support. Emergency response plans are discussed further in Section 4.9.2, "Regulatory Setting."

These revisions represent minor clarifications and do not change the analysis or conclusions of the EIR. In addition, SANDAG looks forward to continuing coordinating and collaborating with County OES staff on regional emergency planning efforts.

A-4.49 Cont. the local jurisdictional level with law enforcement and transportation partners implementing operations. The text should also specify that the Operational Area Emergency Operations Center (OA EOC) provides situational awareness but does not override the authority of the field Incident/Unified Commander, and that each jurisdiction/special district in the OA maintains its own Emergency Operations Plan (EOP), which the OA EOP is intended to support. Continued collaboration and coordination with the County's OES is highly recommended.

Hydrology and Water Quality

A-4.50 The County requests closer alignment with its Regional Municipal Stormwater Permit, Floodplain Management Plan, Integrated Regional Water Management Plan, and Local Agency Management Plan for septic systems in the UA. In addition, the DEIR should more fully address cumulative hydrology and water quality impacts, particularly related to the Tijuana River Valley.

A-4.51 The County asks SANDAG to evaluate how the Plan's proposed projects may affect County-led restoration and water quality protection initiatives in this area of regional binational concern.

A-4.52 The County further recommends coordination for any grading or development proposed in FEMA and/or County-mapped floodway or floodplain, in the UA, to ensure compliance with the County's Flood Damage Prevention Ordinance and FEMA regulations. Projects altering a floodway or floodplain should obtain the required County permit and Conditional/Letter of Map Revision (CLOMR/LOMR), and a "no-rise" certification with supporting analysis (FDPO §811.506).

A-4.53 In addition, the County is seeking clarification regarding Section 4.10 (HWQ-3) and Section 4.15 (U-1) which explain that hydromodification and water quality requirements will be met. These Plan measures do not directly address peak flow impacts, which may still experience significant increases or diversions.

Parks, Recreation, and Open Space

A-4.54 The County requests further collaboration on Plan projects and analysis of how they may affect recreation access and trail connectivity in the UA.

Transportation

A-4.55 The County requests collaboration on investing in its TOAs, VMT methodology, and rural mobility needs into the Regional Plan, with transparent modeling and equitable funding for transit, microtransit, and road safety improvements serving unincorporated communities.

Tribal and Cultural Resources

A-4.56 The County recommends alignment with the County's Resource Protection Ordinance, Grading, Clearing, and Watercourses Ordinance, and Local Register of Historical Resources. The County is actively integrating Tribal Cultural Resources in accordance with AB52, and alignment with SANDAG on those efforts will require coordination. Early and meaningful coordination with County staff and tribal governments will ensure potential cultural resources impacts are avoided or mitigated and that County parks and preserves with cultural significance are protected. In addition,

A-4.57 the County requests that analysis of potential impacts to the County Administration Center, from the proposed Airport Transit Connection, be addressed in Section 4.5.4 to ensure adequate mitigation.

Utilities and Public Services

A-4.58 The County highlights the importance of recognized growth-related impacts on utilities and services, particularly in dispersed unincorporated communities. We encourage expanded

A-4.59

Response A-4.50

The commenter requests that the EIR align better with the Regional Municipal Stormwater Permit, Floodplain Management Plan, Integrated Regional Water Management Plan, and Local Agency Management Plan for septic systems in the unincorporated areas of the County. Section 4.10.2, "Regulatory Setting," in Section 4.10 of the EIR describes the applicable federal, state, and local laws, regulations, plans, and policies related to hydrology and water quality, including the those specific to Regional Municipal Stormwater Permit, Floodplain Management Plan, Integrated Regional Water Management Plan, and Water Quality Control Policy for Siting, Design, Operation, and Maintenance of onsite wastewater treatment systems (OWTS) (i.e., septic tanks). Regional and local applicable plans and policies are described on pages 4.10-16 through 4.10-28 of the EIR.

As discussed in Response A-4.41, the proposed Plan is aligned with the specified permit, plans and policy. Moreover, as noted in Response A-4.31, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time to ensure alignment with applicable regulatory requirements. In addition, compliance is assumed in the EIR for existing mandatory regulations because they are required by law.

The comment does not identify any inadequacies in the EIR. Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.51

The commenter requests that the EIR expand on the cumulative analysis of hydrology and water quality impacts to the Tijuana River Valley. Section 4.10.5, "Cumulative Impact Analysis," in Section 4.10 of the EIR addresses cumulative hydrology and water quality impacts. (EIR, page 4.10-67 to 70.) As described on page 4.10-69 of the EIR,

waste discharges into some receiving waters from Northern Baja California would ultimately enter the Tijuana River and the Pacific Ocean where the waste would impact beaches in the southern part of the San Diego region. The Tijuana River is a 303(d)-listed water body for various impairments. The Tijuana River Estuary, a National Estuarine Sanctuary, supports a variety of threatened and endangered plants and animals and is 303(d)-listed for eutrophic conditions, indicator bacteria, lead, low dissolved, oxygen, nickel, pesticides, thallium, trash, toxicity, and turbidity. Discharges from Northern Baja, which are not controlled by regional regulations, would impact these water bodies within the region. The EIR also identified that contributions to cumulative water quality impacts occur in part because polluted water from Northern Baja California, which is not subject to federal and state regulatory requirements, discharges into the Tijuana River and affects receiving waters throughout the region. Although impacts exist due to unregulated polluted water that enters the region, the proposed Plan would not add to this water quality impact to produce a significant cumulative water quality impact.

Compliance with federal, state, and local water quality requirements, such as the CWA implemented by Porter-Cologne Act, Water Code Section 13000 et seq.; NPDES regulations; and the Municipal Permit, would ensure that implementation of the proposed Plan would not result in a substantial degradation of water quality in violation of any water quality standards or waste discharge requirements. When the proposed Plan's impact are added to impacts related to surface or groundwater quality in water sources originating in the United States cumulative impacts would be less than significant due to federal and state regulatory requirements also applicable to development throughout the region for the protection of WQOs. WQOs would protect beneficial uses throughout Southern California and ensure effectiveness of regulations pertaining to water quality and hydrologic modifications.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.52

The commenter requests that SANDAG evaluate how the Plan's proposed project may affect County-led restoration efforts and water quality protection initiatives. As described in under HWQ-1 in Section 4.10, "Hydrology and Water Quality," of the EIR, compliance with applicable regulatory requirements including the Construction General Permit, Caltrans Statewide Storm Water Program and Management Plan, and Municipal Stormwater Permit outlined in Section 4.10.2, "Regulatory Setting," would require that predevelopment hydrology be maintained after construction and treatment of runoff to substantially reduce or eliminate the discharge of pollutants to storm drain systems and receiving waters during future development projects. For projects that discharge to 303(d)-listed impaired water bodies, BMPs would be required that target the removal of the pollutants causing the impairment. Compliance with applicable regulatory requirements would reduce impacts to County-led restoration and water quality protection initiatives in the Tijuana River Valley. In addition, compliance is assumed in the EIR for existing mandatory regulations identified in Response A-4.51 and the EIR because they are required by law.

Further, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific hydrology and water quality analysis of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time. SANDAG looks forward to coordinating with County staff prior developing projects that may affect County-led restoration and water quality protection initiatives.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.53

The commenter recommends coordination for any grading or development proposed in FEMA or County-mapped floodway or floodplains, to ensure compliance with the County's Flood Damage Protection Ordinance and FEMA regulations. The commenter specifies that projects altering a floodway or floodplain should obtain the required County permit and Conditional/Letter of Map Revision (CLOMR/LOMR), and a "no-rise" certification with supporting analysis.

Section 4.10.2, "Regulatory Setting," in Section 4.10 of the EIR describes the applicable federal, state, and local laws, regulations, plans, and applicable policies related to hydrology and water quality,

including those specific to development within a floodway or floodplain. For projects involving improvements such as grading or development that would affect the hydrologic or hydraulic characteristics of a flooding source and modify an existing regulatory floodway, effective base flood elevations, an SFHA, or areas that are subject to inundation by a base flood, a conditional letter of map revision would need to be approved by FEMA, as described on page 4.10-16 of the EIR. The County's Floodplain Management Plan (FMP), which was prepared with input from county residents, responsible officials, and consultants, and with the support of Cal OES and FEMA, as well as the County's Flood Damage Prevention Ordinance are described on page 4.10-27 of the EIR. Development that would accommodate growth under the proposed Plan is required to align with the County's hazard MAP as part of compliance with the County of San Diego FMP (County of San Diego 2007).

As discussed under Impact HWQ-3 (pages 4.10-47 to 4.10-67), regional growth and land use change associated with the proposed Plan would change drainage patterns, increase impervious surface area, and reduce natural (i.e., undeveloped) landscape. Further, development forecasted on vacant land, open space, and agricultural land, mainly in rural areas in San Diego County, would cause greater increases in impervious surfaces than infill and redevelopment, resulting in alterations to existing drainage patterns, an increase in potential for flooding, and impeded or redirected flood flows. The regional growth pattern in 2035 and 2050 would result in development within 100-year and 500-year flood hazard zones (as depicted in Figure 4.10-3 of the EIR). However, the National Flood Insurance Program mandates that development is not to proceed within the 100-year floodplain if development is expected to increase flood elevation by 1 foot or more (44 CFR Section 60.3) (EIR, page 4.10-47 and 4.10-48). As discussed under Impact HWQ-3 and HWQ-4, the County of San Diego FMP identifies actions and recommendations for flood risk reduction. Development that would accommodate growth under the proposed Plan is required to align with the County's hazard MAP as part of compliance with the County of San Diego FMP (EIR pages 4.10-47 through 4.10-67). Potential flooding impacts resulting from construction would be primarily addressed through compliance with the Construction General Permit and the requirement to develop a SWPPP, as discussed in Impact HWQ-1 in the EIR (see, e.g., pages 4.7-29 through 4.10-42). Compliance is assumed in the EIR for existing mandatory regulations identified in Response A-4.51 and the EIR because they are required by law.

Further, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific hydrology and water quality analysis of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.54

The commenter requests clarification regarding HWQ-3 in Section 4.10 and U-1 under Section 4.15 to explain how hydromodification and water quality requirements will be met as the Plan measures do not directly address peak flow impacts, which still may experience significant increases and diversions. As discussed under Impact HWQ-3 in Section 4.10 of the EIR, future development associated with the implementation of the SCS land use pattern and transportation network improvement projects under the proposed Plan would alter existing topography and drainage patterns and could increase stormwater runoff volume and rates due to increased impervious area. Development forecasted on vacant land, open space, and agricultural land, mainly in rural areas in San Diego County, would cause greater increases in impervious surfaces than infill and redevelopment, resulting in alterations to existing drainage patterns, an increase in potential for flooding, and impeded or redirected flood flows. Land use development generally alters drainage patterns by redistributing runoff that is discharging to waterbodies (hydromodification), whereas linear transportation projects can result in direct modifications to waterbodies through new and modified water crossing structures (e.g., bridges and culverts). Flooding impacts resulting from construction would be primarily addressed through compliance with the Construction General Permit and the requirement to develop a SWPPP which would require the implementation of BMPs during construction to minimize runoff from the construction site and reduce the potential

for any on or off site flooding. During operations and maintenance, development projects would ensure predevelopment hydrology is maintained in compliance with current hydromodification requirements of the Municipal Permit. Runoff from post construction operations for all new developments would be required to be mitigated and treated through LID, on site design, or off site structural BMPs. LID and incorporation of natural spaces, such as detention basins, infiltration strips, and porous paving that reduce, infiltrate, and manage stormwater runoff flows. These measures would be required to be properly sized and engineered to substantially lessen runoff from development, thereby avoiding adverse hydromodification and flooding impacts. In addition, the contractor would comply with the minimum construction BMPs identified in the regional MS4 permit and implement construction BMPs to manage stormwater run-on and runoff from individual construction sites (EIR pages 4.10-47 to 49).

The EIR's analysis of Impact HWQ-3 addresses peak flow impacts as follows:

> In addition, HMP regulations, as well as the Municipal Permit, require that PDPs maintain predevelopment hydrology. As a result, additional runoff volumes and peak flow discharges from impervious areas, such as freeways, must be attenuated to maintain hydrological conditions and not exceed stormwater conveyance capacities. LID is commonly applied to achieve this requirement. By incorporating these types of prescriptive design standards in compliance with regulatory requirements, surface runoff patterns and flooding associated with transportation network improvements would be controlled. Through the various hydromodification requirements that would be in place, the transportation network improvements would maintain predevelopment hydrology. Therefore, transportation network improvements associated with the proposed Plan would not substantially alter existing drainage patterns or impede or redirect flood flows such that flood risk would increase by 2035. This impact is less than significant.

Although regional growth and land use change associated with the proposed Plan may result in future development that would increase stormwater runoff volume and rates or alter existing drainage patterns, compliance with regulatory requirements and implementation of similar design measures, as described in Section 4.10.2, "Regulatory Setting," of the EIR 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 or substantially increase the rate or amount of, impede, or redirect flood flows such that flood risk would increase.

The EIR's analysis of Impact U-1 addresses peak flow impacts as follows:

> As described in the "Regulatory Setting" section in Section 4.10, "Hydrology and Water Quality," engineering standards, including the Caltrans Highway Design Manual and county requirements, would be followed for properly controlling and conveying surface runoff and surface waters when drainage modifications are necessary for project implementation. In addition, requirements in the Municipal Storm Water Permit (Order R9-2013-0001) require that PDPs maintain pre project hydrology under postconstruction operation. This means that additional runoff volumes and peak flow discharges from new impervious areas must be attenuated to pre project levels in order to maintain hydrological conditions and not exceed storm water conveyance capacities. One of the methods for achieving this is through the implementation of the LID, as discussed above.

As discussed under Impact U-1 in Section 4.15, development associated with the proposed Plan would have to comply with all existing regulations pertaining to drainage patterns (i.e., the local Standard Urban Stormwater Mitigation Plan [SUSMP] and hydromodification management plan [HMP]). The storm water regulations include the requirement that post project storm water flows match the preproject flows for PDPs. When there is an increase in impervious area, this requirement would generally be achieved through the implementation of the appropriate BMPs described in the local SUSMP and HMP, and the *County Low Impact Development (LID) Handbook*. LID is an integrated site design methodology that uses small-scale detention and retention to minimize pollutants conveyed by runoff and to mimic pre project site hydrological conditions.

Compliance is assumed in the EIR for existing mandatory regulations identified in Response A-4.51 and the EIR because they are required by law. Moreover, the EIR prepared for the proposed Plan is a first-

tier Program EIR. Second-tier projects that would implement the Plan include site-specific analysis of impacts associated with hydromodification and water quality as a result of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.55

The commenter requests for further collaboration on proposed projects and analysis of how they may affect recreation access and trail connectivity in the unincorporated areas. Section 4.15.4 in Section 4.15, "Public Services, Recreation, and Utilities," of the EIR describes the County's Community Trail Master Plan and includes mitigation measure REC-1, which requires future projects to implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. The EIR assumes that trails are included in recreational facilities. The EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific analysis of impacts to recreational facilities as a result of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional mitigation measures as applicable for implementation at that time. In addition, it is assumed that second-tier projects will be consistent with regulatory requirements, such as consistency with the County's Community Master Plan. SANDAG looks forward to coordinating and collaborating with County staff prior developing projects that may affect access to County recreation access and trail connectivity.

Response A-4.56

The commenter requests collaboration on investing in its TOAs, VMT methodology, and rural mobility needs in the Regional Plan, as well as transparent modeling and equitable funding for transit, microtransit, and road safety improvements in unincorporated communities. This is not a comment on the adequacy of the DEIR. As such, no further response is required. However, SANDAG looks forward to continuing to coordinate and collaborate with County staff on all of the topics identified in this comment including investing TOAs, VMT methodology, and rural mobility needs.

Response A-4.57

The commenter recommends alignment with County Ordinances and early and meaningful coordination with County staff and tribal governments to ensure tribal cultural resource impacts are avoided or mitigated. The comment requests County parks and preserves with cultural significance are adequately protected. Section 4.5.2 in Section 4.5, "Cultural Resources," and Section 4.17.2 in Section 4.17, "Tribal Cultural Resources," of the EIR describe the applicable federal, state, and local laws, regulations, plans, and policies related cultural and tribal cultural resources, respectively. The County's Resource Protection Ordinance (RPO); Grading, Clearing, and Watercourses Ordinance; and Local Register of Historical Resources are described on pages 4.5-13 and 4.17-10 of the EIR. Compliance with existing mandatory regulations is assumed in the EIR.

The Resource Protection Ordinance (RPO) (San Diego County Code of Regulatory Ordinances Sections 86.601–86.608) mandates the evaluation of cultural resources during the county's environmental review process. Significant sites, including those of tribal cultural importance, must be preserved. Section 86.604(g) of the ordinance prohibits grading, excavation, or other damaging activities on such sites except for scientific research conducted under an approved research design by a qualified archaeologist. Grading plans must be modified if unanticipated cultural resources are found, and appropriate mitigation measures must be implemented in coordination with the county and tribal representatives. (San Diego County Code of Regulatory Ordinances Section 87.216(a)(7)).

Section 4.15.4 in Section 4.15, "Public Services, Recreation, and Utilities," of the EIR describes the County's Community Trail Master Plan and includes mitigation measure REC-1, which requires future projects to implement mitigation measures to avoid or reduce substantial physical deterioration of parks or other recreational facilities. The EIR assumes that trails are included in recreational facilities. The EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific analysis of impacts to recreational facilities as a result of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be

subject to project-specific environmental review. Consistency with ordinances would be analyzed during project-specific environmental review.

The EIR considered these regulations in its evaluation of the proposed Plan's impacts on cultural and tribal cultural resources. SANDAG concurs that early and meaningful coordination with County staff and tribal governments is essential in ensuring potential cultural resources impacts are avoided or mitigated and that County parks and preserves with cultural significance are protected. SANDAG looks forward to coordinating and collaborating with County staff prior developing projects that may affect cultural and tribal cultural resources in the unincorporated county. No changes to the EIR are warranted in response to this comment.

Response A-4.58

The commenter recommends that analysis of potential impacts to the County Administration Center from the proposed Airport Transit Connection be addressed in Section 4.5.4, "Environmental Impacts and Mitigation Measures," of the EIR to ensure adequate mitigation. As stated in Response A-4.31, the EIR prepared for the proposed Plan is a first-tier Program EIR. The degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This 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, such as the proposed Airport Transit Connection. 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). Thus, a project-specific evaluation of the proposed Airport Transit Connection would not be appropriate for the Regional Plan's Program EIR.

As part of the implementation of the proposed Plan, individual second-tier projects that are part of the Plan, including the proposed Airport Transit Connection, would be subject to project-specific environmental review. This would include an evaluation of any potential impacts on the County Administration Center, at which time additional project-specific mitigation measures would be identified for implementation, as applicable. Therefore, no changes to the EIR are warranted in response to this comment.

Response A-4.59

The commenter highlights the importance of growth impact on utilities, particularly in unincorporated communities and encourages expanded coordination on service delivery, utility planning, and recreation facilities. This is not a comment on the adequacy of the EIR. As such, no further response is required. However, SANDAG agrees with the County and looks forward to continued coordination with County regarding regional service delivery, utility planning, and recreation facilities to ensure equity across the region.

A-4.59. Cont. coordination on regional service delivery, utility planning, and recreation facilities to ensure equity across the region.

RURAL EQUITY, INCLUSION, & ENVIRONMENTAL JUSTICE

A-4.60 The County recommends that the Plan's environmental justice (EJ) analysis extend beyond urban centers to address the distinct needs of unincorporated, rural, Tribal, and disadvantaged communities. Using tools, such as the current version of CalEnviroScreen and SB 535, together with disaggregated County-level data, to show how benefits and burdens are distributed, particularly in rural and environmental justice communities. The County further requests inclusion on EJ metrics table, community-scale outcome measures, and commitments to post-adoptions monitoring.

A-4.61 Unincorporated communities face higher per-capita VMT and remain underserved by regional transit. To ensure equitable outcomes, we encourage SANDAG to publish machine-readable datasets, provide accessible data consistent with AB 361 requirements (i.e., AMB3 version), clarify funding and phasing for investments, including EJ communities, flexible fleets, microtransit, first/last-mile, and safety projects in village areas. The County also supports Next Gen Rapid Routes and inclusive active transportation options ("walk, bike, roll"), paired with early coordination on County property rights-of-way.

MITIGATION & ALTERNATIVES

A-4.62 The County recommends that the draft Environmental Impact Report (DEIR) strengthen its Mitigation Monitoring and Reporting Program (MMRP) with enforceable measures that reflect unincorporated needs, including wildfire evacuation capacity, rural highway safety, and infrastructure constraints, such as septic, wastewater, and limited transit. Mitigation should also prioritize rural-serving transit investments and protections for low-income households from displacement near new transit investments. In addition, the alternatives analysis should evaluate

A-4.63 scenarios aligned with the County's General Plan land uses and rural mobility strategies to better capture cumulative impacts. Transparent release of model assumptions and outputs at Plan adoption will be essential, as future VMT-Efficient areas, as defined by SANDAG, may shift based on updated modeling.

CONCLUSION

A-4.64 If you have any questions regarding these comments, please contact Ashley Rivero, Senior Environmental Land Use Planner, at (619) 629-4438 or ashley.rivero@sdcounty.ca.gov. The County appreciates the opportunity to provide comments on the draft Environmental Impact Report and consideration of these comments and recommendations.

Response A-4.60

This comment makes recommendations for the proposed Plan's environmental justice analysis. This is not a comment on the adequacy of the DEIR and as such, no further response is required. Environmental justice is not a resource area subject to analysis under CEQA. However, additional information about the benefits and the burdens of the proposed Plan is included in Appendix E of the proposed Plan. Appendix E also includes identification of vulnerable communities using the most current version of CalEnviroScreen and lists strategies for reducing pollution exposure in those communities.

Response A-4.61

This comment states that unincorporated communities face higher per-capita VMT and remain underserved by regional transit, and encourages a range of data and planning actions. The comment requests SANDAG clarify funding and phasing for investments, including EJ communities, flexible fleets, microtransit, first/last-mile, and safety projects in village areas. This is not a comment on the adequacy of the EIR. As such, no further response is required. For a list of projects proposed in the unincorporated County, see the subsection titled "East County Subregion and Rural Areas" in Section 2.4.6 of this EIR. Appendix E of the 2025 Regional Plan includes identification of vulnerable communities, including those in the rural and unincorporated County, and lists investments for reducing pollution exposure in those communities. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues.

Response A-4.62

The comment recommends that the EIR strengthen its MMRP with enforceable measures that reflect unincorporated needs including wildfire, highway safety, and infrastructure constraints, and limited transit. Impacts of the proposed Plan were addressed for the entire San Diego region, which includes unincorporated areas of San Diego County. The comment does not identify specific inadequacies in the EIR's analysis of potential direct and indirect impacts on wildfire, highway safety, infrastructure constraints, and limited transit in the unincorporated County, or suggest how such impacts should be

mitigated further. See Responses A-4.11 to 4.13, 4.15 to 4.16, and 4.26 to 4.27 for further discussion of subregional analysis and assumptions. The EIR adequately addresses wildfire evacuation capacity (Section 4.9, pp. 4.9-33 through 4.9-38), rural highway safety (Section 4.16, pp. 4.16-20 and 4.16-43) and infrastructure constraints, such as septic (Section 4.7, pp. 4.7-37) and wastewater (Section 4.15 pp. 4.15-40). Identified mitigation measures are applicable to unincorporated area communities. As required by CEQA, the MMRP will ensure that the mitigation measures are implemented, and that implementation is monitored. In addition, please refer to Global Response 2 regarding the enforceability of the mitigation measures included in the EIR.

Additionally, the proposed Plan includes additional transit and flexible fleet services for the rural areas of the region. Appendix A of the 2025 Region Plan provides:

To better connect the rural communities, the plan identifies a new Rapid 277 connection between Sabre Springs and Ramona, as well as upgrades to existing rural routes to provide more trips throughout the week (Attachment A2 Transit Frequencies and Spans of Service). Flexible Fleet services include microtransit in Fallbrook-Pala, Ramona, Alpine, Borrego Springs, Lakeside, and Casa de Oro/Spring Valley. (p. 25). SANDAG looks forward to continuing to work with the County of for the reasons stated above, no changes to the EIR are required as a result of this comment. SANDAG looks forward to future coordination with the County of San Diego on transportation planning in the unincorporated area of the region.

Response A-4.63

The comment requests that the alternatives analysis includes scenarios aligned with the County's General Plan land uses and rural mobility strategies. As discussed in response to comment A-4.26, because the proposed Plan is consistent with the County General Plan, there is no need to add an EIR alternative that aligns with General Plan buildout. The alternatives analyzed in the DEIR used a more densified land use pattern than is assumed in the County's adopted General Plan to focus growth in areas with available multimodal transportation. See Global Response 1 for a discussion of the sufficiency of the alternatives analysis in the DEIR.

It is unclear which specific rural mobility strategies are referred to in this comment. The proposed Plan does include mobility options for the rural areas of the County, including increased rural transit, so there is no need to add an EIR alternative that includes these options. The cumulative impacts of the proposed Plan are discussed in each section of Chapter 4, "Environmental Analysis," of the EIR, and the alternatives section analyzes the direct, indirect, and cumulative impacts of the alternatives as compared to the proposed Plan.

Modeling assumptions and outputs are documented throughout the proposed Plan in Appendices B, F, M, and N.

Response A-4.64

The comment requests that if SANDAG has any questions regarding these comments, to contact the County. Thank you for the comments. SANDAG looks forward to future coordination with the County of San Diego.

Comment Letter A-5: California Department of Fish and Wildlife

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Comment Letter A-5: California Department of Fish and Wildlife

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 13, 2025

Kirsten Uchitel
San Diego Association of Governments
1011 Union Street, Unit 400
San Diego, CA 92101
kirsten.uchitel@sandag.org

Subject: Draft Environmental Impact Report (DEIR) for the 2025 Regional Plan, SCH No. 2023010039, San Diego County, CA

Dear Kirsten Uchitel:

A-5.1 The California Department of Fish and Wildlife (CDFW) reviewed the Draft Environmental Impact Report (DEIR) from the San Diego Association of Governments' (SANDAG) for the 2025 Regional Plan (Plan) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

A-5.2 CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

Response A-5.1

Thank you for CDFW's participation in the environmental review. Further elaboration regarding your organization's comments is addressed in the responses below.

Response A-5.2

The comment summarizes CDFW's role and objectives, Responsible Agency and permitting responsibilities, and habitat conservation plans in the SANDAG region to which projects implementing the proposed Plan may be subject. No Draft EIR comments are provided, and no further response is necessary.

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example, the Plan may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Plan as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Plan proponent may seek related take authorization as provided by the Fish and Game Code.

A-5.2 Cont.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program (Fish & G. Code, § 2800 et seq.). While SANDAG is not an implementing entity of any regionally adopted NCCP, the DEIR includes lands within several NCCP plan areas, including: all Subarea Plans under the Subregional Multiple Species Conservation Program (MSCP), draft North County Plan, draft East County Plan, and all Subarea Plans under the Subregional Multiple Habitats Conservation Plan (MHCP). Subsequent projects tiering off of the DEIR may be subject to the provisions of the respective NCCP.

PLAN DESCRIPTION SUMMARY

Proponent: San Diego Association of Governments (SANDAG)

Objective: The Plan is an update to San Diego Forward: The 2021 Regional Plan adopted in October 2021 and subsequently amended in October 2023, and the 2021 Federal Regional Transportation Plan, adopted in December 2021. The DEIR analyzes the significant environmental impacts of the proposed 2025 Plan, which focuses on developing an integrated planning strategy for achieving sustainability in the areas of land use decisions, housing development, and planned transportation for the San Diego region through 2050. The Plan delineates an integrated transportation system throughout the 11 Major Travel Corridors of the San Diego region, specifically: South Bay to Sorrento; Central Mobility Hub; State Route 125 (SR 125); Interstate 15 (I-15); Interstate 5 (I-5) North Coast Corridor; State Route 94 (SR 94); Interstate 8 (I-8); Coast, Canyons, and Trails; State Route 56 (SR 56); San Vicente; and North County.

A-5.3

The programmatic and long-term nature of the proposed Plan necessitates a general, and at times qualitative approach, to the evaluation of impacts. The DEIR analyzes impacts for the two main physical components of the proposed Plan, as well as the combined impacts of these components: regional growth and land use change, and transportation network improvements and programs.

The DEIR functions as a Programmatic EIR under CEQA Guidelines Section 15168 for streamlining future projects. The DEIR provides a foundation for second-tier CEQA

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

Response A-5.3

The comment provides a summary of the project description and scope of the EIR as described in the EIR. No Draft EIR comments are provided, and no further response is necessary.

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documents for subsequent projects but does not analyze the project-specific impacts of individual projects. Examples of subsequent projects covered by the DEIR are:

- Central County Subregion:
  - I-15 Bikeway: Murphy Canyon Road to Affinity Court, State Route 52 Bikeway: I-5 to Santo Road;
  - Regional Rail 398: Oceanside to Downtown San Diego (Double tracking, bridge replacements, realignment in Del Mar, new platform at Fairgrounds);
  - Regional Rail 398: Camp Pendleton to Downtown San Diego (Grade separations, curve straightening, Miramar Tunnel, new station at Camp Pendleton and UTC)
  - Light Rail 582: Mission Valley to U.S.–Mexico Border via City Heights, National City, and Chula Vista; and
  - Regional Rail 598: Pacific Surfliner Rail2Rail (LOSSAN).

- East County Subregion:
  - San Diego River Trail: Mast Park to Lakeside Baseball Park;
  - San Diego River Trail: Carlton Oaks Segment;
  - State Route 94 Multi-Use Pathway;
  - State Route 67: Multimodal operational improvements with shoulder widening for enhanced emergency access from Mapleview to Dye Road;
  - State Route 76: Shoulder widening along Pala Reservation Western Boundary to Pala Reservation Eastern Boundary; and
  - State Route 94: Jamul Reservation to Tecate Road Shoulder Widening/Straightening.

A-5.3
Cont

- North County Subregion:
  - Mid-County Bikeway: Coastal Rail Trail to Inland Rail Trail
  - Inland Rail Trail: Vista to Oceanside,
  - San Luis Rey River Trail,
  - State Route 76: SR 79 to Valley Center Road Facility Improvements, Rice Canyon Road to Pala Reservation Road Straightening, and Harolds Road to Pauma Rancho Road Straightening; and
  - SPRINTER (Oceanside to Escondido): Double-tracking and grade separations.

Location: The Plan encompasses the entirety of San Diego County, which is more than 4,200 square miles. Most of the urban development lies in the western portion of San Diego County near the coast. Development inland in the eastern portion of the region is less dense and has a more rural character. The boundaries of the Plan include the cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and unincorporated areas within the County.

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A-5.3 Cont

Over half of the total land area in the region is not available for public development, including public lands, dedicated parks and open space, lands constrained for environmental reasons, and military use.

Timeframe: The 2025 Regional Plan projects impacts forward to 2050. SANDAG is required to update the Regional Plan every 4 years.

A-5.4

Biological Setting: The DEIR identifies 17 vegetation types in three categories in the San Diego Region: Wetlands and Riparian (Beach/Coastal Dunes/Saltpan/Mudflats, Marsh, Meadows and Seeps, Open Water and Streams, Riparian Forest/Woodland, Riparian Scrub, Vernal Pools), Uplands (Chaparral, Coastal Scrub, Desert Dunes, Desert Scrub, Oak Woodlands, Forest/Woodland, Grasslands), and Other Cover Types (Agriculture, Disturbed Habitat, Urban/Developed). As indicated in the DEIR, 34 federally or state-listed or candidate plant species and approximately 244 additional special-status plant species have known distributions within San Diego County. Twenty-nine (29) federally and/or state-listed or candidate animal species have potential to be found within San Diego County, as year-round residents or as migrants. An additional 138 special status wildlife species have known distributions within San Diego County.

Wildlife movement occurs across landscape features (e.g., wildlife corridors, habitat linkages) within the boundaries of the Regional Plan. The various NCCP plans, both adopted and still in draft, identify landscape-level biological linkages that serve to connect large tracts of core habitat. These linkages allow species movement over time between habitat patches that would otherwise be disconnected. The DEIR focuses on the qualitative and quantitative analysis of landscape level regional wildlife movement and habitat linkages rather than specific local corridors (e.g., small canyons, ephemeral drainages); the latter would be evaluated individually during subsequent project-level CEQA review.

A-5.5

The Biological Resources section of the DEIR projects significant and unavoidable impacts in 2035 and 2050 to natural resources from projects tiering from the Plan:

> BIO-1 projects significant and unavoidable impacts to sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS and state or federally regulated waters and wetlands through direct removal, filling, hydrological interruption, or other means. BIO-1 mitigation measures include: design, minimization, and avoidance measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources; provision of compensatory mitigation; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.
>
> BIO-2 projects significant and unavoidable direct and indirect impacts to certain 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

Response A-5.4

The comment provides a summary of the biological setting of the San Diego Region and the EIR's approach to wildlife movement and habitat linkages. This comment is consistent with the existing conditions and wildlife movement analysis discussed in Section 4.4, "Biological Resources," of the EIR. No comments are provided regarding adequacy of the Draft EIR, and no further response is necessary.

Response A-5.5

The comment summarizes the impacts identified in Section 4.4, "Biological Resources," of the EIR under impacts BIO-1 through BIO-4. No comments regarding adequacy of the Draft EIR, are provided, and no further response is necessary.

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in CEQA Guidelines Section 15380. BIO-2 mitigation measures include: design, minimization, and avoidance measures for Special Status animal species; provision of compensatory mitigation for Special Status plant and animal species; preparation of a Habitat Restoration Plan; preparation of Habitat/Long-Term Management Plans; and implementation of Best Management Practices (BMPs) to avoid indirect impacts.

A-5.5 Cont.

BIO-3 projects significant and unavoidable impacts to the movement of native resident or migratory fish and wildlife species, to established native resident or migratory wildlife corridors, and to the use of native wildlife nursery sites. Mitigation would involve facilitation of wildlife movement.

BIO-4 projects that no conflicts with any approved HCPs, NCCPs, other conservation plans, and local biological protection policies and ordinances would occur. The DEIR states that encroachment into hardline preserve areas would not conflict with NCCPs or HCPs because biologically equivalent or superior compensation of habitat or project redesign would be required when there is encroachment into hardline preserve areas. Thus, BIO-4 projects less than significant impacts. The County of San Diego's draft North County and East County Plans were not included in this analysis.

A-5.6 CDFW's primary concerns with respect to climate change in San Diego County are the effects on biodiversity, special status plant and wildlife species, natural vegetation communities, and connections which maintain viable movement corridors between blocks of conserved habitat. Because climate change may impact species directly or indirectly by altering the distribution of vegetation types, promoting expansion of non-native species, duration and severity of drought, and increased frequency or magnitude of wildfires, CDFW considers the use of regional scale, multiple species conservation plans to be a valuable tool to lessen the effects of climate change.

COMMENTS AND RECOMMENDATIONS

A-5.7 It is the policy of CDFW to promote and foster the development of planning strategies at the ecosystem level through active participation in local development of regional NCCPs, which often include innovative multiple species habitat conservation planning efforts (e.g., MSCP). The success of these plans is reliant on maintaining core biological resource areas and habitat linkages that are essential to the long-term biological viability of associated flora and fauna. Many of the projects defined within the Plan extend through diverse and biologically valuable habitats where the need for comprehensive planning and creative designs solutions will be essential to ensure goals and objectives articulated in current and draft NCCP/HCP efforts are not undermined. CDFW believes the Plan provides a unique opportunity to develop and refine the SANDAG policies and strategies that could lead to more effective implementation of resource conservation and species protection. This includes compliance with State and Federal endangered species acts, approved NCCP/HCPs (e.g., County of San Diego's

Response A-5.6

This comment expresses CDFW's concerns with respect to climate change and its effects on the region's biodiversity. SANDAG has included a Climate Adaptation and Resilience Program in the proposed Plan. In addition, the anticipated effects from climate change is analyzed in the environmental impact analysis sections of Chapter 4 of the EIR. More specifically, a discussion of the effects of climate change on San Diego Region biological resources sis included in Section 4.4, "Biological Resources," of the EIR. The EIR also includes an analysis of the proposed Plan's consistency with adopted MSCPs, NCCPs, and HCPs in Impact BIO-4.

Response A-5.7

SANDAG appreciates CDFW's intentions to complement existing work and provide guidance to reduce the potential for conflict between existing and future plans and regulations for species protection. With regards to the analysis of NCCPs, the biology section (pages 4.4-45 and 4.4-46) regulatory setting describes the status of the draft North County and East County MSCPs. However, the CEQA analysis considers potential conflicts with only adopted HCPs, not draft HCPs, consistent with CEQA Guidelines Appendix G question IV.e and Section 15125(d)(e)). See also Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134, 1146 (CEQA does not require EIRs to analyze impacts of a project on unadopted conservation plans.

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A-5.7 Cont.

and City of San Diego's approved MSCP and several others) and the in-process North County and East County Plans. Our comments below are intended to complement existing work to date and provide guidance to reduce the potential for any subsequent conflict that could occur between existing and/or future plans, and other regulations for species protection (e.g., MSCP/MHCP, Lake and Streambed Alteration Agreements under Fish and Game Code §1600 et seq., Fish and Game Code §3500, et seq., etc.) that have received, or are anticipated to receive, State and Federal permits.

CDFW offers the comments and recommendations below to assist SANDAG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Recommendations may also be included to improve the document.

COMMENT # 1: Consistency with Natural Community Conservation Planning (NCCP) Programs

Issue: The DEIR does not analyze potential conflicts with draft and final NCCPs.

A-5.8

Specific impact: The North and East County Plans have not yet been finalized; however, in March 2021, the County of San Diego (County) reinstated the Planning Agreement with the United States Fish and Wildlife Service (USFWS) and CDFW for both draft plans. The County has completed the North County Plan conservation design and identified priority areas for conservation that are being considered in the CEQA analysis of development projects within the North County Plan planning area. While a planning effort for the eastern portions of the San Diego region was considered by the County in 2008, the East County Plan planning efforts have slowed. However, preliminary conservation design was completed for this area, which identified areas for conservation that are considered during CEQA analysis as described above for the North County Plan. Without a discussion of these draft NCCPs, CDFW is concerned that subsequent projects that tier off the Regional Plan may conflict with the goals and objectives of the draft NCCPs. The Regional Plan is an appropriate document to highlight this outstanding need.

A-5.9

Why impact would occur: There has been an ongoing effort by the County and the Wildlife Agencies (CDFW and USFWS; collectively, the Wildlife Agencies) to finalize the draft North County Plan and prepare the draft East County Plan. To ensure compliance with the CEQA Guidelines Section 15125(d), the DEIR should discuss any inconsistencies between the proposed projects described in the Plan and applicable general plans and regional plans, such as the draft North and East County Plans.

A-5.10

Furthermore, the Planning Agreement outlines an Interim Review Process to ensure that preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures are not precluded and that project impacts are adequately mitigated. Projects subject to the Interim Review Process are partly defined within the Planning Agreement as projects subject to

Response A-5.8

The comment notes that the EIR does not analyze potential conflicts with draft NCCPs, and expresses concern that without this discussion, future second-tier projects may conflict with the goals and objectives of the draft NCCPs. The EIR evaluates conflicts with only adopted NCCPs. Please refer to response to comment A-5.7 which explains why the EIR only analyzes conflicts with adopted NCCPs. Future second tier-projects would be required to comply with provisions of NCCPs being implemented at the time the projects are being implemented.

Response A-5.9

The comment requests that the EIR should discuss inconsistencies between the proposed Plan and applicable general plans and regionals plans, such as the draft North and East County Plans. The EIR does include an analysis of the Plan's consistency with adopted plans. Please refer to response to comment A-5.7 which explains why the EIR only analyzes adopted NCCPs. The EIR impact analyses (Impact LU-2 for general plans and Impact BIO-4 for regional conservation plans) comply with CEQA Guidelines Section 15125(d), which requires discussion of project inconsistencies with "applicable" general plans and regional plans. Applicable plans are those that have been adopted, not proposed plans. See *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1146 (CEQA does not require EIRs to analyze impacts of a project on unadopted conservation plans

Response A-5.10

The comment discusses the Planning Agreement and Interim Review Process for the North and East County HCPs, and the fact that the Plan includes proposed projects subject to County permitting authority and the Interim Review Process. It request a supplemental analysis of future conflicts with the draft North and East County HCPs, and the implications of a lack of this. On the project-specific level, all projects identified in the proposed Plan and subject to discretionary review would go through the interim review process between the County and the wildlife agencies once the Draft North and East County Plans are adopted. This has been clarified in the EIR

text in Section 4.4, "Biological Resources," under Impact BIO-4 on page 4.4-87 by adding the following:

> These conservation plans describe the processes by which future development impacts on target habitats and species both inside and outside preserves are evaluated and approved while meeting conservation targets, including consistency with these conservation plans during the project-specific interim review process between the County and the wildlife agencies for projects subject to discretionary permits.

The EIR does include an analysis of the Plan's consistency with adopted plans (see Local Laws, Regulations, Plans, and Policies, page 4.4-46). Therefore, a supplemental analysis on a programmatic level would not be conducted on Draft HCPs. Please refer to response to comment A-5.7 which explains why the EIR only analyzes adopted NCCPs.

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A-5.10 Cont.

discretionary permits. The Plan includes proposed projects that may impact land formerly subject to the County's discretionary permitting process and thereby the Interim Review Process. CDFW requests the Plan include a supplemental analysis for Biological Resources to ensure regional conservation objectives of the draft North and East County Plans would not be eroded by implementation of the Plan.

Lack of analysis of future conflicts with the draft North and East County Plans may inhibit forward planning for preservation, acquisition, management and monitoring of open space and biological resources and funding opportunities for support of the existing and future conservation actions.

A-5.11

Evidence impact may be significant: Compliance with approved and draft habitat plans, such as the MSCP, MHCP, and draft North and East County Plans, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. The proposed Plan update occurs across multiple NCCP areas and is subject to the provisions and policies of the appropriate NCCPs. An assessment of the impacts to the various NCCPs as a result of the Plan update is necessary to address CEQA requirements.

Recommended Potentially Feasible Mitigation Measure(s)

A-5.12

Recommendation #1: Recirculate with NCCP information. SANDAG should consider recirculating the DEIR to include additional information about the draft NCCPs in the Plan area. The recirculated DEIR should specify how the Plan and subsequent projects will have "no impact" in terms of conflict with draft and final NCCPs.

COMMENT # 2: Connectivity

A-5.13

Issue: The Plan crosses multiple NCCP linkage areas and construction and associated activities in these areas may prevent wildlife from utilizing the linkages.

Specific impact: Project activities such as working in and constructing new infrastructure within wildlife linkage areas may prevent wildlife from using these areas, thus reducing connectivity.

A-5.14

Why impact would occur: NCCP linkage areas are important for wildlife connectivity for numerous sensitive species, such as coastal California gnatcatcher (*Polioptila californica californica; Endangered Species Act (ESA)-listed threatened and California Species of Special Concern (SSC))*, and Peninsular Bighorn Sheep (*Ovis canadensis nelsoni; ESA-listed endangered and CESA-listed threatened)*, as well as fish species. The DEIR lacks information for CDFW to determine if the anticipated transportation projects described in the Plan will negatively affect wildlife connectivity. In general, wildlife is losing its ability to move and migrate as habitat is converted, or infrastructure built (Leonard et al., 2017). New roads or other transportation infrastructure may

Response A-5.11

The comment states that the EIR should assess impacts to various NCCPs as a result of the Plan is to address CEQA requirements. The EIR does include an analysis of the Plan's consistency with adopted general plans and regional conservation plans. Please refer to response to comment A-5.7 which explains why the EIR only analyzes adopted NCCPs, and response to comment A-5.9, which explains why the EIR impact analyses do comply with CEQA Guidelines Section 15125(d). The EIR assessed impacts to all adopted NCCPs in Impact BIO-4 of Section 4.4, "Biological Resources," of the EIR and concluded that the proposed Plan would not cause a significant impact in the 2035 and 2050 plan years. Project-specific planning, review by local agencies, regulatory agencies, and wildlife agencies, and CEQA review of land use and transportation projects would minimize or remove any potential conflict with policies and ordinances protecting biological resources because of built-in provisions in the NCCP implementation policies and ordinances to avoid impacts to the preserve system. See EIR pages 4.4-87 through 4.4-90.

Response A-5.12

The commenter requests recirculation of the EIR to include an analysis of draft NCCPs. The EIR does include an analysis of the Plan's consistency with adopted plans. Please refer to response to comment A-5.7 which explains why the EIR only analyzes adopted NCCPs Therefore, no revisions to EIR are necessary in response to the comments related to the draft NCCPs, and recirculation of the Draft EIR is not required because "significant new information" related to draft NCCPs has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5.

Response A-5.13

The comment notes that new infrastructure within wildlife linkage areas may prevent wildlife movement. The San Diego region has 30-year history of conservation planning for multiple species and their habitats, including the identification of an interconnected wildlife preserve system aimed at promoting connectivity and decrease the negative effects of habitat fragmentation. In order to conserve the region's biodiversity, Impact BIO-3 describes the proposed Plan's

intent to conserve unfragmented lands and climate-resilient wildlife movement corridors, and cores and linkages consistent with adopted local NCCP Subarea Plans. At the project-level, as discussed in Section 4.4, "Biological Resources," of the EIR, projects that implement the proposed Plan will have to discuss impacts on the project on the conservation plans that include direct loss of habitat and species and indirect impacts such as promoting fragmentation and hindering wildlife movement. This analysis would be included, as appropriate, into the subsequent (i.e., second tier) environmental review that will occur at the project level. Mitigation Measure BIO-3a addresses recommended design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies, such as incorporate wildlife movement and corridor planning data into the project design, minimize the number of road and rail crossings through identified wildlife corridors, incorporate the appropriate wildlife crossing infrastructure into the project design, maximize the use of overpasses strictly for wildlife use, install directional fencing, etc. Also, please also refer to Global Response 3 for an explanation of why the EIR's wildlife movement analysis meets CEQA requirements.

Response A-5.14

The comment states that NCCP linkage areas are important for wildlife connectivity for numerous special status species, and asserts the EIR lacks information to determine if the proposed Plan transportation projects would negatively affect wildlife connectivity. The EIR does include information addressing wildlife connectivity for special-status species, including the California gnatcatcher and Peninsular Bighorn sheep and special-status fish species as discussed in this comment (see BIO-3 direct and indirect impact discussion on pages 4.4-78 through 4.4-84). For example, Section 4.4, "Biological Resources," of the EIR, addresses the MHCP Stepping Stone analysis for gnatcatcher connectivity (page 4.4-32 and 4.4-35); impacts to bighorn sheep movement are also addressed in Section 4.4. Impact BIO-3 of the EIR concludes that there would be significant programmatic direct impacts to wildlife movement. Mitigation measures in Mitigation Measure BIO-3a include design considerations to facilitate wildlife movement and wildlife movement.

Specifically, connectivity was evaluated for adopted HCPs and available published wildlife movement corridor sources. This includes the gnatcatcher stepping stones as evaluated in the MHCP (see Multiple Habitat Conservation Plan on page 4.4-35). Potential habitat and habitat patches for Bighorn Sheep was assessed qualitatively through the SDSU climate resilient wildlife movement model (see "Southern California Climate Resilient Connectivity Linkage Network on page 4.4-33), which includes the Peninsular sheep habitat patch evaluation from published documents by Southcoast Wildlands (Penrod et al. 2012).

Connectivity for new roads and infrastructure would be evaluated on a project-specific level and would include the evaluation of wildlife movement across linear infrastructure, including connectivity design considerations and impact and mitigation evaluations, consistent with Mitigation Measure BIO-3a. Moreover, the EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review and any regulatory permitting and consultation requirements. The lead agency may identify additional mitigation measures as applicable for implementation at that time.

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A-5.14 Cont. present a semi-permeable to impermeable barrier to wildlife connectivity. By reducing connectivity, reductions in gene flow and lower genetic diversity can lead to overall reductions in a population's fitness and adaptability.

A-5.15 The ecological footprint of roads extends beyond its physical footprint due to road mortality, habitat fragmentation, and indirect impacts (Spencer et al, 2010). Limiting movement and passage of species can lead to the reduction of genetic fitness in populations, making them more vulnerable to stochastic events or extreme conditions, and lead to the inability of populations to recolonize habitat after disturbance events (e.g. fires, floods, droughts). It also can result in the loss of resident wildlife populations by altered community structure (e.g. species composition, distribution), and/or partial or complete loss of populations of migrant species due to blocked access to critical habitats (CDFW, 2009; Haddad et al., 2015; Nicholson et al., 2006).

A-5.16 The California Fish Passage Assessment Database [ds69] on BIOS a shows that there are several potential fish passage locations which warrant or require further assessment, according to reconnaissance surveys done by Pacific States Marine Fisheries Commission or California Conservation Corps in 2020 and 2021. Improper stream crossing design and installation can create fish passage barriers which would be detrimental to the multiple sensitive fish species found throughout San Diego County. This potential disruption of the longitudinal connectivity of rivers and other bodies of water by the installation and/or repairs to transportation infrastructure may impede fish movements to feeding and spawning grounds (Barbarossa et al., 2020).

A-5.17 The DEIR should recognize that additional areas for fish and wildlife movement may be subsequently identified through future studies and/or become necessary as a result of future urbanization/development in San Diego County. Thus, projects which tier off the final EIR may need to address wildlife corridor issues beyond the corridors identified in the DEIR.

A-5.18 **Evidence impact would be significant:** Changes to road width and levels of human disturbance are reasonable potential direct and indirect physical changes in the environment that will likely impact wildlife connectivity. Habitat conversion and fragmentation forces many California species to migrate in search of replacement habitat, and it also risks continued survival of species by compromising genetic diversity, among other things. (Fish & G. Code, § 1955 (b).) California wildlife is losing the ability to move as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors (Fish & G. Code, § 1955 (c).) Habitat connectivity and wildlife migratory corridors are essential to the continued survival of many California species. (Fish & G. Code, § 1955 (d).) Habitat connectivity is also necessary to reduce wildlife-vehicle collisions, which put people and wildlife at risk of injury or death. (Fish & G. Code, § 1955 (e).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 711.7.)

Response A-5.15

The commenter states that limiting the movement and passage of species can lead to the reduction of genetic fitness in populations making them more vulnerable during extreme conditions and could lead to an inability to recolonize habitats after disturbance events. It states loss of resident populations by altered community structure or complete loss of populations due to blocked access to critical habitat may also occur. A paragraph was added to the BIO-3 on page 4.4-78 stating the following:

> Impacts to wildlife movement may occur through reducing connectivity and thereby reductions in gene flow that would lead to inferior genetic diversity and population fitness. Habitat fragmentation due to creating impermeable barriers to wildlife movement could also result in direct mortality, increased vulnerability to stochastic events or extreme conditions, decreased ability to recover from disturbance events, decreased resiliency to climate change, and population loss due to blocked access to critical habitats (Spencer et al. 2010).

The EIR Impact BIO-3 does determine that there would be a significant impact to wildlife movement. Mitigation Measure BIO-3a provides measures to reduce wildlife movement impacts for second-tier projects implementing the proposed Plan. See also Global Response 3 and response to A-5.14 for an explanation of why the EIR's wildlife movement impact analysis meets CEQA requirements.

Response A-5.16

The commenter states that the California Fish Passage Assessment Database shows several potential fish passage locations which warrant further assessment and that improper stream crossing design could create fish passage barriers and impede fish movement to feeding and spawning grounds. In response to this comment, a discussion of the California Fish Passage Assessment Database was added to the Section 4.4 regulatory setting, page 4.4-35.

Impact BIO-3 evaluates wildlife movement impacts to all species pursuant to CEQA significance criteria derived from CEQA Guidelines

Appendix G, including impacts to migratory fish species. In response to this comment, impacts of transportation projects on migratory fish passage were specifically added to the Impact BIO-4 impact analysis, page 4.4-81, as follows:

> Also, transportation network improvements may create migratory fish passage barriers. As with development projects, direct impacts on aquatic habitat from dams, diversions, grade-control structures, pipes and culverts, and highway or railway crossings in streams and lagoons can inhibit movements of resident or migratory fish and fragment aquatic habitat for native aquatic wildlife. These structures can prevent aquatic species' access to spawning and rearing habitats.

Also, in response to this comment, a bullet in Mitigation Measure BIO-3a was modified as follows:

> Additionally, within aquatic habitat ~~impacting~~ and identified fish migration corridors for ~~species such as southern steelhead~~ 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 ~~for migratory fish species~~ in order to provide fish access to spawning and rearing habitats.

Response A-5.17

The comment requests that projects which tier off of the EIR need to address wildlife corridors issues beyond what is included in the EIR. Please see Global Response 3 which describes adequacy of the wildlife movement analysis included in the EIR. The EIR prepared for the proposed Plan is a first-tier Program EIR. Second-tier projects that would implement the Plan include site-specific analysis of development projects. As part of the implementation of the proposed Plan, individual projects that are part of the Plan would be subject to project-specific environmental review. The lead agency may identify additional wildlife corridors for analysis and additional mitigation measures for implementation at that time. Mitigation Measure BIO-1a includes early coordination with the wildlife agencies, and Mitigation Measure BIO-3a includes measures to facilitate fish and wildlife movement and provide designs for movement corridors.

Response A-5.18

The commenter states that changes to road widths and levels of human disturbance will likely impact wildlife connectivity and discusses the impacts associated with reduced wildlife connectivity, it highlights the importance of habitat connectivity and migration corridors. It does not recommend specific changes to the EIR. Please see Global Response 3 and response to comment A-5.14 regarding the adequacy of the EIR's wildlife movement analysis. The EIR determines that proposed Plan impacts to wildlife movement corridors would be significant. Mitigation Measure BIO-1a includes early coordination with the wildlife agencies, and Mitigation Measure BIO-3a includes measures to facilitate fish and wildlife movement and provide designs for movement corridors.

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A-5.19 In addition, Streets and Highways Code section 156.3 (Senate Bill 857) requires the California Department of Transportation (Caltrans), who is often a Lead Agency along with SANDAG on the specific projects analyzed under this Plan, to assess and address potential fish passage barriers for projects affecting fish bearing streams, in consultation with CDFW. As the activities described within the Plan may affect fish passage barriers, this is a potentially significant impact under CEQA that should be analyzed and addressed (CEQA Guidelines § 15071(e)).

Recommended Potentially Feasible Mitigation Measure(s)

A-5.20 **Recommendation #2:** The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 4.4-34 of the DEIR) as well as corresponding text on page 4.4-35 should be expanded to include certain omitted linkages prior to publication of the final EIR. Connectivity throughout the subregional MHCP and draft North and East County Plans should be included; for example, connections through Oceanside for coastal California gnatcatcher should be added to the map. The map is also missing the linkage along the I-15 through North County. Additionally, there is no reference to linkage in the text. Additionally, it is not clear if Multi-Habitat Planning Areas (MHPA) on the map shown near the Border include the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep and whether this is included in the areas referenced in the text on page 4.4-32 under the Las Californias Binational Conservation Initiative section.

COMMENT # 3: Impacts to Quino checkerspot butterfly

Issue: The Plan includes projects that may impact suitable habitat for Quino checkerspot butterfly (*Euphydryas editha quino*; *ESA-listed endangered and CESA candidate*), and ground disturbing activity may result in take of these species.

A-5.21 **Specific impact:** The DEIR states that Quino checkerspot butterfly is federally endangered and does not have any protections under CESA (Page 4.4-16). On August 13, 2025, the California Fish and Game Commission accepted a petition to list Quino checkerspot butterfly under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Activities resulting in ground disturbance or vegetation disturbance could result in loss of foraging resources and/or direct take.

A-5.22 **Why impact would occur:** Quino checkerspot butterfly was once a common butterfly throughout Southern California but has lost over 75% of its habitat. The Quino checkerspot butterfly is now only known from 62 potential sites in southern San Diego and Riverside Counties. Of those 62, the butterfly has been observed in only 33 sites (53.2%) during the last 10 years, and all sites are threatened by habitat destruction, degradation, fragmentation, wildfires and the effects of climate change.

Activities related to individual projects described in the Plan could result in potential significant impacts, including loss of foraging resources, changes in foraging behavior, reduced health and vigor of eggs, young, and/or adults and direct mortality. Ground

Response A-5.19

The comment notes legislation requiring Caltrans to address fish barrier impacts to anadromous species, and requests that the effect of fish passage barriers be evaluated as significant impacts in the EIR. A summary of Streets and Highways Code – SHC 156.3 was added to Section 4.4 "State Laws, Regulations, Plans, and Policies," (pages 4.4-44 and 4.4-45). Please see responses to comments A-5.14, A-5.15, and A-5.16, which discuss how the EIR addresses fish passage for all projects implementing the proposed Plan, including Caltrans projects.

Response A-5.20

This comment recommends that several wildlife movement linkages be added to the EIR text and Figure 4.4-15. Regarding inclusion of linkages in the draft North and East County HCPs, some of these linkages were included where they occurred as a dataset in the SDSU climate resilient wildlife movement model that was used for the EIR impact analysis. Regarding the connections through Oceanside for coastal California gnatcatcher, all linkages from the MHCP, including the City of Oceanside gnatcatcher stepping stones linkages, are included in Figure 4-4.15 and have been addressed in the Section 4.4, "Biological Resources," of the EIR, specifically Impact BIO-3. Regarding the linkage along through the I-15 through North County, the linkage is included in the more generalized corridor mapping in Figure 4.4-15, which does not map specific linkages. Figure 4.4-15 also includes the mapped MSCP and MHCP linkages, but some of these linkages are embedded in the SDSU connectivity model and are, therefore, only called out in on the figure where they don't overlap with the SDSU model.

The EIR is based on published information. EIR preparers reviewed the metadata for the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep and were not able to identify a verified wildlife corridor linking the Jacumba area to Mexico. Published Peninsular Bighorn Sheep habitat patches are included in the graphics provided by Southcoast Wildlands (Penrod et al. 2012), but no information on wildlife corridors in San Diego County is provided in this publication. Therefore, a specific wildlife corridor in

this area is not included in the text on page 4.4-32 under the Las Californias Binational Conservation Initiative section, although much of the linkage is included in the more generalized corridor mapping in Figure 4.4-15 that does not map specific or individual linkages. Wildlife movement corridors, including linkages for California gnatcatcher and Peninsular bighorn sheep, would be evaluated on a project-specific level should projects be planned there in the future. Currently, the SANDAG transportation footprint does not include any projects occurring in the vicinity of the Jacumba to Mexico location.

Lastly, Mitigation Measure BIO-3a calls for identifying project-specific wildlife migration corridors when second-tier projects implementing the proposed Plan are evaluated. When second-tier projects are evaluated in the future, information in draft HCPs may be considered as part of "best available information" already included in this mitigation measure.

Response A-5.21

The comment suggests some revisions to the EIR be made for the discussion of the Quino checkerspot butterfly. The EIR was updated and the proposed listing of Quino checkerspot butterfly under CESA was added to the text in Section 4.4.1 and Table 4-4.3. Text and tables have been updated to include Quino checkerspot butterfly as a state proposed species for listing. Since it is federally listed, impacts to this species were already evaluated in the EIR as part of Impact BIO-2.

Response A-5.22

The commenter notes that projects implementing the proposed Plan could affect Quino checkerspot butterfly and advises early consultation with CDFW for projects that may impact the Quino checkerspot butterfly, as significant project modifications and mitigation measures could be required to obtain an Incidental Take Permit or Consistency Determination under CESA. Please see response to comment A-5.21. Text and tables in Section 4.4.1 (Special Status Species) have been updated to include Quino checkerspot butterfly as a state proposed species for listing. Impacts to this species would require CDFW protocol habitat assessments and/or focused species surveys and the application of an Incidental Take Permits under Section 2081 of the Fish and Game Code. In addition, EIR mitigation measure BIO-1a recommends early consultation with the wildlife agencies to avoid, minimize and mitigate for impacts to sensitive biological resources.

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disturbance and vegetation removal associated with project implementation during the breeding season could result in the loss of breeding success. Habitat loss resulting from project activities will contribute to a cumulative decrease of foraging habitat for this species, as urban development projects continue to eliminate tracts of native vegetation. Thus, projects which tier off the final EIR may need to address impacts to Quino checkerspot butterfly beyond the analysis identified in the DEIR.

A-5.22 Cont.

Quino checkerspot butterfly is not a Covered Species under the City of San Diego's MSCP or Vernal Pool Habitat Conservation Plan, the County's MSCP, or draft North County Plan; therefore, impacts to Quino checkerspot butterfly and their habitat were not anticipated, analyzed, or authorized in the associated NCCP permits. Appropriate take authorization from CDFW under CESA may include an Incidental Take Permit (ITP) or a Consistency Determination, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP.

A-5.23

Evidence impact may be significant: Quino checkerspot butterfly is a CESA candidate species, and take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). CDFW considers impacts to species that are candidates for CESA listing to be significant under CEQA. Accordingly, the activities described in the Plan may have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The Plan may reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Quino checkerspot butterfly. The Plan may include projects that may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands.

Recommended Potentially Feasible Mitigation Measure(s)

A-5.24

Recommendation #3: Disclosure of potential impacts to Quino checkerspot butterfly. The EIR should be updated to reflect the status of Quino checkerspot butterfly as a CESA candidate species and include any updated analyses to reflect the Plan's impact on floral resources, host plants, and habitat for Quino checkerspot butterfly.

A-5.25

Recommendation #4: Early Consultation for Quino checkerspot butterfly. Early consultation with CDFW is encouraged, as significant modification to potential proposed projects and mitigation measures may be required to obtain an ITP or a Consistency Determination if projects proposed in the Plan may impact Quino checkerspot butterfly.

Response A-5.23

The comment summarizes the status of the Quino checkerspot butterfly and potential impacts to this species associated with the implementation of the proposed Plan. Please see response to comment A-5.21 and A-5.22.

Response A-5.24

Comment recommends that the status of the Quino checkerspot butterfly and EIR impact analyses on floral resources, host plants and habitat be updated. As described in Section 4.4.1 on page 4.4-2, the Quino checkerspot butterfly uses grasslands and other nonsensitive habitats that contain certain nectaring and flowering plants and the host plant dwarf plantain (*Plantago erecta*). Please see Response A-5.21 which explains why an analysis of the species' floral resources and host plants cannot be made on a programmatic level. However, the species' federally designated critical habitat has been assessed (see Table 4.4-4 on pages 4.4-24 and 4.4-25).

Response A-5.25

The comment explains that requirements for early consultation for Quino checkerspot butterfly. The Quino checkerspot butterfly was already included in the EIR analysis of potential impacts to federally listed species and federally designated habitat and impacts on critical habitat included in Table 4.4-9. The analysis was based on available information and GIS data. The evaluation of project-specific impacts on foraging and breeding habitat, including floral resources and host plants, is not possible on a programmatic level (. As stated in mitigation measure BIO-1a, early consultation with the wildlife agencies would occur on a project-specific level. For second-tier projects, specific analyses would be prepared, including habitat assessments for Quino checkerspot butterfly that would include the mapping of nectaring and host plants and the potential need for an Incidental Take Permit (ITP) under Section 2081 of the California Fish and Game Code.

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ADDITIONAL COMMENTS

COMMENT #5: Regional Funding Source

A-5.26 The *TransNet* Extension Ordinance and Expenditure Plan, approved countywide by voters in November 2004, includes an Environmental Mitigation Program (EMP) which is a funding allocation category for the costs to mitigate habitat impacts for regional transportation projects. This funding program is projected to expire in Fiscal Year 2028. The EMP is a unique component of the *TransNet* Extension in that it goes beyond traditional mitigation for transportation projects by including a funding allocation for habitat acquisition, management, and monitoring activities as needed to help implement the MSCP and MHCP, including subarea plans issued under these subregional planning efforts. This funding allocation is tied to mitigation requirements and the environmental clearance approval process for proposed transportation projects. Additionally, SANDAG has been discussing funding needs for planning and implementation of regional conservation efforts throughout San Diego County, including the monitoring and management of regional preserves. CDFW strongly supports the development of the Regional Funding Source to support implementation of the MSCP and MHCP, and it should be a critical component of the San Diego Forward program.

COMMENT #6:New commuter and light rail alignments

A-5.27 CDFW acknowledges that the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Commuter Rail Corridor Alignment, San Diego segment, Project is being analyzed through a separate CEQA document. CDFW provided comments on the Updated Notice of Preparation circulated on May 16, 2025, regarding our concerns with impacts to special status species, sensitive habitats, and conserved lands. The LOSSAN Project is disclosed in the DEIR, and it appears some segments may tier off the Plan EIR. Given the magnitude of potential impacts from the LOSSAN Project and the potential Boundary Line Adjustments or minor amendments that may be required pursuant to the City of San Diego's MSCP and County of San Diego's South County MSCP, CDFW requests early consultation with the Wildlife Agencies prior to public review of any subsequent project-level CEQA documents.

Recommendation #7: New commuter and light rail alignments proposed through the City and County of San Diego

A-5.28 CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies, the City of San Diego, and County of San Diego to design alignments that avoid sensitive resources and preserved lands.

ENVIRONMENTAL DATA

A-5.29 CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, §

Response A-5.26

The commenter supports the development of a Regional Funding Source to support implementation of the MSCP and MHCP and suggests that it be included in the proposed Plan. This comment relates to the content of the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

As stated in Regional Plan Appendix Q: Regional Habitat Conservation Vision, SANDAG will continue to coordinate the discussion around how the region can obtain the funding necessary to provide the local jurisdictions share of the regional habitat conservation plans. Historically, regional habitat conservation plans envisioned that funding would be provided by multiple sources: a third from new development, a third from state and federal sources, and a third from local jurisdictions. Each local jurisdiction that is signatory to the conservation plan and the Implementing Agreement with the Wildlife Agencies that provides the legal "take" authorizations identified in the conservation plan is obligated to fund local costs for land conservation, acquisition, management, and monitoring. Identifying a regional funding source would provide a means of helping to offset the costs to local jurisdictions.

The TransNet Extension Ordinance and Expenditure plan included a provision that SANDAG would act on a regional funding measure to meet the long-term requirements for implementing habitat conservation plans in the San Diego region to be considered by the voters no later than four years after passage of the TransNet Extension. Along with transit operations and stormwater management, regional funding for habitat conservation was included in a 2016 ballot measure to assist the region in meeting its underfunded infrastructure needs. The 2016 bond measure, referred to as Measure A, failed to achieve the 2/3 voter approval needed for its adoption leaving the option of regional funding for habitat conservation in question.

SANDAG continues to support and facilitate regional habitat conservation planning. The proposed Plan includes a near-term action to "complete the Regional Habitat Conservation Assessment," which will establish the needs and costs to complete the habitat

conservation plans, and identify possible funding pathways. SANDAG has and will continue to work with the local jurisdictions and state and federal agencies, to direct its mitigation efforts to maximize the build out of the regional habitat conservation preserve while meeting all the necessary regulatory permitting requirements. In addition, SANDAG will continue to facilitate regional dialog around impediments and challenges in the planning and implementation of habitat conservation plans.

Response A-5.27

The comment explains that the LOSSAN project may result in impacts and request early consultation for subsequent project-level CEQA documents prior to public review. Mitigation Measure BIO-1a includes early coordination with the wildlife agencies for second-tier projects. Please also see Global Response 2 regarding mitigation measures for second-tier projects, and response to comment A-1.5 for further information on review of the LOSSAN project.

Response A-5.28

The comment requests early consultation for new commuter and light rail alignments. Early consultation with the wildlife agencies for second-tier projects is included in Mitigation Measure BIO-1a: "Conduct early coordination with the wildlife agencies and the respective local jurisdictions to design alignments that avoid sensitive resources and preserved lands." Mitigation Measure BIO-1a also specifies the avoidance of sensitive resources by designing projects and alignment to be placed in the least environmental sensitive area and keeping development footprints out of sensitive habitats.

Response A-5.29

The comment requests that SANDAG submit any survey data on special status species and natural communities collected for the EIR. Reporting of special-status species and natural communities surveys to the CNDDB would occur for each specific project on a project-specific analysis level. It is common practice by biological consultants to report any special-status species and natural communities detected during project surveys to the CNDDB.

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21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[3] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

A-5.29 Cont.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[4].

SANDAG should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

A-5.30

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

A-5.31

CDFW appreciates the opportunity to comment on the DEIR to assist SANDAG in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the SANDAG has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Katrina Rehrer[5], Senior Environmental Scientist (Specialist).

Sincerely,

Signed by:
Glen Lubcke
AD7D070BCB86466...

Glen M. Lubcke
Environmental Program Manager
South Coast Region

[3] https://wildlife.ca.gov/Data/CNDDB
[4] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit
[5] Phone: (310) 387-9260; Email: Katrina.rehrer@wildlife.ca.gov

Response A-5.30

The comment noted the filing fees required when filing a Notice of Determination. This comment does not address adequacy of the Draft EIR, and no further response is required.

Response A-5.31

This comment requests review of SANDAG responses to the commenter's comments, and notification of forthcoming proposed Plan hearing dates. SANDAG will provide the requested information to the commenter,

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ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

A-5.32

Attachment B: MSCP core resource areas and linkages map

Attachment C: Fish passage locations

ec: California Department of Fish and Wildlife
Melanie Burlaza, Senior Environmental Scientist (Supervisory)
Katrina Rehrer, Senior Environmental Scientist (Specialist)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

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A-5.33

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Response A-5.32

This comment identifies three attachments to the comment letter. The following are responses to the comments included in these attachments.

Response A-5.33

The comment provides a list of references cited in the comment letter. No response is necessary.

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

	Mitigation Measure	Timing	Responsible Party
A-5.34	**Recommendation #1: Recirculate with NCCP information.** SANDAG should consider recirculating the DEIR to include additional information about the draft NCCPs in the Plan area and establishment of a Regional Funding Source. The recirculated DEIR should specify how the Plan and subsequent projects will have "no impact" in terms of conflict with draft and final NCCPs.	Prior to adoption of the final Environmental Impact Report	Lead Agency
A-5.35	**Recommendation #2:** The Regional Wildlife Movement Corridor Map (Figure 4.4-15, page 4.4-34 of the DEIR) as well as corresponding text on page 4.4-35 should be expanded to include certain omitted linkages prior to publication of the final EIR. Connectivity throughout the subregional MHCP and draft North and East County Plans should be included; for example, connections through Oceanside for coastal California gnatcatcher should be added to the map. The map is also missing the linkage along the I-15 through North County and there is no reference to it in the text. Additionally, it is not clear if Multi-Habitat Planning Areas (MHPA) on the map shown near the Border include the north/south connectivity with Mexico near Jacumba for Peninsular Bighorn Sheep and whether this is included in the areas referenced in the text on page 4.4-32 under the Las Californias Binational Conservation Initiative section.	Prior to adoption of the final Environmental Impact Report	Lead Agency

Response A-5.34

The comment recommends recirculation of the Draft EIR to include information on draft NCCPs and establishment of a regional funding source. Please see response to comment A-5.12, which explains why recirculation of the Draft EIR to include information draft NCCPs is not required. Please also see response to comment A-5.26 regarding the establishment of a regional funding source.

Response A-5.35

This comment request that additional wildlife corridors be added to the EIR. Published wildlife corridors, including linkages identified in the MSCP and MHCP, are included in the wildlife movement corridor analysis and imbedded in Figure 4.4-15, which is an overlay of available wildlife movement corridor modeling data in the San Diego region. See Global Response 3 and response to comment A-5.20 regarding the adequacy of the EIR's wildlife movement analysis, and why the additional corridors identified by the commenter need not be added to the EIR.

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	Mitigation Measure	Timing	Responsible Party
A-5.36	**Recommendation #3: Disclosure of potential impacts to Quino checkerspot butterfly.** The EIR should be updated to reflect the status of Quino checkerspot butterfly as a CESA candidate species and include any updated analyses to reflect the Plan's impact on floral resources, host plants, and habitat for Quino checkerspot butterfly.	Prior to adoption of the final Environmental Impact Report	Lead Agency
A-5.37	**Recommendation #4: Early Consultation for Quino checkerspot butterfly.** Early consultation with CDFW is encouraged, as significant modification to potential proposed projects and mitigation measures may be required to obtain an ITP or a Consistency Determination if projects proposed in the Plan may impact Quino checkerspot butterfly.	Prior to project-level activities	Lead Agency
A-5.38	**Recommendation #6: New commuter and light rail alignments** CDFW acknowledges that the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Commuter Rail Corridor Alignment, San Diego segment, Project is being analyzed through a separate CEQA document. CDFW provided comments on the Updated Notice of Preparation circulated on May 16, 2025 regarding our significant concerns with impacts to sensitive species, habitats, and conserved lands. The overall LOSSAN Project is disclosed in the DEIR, and it appears some segments may tier off the Plan EIR. Given the magnitude of potential impacts from the LOSSAN Project and the potential Boundary Line Adjustments or minor amendments that may be required pursuant to the City of San Diego's MSCP and County of San Diego's South County MSCP, CDFW requests early consultation with the Wildlife Agencies prior to public review of any subsequent project-level CEQA documents.	Prior to public review of any subsequent project-level CEQA documents	Lead Agency

Response A-5.36

This comment requests disclosure of potential impacts to Quino checkerspot butterfly. Please see responses to comments A-5.21, A-5.22 and A-5.25 related to disclosure of potential impacts to Quino checkerspot butterfly.

Response A-5.37

This comment requests early consultation for second-tier projects affecting Quino checkerspot butterfly. Please see response to comment A-5.21 and A-5.25 relative to the inclusion of Quino checkerspot as a state candidate species, early coordination with the wildlife agencies, and the potential need to apply for an ITP for second-tier projects.

Response A-5.38

This comment requests early consultation prior to public review of project-level CEQA documents for the LOSSAN corridor. Please see response to commentA-5.27 regarding consultation for LOSSAN corridor projects.

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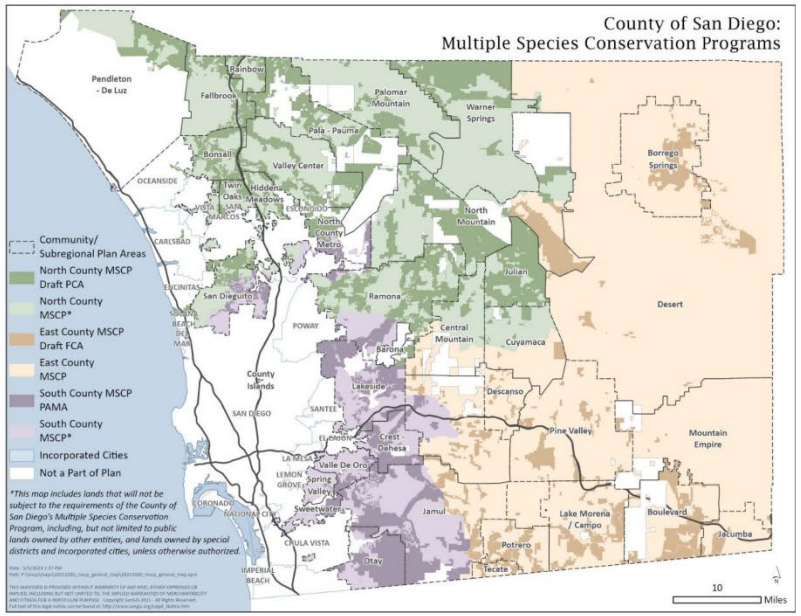
	Mitigation Measure	Timing	Responsible Party
A-5.39	**Recommendation #7: Recommendation #6: New commuter and light rail alignments proposed through the City and County of San Diego** CDFW recommends SANDAG conduct early coordination with the Wildlife Agencies, the City of San Diego, and County of San Diego to design alignments that avoid sensitive resources and preserved lands.	Prior to public review of any subsequent project-level CEQA documents	Lead Agency

Response A-5.39

This comment requests early coordination for new commuter and rail alignments. Please see response to comment -5.28 regarding early consultation for new commuter and rail alignments.

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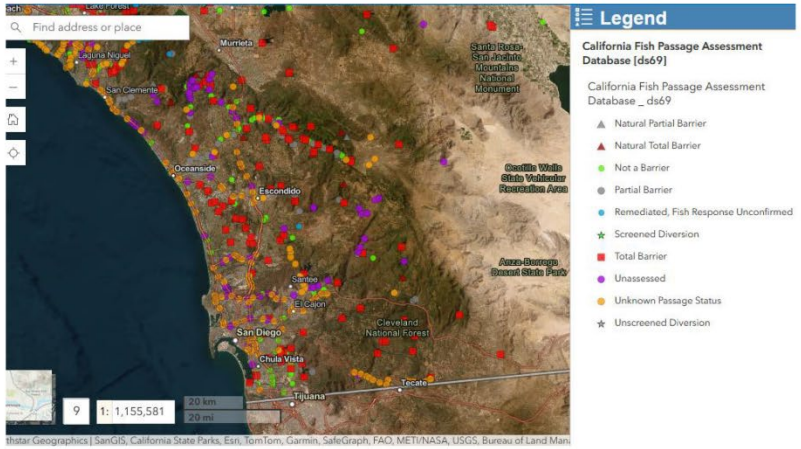
A-5.40 | **ATTACHMENT B: MSCP CORE RESCOURCE AREAS AND LINKAGES MAP**

Response A-5.40

The attached Attachment B: MSCP Core Resources Areas and Linkages Map has been used in the GIS overlay analysis of the programmatic impacts to core and linkages and data from this map is included in Figure 4.4-15 of the EIR. See description of data sources and methods on page 4.4-33 through 4.4-35, specifically the description of the inclusion of the MSCP core and linkages on page 4.4-33. No revisions to the EIR are necessary.

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A-5.41 | **ATTACHMENT C: FISH PASSAGE LOCATIONS**

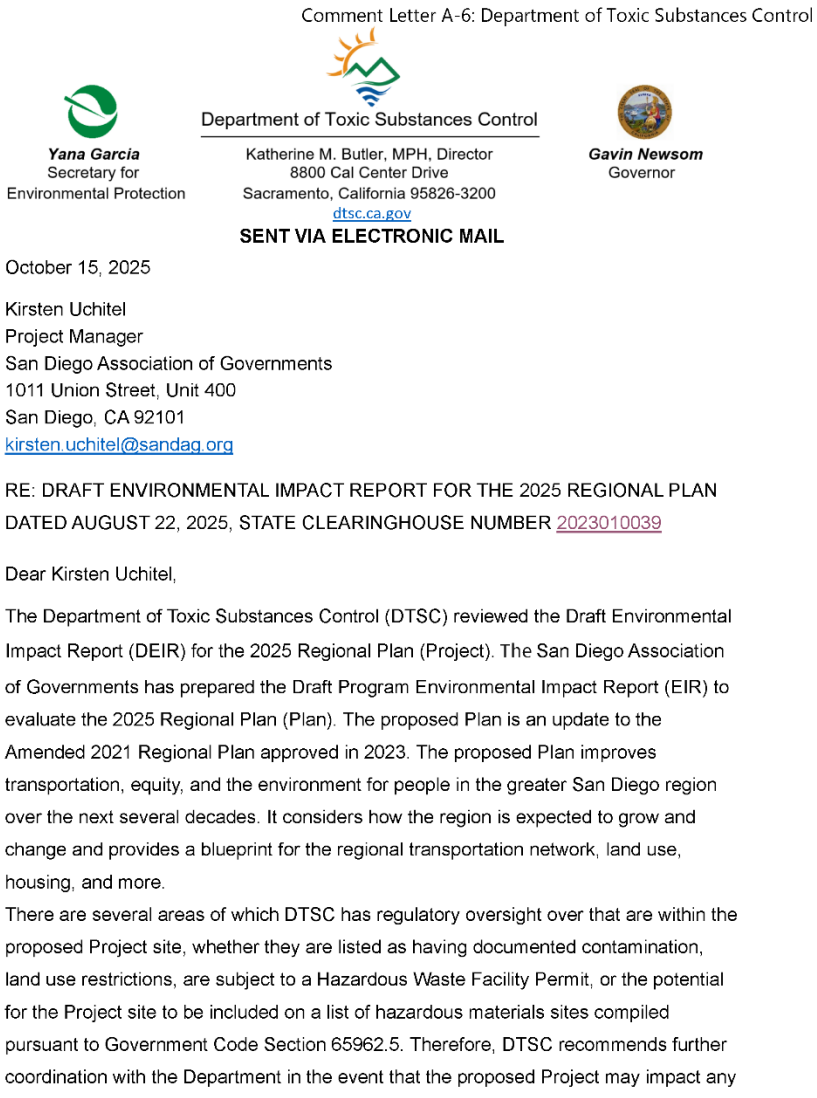
Response A-5.41

Attachment C is a figure identifying fish passage locations in San Diego County sourced from the California Fish Passage Assessment data for anadromous fish. The only anadromous fish species present in San Diego County are the southern steelhead occupying San Mateo Creek and additional critical habitat present in Santa Margarita Creek in north San Diego County, and native rainbow trout in Pauma Creek, the West Fork of the San Luis Rey River, and occasionally in the Sweetwater River. A measure to address anadromous fish species has been added to Mitigation Measure BIO-3a. Please see response to comment A.5-16 regarding addition of the California Fish Passage Assessment Database to the EIR, and response to comment A.5-19 about addressing fish passage pursuant to SHC 156.3.

In response to this comment, a bullet in Mitigation Measure BIO-3a was modified as follows:

- Additionally, within aquatic habitat ~~impacting~~ and identified fish migration corridors for ~~species such as southern steelhead~~ 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 ~~for migratory fish species~~ in order to provide fish access to spawning and rearing habitats.

Comment Letter A-6: California Department of Toxic Substances Control



Comment Letter A-6: Department of Toxic Substances Control

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 15, 2025

Kirsten Uchitel
Project Manager
San Diego Association of Governments
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kirsten.uchitel@sandag.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE 2025 REGIONAL PLAN DATED AUGUST 22, 2025, STATE CLEARINGHOUSE NUMBER 2023010039

Dear Kirsten Uchitel,

A-6.1 The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the 2025 Regional Plan (Project). The San Diego Association of Governments has prepared the Draft Program Environmental Impact Report (EIR) to evaluate the 2025 Regional Plan (Plan). The proposed Plan is an update to the Amended 2021 Regional Plan approved in 2023. The proposed Plan improves transportation, equity, and the environment for people in the greater San Diego region over the next several decades. It considers how the region is expected to grow and change and provides a blueprint for the regional transportation network, land use, housing, and more.

A-6.2 There are several areas of which DTSC has regulatory oversight over that are within the proposed Project site, whether they are listed as having documented contamination, land use restrictions, are subject to a Hazardous Waste Facility Permit, or the potential for the Project site to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends further coordination with the Department in the event that the proposed Project may impact any

Response A-6.1

This comment includes opening remarks and describes the proposed Plan. This comment does not pertain to the adequacy of the analysis included in the EIR. Therefore, no further response is required.

Response A-6.2

Appendix I, "Hazardous Materials Site Listings," of the EIR contains a compiled list of hazardous material sites including the Ketama Aerospace and Electronics site and the Magnolia Elementary School site as specified by the commenter. Potential project impacts on any areas under Department of Toxic Substances Control (DTSC) regulatory oversight, as described in Section 4.9, "Hazards and Hazardous Materials," would require coordination with the DTSC as noted, and adherence to the federal, state, and local laws that govern the use of hazardous materials. This would ensure that any impacts from projects implementing the proposed Plan associated with the routine transport, use, disposal, and accidental release of hazardous materials (including the release of contaminants from a Government Code Section 65962.5 hazardous materials site) are less than significant and do not create a significant hazard to the public or the environment.

Coordination regarding project level impacts and required project level technical analysis, such as the identification of contaminated groundwater and soils, are undertaken during the project development and environmental clearance phase for future projects. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects implementing the Plan are subject to environmental review in compliance with CEQA, and will follow applicable hazardous materials and hazardous waste laws and regulations, and coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

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of the areas that may fall under DTSC's oversight. In particular, the Ketema Aerospace and Electronics site and the Magnolia Elementary School site have contaminated groundwater at a relatively shallow depth. DTSC recommends and requests consideration of the following comments:

A-6.2 Cont.

1. DTSC is currently working with California Department of Transportation to address the issue with the water removal activities at the Bradley Avenue pumphouse within the Ketema Aerospace and Electronics site. Future excavation/road improvement work in this area might encounter contaminated groundwater and/or vapor intrusion issues. Therefore, DTSC recommends a proper notification system be set in place, so DTSC can be involved in the early stage(s) of the future earth disturbance work in this area to address these potential issues.

A-6.3

2. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

A-6.4

3. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

A-6.5

Response A-6.3

As described in Section 4.9, "Hazards and Hazardous Materials," adherence to the federal, state, and local laws that govern the use of hazardous materials would ensure that any impacts associated with the routine transport, use, disposal, and accidental release of hazardous materials (including the release of contaminants from a Government Code Section 65962.5 hazardous materials site) are less than significant and do not create a significant hazard to the public or the environment.

Coordination regarding project level impacts and required project level technical analysis, such as the identification of contaminated groundwater, soils, and vapor intrusion issues are undertaken during the project development and environmental clearance phase for future projects. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects implementing the Plan, including potential development near the Ketema Aerospace and Electronics Site, are subject to environmental review in compliance with CEQA, and will follow applicable laws and regulations, including DTSC notification, and coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

Response A-6.4

As described in Section 4.9, "Hazards and Hazardous Materials," adherence to the federal, state, and local laws, including compliance with the Toxic Substances Control Act of 1976 and the Occupational Safety and Health Act which regulates the removal and disposal of hazardous materials such as lead-based paint (LBP), mercury, asbestos containing materials, and polychlorinated biphenyl caulk would ensure that impacts associated with the routine transport, use, disposal, and accidental release of hazardous materials are less than significant.

Coordination regarding project level impacts and required project level technical analysis, such as the identification of hazardous

materials such as LBP, mercury, asbestos containing materials, and polychlorinated biphenyl caulk, are undertaken during the project development and environmental clearance phase for future projects. As discussed in Section 4.9, "Hazards and Hazardous Materials," all projects would be required to comply with the California Land Environmental Restoration and Reuse Act and several other hazardous materials related regulations. As required by these regulations if a project is located near a current or former building that has the potential to release hazardous materials as a result of construction activities, the project would be required to conduct site surveys and soil sampling consistent with DTSC's Preliminary Endangerment Assessment Guidance Manual, including the preparation of a soil sampling work plan. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects implementing the Plan are subject to environmental review in compliance with CEQA, and will follow applicable laws and regulations, including hazardous materials laws and coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall.

Response A-6.5

As described in Section 4.9, "Hazards and Hazardous Materials," adherence to the federal, state, and local laws, including compliance with the Toxic Substances Control Act of 1976 and the Occupational Safety and Health Act which regulates the use of imported soil/fill to ensure that impacts associated with the routine transport, use, disposal, and accidental release of hazardous materials are less than significant. The commenter cites specific manuals and additional information related to requirements of importing fill to a site to ensure the fill is suitable for the intended land use.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects implementing the Plan are subject to environmental review in compliance with CEQA, and will follow applicable laws and regulations, including hazardous materials laws and coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall. Any necessary sampling of contaminated imported soils and imported fill material, and additional necessary site-specific measures to avoid contaminated imported soils and fill material impacts, would be identified during that process.

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Page 3

4. Although it is not anticipated that munitions, munitions debris, or other explosive hazards associated with the FUDS site will be identified within the boundaries of the Project site, DTSC recommends performing additional research on the FUDS boundaries in relation to the Project site. Should a suspected military munition be encountered at the Project Site: **Recognize** that munitions are dangerous; **Retreat** — do not approach, touch, move or disturb it, but carefully leave the area; and **Report** immediately what you saw and where you saw it to local law enforcement — call 911.

A-6.6

DTSC would like to thank you for the opportunity to comment on the DEIR for 2025 Regional Plan. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions regarding these comments, please contact us via our CEQA Review email.

A-6.7

Sincerely,

Dave Kereazis

Dave Kereazis
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cc: (via email)

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Response A-6.6

SANDAG appreciates the information provided by the commenter regarding the best safety practices in the event that munitions, munitions debris, or other explosive hazards associated are discovered within a Formerly Used Defense Site (FUDS). Potential project impacts on any areas under DTSC regulatory oversight including FUDS, as described in Section 4.9, "Hazards and Hazardous Materials," would require coordination with the DTSC as noted, and adherence to the federal, state, and local laws that govern the use of hazardous materials. This would ensure that any impacts from projects implementing the proposed Plan within a FUDS are less than significant.

Coordination regarding project level impacts and required project level analysis and the identification of existing site conditions such as proximity to a FUDS is undertaken during the project development and environmental clearance phase for future projects. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects implementing the Plan are subject to environmental review in compliance with CEQA, and will follow applicable laws and regulations, including hazardous waste laws and coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall. Any site-specific impacts and additional measures to avoid FUDs impacts, would be identified during that process.

Response A-6.7

This comment is a concluding statement. SANDAG appreciates the comments provided by DTSC and your participation in the CEQA environmental review process for the 2025 Regional Plan.

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Comment Letter A-7: North County Transit, San Diego Railroad

Comment Letter A-7: North County Transit, San Diego Railroad

NORTH COUNTY TRANSIT
SAN DIEGO RAILROAD

COMMENT-RESPONSE LOG

Project: Regional Plan dEIR Comments
Submittal: dEIR
Contract Reference: SANDAG

Response Codes: A=Agreed and will comply/take action. B= Will investigate. C=Disagree for reasons noted in Response/Status Column. D=Will address in next phase.

REVIEWER RESPONSIBILITY

	No.	Reviewer	Agency	REF. PAGE	COMMENT	RESPONSE	RESOLUTION-ACTION ITEM
A-7.1		Lillian Doherty	NCTD	2-29	Alternative 4 is requested to be carried forward for evaluation rather than Alternative 5. Developer finds Alternative 4 to be the most viable for their future development & NCTD's internal team finds that the 2 stage trench is not as viable or justifiable without examples. Compared to the Alternative 5 option, Alternative 5 would allow the developer to design and construct their facility and still use the proposed shoofly area for non-structure feature (i.e., parking, landscape, etc.) that will allow the trench to be constructed in the future with reduced impacts to the developer.		
A-7.2		Lillian Doherty	NCTD	2-29	Why is one of the short-term recommendations to develop feasibility studies for potential TOD w/in MTS and NCTD service areas? Can this be described in greater detail? If on NCTD property, NCTD does not require further study. Adequate studies have been completed to evaluate the financial feasibility of redeveloping NCTD property.		
A-7.3		Lillian Doherty	NCTD	2-29	Does NCTD have an interest in extending LOSSAN to the US-Mexico Border?		
A-7.4		Lillian Doherty	NCTD	2-29	Of the 6 rapid routes - do we support these? Are these in NCTD footprint?		
A-7.5		Lillian Doherty	NCTD	2-29	Please describe the clean transportation programs described in the short-term actions?		
A-7.6		Lillian Doherty	NCTD	2-29	Describe which projects are proposed that improve goods movement as described in the dEIR.		
A-7.7		Lillian Doherty	NCTD		Include comment to support funding for transit operations and flexibile fleets.		
A-7.8		Lillian Doherty	NCTD		Provide additional information about available smart growth grants.		
A-7.9		Lillian Doherty	NCTD	2-43	Confirm cost estimates for oceanside to downtown San Diego		
A-7.10		Lillian Doherty	NCTD		What projects are planned to occur at Camp Pen to double 2035 cost estimate bringing total cost to $9 B?		
A7.11		Lillian Doherty	NCTD	3-3	Correct: SPRINTER hybrid rail and not "light rail". Also clarify that SPRINTER is a diesel powered multiple unit rail vehicle - not "light rail."		
A-7.12		Lillian Doherty	NCTD	4.3-32	The paragraph following the heading "Transit Improvement and Expansion Program" only describes initiatives to transition to ZEBs by MTS. NCTD is notably missing from this. Additionally, the State is announcing a plan to supplement COASTER/Surfliner trips with ZER mid day. NCTD is also actively seeking to transition its SPRINTER fleet to a fuel cell H2 option.		
A-7.13		Lillian Doherty	NCTD	4.3-38	The text indicates that all diesel locomotives will be replaced with zero emission electric engines by 2050, which is not exactly correct because CARB withdrew its request for authorization for the EPA to enforce the In-Use Locos. Note, however, that the In-Use Locomotive reg doesn't apply to light rail, hybrid rail, and other multiple-unit vehicles, which are not propelled by a locomotive. SPRINTER is one of these latter categories that must be replaced/transitioned.		
A-7.14		Lillian Doherty	NCTD	4.3-38	It is noted that the text regarding passenger rail references Amtrack, Metrolink, COASTER and SPRINTER, however, MTS services appear to be excluded. Is that intentional?		
A-7.15		Lillian Doherty	NCTD	GENERAL/ THROUGHOUT	All references to SPRINTER, BREEZE, or COASTER should be capitalized.		
			NCTD				
			NCTD				
			NCTD				
			NCTD				
					dEIR available here: https://www.sandag.org/-/media/CD50E43504214D29BC91B64D06FC5884.ashx		

Response A-7.1

The comment specifies that Alternative 4 be carried forward for evaluation rather than Alternative 5, and states that the developer finds Alternative 4 to be the most viable for their future development. it is not clear to which of the project components the comment refers; page 2-29 of the Draft EIR includes a list of implementation actions proposed for the 2025 Regional Plan and there is no reference to Alternative 4 or 5 on the page referenced. As to EIR alternatives, the alternatives impact analysis within the EIR has been conducted in full compliance with the requirements of CEQA, pursuant to Section 15126.6 of the State CEQA Guidelines; see Global Response 1. As described in Chapter 5, *Alternatives Analysis*, and Appendix M, *Alternatives Data,* the EIR included the analysis of three alternatives. For these reasons, no revision to the EIR is required as a result of this comment.

Response A-7.2

The comment requests information on TOD feasibility studies within MTS and NCTD service areas. This comment does not address the adequacy of the EIR. As such, no further response is required. However, SANDAG has revised Chapter 3, Implementation Actions, of the proposed Plan to state that the referenced near-term action is to develop feasibility studies analyzing the potential for TOD on publicly owned land.

Response A-7.3

The comment questions whether the North County Transit District (NCTD) has an interest in extending the LOSSAN corridor to the US-Mexico Border. As stated in Section 2.4.5, "Implementation Actions," SANDAG intends to study the feasibility of extending the LOSSAN corridor to the U.S.-Mexico border. The results of these studies will determine the potential opportunities associated with extending the LOSSAN corridor to the U.S.-Mexico border and identify the local agencies and stakeholders that would be involved with the project if it is determined to be feasible. This feasibility study would be coordinated by SANDAG and would include coordination with NCTD,

if requested. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.4

The comment appears to pose a question to NCTD staff reviewing the EIR regarding Rapid routes. The proposed Plan includes 35 new Rapid routes and funding for improvements to 9 existing Rapid routes by 2035. It is unclear which Rapid routes the comment is referencing. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.5

The comment requests a description of the clean transportation programs described as short-term actions on page 2-29 of the Draft EIR. The clean transportation programs referred to on page 2-29 of the EIR (page 2-40 of the Final EIR) include several clean transportation programs that have been identified by SANDAG to reduce greenhouse gas emissions, improve air quality, and reduce petroleum dependence. These programs include the wireless electric vehicle charging, regional electric vehicle charger management strategy, regional medium and heavy duty zero emission vehicle (ZEV) blueprint, as well as incentive programs to reduce the cost of acquiring a ZEV and associated charging infrastructure for residents. Additional information regarding these clean transportation programs can be found on SANDAG's website at the following link: https://www.sandag.org/projects-and-programs/innovative-mobility/clean-transportation. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.6

The comment requests a description of which proposed projects would improve goods movement as described on page 2-29 of the Draft EIR. As described under Section 2.4.2, "Transportation Network Improvements," of the EIR, projects aimed at improving goods movement are included under the Complete Corridors project type category and generally include improvements at freight gateways (land border crossings, maritime terminals, and air cargo terminals), on rail lines, and on roadways. Tables 2-9 on pages 2-79 through 2-86 of the EIR include the specific projects that fall under this category in the "Project Category" column. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.7

The comment expresses the intent to support funding for transit operations and flexible fleets. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

Response A-7.8

The comment requests additional information about available smart growth grants. SANDAG leverages partnerships with cities and the county through the Smart Growth Incentive Program and other grants to provide funds for transportation-related improvements and planning efforts that support smart growth in the County. Additional information regarding the current grant programs supported by SANDAG can be found at the following link: https://www.sandag.org/funding/grant-programs/smart-growth-and-housing. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.9

The comment requests confirmation of cost estimates for Oceanside to downtown San Diego. This response assumes that the comment is referencing Regional Rail 398 project (TL003), which is listed in Table 2-9 in the EIR. As stated on page 2-84 of the EIR, the current cost projections for TL003 are $4.324 billion. The methodology for determining implementation costs for the projects proposed in the 2025 Regional Plan and analyzed in the EIR is discussed in Appendix H to the proposed Plan, *Cost Estimation Methodology*. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.10

The comment asks what projects are planned to occur at Camp Pendleton that bring total costs to $9 billion. This response assumes that the commenter is referencing Regional Rail 398 project (TL004), listed in Table 2-9 in the EIR. As described on page 2-84 of the EIR, Regional Rail 398 project includes a new connection from Camp Pendleton to downtown San Diego. This project will include grade separations, curve straightening, the reconstruction of the Miramar

Tunnel, and a new station at Camp Pendelton and University Town Center (UTC). This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response A-7.11

The comment states that SPRINTER is not light rail In response to this comment, the text of page 3-3 of the EIR has been revised to read as follows:

> In North County, the North County Transit District (NCTD) manages the SPRINTER ~~light~~ hybrid-rail system, which operates diesel-powered ~~light~~ multiple unit rail vehicles along a 22-mile east–west route serving 15 stations connecting Oceanside, Vista, San Marcos, and Escondido generally along SR 78.

Response A-7.12

The comment requests that that information be added about NCTD's ZEB programs. The comment also notes that there are future State plans to supplement the COASTER and SURFLINER trips with a zero-emission rail option during the day and that NCTD looks forward to continued coordination on the implementation and transition of its existing fleet to zero emission technology. In response to this comment, the text on page 4.3-32 of the EIR has been revised to read as follows:

> The entire Metropolitan Transit System (MTS) fleet of 40- and 60-foot buses uses Renewable Compressed Natural Gas, and MTS recently adopted a plan to transition the entire fleet to zero-emission vehicles by 2040. MTS currently has 25 electric buses in service (MTS 2025). In addition, North County Transit District (NCTD) adopted its Zero Emission Bus (ZEB) Transition Plan in 2020, which will convert 100 percent of its 52-bus fleet with hydrogen and battery electric zero emission technology by 2042. NCTD is also actively exploring transitioning the SPRINTER fleet from a diesel-powered multiple unit rail system to a hydrogen (H2) fuel cell option (NCTD 2025).

Response A-7.13

The comment suggests that CARB's withdrawal of its request to enforce the In-Use Locomotive Regulation means that the EIR assumption that all diesel locomotives will be replaced with zero emission electric engines is not exactly correct. However, the assumption that all diesel locomotives would be replaced by zero emission technology by 2050 is not dependent on implementation of the In-Use Locomotive Regulation. NCTD notes in comment A-7.12 that it is seeking to transition its SPRINTER fleet to a fuel cell option, which is zero emission. Similarly, Amtrak Surfliner has plans to transition its fleet to hydrogen-powered zero emission engines by 2035. Assuming that implementation of these existing agency plans is entirely contingent upon implementation of CARB's In-Use Locomotive Regulation is speculative.

The commenter also notes that other engine types, such as light rail, hybrid rail, and multiple-unit vehicles, such as those that run on SPRINTER lines, are not regulated by the In-Use Locomotive Regulation. The EIR acknowledges this comment on pages 4.3-15 and 4.3-16 of the EIR, which states that smaller engines, like those used by Coaster and Sprinter, are not regulated under "locomotive" standards. Therefore, no further response is required.

Response A-7.14

The comment notes that MTS was excluded from the reference to passenger rail operators in the region and asks whether that was intentional. MTS was intentionally excluded from that reference because the reference is to the passenger rail activity (Amtrak, Metrolink, Coaster, and Sprinter) that was included in the mass emissions estimates shown in Table 4.3-6 of the EIR. MTS (Trolley) is not included because the Trolley is electrically powered.

Response A-7.15

The comment requests capitalization of references to certain transit lines. In response to this comment, the following revisions have been made to the EIR.

Page 4.3-16 of the EIR has been revised to read as follows:

> Engines smaller than 750 kW, including the 440-hp diesel-multiple unit (DMU) engines that power some ~~coaster~~ COASTER and ~~sprinter~~ SPRINTER activity, are regulated under the emission standards for non-road diesel engines, discussed above."

Page 4.3-36 of the EIR has been revised to read as follows:

> Passenger rail emissions were estimated based on rail activity for existing services (e.g., Amtrak, ~~sprinter~~ SPRINTER, and ~~coaster~~ COASTER), proposed new rail lines, and locomotive fleet turnover for each analysis year, as provided by SANDAG staff (Uchitel pers. comm.), along with EPA emission factors for locomotives.

Page 4.3-38 of the EIR has been revised to read as follows:

> Moreover, as passenger rail activity increases, rail lines, such as ~~coaster~~ COASTER and Amtrak, primarily operate a modern, Tier 4 engine fleet, and this will continue through 2035."

Page 4.3-38 of the EIR has been revised to read as follows:

> …double by 2035, as daily train trips for each provider (Amtrak, Metrolink, ~~coaster~~ COASTER, and ~~sprinter~~ SPRINTER) are expected to increase from 142 trips per day in total to 280 trips per day in 2035.

Page 4.3-39 of the EIR has been revised to read as follows:

> Therefore, while passenger rail activity is expected to increase more than double by 2050, as daily train trips for each provider (Amtrak, Metrolink, ~~coaster~~ COASTER and ~~sprinter~~ SPRINTER) are expected to increase from 142 trips per day in total to 360 trips per day in 2050, emissions are not expected to increase, as zero emission locomotives result in no emissions at the tailpipe.

Page 7-73 of the EIR has been revised to read as follows:

> ———. 2024a (October). NCTD ~~Sprinter~~ SPRINTER Schedule. Available: https://gonctd.com/wp-content/uploads/SPRINTERSchedule-October-2024-W.pdf. Accessed May 2, 2025.
>
> ———. 2024c (December). ~~Coaster~~ COASTER Schedule. Available: https://gonctd.com/wp-content/uploads/COASTERSchedule-October-2024-Web.pdf. Accessed May 2, 2025.

Organization Letters

Comment Letter B-1: Barrio Logan College Institute

Comment Letter B-1: Barrio Logan College Institute

From: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Sent: Wednesday, October 8, 2025 2:53 PM
To: Kathie Washington; Claudia Watts
Subject: FW: Barrio Logan College Institute (BLCI) El Cajon
Attachments: Registration BLCI El Cajon Showcase 2025 (3).pdf

From: Beatriz Velez <bvelez@blci.org>
Sent: Thursday, September 18, 2025 7:24 PM
To: RegionalPlanEIR <regionalplaneir@sandag.org>
Subject: Barrio Logan College Institute (BLCI) El Cajon

You don't often get email from bvelez@blci.org. Learn why this is important

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

Hello,

I hope you're doing well.

I would like to invite you to our El Cajon Showcase **on Thursday, October 16th inside of Good Shepherd Ministry Center** (772 S. Johnson Ave, El Cajon, CA 92020) **at 6:00pm.**

B-1.1 The goal of our showcase is to give our stakeholders a better understanding of our programs and the impact that we have with our students and families. You will also get the opportunity to meet the El Cajon staff and other individuals who support our organization. We are inviting a wide-variety of partners and community members to join us in this special day.

You can confirm your attendance to our showcase by completing the RSVP form. You can also find the QR code on our flyer which is attached to this email.

https://forms.gle/2eiiJyEby9mW1BM69



Registration Form: BLCI El Cajon Showcase 2025

Join us for BLCI El Cajon's annual showcase! Date: Thursday, October 16, 2025 Time: 6:00 PM Location: Good Shepherd Ministry Center This event is ope to community members, donors, partners, and stakeholders interested in learnin about our program. Please complete this form to RSVP. Registration opens September 8th.

forms.gle

1

Response B-1.1

This comment is an invitation to the commenter's event and does not pertain to the adequacy of the analysis included in the EIR. Therefore, no further response is required.

B-1.1 Cont.

If you know anyone else who may be interested in learning about our services in East Couty, please share this flyer with them.

We are looking forward to seeing you at our showcase.

Thank you.

Sincerely,

Beatriz Velez

El Cajon Manager

BARRIO LOGAN College Institute

851 S. Johnson Avenue El Cajon, CA 92020

: 858-598-4351

: Bvelez@blci.org

: www.blci.org

Breaking the cycle of poverty through education

2

Comment Letter B-2: Smart Mobility

Comment Letter B-2: Smart Mobility

Memorandum

To: SANDAG
From: Norman Marshall
Subject: 2025 Regional Plan EIR
Date: October 8, 2025

B-2.1 I have reviewed the SANDAG Draft 2025 Regional Plan dated May 2025 ("DRP") and the associated Draft Environmental Impact Report ("DEIR") with support from Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF), two organizations dedicated to progressive land use planning and the protection of vital natural resources. I make the following comments:

1) SANDAG has consistently over forecast traffic growth for decades. The 2025 DRP/DEIR traffic forecast is much lower than past forecasts, but still likely overestimates future traffic volumes because:
   a. the modeling relies on outdated survey data,
   b. assumed in-migration likely is overestimated,
   c. employment growth assumed is unrealistically high, and
   d. housing growth likely is overestimated.

B-2.2 2) The DRP/DEIR persists in including "zombie" road projects that were programmed in the past, but no longer have a rationale, and that are inconsistent with the SB 743 vehicle miles traveled ("VMT") metric.

B-2.3 3) The VMT impacts of the zombie road projects are not mitigated.

B-2.4 4) Expanding the transit network should be a higher priority than road network expansion because the road network already serves all trips.

B-2.5 5) Unless transit investments are prioritized and moved up in time, there is no guarantee that they will ever be completed given that the DRP/DEIR relies on uncertain funding sources, particularly in the 2035-2050 timer period.

B-2.6 6) The DEIR states that Alternative 2 - which includes focused growth, higher parking pricing, and arterial and freeway speed reductions – is the environmentally-superior alternative.

B-2.7 7) I recommend that an Alternative 2B be developed and adopted that includes all of the elements of Alternative 2, but excludes the zombie road projects. This also would support additional investments in transit and non-motorized travel infrastructure that would further reduce VMT and greenhouse gas emissions.

1

Response B-2.1

This comment is a brief summary of comments B-2.8 through B-2.12. See responses to comments B-2.8 through B.2-12.

Response B-2.2

This comment is a brief summary of comments B-2.13 through B-2.17. See responses to comments B-2.13 through B.2-17.

Response B-2.3

This comment is a brief summary of comments B-2.18 through B-2.23. See responses to comments B-2.18 through B.2-23.

Response B-2.4

This comment is a brief summary of comment B-2.24. See response to comment B-2.24.

Response B-2.5

This comment is a brief summary of comments B-2.25 through B-2.29. See responses to comments B-2.25 through B.2-29.

Response B-2.6

This comment correctly notes that Alternative 2 was found to be the environmentally superior alternative in the Draft EIR. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

Response B-2.7

This comment is a brief summary of comments B-2.30 and B-2.33. See responses to comments B-2.30 and B-2.33.

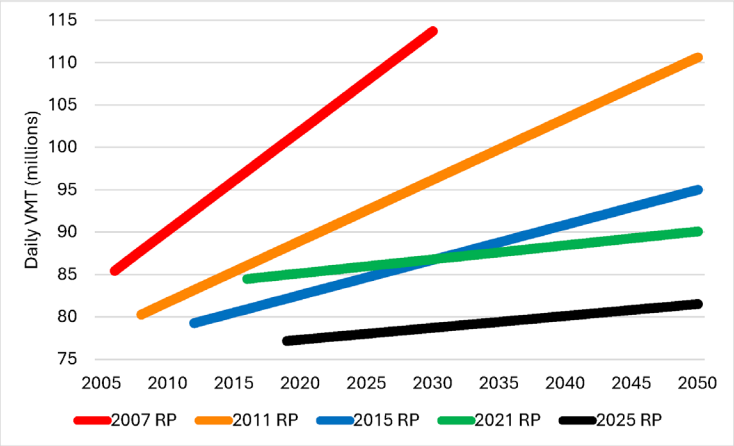
B-2.8

Past SANDAG Forecast Errors

SANDAG has consistently over forecast traffic growth for decades. The figure below shows the regional VMT forecasts from the current DRP along with the RPs published in 2007, 2011, 2015 and 2021.

VMT Forecasts in SANDAG RPs

rp



As shown in the figure:

- Each successive RP has had a base year VMT estimate below the forecast for that year in the previous RP.
- Each horizon year VMT forecast is lower than the horizon year forecast in the previous RP, even when the horizon year is farther out.
- The base year VMT in the current 2025 RP is lower than any of the data points in the previous four RPs.
- The 2050 VMT forecast in the 2025 RP is even lower than estimated base year VMT in two of the previous RPs – base years 2007 and 2015.

Even though this latest forecast is much lower than the previous forecast, it is likely too high as is discussed in the following section.

2

Response B-2.8

This comment states that SANDAG has over-forecast regional traffic growth in Regional Plans published in 2007, 2011, 2015, and 2021. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required. However, it is worth noting that the VMT forecast is based on assumptions available at the time the forecast is developed, including existing technologies, travel behavior data, and other variables, and some variables cannot be predicted. For example, the baseline VMT for the 2021 and 2025 Regional Plans in the comment figure shows the impact of the COVID-19 pandemic, which was not anticipated in the 2015 VMT forecast development. In addition, SB 375 requires SANDAG to submit its technical methodology for estimating greenhouse gas emissions, which is based on regional VMT, to the California Air Resources Board (CARB). For the 2025 Regional Plan, SANDAG worked with CARB until CARB accepted that the technical methodology operated accurately consistent with SB 375. For additional information about SANDAG's technical methodology for estimating greenhouse gas emissions, see Appendix B of the Regional Plan.

The comment also asserts that the 2025 Regional Plan VMT is likely still too high, for the reasons discussed in comments B-2.9 through B-2.12. See responses to comments B-2.9 through B-2.12.

Specific Reasons Why the 2025 DRP Likely Overestimates Traffic Growth

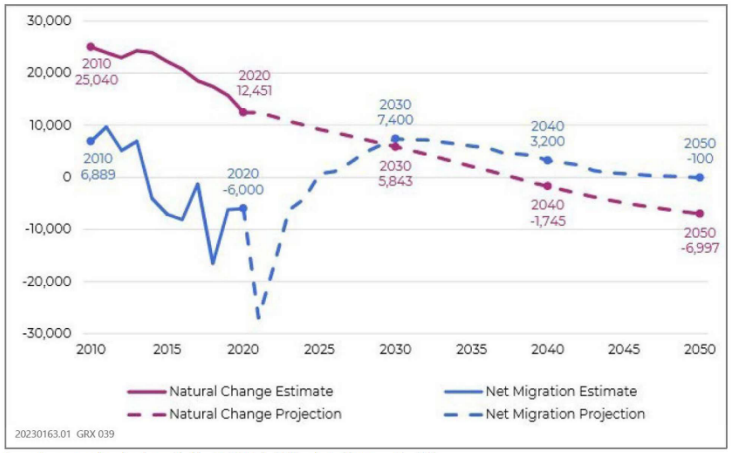
Outdated Survey Data

B-2.9 the ABM3 model used to create the VMT forecasts is still based on a regional household travel survey conducted by SANDAG in 2016/2017.[1] There have been major changes in travel behavior since the pandemic including a permanent shift towards more telework including some only working at home and others with hybrid schedules. The model was updated to include more telework (RP, Appendix M, p. 74), but otherwise the 2016/2017 travel patterns are foundational in the model, and cannot be assumed to remain valid through 2050. For example, the retail sector of the economy is evolving rapidly, and this has had, and will continue to have a major impact on shopping trips.

Assumed In-Migration Likely Overestimated

The figure below is reproduced from the DEIR (p. 2-7) and shows the components of population change assumed in the DRP.

B-2.10



Source Image produced and provided by SANDAG in 2025; adapted by Ascent in 2025.

Figure 2-2 Components of Population Change, San Diego Region 2010–2050

[1] RSG, APM3 Model Development Plan, July 28, 2021, p. 26.

3

Response B-2.9

This comment inaccurately states that the ABM3 model is based on outdated data, citing a July 18, 2021 RSG APM3 Model Development Plan as support for the assertion that ABM3 uses data from 2016 and 2017. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required. The model development plan described in the memo referenced by the commenter was superseded by the actual ABM3 development work conducted between 2022 and 2024, described below and in Appendix M to the proposed Plan.

SANDAG's ABM3 uses a variety of data as inputs, including the household travel survey data referenced in the comment as discussed in Appendix M, "Travel Demand Modeling Tools," of the proposed Plan. ABM3 also utilizes the 2022 Household Travel Behavior Survey (HTS2022) - the latest household travel survey conducted for SANDAG – which uses smartphone-based travel diaries as the primary means of travel data collection. HTS2022 surveyed 2,800 households in San Diego County. The survey asked all households with smartphones to participate using the smartphone-based GPS travel diary and survey app (rMove) for one week and accommodated participating households without smartphones by allowing them to complete their one-day travel diary online or by calling the study call center. For accuracy, data from the 2016 household travel survey was used to estimate statistical models when sample size from HTS2022 alone was not high enough. The 2015 Transit On-Board Survey (OBS2015) numbers were scaled up to match 2022 ridership counts to derive calibration targets for ABM3. OBS2015 collected data on transit trip purpose, origin and destination address, access and egress mode to and from transit stops, the on/off stop for surveyed transit routes, number of transit routes used, and demographic information. The most recent OBS was completed in 2023 and will be used in a subsequent update to the transportation model. (Appendix M, M.71.)

Model validation compares base year 2022 model outputs to independent data, not used to estimate or calibrate model parameters, to ensure that the model is ready to be used for forecasting. Estimated traffic volumes from the model are compared

with traffic counts and estimated transit ridership is compared with observed transit boardings. SANDAG maintains a traffic count database that is assembled from various sources: Caltrans Performance and Measuring System (PeMS) tool counts, Caltrans District 11 State Highway Traffic Census Counts, and arterial counts from local jurisdictions, among others. Average weekday traffic was derived from PeMS daily counts collected over Fall 2022 — the most reliable count data source for model validation. SANDAG modeling staff went through an extensive effort to create a new PeMS inventory with 564 counts in 2022 which is an improvement over 498 counts in 2019. The new count inventory was built based on observed five-minute data rather than the one-hour data used in the previous count inventory. This improvement provides more accurate observed count inventory for validating traffic flow of each ABM time of day. Combined with other count inventories, the final count inventory has 1,594 counts available for validating traffic flow of main lane freeway… Estimated transit boardings from the model are validated against 2022 daily transit ridership obtained from transit agencies in the region.

SANDAG performed roadway validations at regional, subregional (Major Statistical Areas), and highway corridor levels, segmented by time of day and roadway facility types and by road type and volume group. Overall validation results were satisfactory without unexpected results." (Appendix M, M.73.)

Working from home, or teleworking, may contribute to reductions in driving since employees do not have to travel to a workplace. The SANDAG ABM explicitly accounts for this reduction by identifying the work location of some workers as "home." In the SANDAG ABM, persons who work from home do not make work trips, but they can make other trips during the simulation day that may offset the reduced home–to-work VMT. Since COVID-19, telecommuting has increased significantly. SANDAG projects a modest increase in primary telework overtime beyond 2022 as shown in Table M.15. The main contributing factor to this dynamic is that SANDAG's employment forecast anticipates non-wage and salary jobs growing as a share in the region. This projection aligns with the distribution of jobs across sectors and the unique occupational composition of each sector. For example, Professional, Scientific and Technical Services is among the strongest growing sectors in terms of job creation. This sector also has higher shares of non-wage and salary jobs and occupations that are more accommodating of remote work arrangements. As a result, it feeds into SANDAG's projection of non-wage and salary jobs where individuals work from home. Occasional telework reflects the share of the workforce that can work at home at least one day a week and do not identify working from home as their primary place of work. This is assumed to be constant at the base year (2022) level of about 15.6%. (Appendix M, M.74).

The comment also states that the retail sector of the economy is rapidly evolving. Data specific to evolving segments of the retail sector was incorporated in the Commercial Vehicle Model as described in Appendix M of the proposed Plan:

> The primary sources of data for developing the CVM were the 2022 SANDAG Commercial Vehicle Establishment and TNC- [transportation network companies] driver surveys, which focused on goods, services, and maintenance trips, and obtained travel diaries from employees of these establishments whose jobs involve routine travel for either goods pickup and delivery or for service provision. The TNC driver survey used an identical travel diary format to the Establishment survey, the difference being that individual TNC drivers were surveyed as their own establishments who worked on behalf of an online pickup and delivery service. The Establishment and TNC surveys provided detailed travel pattern data for individual drivers and vehicles, which formed the basis for estimating and calibrating model components. The categorical definitions of attribute variables in the two surveys set the possibilities for segmentation of the model system, such as establishment industry sectors; trip origin and destination purposes, land uses, and place types; and vehicle types. (Appendix M, M.67).

Response B-2.10

This comment expresses the view that the Series 15 Growth Forecast used in the development of the 2025 Regional Plan likely overestimated net migration. The following response explains why this conclusion is incorrect.

As explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern" (SANDAG 2025a):

> At the regional level, SANDAG's forecast framework is built around three core components: population, housing, and jobs. During the model development phase, SANDAG held a series of peer review panels (PRPs) comprised of both SANDAG staff and external experts, including demographers and economists. These panels reviewed the forecast model framework, key assumptions, and model outputs. The feedback provided by the PRPs was essential in refining the models and assumptions used in the forecast.
>
> One of the key models influenced by the PRPs' feedback was the Cohort Component Model (CCM), which serves as the primary model used to project population changes. The CCM integrates detailed assumptions related to fertility, mortality, and migration, which are the key drivers of population change.
>
> Based on PRP recommendations, the forecast incorporates assumptions that reflect a trend of declining fertility, stable mortality rates, and migration patterns anticipated to align with historical averages over time and taper off near the forecast's horizon year. These adjustments align with national demographic trends and account for the lingering effects of COVID-19, which has slowed population growth in the region. Despite uncertainties posed by COVID-19 and climate change, the PRP supported a stable mortality scenario, noting that advancements in healthcare and healthier lifestyles continue to drive modest gains in life expectancy. Consequently, the forecast projects a slower population growth rate compared to previous forecasts. The population forecast also highlights the shift in the drivers of population growth. Historically, natural change (births minus deaths) was the primary contributor to regional population increases, but this trend has been slowing. As Figure 2-2 [cited in the comment] illustrates, both natural change and net migration (the difference between in-migrants and out-migrants) have been declining since 2010. By 2030, natural change is projected to drop below net migration, meaning that net migration will become the primary driver of population growth. These trends reflect broader national patterns of lower birth rates and aging populations.
>
> Net migration, however, remains the most volatile component of change. Throughout the peer review process, various migration scenarios were presented, with a recommended approach based on a return to historical averages from 1991-2020. PRPs suggested that factors such as regional job growth, housing vacancy rates, and the State's annual population estimates influence net migration. As regional employment rises, vacancy rates fall, and the State's population increases, net migration for the region is projected to climb through the mid-years of the forecast. Over time, as these trends slow, and with the State's population growth expected to turn negative, net migration is forecasted to decrease, ultimately turning negative by the forecast's horizon.
>
> In summary, the slowing population growth can be attributed to a combination of declining natural growth (births minus deaths) and fluctuating net migration. Although net migration initially increases, it begins to decline around 2030 and cannot fully compensate for the continued decrease in natural growth. As a result, the population forecast reflects a smaller starting population due to pandemic-related losses and aligns with slower-growth expectations in both state and national projections from the California Department of Finance and U.S. Census Bureau, respectively. (Appendix F, F.3-4.)

The comment also references new federal policies discouraging immigration and accelerating deportation of existing undocumented immigrants and suggests that there will be long-term effects from these policies. However, the duration of such policies and their effect on long-term in-migration are speculative.

B-2.10 Cont

As shown in the figure, there was net out-migration from the region over the past decade, but in the DRP this trend is assumed to reverse for the period 2025-2050. California net migration is a combination of two components – net out-migration of residents to other states, and net in-migration from other countries.[2] Current anti-immigrant policies are having a major impact with on the latter component in the short-run with the Pew Research Center estimating that more than a million foreign-born residents left the U.S. between January and June of this year,[3] In the most recent Census data, 23.7% of the San Diego population is foreign-born, and of those, 41.9% are not U.S. citizens.[4] Therefore, the County population likely is decreasing significantly already. There likely will be long-term effects from these policies, even if the policies are reversed, because many foreign-born residents and potential immigrants from other countries will plan differently.

Unrealistic Employment Growth Assumed

The DRP assumes significant employment growth even with little or no population growth in its Series 15 forecast.

B-2.11

> While the Series 15 forecast projects that the number of people in the region will eventually decrease, it also includes continued growth in the number of jobs in the region. Continued job growth is also possible for several reasons. A key factor is that the region's prime working age population (25 to 64) remains stable and changes the least of all age groups (Figure 3). Additionally, the job forecast accounts for more individuals working more than one job, gig work increasing, and the region being able to attract workers from outside the county. (Housing Fact Sheet)

The assumption that more individuals will work more than one job is wildly speculative, as is the assumption that gig work will continue to increase. The assumption that there will be more in-commuting also is unwarranted because the statewide population forecasts mirroring the San Deigo County forecasts, i.e. statewide population is leveling off and expected to eventually decrease by 2050.[5] Future employment even could be lower than today, e.g. if AI substitutes for current jobs. Employment growth likely is significantly overestimated in the DRP.

[2] https://dof.ca.gov/forecasting/demographics/estimates/E-6/
[3] https://www.pewresearch.org/short-reads/2025/08/21/key-findings-about-us-immigrants/
[4] https://data.census.gov/profile/San_Diego_County,_California?g=050XX00US06073
[5] https://www.newgeography.com/content/007894-california-no-growth-2060-state-projections#:~:text=The%20state%20of%20California%20Department%20of%20Finance,12%2C000%20fewer%20residents%20than%20in%202020%20(39%2C520%2C000).

4

Response B-2.11

This comment expresses the view that the Series 15 Growth Forecast used in developing the 2025 Regional Plan assumes unrealistic and speculative employment growth. The following response explains why this conclusion is likely incorrect.

As explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern" (SANDAG 2025a):

> The jobs forecast was developed using the Regional Economic Models, Inc. (REMI) Transight framework, which integrates national, state, and local economic trends. One notable update to the jobs model is the inclusion of non-wage and salary jobs, which include gig economy, that have grown in importance over the past several years. These jobs, often outside of traditional employment structures, are becoming a significant part of the region's labor market. The population inputs from the CCM [discussed above in response to comment B-2.10] feed directly into the REMI model's job growth projections, illustrating how changes in population size and composition influence employment trends. (Appendix F, F.7.)

As discussed in response to comment B-2.10, SANDAG's Series 15 Regional Growth Forecast model framework, key assumptions, and outputs, were reviewed by a series of peer review panels (PRPs) comprised of both SANDAG staff and external experts, including demographers and economists. These PRPs provided review and feedback of assumptions related to individuals working in the gig economy, holding more than one job, and in-commuting. The net employment impacts of AI are too speculative to forecast over the life of the proposed Plan at this time.

Housing Growth Likely Overestimated

The Series 15 forecast adds 112,944 people between 2022 and 2050, but almost twice as many additional housing units over the same period, 202,819. The rationale is that:

B-2.12

> Because the population is aging, there will be an increased need for housing since older individuals are more likely to live in households with fewer people than younger individuals.[6]

It is likely that average household size will get smaller with an aging population, but the assumed 16.6% increase in housing stock in combination with little population growth seems excessive. If population growth is lower than in the DRP forecast, the housing growth is overstated even further.

Zombie Road Projects

The DEIR states:

> CEQA Guidelines Section 15123(b)(2) requires that an EIR contain a discussion of areas of controversy known to the lead agency, including issues raised by agencies and the public. Several areas of controversy were identified during the EIR scoping process, and through public input on the proposed Plan outside of the Notice of Preparation (NOP) process. (DEIR p. ES-2)

B-2.13

One of the issues listed is:

> Whether to reduce freeway expansions. and focus land use and transportation growth within urban core areas that would provide affordable housing and transportation needs and meet GHG and vehicle miles traveled (VMT) reduction targets. (DEIR, p. ES-3)

Alternatives 2 and 3 include more focused land use, but none of the alternatives analyzed vary the freeway expansion program. The DEIR identified that freeway expansion is an issue but did not address it. This is a failure to meet the intent of CEQA.

B-2.14

All of the RPs discussed above have allocated a large proportion of the capital budget to building out the managed lanes system. The managed lanes program is somewhat smaller in the 2025 DRP than in the previous RPs – partly because a fair amount of has already been completed and partly because the program has been scaled back some, likely due to

[6] SANDAG infobits. Series 15 Forecast: What Will the Regional Look Like in 2050? March, 2024.

5

Response B-2.12

This comment expresses the view that the Series 15 Growth Forecast used in developing the 2025 Regional Plan overestimates housing growth. The following response explains why this conclusion is likely incorrect.

As explained in Appendix F of the proposed Plan, "Regional Growth Forecast with Sustainable Communities Strategy Land Use Pattern" (SANDAG 2025a):

> Between 2022 and 2050, the San Diego region is expected to grow by approximately 113,000 people, reflecting slower growth than previous forecasts due to shifts in migration patterns and declining birth rates. Despite this slower population growth, the region's existing housing shortages will continue to drive demand for housing and job opportunities, leading to the addition of approximately 203,000 housing units and about 234,000 jobs by 2050. (Appendix F, F.2.)
>
> The housing forecast is developed using a household formation model that applies headship and vacancy rates. The forecast assumes that headship rates (the share of the population identified as heads of households) will gradually return to historical levels, specifically those observed between 2005 and 2009, by 2050. Vacancy rates are assumed to stabilize at healthy levels, with 5% for renters and 2% for homeowners. These assumptions, which were informed by feedback from Peer Review Panels, lead to a projection of 202,819 additional housing units by 2050. This faster housing growth relative to population growth is expected to help reduce overcrowding in the region and aligns with housing trends observed in statewide forecasts. Additionally, the forecast assumes smaller household sizes due to shifting demographics and increased housing availability. (Appendix F, F.6.)

The comment also asserts that if population growth is lower than in the Regional Plan population forecast, housing growth is overstated even further. However, the Regional Plan population forecast did not

overestimate population growth, as explained in response to comment B.2-10.

Response B-2.13

This comment mischaracterizes the 2025 Regional Plan as having a freeway expansion program that is identified as an area of controversy but is not addressed in the Draft EIR. The issue of how to balance roadway and transit investments in San Diego County is a long-standing area of controversy for the region. A detailed description of the background, data sources, methodologies, and outputs associated with ABM3 is available at: https://sandag.github.io/ABM/index.html. See responses to comments B.2-30 and B.2-33, and Global Response 1, regarding why the EIR alternatives analysis meets CEQA requirements.

The comment states that the Draft EIR identified freeway expansion as an issue but did not address it, failing to meet the intent of CEQA. However, CEQA and the CEQA Guidelines do not prescribe any particular approach for discussing or addressing an area of controversy once it is identified in an EIR Executive Summary. Further, the EIR project description and impact analysis do address limiting freeway expansions.

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 lane connectors (Appendix A, 2025 Regional Plan).

The proposed SR94/125 interchange would eliminate the need for southbound SR-125 traffic to use Spring Street to connect to eastbound SR-94, reducing queueing and delays for the freeway and local street network and improving traffic flow, thus increasing the level of safety and operations. Caltrans began an environmental reevaluation for this project in fall 2025 after completing a mitigated negative declaration in 2015 (SCH Number 2015071036).

The proposed I-5/SR78 interchange would improve overall air quality by reducing idling vehicles, providing carpool/HOV and transit vehicle connectivity between two important regional corridors, and protect and/or enhance the human and natural environment in the project vicinity, such as supporting the Buena Vista Lagoon Restoration, where feasible. Caltrans anticipates environmental review for this project to be complete by 2029.

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 because transit would be limited to travel in congested general-purpose lanes during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20 percent faster compared to general purpose lanes and travel times may experience up to a 23 percent reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

All these projects are reflected in the modeling and impacts analyses of the 2025 Regional Plan included in the EIR.

Response B-2.14

This comment describes the capital budget allocated to the managed lane system in the 2025 Regional Plan and prior regional plans. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required. As described in response to comment B-2.13.

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 lane connectors (Appendix A, 2025 Regional Plan).

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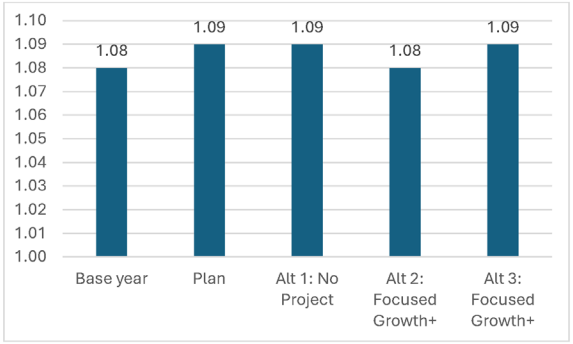
This comment provides no evidence that the proposed alternative would substantially lessen the proposed Plan’s significant impacts.

B-2.14 Cont insufficient financial resources. Nevertheless, the freeway expansion program is still very large including $24,787,000 (2024$) for "Complete Corridors." (RP, Table 4.2, p. 41)

B-2.15 In earlier RPs, the managed lane expansion was justified by the large increases in forecast VMT and congestion delay. In 2018, revised CEQA Guidelines were issued that established VMT as the basis for evaluating transportation impacts of land development and transportation projects instead of level-of-service or delay metrics. This change should have stopped freeway expansion in California that results in higher VMT, but it has not. The state continues to build out long-programmed freeway expansion projects which I am calling" zombie road projects" because they do not die even though their rationale disappeared years ago and they make a mockery of the VMT standard.

B-2.16 In the 2015 EIR, the remaining vestige of the old level-of-service/delay regime are freight metrics including truck Travel Time Index (TTI) by facility type where the TTI is calculated as the total travel time divided by a hypothetical (and impossible to achieve) travel time with no delay. The graphic below shows the EIR Highway TTI metric for the base year and for the four 2050 alternatives.

Truck Travel Time Index (TTI) by Facility Type – Highway (DEIR Appendix M)



B-2.17 As shown in the figure above, the delay metric is identical under both the Plan and Alternative 1 (No Project) which excludes the zombie road projects. Therefore, the zombie road projects have little, if any, benefit, and as discussed in the next section have significant disbenefits.

6

Response B-2.15

This comment references the 2018 revisions to the CEQA Guidelines replacing level-of-service (LOS) with vehicle miles traveled (VMT) as the metric for evaluating transportation impacts of new development under CEQA. This comment also expresses the opinion that the switch from LOS to VMT should have stopped freeway expansion in California and criticizes California for completing programmed freeway expansion projects. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

As described in response to comment B-2.13, 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 lane connectors (Appendix A, 2025 Regional Plan).

The proposed SR94/125 interchange would eliminate the need for southbound SR-125 traffic to use Spring Street to connect to eastbound SR-94, reducing queueing and delays for the freeway and local street network and improving traffic flow, thus increasing the level of safety and operations. Caltrans began an environmental reevaluation for this project in fall 2025 after completing a mitigated negative declaration in 2015 (SCH Number 2015071036).

The proposed I-5/SR78 interchange would improve overall air quality by reducing idling vehicles, providing carpool/HOV and transit vehicle connectivity between two important regional corridors, and protect and/or enhance the human and natural environment in the project vicinity, such as supporting the Buena Vista Lagoon Restoration, where feasible. Caltrans anticipates environmental review for this project to be complete by 2029.

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 because

transit would be limited to travel in congested general purpose lanes during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20 percent faster compared to general purpose lanes and travel times may experience up to a 23 percent reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

Based on the above information, the justification for managed lanes and managed lane connectors includes faster transit times and reduced VMT. This comment provides no evidence that the proposed alternative would substantially lessen the proposed Plan's significant impacts.

Response B-2.16

This comment describes the Truck Travel Time Index for highways in the San Diego region. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

Response B-2.17

This comment describes the Truck Travel Time Index (TTTI) data and concludes that because the TTTI delay metric is identical under the 2025 Regional Plan and the No Project Alternative, roadway projects in the Plan provide no regional congestion or VMT benefits. The TTTI data reflects congestion associated with a small and specific portion of regional roadway traffic. TTTI data is used exclusively to provide a secondary performance measure for the 2025 Regional Plan, as seen in Appendix N of the proposed Plan. Trucks with more than two axels and vehicles towing trailers are not permitted on the managed lane system. As such, TTTI data is not an effective surrogate for regional VMT impacts or benefits of managed lane and managed lane connector projects in the proposed Plan.

VMT Impacts of Zombie Road Projects Are Not Mitigated

The 2018 Governor's Office of Planning and Research on Evaluating Transportation Impacts in CEQA states:

> For projects that increase roadway capacity, lead agencies can evaluate induced travel quantitatively by applying the results of existing studies that examine the magnitude of the increase of VMT resulting from a given increase in lane miles. These studies estimate the percent change in VMT for every percent change in miles to the roadway system (i.e., "elasticity").35 Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. The most recent major study, estimates an elasticity of 1.0, meaning that every percent change in lane miles results in a one percent increase in VMT. . . (p. 23)
>
> Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel.37 If those effects are significant, the lead agency will need to consider mitigation or alternatives. (p. 25)

B-2.18

The model used to develop the EIR metrics, ABM3, cannot fully account for induced travel. Therefore, off-model adjustments were applied to estimate total VMT and greenhouse gas emissions. The DRP states:

> The elasticities not accounted in ABM3 are used in conjunction with the inventory of lane miles added to calculate the VMT adjustments in both 2035 and 2050. The additional VMT is then converted to per capita GHG emission for SB 375 purposes. The results of the adjustment are an additional 712,116 daily SB 375 VMT from 2022 to 2035, a 1% per capita VMT increase, and a corresponding 1% per capita CO2 increase. These differences decrease the calculation of the SB 375 per capita 2035 reduction by +0.78%, relative to 2005. When applied to the 2050 forecast year, the estimation methodology results in an additional 766,360 daily SB 375 VMT from 2022 to 2050, a 1.1% per capita VMT increase, and a corresponding 1.1% per capita CO2 increase. (RP, Appendix B, Sustainable Communities Strategy Documentation and Related Information, p. 38)

B-2.19

B-2.20 The DEIR states that multiple categories of air quality impacts are "significant and unavoidable" including:

7

Response B-2.18

This comment references sections of a 2018 Governor's Office of Planning and Research report on Evaluating Transportation Impacts in CEQA. The cited language notes that lead agencies have discretion to choose methodologies for analyzing induced travel. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

Response B-2.19

This comment references a section of Appendix B of the Draft Regional Plan describing the off-model adjustment used to quantify the estimated induced demand not accounted for in SANDAG's Activity-Based Model, ABM3. (Appendix B, B.38.). CARB requires SANDAG is required under the Final Sustainable Communities Strategy Program and Evaluation Guidelines (November 2019) to analyze the induced demand impacts of the proposed Plan, which are documented in Appendix B of the 2025 Regional Plan. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, which is also included in Appendix B. The induced demand analysis is used in the calculation of greenhouse gas reductions under Senate Bill 375. This is not a comment on the adequacy of the Draft EIR or the adequacy of SANDAG's approach for calculating induced demand. As such, no further response is required.

Response B-2.20

This comment restates air quality impacts that are significant and unavoidable in the Draft EIR. It also restates two mitigation measures proposed to address significant and unavoidable air quality impacts in the Draft EIR. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

- AQ-2 Result in an operations-related cumulatively considerable net increase in nonattainment or attainment criteria pollutant, including VOC, NOx, PM_{10}, $PM_{2.5}$, and Sox: Significant impact in 2035 and 2050.
- AQ-4 Expose sensitive receptors to substantial PM_{10} and $PM_{2.5}$ concentrations: Significant impact in 2035 and 2050.
- AQ-5 Expose sensitive receptors to substantial TAC concentrations: Significant impact in 2035 and 2050. (DEIR, Table ES-1)

B-2.20 Cont

In each case, two of the mitigation measures listed in the DEIR are:

- AQ-2b Regional Plan VMT Credit/Banking Program
- TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects (DEIR, Table ES-1)

B-2.21 Re Mitigation Measure AQ-2b , the DEIR states "SANDAG shall include a pilot version of this program within the 2029 Regional Plan." (DEIR, p. 4.3-41) Therefore, the DEIR includes no mitigation with this measure during the next four years, and no guarantees of any mitigation afterwards.

B-2.22 Measure TRA-2 is similarly toothless. The DEIR discussion of it includes no mechanisms to implement this measure, but instead is focused on demonstrating that it would not achieve the "substantial VMT reductions needed to help achieve statewide GHG reduction goals." (DEIR, p. 4.16-33 – 4.16-49)

B-2.23 The VMT impacts of the road expansion projects in the Plan should be mitigated with actual programmed mitigation measures that are quantified to mitigate the VMT impacts calculated in the DRP.

Transit First

B-2.24 The managed lane program has been branded by SANDAG as "complete corridors" but the automobile network is already complete. There is no one who cannot drive anywhere in the region because the managed lane system is "incomplete." In sharp contrast, the transit system is far from complete. There are many trips in the region that cannot be realistically made by transit. Therefore, building transit is critical for expanding transportation access, particularly to those who cannot or choose not to drive.

B-2.25 The SANDAG DRP/DEIR is presented as a balanced approach including large investments in roadway and transit expansion. However, the transit expansion in the DRP is not guaranteed. The DRP/DEIR covers the period 2025-2050. Expenditures in the initial years are much more certain than expenditures in the later years. The most certain expenditures are those programmed in the current Regional Transportation Improvement Program (RTIP).

8

Response B-2.21

This comment states that the Draft EIR includes no mitigation as part of Mitigation Measure AQ-2b in the next four years or afterwards. CEQA Guidelines Section 15126.4 requires that mitigation measures be feasible, enforceable, and capable of reducing or avoiding a significant environmental impact, and the EIR's AQ-2b mitigation measure meets these requirements. CEQA does not require that the effectiveness of every mitigation measure be quantified, but lead agencies must support with substantial evidence in the record the mitigation will be effective. CEQA allows for measures to be incorporated into plans that will set the policy framework for later projects implementing the plans. While mitigation measures must include sufficient performance standards and be capable of implementation, CEQA does not require that every mitigation measure include prescriptive or highly detailed implementation steps at the EIR stage, or that mitigation measure effectiveness be quantified. Mitigation Measure AQ-2b is the development of a pilot program for a regional VMT mitigation program that can be ready for inclusion in the 2029 Regional Plan. It is inaccurate to characterize the development of a regional program to mitigate VMT as including no mitigation. Creating a program for VMT mitigation through credits, fees, or an in-lieu program offers a new, additional opportunity for reducing regional VMT. See also response to comment B-2.22.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-2.22

This comment asserts that TRA-2 is "toothless," and the Draft EIR discussion includes no mechanisms to implement the mitigation measure. SANDAG will commit to mitigation measures assigned when it adopts CEQA findings, and implementation will be assured through inclusion in the Mitigation Monitoring and Reporting Program (MMRP). In addition to mitigation measure TRA-2, SANDAG also proposes to further reduce total VMT and VMT per capita with the following mitigation measures: 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), and AQ-2b (Regional Plan VMT Credit/Banking Program). See Global Response 2 for an explanation of how measures assigned to other entities for second-tier projects would be implemented.

Response B-2.23

This comment states that the VMT impacts of the road expansion projects in the proposed Plan should be mitigated with programmed, quantified mitigation measures. CEQA Guidelines Section 15126.4 requires that mitigation measures be feasible, enforceable, and capable of reducing or avoiding a significant environmental impact, and the EIR's VMT mitigation measure meets these requirements. CEQA does not require that the effectiveness of every mitigation measure be quantified, but lead agencies must support with substantial evidence in the record the mitigation will be effective. CEQA allows for measures to be incorporated into plans that will set the policy framework for later projects implementing the plans. While mitigation measures must include sufficient performance standards and be capable of implementation, CEQA does not require that every mitigation measure include prescriptive or highly detailed implementation steps at the EIR stage, or that mitigation measure effectiveness be quantified. See also response to comment B-2.22 and Global Response 2. For these reasons, no changes to the EIR are required in response to this comment.

Response B-2.24

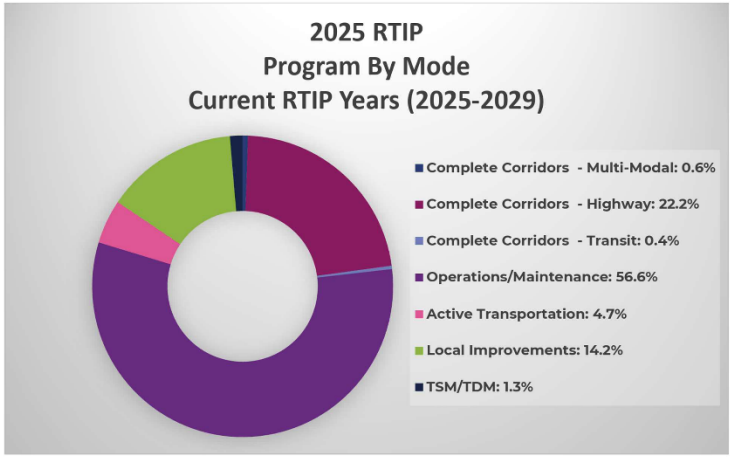
This comment expresses the view that the automobile network in the San Diego region is complete, and that the transit system is far from complete. However, many transit trips in the region occur on buses that use the roadway network. The 2025 Regional Plan includes 35 new Rapid routes and funding for improvements to nine existing Rapid routes by 2035 supported by a managed lane network (Appendix A, 2025 Regional Plan) that reduces travel times (Appendix N, 2025 Regional Plan) by removing transit vehicles from congested general purpose lanes. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

Response B-2.25

This comment characterizes the relative certainty of funding over the life of the 2025 Regional Plan and the 2025 Regional Transportation Improvement Plan. See Global Response 4 for a discussion of funding requirements and constraints for the 2025 Regional Plan. It is correct that expenditures in early years of the Plan are more certain than expenditures in later years. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

The 2025 RTIP for TY 2025-2029, dated September 27, 2024 includes 50 times as much capital funding for "Complete Corridors – Highways" as for "Complete Corridors – Transit" as shown in Figure 1-2 reproduced below.

Figure 1-2: 2025 RTIP Program by Mode – Current RTIP Years (2025–2029)



B-2.26

There is evidence that transit investments are being pushed farther into the future. The 2025 DRP/DEIR and 2021 RP/EIR both include large capital expenditures for Trolley grade separations. In the 2021 DRP/DEIR, 50% of these investments were programmed in the time period up to 2035 and the other 50% were programmed in the 2035-2050 period. In the 2025 DRP/DEIR, only 17% of the expenditures are programmed in the 2025-2035 period, and 83% are pushed back until after 2035. The same pattern is present for Sprinter double tracking, grade separations, and extension. In the 2021 RP/EIR, 50% of these expenditures were programmed in the period up to 2035; in the 2025 DRP/DEIR, only 29% of the expenditures are programmed in the period up to 2023.The largest transit expenditure in the 2025 DRP/DEIR is for a set of LOSSAN Corridor projects. Again, most of the spending (68%) is pushed back until after 2035. In fact, the inclusion of these transit projects in the DRP/DEIR does not guarantee that these projects will ever be completed.

B-2.27

It is critical that the transit investments be moved forward in time and the zombie road projects be pushed back in time or, even better, simply eliminated.

9

Response B-2.26

This comment characterizes the timing of transit investments over the life of the 2025 Regional Plan as compared to the 2021 Regional Plan. This comment also states that 2025 Regional Plan projects programmed for 2035 and later are not guaranteed to be implemented. The 2025 Regional Plan includes significant transit investments by the Plan's 2035 horizon year, including funding for 35 new Rapid routes and funding for improvements to 9 existing Rapid routes. The 2025 Regional Plan focuses on building Rapid transit projects in the earlier years of the Plan precisely because they can be implemented more quickly. Larger transit infrastructure projects require longer time horizons for implementation due to cost and complexity of design and construction. See Global Response 4 for a discussion of funding and programming requirements for the 2025 Regional Plan. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

Response B-2.27

This comment suggests that the 2025 Regional Plan should either prioritize transit over roadway projects or eliminate roadway projects altogether. The 2025 Regional Plan includes significant transit investments by the Plan's 2035 horizon year, including funding for 35 new Rapid routes and funding for improvements to 9 existing Rapid routes. The 2025 Regional Plan focuses on building Rapid transit projects in the earlier years of the Plan precisely because they can be implemented more quickly. Larger transit infrastructure projects require longer time horizons for implementation due to cost and complexity of design and construction. See Global Response 4 for a discussion of the funding constraints of the 2025 Regional Plan with respect to programming projects, advancing projects, and transferring funding between projects. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

Highly Questionable Fiscal Plan

In a 2050 plan, there is a high level of uncertainty about future revenues. In order to "pencil out" and cover programmed expenditures, the RTP/DEIR relies on several uncertain future revenue sources, including:

- $7.11 billion from ½ cent sales tax for MTS and NCTD in service areas enacted in 2030
- $13.72 billion from two additional ½ cent sales taxes (enacted in 2032 and 2036)
- $2.31 billion for a state-enacted last-mile fee on deliveries
- $2.72 billion for state-enacted ride-hauling fees (Uber etc.)
- Federal and state funds continuing to grow with inflation despite the issues with gas taxes given the trend toward electrification
- Several other new sources
- $3.65 billion "anticipated/undetermined" to fill the remaining shortfall (DRP, Appendix I, Table I.3)

B-2.28

B-2.29 The revenue stream after 2035 is especially uncertain, which reinforces the question raised in the previous section about whether the transit investments in the DRP/DEIR will be completed. Dedicated funding for the transit projects should be established, and the timing of these projects should be moved forward.

Environmentally Superior Alternative

The DEIR analyzes three alternatives to the proposed Plan:

- Alternative 1: No Project Alternative
- 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 (DEIR p. ES-22)

B-2.30

Alternatives 2 and 3 both include all the zombie road projects that are in the Plan. (DEIR, Table ES-2, p. ES-23) An alternative should have been included in the DEIR that includes all or the transportation projects other than freeway expansion, so the impacts of the zombie road projects on VMT and other metrics could be separated from the impacts of the entire Plan.

B-2.31 Nevertheless, it is worth noting that Alternative 2 was found to be environmentally superior to the proposed Plan. The DEIR states:

10

Response B-2.28

This comment states the revenue sources for the 2025 Regional Plan and that some funding sources are uncertain. The revenue sources for the proposed Plan have been updated in proposed Plan Appendix I and are different than those stated in the comment. See Global Response 4 for a discussion of the funding requirements and constraints for the 2025 Regional Plan, including uncertainties. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues. Further information about project phasing is available in Appendix A of the proposed Plan: Transportation Projects, Programs, Policies, and Phasing. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

Response B-2.29

This comment focuses on the post-2035 revenue sources for the 2025 Regional Plan and suggests that dedicated transit funding should be identified and implementation of transit projects should be advanced. See Global Response 2 for a discussion of the funding constraints of the 2025 Regional Plan with respect to programming projects, advancing projects, and transferring funding between projects. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues. Further information about project phasing is available in Appendix A of the proposed Plan: Transportation Projects, Programs, Policies, and Phasing. This is a comment on the proposed Plan rather than adequacy of the EIR, and no further response is required.

Response B-2.30

This comment identifies the three alternatives analyzed in the Draft EIR and suggests that an alternative without roadway projects should have been included to distinguish VMT and other metrics attributable to roadway projects. Please see Global Response 1 for an explanation of why the EIR's range of alternatives meets CEQA requirements, and why the commenter's proposed alternative need not be included. In addition, this comment is based on a faulty assumption that the 2025 Regional Plan has a freeway expansion component that could easily be severed from the Plan's

transportation network. However, the 2025 Regional Plan has no additional general-purpose lanes and most of the managed lane and managed lane connector projects serves existing or planned transit network elements. Eliminating those managed lane and managed lane connector projects would limit the effectiveness of transit in reducing VMT and other impacts of the 2025 Regional Plan because transit would be limited to travel in congested general-purpose lanes during peak commute hours. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20 percent faster compared to general purpose lanes and travel times may experience up to a 23 percent reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand.

This comment provides no evidence that the proposed alternative would substantially lessen the proposed Plan's significant impacts.

For these reasons, the alternative proposed in the comment need not be added to the EIR, and no changes to the EIR are required.

Response B-2.31

This comment correctly notes that Alternative 2 was found to be the environmentally superior alternative in the Draft EIR. It also restates a section of the Draft EIR comparing Alternative 2 to the proposed Plan. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

B-2.31 Cont

Compared to the proposed Plan's significant impacts, Alternative 2 would have decreased impacts for one or more significance criteria for the following environmental resources: aesthetics and visual resources, agricultural and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, paleontological resources, greenhouse gas emissions, mineral resources, noise and vibration, public services, recreation, utilities, transportation, tribal cultural resources, water supply, and wildfire. Compared to the proposed Plan's significant impacts, Alternative 2 would have increased impacts for only a few significance criteria for the following resource areas: land use and population and housing.

B-2.32

Among the alternatives, Alternative 2 would achieve the greatest reductions of GHG emissions VMT, and air quality emissions as compared to the proposed Plan. Alternative 2 would result in a 24.6 percent per capita GHG reduction below 2005 levels in 2050, which would result in a greater reduction than the proposed Plan (19.51 percent below 2005 levels in 2050). In addition, Alternative 2 would result in a SB743-based VMT per capita of 14.55 in 2050 compared to VMT per capita of 15.39 VMT under the proposed Plan in 2050 (see Appendix M). SB- 743 based VMT per capita reflects non-commercial VMT per resident in the region. In addition, Alternative 2 would result in an increase in SB 375- based total regionwide VMT of 959,729 vehicle miles per day in 2050 compared to Baseline Year 2019 conditions. This increase would be less than the increase of 4,343,189 miles per day in 2050 under the proposed Plan (see Appendix M). Therefore, Alternative 2 would result in decreased impacts as it would achieve a higher VMT reduction than the proposed Plan. Because VMT reductions correlate to GHG reductions, Alternative 2 would result in decreased GHG impacts as compared to the proposed Plan. Alternative 2 would also result in a decrease in reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), fine and respirable particulate matter ($PM_{2.5}$ and PM_{10}), and sulfur oxide (SO_x) emissions compared to the proposed Plan from onroad sources. (DEIR, p. 5-5)

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Response B-2.32

This comment restates a section of the Draft EIR comparing Alternative 2 to the proposed Plan. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

B-2.33

Recommendations

Alternative 2 includes focused growth, higher parking pricing, and arterial and freeway speed reductions. It is recommended that an even more environmentally-superior Alternative 2B be developed and adopted that includes all of the elements of Alternative 2, but excludes the zombie road projects. This also would support larger and more-timely investments in transit and non-motorized travel infrastructure that would further reduce VMT and greenhouse gas emissions.

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Response B-2.33

This comment proposes that a new alternative be analyzed that includes focused growth, higher parking pricing, arterial and freeway speed reductions, and excludes "zombie road projects" such as programmed freeway and managed lanes projects. Please see Global Response 1 for an explanation of why the EIR's range of alternatives meets CEQA requirements, and why the commenter's proposed alternative need not be included.

With respect to the projects that the commenter refers to as zombie road projects, 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 lane connectors (Appendix A, 2025 Regional Plan).

The proposed SR94/125 interchange would eliminate the need for southbound SR-125 traffic to use Spring Street to connect to eastbound SR-94, reducing queueing and delays for the freeway and local street network and improving traffic flow, thus increasing the level of safety and operations. Caltrans began an environmental reevaluation for this project in fall 2025 after completing a mitigated negative declaration in 2015 (SCH Number 2015071036).

The proposed I-5/SR78 interchange would improve overall air quality by reducing idling vehicles, providing carpool/HOV and transit vehicle connectivity between two important regional corridors, and protect and/or enhance the human and natural environment in the project vicinity, such as supporting the Buena Vista Lagoon Restoration, where feasible. Caltrans anticipates environmental review for this project to be complete by 2029.

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 because transit would be limited to travel in congested general-purpose lanes

during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20 percent faster compared to general purpose lanes and travel times may experience up to a 23 percent reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

This comment provides no evidence that the proposed alternative would substantially lessen the proposed Plan's significant impacts.

The majority of project funding comes with constraints. SANDAG does not have the discretion to move funds designated for roadway projects to fund transit investments. Similarly, SANDAG cannot take funds designated by the funding agency for roadway projects and utilize them to advance phasing of transit projects. See responses to comments B-2.26 and B-2.27. See also Global Response 4 for a discussion of the funding constraints of the 2025 Regional Plan with respect to programming projects, advancing projects, and transferring funding between projects.

Global Response 1 explains several reasons why this alternative was not included for detailed evaluation in the EIR. First, this suggested alternative is a variation of Alternative 2, which includes many components of the suggested alternative. Second, this alternative is legally infeasible because federal transportation law requires the proposed Plan to include system-level estimates of costs and revenue sources to adequately operate and maintain the Federal-aid highways [23 CFR 450.324(f)(11)(i)]. 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. Lastly, there is no evidence that this alternative would substantially lessen the proposed Plan's VMT, GHG, or other environmental impacts.

Resume

NORMAN L. MARSHALL, PRESIDENT

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EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (37 Years, 23 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

B-2.34

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

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Response B-2.34

This comment includes the commenter's resume. This is not a comment on the adequacy of the Draft EIR. As such, no further response is required.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

B-2.34 Cont

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

B-2.34 Cont

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

15

B-2.34 Cont

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

Comment Letter B-3: The San Diego River Foundation

Comment Letter B-3: The San Diego River Foundation

From: Kirsten Uchitel <Kirsten.Uchitel@sandag.org>
Sent: Monday, October 13, 2025 10:53 AM
To: Kathie Washington; Claudia Watts
Cc: Samantha Foulke
Subject: Fw: Comment Letter EIR 2025 Regional Plan
Attachments: SDRiverTrail_WVX_ProjectAT052.pdf; SANDAG_CommentLetterSDRPF.pdf

Follow Up Flag: Flag for follow up
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From: RegionalPlanEIR <regionalplanEIR@sandag.org>
Sent: Sunday, October 12, 2025 4:31:10 PM
To: Kirsten Uchitel <Kirsten.Uchitel@sandag.org>; Samantha Foulke <samantha.foulke@sandag.org>; Allie Fen <Allie.Fen@sandag.org>; Brooke Wedner <Brooke.Wedner@sandag.org>
Subject: FW: Comment Letter EIR 2025 Regional Plan

From: Rob Hutsel <rob@sandiegoriver.org>
Sent: Sunday, October 12, 2025 11:30:51 PM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <regionalplanEIR@sandag.org>
Cc: Jillian Quint <jillian@sandiegoriver.org>
Subject: Comment Letter EIR 2025 Regional Plan

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

Dear SANDAG Planning Staff,

B-3.1

The San Diego River Park Foundation is pleased to submit an official comment letter on the Draft Environmental Impact Report (EIR) for the 2025 Regional Plan.

The attached PDF details our comment regarding Project AT052: San Diego River Trail – Bridge Connection Sefton Field to Mission Valley YMCA (West Valley Crossing).

The primary request is for clarification and immediate inclusion of this critical crossing and north trail connection in the 2035 Bikeway Network (Figure 2-7), consistent with its status as an Early Action Priority and its necessity for completing the San Diego River Trail.

Please confirm receipt of the attached comment letter. Thanks.

Respectfully,
Rob Hutsel
CEO
The San Diego River Park Foundation

619-244-7024 cell

Since 2001, dedicated to celebrating, conserving, and healing the amazing 52 mile long San Diego River.

1

Response B-3.1

The comment is an introductory statement for the detailed comments in the attached letter. Generally, the comment requests inclusion of the San Diego River Trail – Bridge Connection Sefton Field to Mission Valley YMCA (West Valley Crossing) project in the 2035 Bikeway Network. Please refer to subsequent responses to comments below for detailed responses.



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The San Diego River Park Foundation is a 501(c)(3) charitable organization.

EIN 01-0565671

4891 Pacific Hwy, Ste 114
San Diego, CA 92110

(619) 297-7380

October 10, 2025

SANDAG Regional Planning Division
Submitted via email

Subject: Clarification and Inclusion Request for **Project AT052: San Diego River Trail – Bridge Connection Sefton Field to Mission Valley YMCA** (West Valley Crossing)

The San Diego River Park Foundation appreciates the opportunity to provide comment on the Draft Environmental Impact Report (EIR) for the 2025 Regional Plan. Our comment concerns Project AT052: San Diego River Trail – Bridge Connection Sefton Field to Mission Valley YMCA, commonly referred to by our organization and the local community as the West Valley Crossing.

This project is a critical gap in the San Diego River Trail, a designated regional bikeway, directly identified in the Draft EIR text but absent from Figure 2-7 (2035 Off-Street Bikeway Network). B-3.2

We respectfully request clarification on whether the omission of Project AT052 from Figure 2-7 is an error, and if so, that the figure and associated project list be updated to accurately reflect its inclusion and prioritization by 2035.

Technical Background and Planning Context

The West Valley Crossing has been formally identified and prioritized in multiple planning documents: B-3.3

- SANDAG Regional Bike Plan/Early Action Program (EAP) as Project AT052 (Priority #48)
- City of San Diego Mission Valley Community Plan (Adopted 2020)
- State of California San Diego River Conservancy San Diego River Trail Gaps Analysis (2018)

Response B-3.2

The comment is an introductory statement for the detailed comments in the letter. Generally, the comment requests inclusion of the San Diego River Trail – Bridge Connection Sefton Field to Mission Valley YMCA (West Valley Crossing) project in the 2035 Bikeway Network. Please refer to subsequent responses to comments below for detailed responses.

Response B-3.3

The comment identifies planning documents in which AT052 is discussed and describes AT052. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

- City of San Diego River Park Master Plan
- And others.

The project proposes a Class I bikeway bridge that would connect Sefton Field on the south side of the San Diego River to the Mission Valley YMCA and Friars Road on the north. This location represents one of the most significant remaining discontinuities in the regional San Diego River Trail system, a SANDAG recognized regional bikeway. B-3.3 Cont.

Problem: A Critical Connectivity Gap

Currently, the estuary segment of the San Diego River Trail travels 3 miles from Dog Beach/Ocean Beach and terminates abruptly at the City of San Diego's Sefton Park, leaving trail users without a safe or direct means to cross the river or access northern destinations such as the YMCA, USD, the major Riverwalk Development, or the planned trolley station in the Riverwalk development.

Without this bridge, pedestrians and cyclists must travel on the busy Hotel Circle Driver or utilize the unsafe Morena Boulevard Bridge, both of which present substantial safety risks and discourage non-motorized travel. B-3.4

This discontinuity effectively cuts off the western segment of the River Trail to the next section which starts at Fashion Valley Road and continues eastward to SDSU Mission Valley and beyond.

The Draft Eir should better recognize that the first phase of construction of Riverwalk will include a section of this regional bikeway and includes a study to extend this section to the Mission Valley YMCA.

Importance of Inclusion by 2035

The Draft EIR Figure 2-7 (2035 Bikeway Network) does not show Project AT052 or the **connecting north-end trail segment** to the Riverwalk development and planned MTS Trolley Station. This omission raises concern, as the 2050 Bikeway Map (Figure 2.3, Draft Regional Plan p. 21) does include the connection—indicating SANDAG's recognition of its necessity, but on a delayed timeframe that does not align with Mission Valley's near-term growth. B-3.5

Mission Valley's population is projected to double from approximately 20,800 in 2012 to 50,000 residents by 2035, and to triple to over 75,000 by 2050. Deferring the West Valley Crossing until 2050 leaves an entire generation without access to a safe, sustainable, and equitable active B-3.6

Response B-3.4

The comment describes a discontinuity in the River Trail and states that the EIR should better recognize that the first phase of the Riverwalk development includes a section of this bikeway. AT052's bridge connection is identified in Table 2-7 of the EIR, which lists proposed projects in the Central County Subregion, organized by project type and phase. The phase year for AT052 is 2035. The analysis does not include specific construction phasing for individual projects.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-3.5

The comment states that the EIR does not show AT502 or the connecting north-end trail segment to the Riverwalk development and planned MTS Trolley Station in the 2035 Active Transportation Network although it is shown in the 2050 Active Transportation Network. AT052 is included in the 2035 Active Transportation Network. The missing segment in the 2035 Active Transportation Network that the comment is likely referring to is AT051, San Diego River Bikeway Connections, the phase year for which is 2050. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, discussed this comment, and identified next steps for incorporating the latest information from the Riverwalk development when shared with SANDAG.

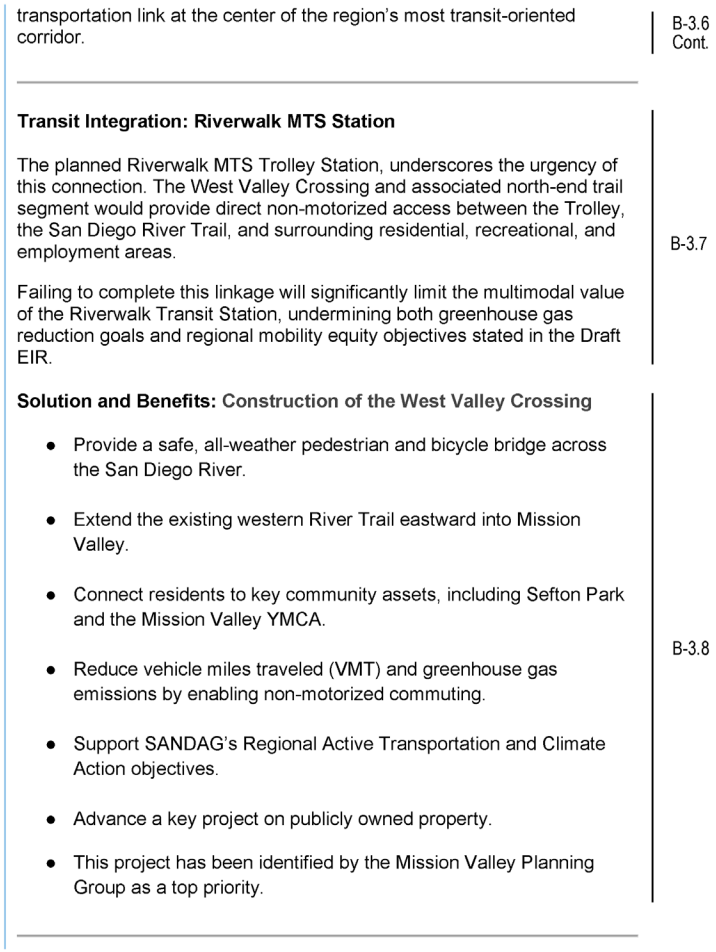
For these reasons, no changes to the EIR are required in response to this comment.

Response B-3.6

The comment describes projected growth in Mission Valley's population. This is not a comment on the adequacy of the EIR and, as such, no further response is required. The proposed Plan anticipates substantial growth through 2035, with Mission Valley absorbing a significant share of new housing and jobs. The comment also states that AT052 should not be deferred to 2050 given the increase in population anticipated in Mission Valley. Implementation of AB052 is not deferred to 2050 but is instead in the 2035 phase year of the

proposed Plan. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, and believes this comment has been addressed.

For these reasons, no changes to the EIR are required in response to this comment.



transportation link at the center of the region's most transit-oriented corridor.

B-3.6 Cont.

Transit Integration: Riverwalk MTS Station

The planned Riverwalk MTS Trolley Station, underscores the urgency of this connection. The West Valley Crossing and associated north-end trail segment would provide direct non-motorized access between the Trolley, the San Diego River Trail, and surrounding residential, recreational, and employment areas.

Failing to complete this linkage will significantly limit the multimodal value of the Riverwalk Transit Station, undermining both greenhouse gas reduction goals and regional mobility equity objectives stated in the Draft EIR.

B-3.7

Solution and Benefits: Construction of the West Valley Crossing

- Provide a safe, all-weather pedestrian and bicycle bridge across the San Diego River.
- Extend the existing western River Trail eastward into Mission Valley.
- Connect residents to key community assets, including Sefton Park and the Mission Valley YMCA.
- Reduce vehicle miles traveled (VMT) and greenhouse gas emissions by enabling non-motorized commuting.
- Support SANDAG's Regional Active Transportation and Climate Action objectives.
- Advance a key project on publicly owned property.
- This project has been identified by the Mission Valley Planning Group as a top priority.

B-3.8

Response B-3.7

The comment describes the need to connect the San Diego River Trail to the planned MTS trolley station associated with the Riverwalk development and states that failure to complete this linkage will undermine the greenhouse gas reduction goals and regional mobility equity objectives of the EIR. Implementation of AB052 is in the 2035 phase year of the proposed Plan. Additionally, staff has met with the San Diego River Park Foundation and believes this comment has been addressed. As discussed in Chapter 2, "Project Description," the EIR recognizes the importance of integrating transit stations with active transportation facilities to achieve regional mobility and GHG reduction goals. The proposed Plan prioritizes multimodal connectivity through investments in transit, bikeways, micro-transit, and neighborhood electric vehicle services. These strategies are designed to support seamless transfers between modes and improve first/last-mile access for all users.

As discussed in Section 4.8 of the EIR, "Greenhouse Gas Emissions and Climate Change," the proposed Plan meets SB 375 targets for reducing per capita GHG emissions from passenger vehicles and light-duty trucks by 19.35% by 2035 and incorporates strategies to reduce VMT, expand zero-emission vehicle infrastructure, and improve transit access in disadvantaged communities. The EIR's Executive Summary details how mobility equity objectives are advanced through fare subsidies, flexible fleet programs, and investments in underserved areas, ensuring that transit stations like Riverwalk function as equitable multimodal hubs. See EIR page ES-1.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-3.8

The comment describes the benefits of AT052. This is not a comment on the adequacy of the EIR and as such, no further response is required. See response to comment B-3.7.

Request for Clarification and Inclusion

The San Diego River Park Foundation respectfully requests that SANDAG:

1. Clarify whether Project AT052 (West Valley Crossing) should have been included from the 2035 Bikeway Network shown in Figure 2-7. B-3.9
2. If so, revise Figure 2-7 and associated tables to reflect its inclusion in the 2035 network, consistent with its status as a Tier 2 Early Action project in the Regional Bike Plan.
3. Evaluate the missing connection to the Riverwalk development and planned Riverwalk MTS Trolley Station, and ensure this linkage is incorporated into near-term planning for 2035 implementation. B-3.10
4. Coordinate with the City of San Diego and partner agencies to ensure the West Valley Crossing is advanced to project development and funding readiness consistent with the community's priority. B-3.11

Bridging the West Valley Crossing is an essential step in completing the San Diego River Trail, realizing the City and State's long-standing vision for a continuous, safe, and climate-friendly mobility corridor. This connection will provide lasting benefits for active transportation, community connectivity, public safety, and regional resilience. B-3.12

We appreciate SANDAG's continued leadership in advancing sustainable mobility and urge that this critical link be included and prioritized in the 2035 active transportation network.

Respectfully submitted,

Rob Hutsel

Rob Hutsel
President and CEO

Response B-3.9

The comment requests clarification on whether AT052 should have been included in Figure 2-7. AT052 is included in Figure 2-7, which depicts the 2035 Active Transportation Network. The missing segment in the 2035 Active Transportation Network that the comment is likely referring to is AT051, San Diego River Bikeway Connections, the phase year for which is 2050. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, and believes this comment has been addressed. For these reasons, no changes to the EIR are required in response to this comment.

Response B-3.10

The comment requests that AT052 be evaluated and incorporated into near-term planning for 2035 implementation. AT052 has been evaluated and is included in 2035 phase of the proposed Plan. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, and believes this comment has been addressed.

Response B-3.11

The comment requests that SANDAG coordinate with the City of San Diego and partner agencies to advance the development of AT052. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan. SANDAG will coordinate as needed to advance AT052 consistent with the proposed Plan. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, and believes this comment has been addressed.

Response B-3.12

The comment states that AT052 is an essential element of the San Diego River Trail and asks that SANDAG include AT052 in the 2035 phase year of the proposed Plan. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan. Additionally, staff met with the San Diego River Park Foundation on October 24, 2025, and believes this comment has been addressed.

Comment Letter B-4: Sierra Club San Diego Chapter

Comment Letter B-4: Sierra Club San Diego Chapter

SIERRA CLUB
SAN DIEGO CHAPTER

October 13, 2025

SANDAG Regional Plan EIR
ATTN: Kirsten Uchitel, Senior Planner
1011 Union Street, Suite 400
San Diego, CA 92101
regionalplaneir@sandag.org

B-4.1 The San Diego Chapter of the Sierra Club provides the following comments on the Draft Environmental Impact Report for the 2025 Regional Plan ("DEIR"). Sierra Club has previously submitted comment letters on the Initial Concept for the 2025 Regional Plan and Draft 2025 Regional Plan (Regional Plan) identifying deficiencies and requesting specific constructive improvements. Unfortunately, neither the Draft 2025 Regional Plan nor DEIR sufficiently reduce significant greenhouse gas emissions and impacts to biological resources. Major deficiencies in the DEIR are described below and we urge SANDAG to revise the Regional Plan and recirculate a new DEIR.

I. The DEIR Fails to Consider a Reasonable Range of Alternatives to Avoid or Substantially Lessen" Significant Impacts.

B-4.2 The DEIR fails to adequately analyze alternatives to the Project because it did not include a reasonable range of alternatives that would "avoid or substantially lessen" the Project's significant impacts, as required by CEQA at Public Resources Code section 21002 and CEQA Guidelines section 15126.6 subdivisions (a), (b). ["it is reasonable to expect at least one project alternative to have been focused primarily on significantly reducing vehicle trips."].) (Golden Door II, supra, 50 Cal.App.5th 467, 547, citing Cleveland National Forest Foundation v. San

B-4.3 Diego Assn. of Governments (2017) 17 Cal.App.5th 413, 437. SANDAG also fails to provide alternatives avoiding or substantially lessening the Project's significant impacts GHG emissions and on biological resources.

B-4.4 SANDAG must revise the Regional Plan and recirculate a new DEIR that includes alternatives that fully support the State's ability to achieve GHG reduction goals, goals for protection of biodiversity, and to reduce vehicle trips. Sierra Club has previously suggested the following alternatives to reduce GHG emissions, discourage urban sprawl, and benefit public transit that should be included in project alternatives in a revised and recirculated DEIR to reduce impacts of the Regional Plan.

4241 Jutland Dr., Ste. 303, San Diego, CA. 92117 | TEL: 858-569-600| http://sandiego.sierraclub.org

Response B-4.1

The comment is an introductory statement for the detailed comments attached to the letter. Generally, the comment asserts that the EIR fails to sufficiently reduce greenhouse gas (GHG) emissions and impacts to biological resources. Please refer to subsequent responses to comments below for detailed responses.

Response B-4.2

The comment asserts that the EIR fails to adequately analyze a reasonable range of alternatives. Please refer to Global Response 1 for a response to this comment and a discussion of how the EIR alternatives analysis complies with CEQA requirements.

Response B-4.3

The comment asserts that the EIR failed to provide alternatives that avoid or substantially lessen GHG and biological resources impacts. As discussed in the EIR, pages 5-5 and 5-6, Alternative 2 would decrease impacts to greenhouse gas emissions and biological resources compared to the proposed Plan. (EIR, pp. 5-5, 5-18 to 20 [describing decreased impacts to biological resources], 5-26 to 29 [describing decreased impacts to GHG emissions.])

The EIR quantifies the substantial decrease in GHG emissions relative to the proposed Plan:

> Alternative 2 would result in a 24.3 percent per capita GHG reduction below 2005 levels in 2050, which would result in a greater reduction than the proposed Plan (19.38 percent below 2005 levels in 2050). In addition, Alternative 2 would result in a SB743-based VMT per capita of 14.7 in 2050 compared to VMT per capita of 15.4 VMT under the proposed Plan in 2050 (see EIR Appendix M). SB743 based VMT per capita reflects non-commercial VMT per resident in the region. In addition, Alternative 2 would result in an increase in SB 375-based total regionwide VMT of 1,986,314 vehicle miles per day in 2050 compared to Baseline Year 2019 conditions. This increase would be less than the increase of 4,724,434 miles per day in 2050 under the proposed Plan (see

EIR Appendix M). Therefore, Alternative 2 would result in decreased impacts as it would achieve a higher VMT reduction than the proposed Plan. Because VMT reductions correlate to GHG reductions, Alternative 2 would result in decreased GHG impacts as compared to the proposed Plan.

However, this comment does not provide any suggestions for alternatives. Please refer to subsequent responses below to comments that suggest specific options for alternatives. In addition, please refer to Global Response 1, which explains why the EIR's alternatives analysis addresses alternatives to substantially lessen vehicle trips, GHG impacts, and biological resources impacts.

Response B-4.4

The comment requests revisions to the Regional Plan and EIR to include alternatives that support the State's ability to achieve GHG reduction goals. Please refer to Global Response 1 for a response to this comment, which explains why the EIR's alternatives analysis complies with CEQA requirements. The comment asserts that the EIR should include alternatives that avoid or substantially lessen GHG impacts related to reaching statewide GHG reduction goals, protect biodiversity, and reduce vehicle trips; however, as shown in EIR Sections 5.2 and 5.3, Alternatives 2 and 3 do substantially lessen these impacts. The comment is an introduction to specific suggestions for alternatives for SANDAG to consider. Please see responses to comments B-4.5 through B-4.14 below explaining why CEQA does not require the commenter's suggested alternatives to be added to the EIR. The comment previously suggested these alternatives in a July 15, 2025 comment letter on the proposed Plan. The comment provides no evidence in either the proposed Plan or EIR comment letter that any of its suggested alternatives reduce GHG emissions or discourage urban sprawl.

In addition, the comment'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, and some of these alternatives are considered infeasible (see responses to comments B-4.5 through B-4.14 for details). The comment provided no evidence that the proposed alternatives would substantially lessen the proposed Plan's significant impacts. 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.

Draft EIR recirculation is not required because "significant new information" has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5. Alternatives suggested in the comment are not required to be added to the Draft IR for the reasons explained in Global Response 1 and responses to comments B-4.4 through B-4.14.

B-4.5 • Remove general purpose freeway lanes and interchanges.

B-4.6 • Remove new managed lanes and managed lane connectors, especially where there is no public transit.

B-4.7 • Specifically eliminate high GHG emission, sprawl-inducing projects including new freeway managed and truck lanes on SR 52 between I-15 and I-125, widening SR-67 between Lakeside and Ramona, improvements to rural interchanges on I-8 east of El Cajon, and intersection improvements of wider shoulders, and road straightening on SR-76 east of I-15 and SR 94 east of Jamul.

B-4.8 • Expand rail public transit. Build electric rail public transit by 2035 including several projects proposed in the 2021 Regional Plan: Purple Line commuter rail from the U.S.-Mexico Border to Sorrento Mesa, commuter rail from downtown to El Cajon via San Diego State University and La Mesa, LOSSAN commuter rail from downtown to the U.S.-Mexico Border. Move up the schedule for the LOSSAN University community tunnel to 2035.

B-4.9 • Expand Bus Rapid Transit.

B-4.10 • Redirect funding for freeway and road improvements to expand active transportation.

B-4.11 • Build complete streets in every city, especially in downtown areas.

Sierra Club has also previously suggested removal from DEIR alternatives of several other projects that are particularly harmful to biodiversity:

B-4.12 • Proposed double-tracking the LOSSAN rail corridor through Carroll Canyon. This project would eliminate one of the only wildlife corridors remaining between Torrey Pines State Natural Reserve, Sorrento Valley, Carroll Canyon, and Miramar Marine Corps Air Base. It would also cost billions of dollars that should be redirected to a more efficient long-term solution and SANDAG's planned realignment of this section of the rail corridor to a tunnel under the University community.

B-4.13 • The proposed transit center at Nobel Drive and I-805 would impact highly sensitive natural open space supporting several sensitive species and provide little benefit for effective public transit given its location at the wrong end of the commute and distance from destination businesses.

B-4.14 • Proposed managed lane connectors at the SR 52/I-805 interchange and widening the I-805 bridge over Rose Canyon would compromise or eliminate other important wildlife corridors just to build managed lanes that primarily benefit single-occupancy vehicle users.

II. The Regional Plan fails to sufficiently reduce greenhouse gas ("GHG") emissions.

B-4.15 Courts have emphasized the importance of regional transportation and land use planning in meeting statewide GHG reductions. (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 17 Cal.App.5th 413, 429 ("CNFF II"), Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467, 533-34 ("Golden

Response B-4.5

The comment recommends removing general purpose freeway lanes and interchanges from the 2025 Regional Plan. There are no new general purpose freeway lanes in the proposed Plan, therefore, the proposed Plan already incorporates the suggested element and does not need to add this element to the EIR's discussion of alternatives.

There are two interchanges with general purpose lane connections at I-5/SR78 and SR94/125 in the proposed Plan. (2025 Regional Plan Appendix A, A.17, and A.29). The proposed SR94/125 interchange would eliminate the need for southbound SR-125 traffic to use Spring Street to connect to eastbound SR-94, reducing queueing and delays for the freeway and local street network and improving traffic flow, thus increasing the level of safety and operations (Caltrans 2025b). Caltrans began an environmental reevaluation for this project in fall 2025 after completing a mitigated negative declaration in 2015 (SCH Number 2015071036).

The proposed I-5/SR 78 interchange would improve overall air quality by reducing idling vehicles, providing carpool/HOV and transit vehicle connectivity between two important regional corridors, and protect and/or enhance the human and natural environment in the project vicinity, such as supporting the Buena Vista Lagoon Restoration, where feasible (Caltrans 2025c). Caltrans anticipates environmental review for this project to be complete by 2029.

This comment provides no evidence that the proposed alternative would substantially lessen the proposed Plan's significant impacts. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.6

The comment recommends removing new managed lanes and managed lane connectors from the 2025 Regional Plan, especially where there is no public transit. The majority of the proposed Plan managed lane and managed lane connector projects serve existing or planned transit or are supportive of policies reducing single occupant vehicle usage on the roadway network. (2025 Regional Plan Appendix A, A.6). Eliminating those managed lane and managed lane

connector projects would limit the effectiveness of transit in reducing VMT and other impacts of the proposed Plan because transit would be limited to travel in congested general-purpose lanes during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds, including for bus transit, may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. (2025 Regional Plan Appendix M, Table M.16). Therefore, removing the managed lane and managed lane connectors would increase congestion, reduce the efficiency of the overall network, and as a result, would not clearly lessen the significant impacts of the proposed Plan.

This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.7

The comment recommends removing four allegedly high GHG emission, sprawl-inducing projects": new freeway managed and truck lanes on SR 52 between I-15 and I-125, widening SR 67 between Lakeside and Ramona, improvements to rural interchanges on I-8 east of El Cajon, and intersection improvements, wider shoulders, and road straightening on SR 76 east of I-15 and SR 94 east of Jamul. The projects identified in this comment are all safety and evacuation improvements. The referenced project on SR-52 is a truck climbing lane that improves safety and reduces congestion, thereby reducing idling and resulting GHG emissions during peak commute times. The remaining projects are safety improvements that support safe evacuation in instances of wildfire (San Vicente Comprehensive Multimodal Corridor Plan (SANDAG and Caltrans 2022), pp 61-61, 79-80). The EIR discusses evacuation and wildfire risk on pages 4.9-9 through 4.9-11 and page 4.9-33 through 4.9-38. The comment provides no evidence that any of these projects result in higher GHG emissions or induces sprawl. Further, removing these safety projects that improve rural intersections, widen shoulders, and straighten roads to facilitate evacuation would not clearly lessen the significant impacts of the proposed Plan. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.8

The comment recommends expanding rail public transit, building electric rail public transit by 2035 including several projects proposed in the 2021 Regional Plan: Purple Line commuter rail from the U.S.-Mexico Border to Sorrento Mesa, commuter rail from downtown to El Cajon via San Diego State University and La Mesa, LOSSAN commuter rail from downtown to the U.S.-Mexico Border, and moving up the schedule for the LOSSAN University community tunnel to 2035.

The 2025 Regional Plan focuses on building Rapid bus routes by 2035 because they can be implemented more quickly than rail transit, consistent with available revenues, and bring more transit options to the region. The LOSSAN tunnel project under the University Community is in the proposed Plan for 2050 due to the complexity and cost of construction (2025 Regional Plan Appendix A, A.20). The Purple Line segment from the border to Mission Valley is in the proposed Plan. SANDAG is still planning to construct the Purple Line extension from Mission Valley to Sorrento and it is included in the unconstrained network of the proposed Plan (2025 Regional Plan Appendix A, A.50). However, the project development timeline for the Mission Valley to Sorrento segment of the Purple Line extends beyond 2050 due to complexity and cost. The commuter rail project from downtown to El Cajon via San Diego State University is not included in the proposed Plan network as it was very high cost for parallel service to existing light rail in the proposed Plan (2025 Regional Plan Appendix N, N.7).

The alternative suggested in this comment is infeasible as there are no reasonably available revenues to implement it. See Global Response 4 for a discussion of proposed Plan funding constraints with respect to programming projects, advancing projects, and transferring funding between projects.

This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.9

The comment recommends expanding Bus Rapid Transit. This measure is already included in the proposed Plan. There are 35 new Rapid routes proposed in the 2025 Regional Plan's 2035 network (2025 Regional Plan Appendix A, A.20-21, A.32-33, A.50-53, A.66-67). Additionally, 9 of the existing Rapid routes are funded for additional improvements. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues. Further information about project phasing is available in Appendix A of the proposed Plan: Transportation Projects, Programs, Policies, and Phasing.

Thus, the proposed Plan already incorporates the suggested elements and does not need to add these elements to the EIR's discussion of alternatives. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.10

The comment suggests redirecting funding for freeway and road improvements to expand active transportation. See Global Response 4 for a discussion of the funding constraints of the 2025 Regional Plan with respect to programming projects, advancing projects, and transferring funding between projects. Based on these funding constraints, this alternative is economically infeasible. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.11

The comment suggests building complete streets in every city, especially in downtown areas. In 2004, voters in the San Diego region passed an extension of the half-cent sales tax (TransNet Extension & Ordinance) for transportation infrastructure. The 2004 TransNet Extension & Ordinance for transportation infrastructure states, "All new projects, or major reconstruction projects, funded by revenues provided under this Ordinance shall accommodate travel by pedestrians and bicyclists. Such facilities for pedestrian and bicycle use shall be designed to the best currently available standards and guidelines." In 2008 a TransNet Rule (Board Policy No. 31 Rule #21) was approved outlining appropriate bicycle, pedestrian, and transit measures. AB 1358 went into effect in 2011, requiring cities and the county to plan for complete streets in their local plans.

The proposed Plan includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Therefore, because complete streets are already closely integrated into the existing planning and funding framework, there is no need for the EIR to add a new alternative to build complete streets in every city. Further there is no evidence that that the proposed alternative suggested in this comment would substantially lessen the proposed Plan's significant impacts. Accordingly, no revisions to the EIR are needed in response to this comment.

Response B-4.12

The comment suggests that the EIR analyze alternatives that include the removal of the proposed double-tracking of the LOSSAN rail corridor through Carroll Canyon. The comment characterizes the project as eliminating one of the only wildlife corridors remaining between Torrey Pines State Natural Reserve, Sorrento Valley, Carroll Canyon, and Miramar Marine Corps Air Base, and costing billions of dollars that should be redirected to a more efficient long-term solution and SANDAG's planned realignment of this section of the rail corridor to a tunnel under the University community.

Double tracking of the LOSSAN rail corridor through Carroll Canyon includes the Sorrento to Miramar Phase 2 double track project and the UTC tunnel project. The project cost stated in the comment includes multiple project elements beyond the double-tracking through Carroll Canyon and UTC tunnel components (2025 Regional Plan Appendix A, A.20). The 2025 Regional Plan includes the Sorrento to Miramar Phase 2 double track project in the 2035 phase. The Sorrento to Miramar Phase 2 project is needed for regional freight rail service. The project includes double tracking, curve straightening to reduce the risk of derailments, and seismic stability improvements to improve resiliency.

This segment of the LOSSAN rail corridor already exists as a single track. The EIR includes a mitigation measure addressing facilitation of wildlife movement and connectivity. See mitigation measure BIO-3a

address design considerations to facilitate wildlife movement and connectivity. Connectivity assessment between Marian Bear Park and MCAS Miramar would occur on a project-specific level based on best available studies, including wildlife movement studies, and before-after control-impact studies and shall include corridor widths and wildlife crossing structures design. See also Global Response 3, which explains why the EIR's wildlife movement impact analysis and mitigation measures meet CEQA requirements. When the required permits for the Sorrento to Miramar Phase 2 project are obtained, all applicable conservation measures will be incorporated into the project.

The UTC tunnel is included in the 2050 phase of the proposed Plan, and the Sorrento to Miramar Phase 2 project will be needed for freight rail service after the UTC tunnel is constructed due to several factors: the need for continued access to the Miramar Wye; ventilation issues presented by co-locating passengers waiting on an underground platform while freight trains transit through the tunnel; and the cost and project footprint requirements for the UTC tunnel to accommodate freight rail service. An Alternatives Analysis Report has been completed for this project, documenting the analysis of conceptual alternatives for relocating the existing alignment of the Los Angeles-San Diego-San Luis Obispo Corridor to bypass Miramar Hill and replace the Sorrento Valley Station with a new station closer to UTC. Two conceptual alignments were developed to 10 percent conceptual engineering and recommended for further evaluation during the future preliminary engineering and environmental phase (SANDAG 2023).

The proposed Plan is a long range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning project level impacts and mitigation (as well as a no project alternative) for the UTC tunnel will be evaluated during project-level environmental review. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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). See Global Response 2 regarding the EIR's approach to mitigation measures for second-tier projects, and why it complies with CEQA requirements.

The comment provides no evidence that removing the Sorrento to Miramar Phase 2 project would substantially lessen the proposed Plan's significant impacts. Additionally, there is no evidence that the proposed Plan revision suggested in this comment would substantially lessen the proposed Plan's significant biological impacts. The comment remarks related to funding priorities and efficiency do not address the adequacy of the EIR's analysis or mitigation of significant environmental issues pursuant to Guidelines section 15204(a). Neither does the comment identify inadequacies in the EIR.

Based on the above information, no revisions to the EIR are needed in response to this comment.

Response B-4.13

The comment suggests removing the proposed transit center at Nobel Drive and I-805, asserting that the project would impact highly sensitive natural open space supporting several sensitive species and provide little benefit for effective public transit given its location at the wrong end of the commute and distance from destination businesses.

The project at Nobel Drive and I-805 is not a transit center, but rather a transit-only direct access ramp (DAR) providing access from the I-805 to University City for three new Rapid routes and one existing Rapid route. Because this project is not a transit center, the comment's assertion that the project is located at the wrong end of the commute and distant from destination businesses does not apply to the project. DARs are special freeway entrances where buses, carpoolers, and vanpoolers can directly enter managed lanes from a local road without having to merge onto a freeway from the right side. These ramps could look like either fully separated lanes on the same level as streets or elevated ramps and include technology enhancements (such as meters, stoplights, signage, etc.) that allow DAR users to enter freeways faster than other vehicles. (2025 Regional Plan Appendix A, A.6). The Mira Mesa/Scripps Ranch DAR

on I-15 is an existing DAR example, which was constructed within the existing highway and arterial rights of way.

Section 4.4, "Biological Resources," under significance criteria BIO-1 and BIO-2 discusses impacts of transportation network improvements to sensitive habitats and special status 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 project referenced in this comment (as well as a no project alternative) will be evaluated during project-level environmental review. Additionally, there is no evidence that that the proposed Plan revision suggested in this comment would substantially lessen the proposed Plan's significant biological impacts. Based on the above on information, no revisions to the EIR are needed in response to this comment.

Response B-4.14

The comment suggests removing the proposed managed lane connectors at the SR 52/I-805 interchange and widening the I-805 bridge over Rose Canyon, asserting that the project would compromise or eliminate other important wildlife corridors just to build managed lanes that primarily benefit single-occupancy vehicle users.

This managed lane connector serves new transit planned for the area, as well as carpool and vanpool users. Eliminating these projects would reduce the scope of transit and limit the effectiveness of transit, carpool and vanpool programs in reducing VMT and other impacts of the proposed Plan because those higher occupancy vehicles would be limited to travel in congested general purpose lanes during peak commute hours. The managed lane connector project would utilize existing highway right of way to the extent feasible. The commenter does not identify any specific "other important wildlife corridors" that might be affected by this project.

The wildlife corridor analysis in the EIR is based on the best publicly available data and provides a programmatic analysis of impacts to wildlife corridors. Section 4.4, "Biological Resources," under significance criteria BIO-3 discusses impacts of transportation network improvements to wildlife corridors and describes mitigation measure BIO-3a to reduce the impacts. The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning project level impacts and mitigation (as well as a no project alternative) will be evaluated during project-level environmental review.

Based on the above information, no revisions to the EIR are needed in response to this comment.

Response B-4.15

The comment notes that courts have emphasized the importance of regional transportation and land use planning in meeting statewide GHG reduction goals. The comment reiterates the significance conclusion for Impact GHG-4. No specific issues were raised regarding the adequacy of the EIR GHG analysis, and no further response is required.

Door II").) Yet SANDAG admits, "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." (DEIR Impact GHG-4, p. 4.8-37 to -52.)

B-4.15 Cont.

A. The Significance Threshold for Impact GHG-1 Is Inadequate.

The significance threshold for Impact GHG-1 is whether the Regional Plan "directly or indirectly result[s] in an increase in GHG emissions compared to existing conditions." (DEIR, p. 4.8-28.) Yet the severity of the climate crisis necessitates reductions in GHG emissions from baseline. (see, e.g., Intergovernmental Panel on Climate Change Report, Climate Change 2021, available at https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report_smaller.pdf.) Given the severity of the climate crisis, supported by compelling evidence, a threshold that measures increases to GHG emissions is insufficient to evaluate the Regional Plan's impacts on GHG emissions and the ongoing climate disaster. Instead, SANDAG should adopt a significance threshold focused on reductions of GHG emissions from baseline.

B-4.16

B. The DEIR's GHG Mitigation Measures Violate CEQA.

"Formulation of mitigation measures shall not be deferred until some future time." (CEQA Guidelines § 15126.4, subd. (a)(1)(B).) Deferral of the development of mitigation is only allowable where "specific performance criteria" are required at the "time of project approval." (Sacramento Old City Association v. City Council of Sacramento (1991) 229 Cal.App.3d 1011, 1029.) "Simply stating a generalized goal for mitigating an impact does not allow the measure to qualify for the exception to the general rule against the deferred formulation of mitigation measures." (King & Gardiner Farms, LLC v. County of Kern (2020) 45 Cal.App.5th 814, 856.) The DEIR relies on the following program-level mitigation measures which constitute impermissible deferred mitigation due to the lack of specific performance criteria:

B-4.17

- GHG-4a: Allocate Competitive 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-4c: Allocate Funding for Zero-Emission Vehicle Infrastructure
- GHG-4d: Implement Measures to Reduce GHG Emissions from Transportation Projects
- GHG-4e Implement Measures to Reduce GHG Emissions from Development Projects

The mitigation measures also lack enforcement mechanisms as required by CEQA. (Pub. Resources Code, § 21081.6, subd. (b); Lincoln Place Tenants Assn. v. City of Los Angeles (2007) 155 Cal.App.4th 425, 445.).

B-4.18

B-4.19 SANDAG effectively admits to the lack of criteria for implementation of mitigation measures.

Response B-4.16

The comment asserts that the significance threshold for Impact GHG-1 is inadequate, and that SANDAG should adopt a significance threshold based on reductions of GHG emissions from baseline. As discussed in Chapter 4, "Environmental Impact Analysis Approach," of the EIR, physical conditions as they existed in 2022 are used as the baseline for the impact analysis of the EIR. The 2022 base year for the greenhouse gas emissions analysis is the same as the year used in other technical sections, such as "Air Quality" (Section 4.3) and "Transportation" (Section 4.16).

The EIR approach to Impact GHG-1 is consistent with CEQA Guidelines Section 15064.4(b(1)), which states that significance of impacts from greenhouse gas emissions on the environment may be based on the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

Importantly, the comment requests use of a threshold focused on reductions of GHG emissions from baseline. The EIR uses such a significance threshold for Impact GHG-4 which is consistent with the commenter's recommendation. That threshold is whether the proposed Plan is consistent with the State's ability to achieve statutory 2030 and 2045 GHG reduction targets and goals. CEQA allows multiple significance thresholds to be used for GHG impacts (see, e.g., CEQA Guidelines Section 15064.4(b)). CEQA allows multiple significance thresholds to be used for GHG impacts (see, e.g., CEQA Guidelines Section 15064.4(b)). Therefore, no changes to the EIR analysis are required.

Response B-4.17

The comment suggests mitigation measures GHG-4a through 4e constitute "impermissible deferred mitigation" due to the lack of specific performance criteria. This suggestion is unfounded.

Mitigation measures in a first-tier EIR for a program-level project such as the proposed Plan may contain generalized mitigation criteria and policy level alternatives *(Koster v. County of San Joaquin (1996)* 47 Cal.App.4th 29). See *California Native Plant Society v. City of*

Rancho Cordova (2009) 172 Cal.App.4th 603 (the details of exactly how the required mitigation and its performance standards will be achieved can be deferred pending completion of a future study). The proposed Plan "integrates land use, transportation systems, infrastructure needs, and public investment strategies within a regional framework," and its EIR is a first-tier Program EIR for which mitigation measures may be more generalized than in a project-level EIR. (See EIR page 1-2.)

This comment asserts that EIR Mitigation Measures GHG-4a, GHG-4b, GHG-4c, GHG-4d, and GHG-4e lack specific performance criteria. However, these mitigation measures do include specific performance standards appropriate for Program EIR mitigation measures. For instance, in Mitigation Measure GHG-4a, SANDAG commits to two actions: (1) implementing a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement strategies or measures included in an adopted climate action plan (CAP) or GHG reduction plan, and (2) as part of the next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program, continuing to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and make funding available 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. This measure includes specific performance standards that the grant program(s) will be required to achieve.

In addition, the measure commits SANDAG to achieving additional *annual* GHG emissions reductions during the proposed Plan horizon by implementing projects that would otherwise not occur due to insufficient funding and additional *cumulative* GHG emissions reductions during the proposed Plan horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Second, to receive the competitively awarded grant funding, projects must be included in an adopted CAP or GHG reduction plan. Moreover, this measure includes a commitment by SANDAG to report annually to the Board of Directors on the estimated GHG reductions achieved by the projects funded through this grant program. (EIR page 4.8-47.)

Similarly, in Mitigation Measure GHG-4b, SANDAG commits to three actions: establishing Climate Planning Services for member agencies, developing GHG-reducing planning policies, and supporting local implementation of GHG-reducing initiatives that align with the San Diego Regional Climate Action Roadmap. As part of this, SANDAG's Final Program Budget for Fiscal Year 2026 allocates funding to prepare the Climate Action Roadmap. This measure includes specific performance criteria SANDAG must meet, fund updated GHG reduction plans and GHG-reduction measures that would otherwise not occur due to insufficient funding, staff capacity, or administrative burdens.

As part of Mitigation Measure GHG-4c, SANDAG commits to identifying programs and projects for which to provide funding for electric vehicle charging infrastructure and requires that SANDAG allocate specific amounts to implement this program. This measure includes specific performance criteria SANDAG must meet: the expansion of electric vehicle charging infrastructure through the funding of specific project incentive programs and projects.

As for both Mitigation Measure GHG-4d and Mitigation Measure GHG-4e, these measures are designed to be implemented by future second-tier projects. The performance measures are described in the text within each measure and are to be implemented during the design, construction, and operation of future transportation and development projects. Also, regarding performance criteria that exist for second-tier transportation and land use project mitigation measures such as GHG-4d and GHG-4e, please see Global Response 2.

Based on the above information, no changes to the EIR's GHG mitigation measures are required.

Response B-4.18

This comment asserts that mitigation measures GHG-4a, GHG-4b, GHG-4c, GHG-4d, and GHG-4e lack enforcement mechanisms. However, each of these measures does include an enforcement mechanism, as described below.

Mitigation measures GHG-4a through 4c each include a commitment that SANDAG "shall" implement the mitigation measure and both 4b and 4c identifies the specific funding source(s) and amounts that SANDAG is committing to use to implement the mitigation measure (pages 4.8-47 to 4.8-53). To ensure these measures are implemented,

SANDAG would adopt these measures and include them as part of the Mitigation Monitoring and Reporting Program following certification of the EIR and adoption of the proposed Plan (CEQA Guidelines Section 15097), ensuring that implementation would be implemented and that implementation is monitored and reported, in accordance with CEQA requirements. Also, regarding enforcement mechanisms that exist for second-tier transportation and land use project mitigation measures (GHG-4d and GHG-4e), please see Global Response 2.

Therefore, no changes to the EIR are required in response to this comment.

Response B-4.19

The comment cites language from the EIR, and contends this language is an admission to "lack of criteria for implementation of mitigation measures." The language cited from the Draft EIR in this comment does not pertain to "lack of criteria for implementation of mitigation measures," and the meaning of that phrase is unclear. Rather, the cited language specifically pertains to quantification of the effectiveness of the EIR's GHG mitigation measures.

CEQA Guidelines Section 15126.4 requires that mitigation measures be feasible, enforceable, and capable of reducing or avoiding a significant environmental impact, and the EIR's GHG mitigation measure meet these requirements. CEQA does not require that the effectiveness of every mitigation measure be quantified, but lead agencies must support with substantial evidence in the record the mitigation will be effective.

As explained in the EIR (page 4.8-47), the program-level mitigation measures GHG-4a, 4b, and 4c) were not quantified for effectiveness in the EIR, as their effectiveness would be determined by the specific nature, scale, and timing of funded projects. Many of the specific project-level mitigation measures in Mitigation Measures GHG-4d and 4e are frequently used to reduce GHG emissions. For example, many of the measures in these mitigation measures are from the California Air Pollution Control Officers Association's (CAPCOA) *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* document, which was developed by CAPCOA to assist lead agencies in identifying GHG measures that are available, feasible, and effective in reducing GHG emissions. The Handbook provides methods for quantifying the effectiveness (i.e., GHG emissions reductions) of many of these project-level measures.

CEQA allows for measures to be incorporated into plans that will set the policy framework for later projects implementing the plans. Guidelines Section15126.4(c) states that GHG mitigation measures for long range plans, such as the proposed Plan, may include the identification of specific measures that may be implemented on a project-by-project basis. While mitigation measures must include sufficient performance standards and be capable of implementation, CEQA does not require that every mitigation measure include prescriptive or highly detailed implementation steps at the program EIR stage, or that mitigation measure effectiveness be quantified.

See also response to comment B-4.17 and Global Response 2.

For these reasons, no changes to the EIR are required in response to this comment.

B-4.19 Cont.

"Program level mitigation measures have not been quantified as their effectiveness would be determined by the specific nature, scale, and timing of funded projects. Project level mitigation measures have similarly not been quantified as the reductions achieved from implementation of these measures are contingent upon action taken by local decision makers not within SANDAG's purview." (DEIR, p. 4.8-45)

B-4.20

Further, project-level mitigation measures GHG-4d and -4e state that agencies, "…can and should implement measures to reduce GHG emissions and achieve zero-net energy." (DEIR, p. 4.8-48 and -50). SANDAG then states it does not have the authority to require other agencies to implement these measures (DEIR, p. 4.8-52). But to the extent SANDAG controls or provides funding for any such transportation projects, SANDAG certainly does have the authority to require that these mitigation measures are mandatory as a condition for receiving funding. SANDAG also has the discretion and authority to make mitigation conditions binding on any agency that elects to tier CEQA review and approval of future specific projects to the Regional Plan EIR (CEQA Guidelines § 15168, subd.(c)(3).)

B-4.21

Finally, the DEIR asserts that Impact GHG-4 is significant and unavoidable "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…" and that, "These impacts would persist through 2050" (DEIR, p. 4.8-53). This impact, however, is not unmitigable. Agencies are required to adopt all mitigation measures and discuss and analyze all feasible mitigation measures and alternatives before approving a project with significant impacts. (Pub. Resources Code § 21081; King & Gardiner Farms, LLC, supra, 45 Cal.App.5th 814, 865-66, 869.)

B-4.22

Sierra Club has previously suggested the following entirely feasible measures to reduce GHG emissions, discourage urban sprawl, and benefit public transit that should be included as mitigation conditions in a revised and recirculated DEIR to reduce impacts of the Regional Plan.

- Convert existing managed lanes to public transit lanes open to only buses and other public transit, and carpools.

B-4.23

- Create public transit lanes (or managed lanes) only from converted existing general-purpose lanes.

B-4.24

- To the extent that new managed lanes are constructed, dedicate one managed lane foruse only by public transit or carpools.

B-4.25

- Create special parking programs for EVs or hydrogen fuel cell cars

B-4.26

- Allow for access to managed lanes for EVs or hydrogen fuel cell cars

B-4.27

- Limit greenhouse gas emissions to net zero

B-4.28

- To the extent that any onsite minimization of any transportation project's GHG emissionsto net zero is not feasible, offsite GHG mitigation should be provided to achieve net zero GHG emissions including but not limited to:

B-4.29

  - Preservation of natural habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego

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Response B-4.20

The comment acknowledges that SANDAG does not have authority to require other agencies to implement certain mitigation measures, such as Mitigation Measures GHG-4d and GHG-4e, but requests that SANDAG should, to the extent it "controls or provides funding for any such transportation projects.. require that these mitigation measures are mandatory as a condition for receiving funding." SANDAG's ability to require other agencies to implement specific mitigation measures, its ability to condition certain grant funding on implementation of mitigation measures, and the EIR's use of the phrase "can and should" in its mitigation measures, is discussed in Global Response 2.

This response also argues that CEQA Guidelines Section 15168 subdivision (c)(3) requires that all mitigation measures in the proposed Plan be incorporated into any projects relying on this EIR. Section 15168 subdivision (c)(3) states "[a]n agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program." The "agency" referenced is the lead agency for the subsequent project, not the agency that prepares the first tier Program EIR. Notably, only "feasible" mitigation measures must be incorporated into a project that tiers off of a programmatic EIR. Because the determination of "feasibility" of any given mitigation measure is made at the project level, this EIR cannot definitively say whether the mitigation measures discussed in the EIR will or will not be incorporated into any specific project that tiers from this analysis. It is therefore not correct that *any* projects tiering off this EIR *must*, in all cases, incorporate *every* mitigation measure discussed in the EIR.

Further, if a second-tier project does not incorporate every feasible mitigation measure in the Program EIR into the project EIR, this does not make the Program EIR mitigation measures invalid. Rather, the consequence is that the second-tier CEQA review may not rely on the Program EIR for CEQA streamlining for those significant impacts where Program EIR mitigation measures are not incorporated.

Lastly, the comment's statement that SANDAG has the "discretion and authority" to make mitigation conditions binding on any agency electing to tier from the Regional Plan EIR is inaccurate. SANDAG has no such general discretion and authority. It does have limited discretion and authority to condition certain transportation projects receiving SANDAG grant funding, as described in Global Response 2.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.21

The comment asserts that Impact GHG-4 "is not unmitigable" and that agencies are required to adopt all mitigation measures and discuss and analyze all feasible mitigation measures and alternatives before approving a project with significant impacts.

The EIR identifies Impact GHG-4 as a significant impact in the years 2030, 2045, and 2050. The EIR identifies several feasible mitigation measures to reduce this significant impact by achieving additional GHG emissions reductions above and beyond the reductions shown in the analysis for Impact GHG-4 (mitigation measures AQ-3b, AQ-3c, TRA-2, WS-1a, WS-1b, GHG-4a, GHG-4b, GHG-4c, GHG-4d, and GHG-4e).

However, even with the additional GHG emissions reductions from these mitigation measures, total regional GHG emissions would remain inconsistent with the State's ability to achieve the 2030 reduction target of SB 32 and the 2045 reduction target of AB 1279 that would persist through 2050. Achieving the necessary level of reductions from all GHG emissions sectors will require 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. Therefore, the EIR appropriately concludes that Impact GHG-4 would be significant and unavoidable.

The comment itself does not identify any additional feasible mitigation measures that would further reduce this significant GHG emissions impact, or provide any evidence to support its assertion that Impact GHG-4 "is not unmitigable." Responses to the commenter's specific proposed mitigation measures are presented in responses to comments B-4.3-22 through B-4.3-35. The EIR (see pages 4.8-49 through 4.8-53) provides a detailed discussion of the types of actions required to achieve the statewide GHG emissions targets and goals analyzed in Impact GHG-4 and explains why SANDAG alone cannot bring about all of the needed reductions.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.22

The comment generally introduces a detailed list of proposed mitigation measures. It then identifies a mitigation measure the comment deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions or discourage urban sprawl.

Managed lanes are an integral component of the regional transportation network and contribute to its overall efficiency. Converting existing managed lanes to public transit lanes open to only buses and other public transit and carpool reduce flexibility in dynamically managing congestion on the freeway, leading to increased congestion during peak commute and limiting the effectiveness of these lanes in reducing overall air quality and GHG impacts. Additionally, when needed, access to managed lanes can be restricted to transit/HOV use only during periods of highest congestion. Therefore, converting existing managed lanes to public transit and carpool only lanes would likely increase congestion, reduce the efficiency of the overall network, and as a result, would not materially lessen the significant impacts of the proposed Plan.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.23

The comment identifies a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions or discourage urban sprawl.

Managed lanes are an integral component of the regional transportation network, ensuring a continuous network while maintaining efficient traffic operations. Where there is support from a local jurisdiction and the local community, the proposed Plan does

repurpose general purpose lanes or existing right of way to accommodate new managed lanes rather than constructing new roadway.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.24

The comment identified a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions or discourage urban sprawl.

Managed lanes are an integral component of the regional transportation network and contribute to its overall efficiency. Converting one managed lane to a public transit lane open to only public transit and carpool would reduce flexibility in dynamically managing congestion on the freeway, leading to increased congestion during peak commute and limiting the effectiveness of these lanes in reducing overall air quality and GHG impacts. Therefore, converting one managed lane to public transit and carpool only lanes would likely increase congestion, reduce the efficiency of the overall network, and as a result, would not materially lessen the significant impacts of the proposed Plan. For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.25

The comment identifies a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions or discourage urban sprawl. This comment suggests creating special parking programs for EVs or hydrogen fuel cell cars. SANDAG does not have authority over parking programs, which are controlled by local jurisdictions, however, parking programs for EVs or hydrogen fuel cell cars has been added as TDM measures that can and should be implemented by transportation project sponsors in Mitigation Measure TRA-2, in Section 3.16, "Transportation." The 2022 California Green Building Standards Code, known as CalGreen, includes EV parking requirements for new buildings and designated clean air vehicle parking spaces for EVs, FCEVs, hybrids, propane, and CNG vehicles.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.26

The comment identifies a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions or discourage urban sprawl. This comment suggests allowing access to managed lanes for EVs or hydrogen fuel cell cars. SANDAG does not have authority over programs providing managed lane access to EVs or hydrogen fuel cell vehicles. The state program that did allow such access, the Clean Air Vehicle Decal program, ended effective October 1, 2025. Under Section 166 of Title 23 of the United States Code, federal legislation was required to authorize an extension, but no such action was taken.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.27

The comment suggests limiting GHG emissions to net zero. Although AB 1279 establishes a State carbon neutrality goal by 2050, as discussed in response to comment B-4.21, the EIR (see pages 4.8-49 through 4.8-53) provides a detailed discussion of the types of actions required to achieve the statewide carbon neutrality goal analyzed in Impact GHG-4, and explains why SANDAG alone cannot bring about all of the needed reductions. The same rationale applies to SANDAG's inability alone to reduce GHG emissions within the SANDAG region to net zero.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.28

The comment suggests that if any onsite minimization of any transportation project's GHG emissions to net zero is not feasible, offsite GHG mitigation should be provided to achieve net zero GHG emissions. The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning project level impacts and mitigation will be evaluated during project-level environmental review.

Additionally, this goal may not be feasible for many transportation and development projects, and CEQA does not require use of a net zero significance threshold. (see, e.g., CARB 2022 Scoping Plan, Appendix D.)

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.29

This comment suggests providing offsite GHG mitigation for transportation projects through the preservation of natural habitat land and that the amount of GHG mitigation provided by preservation of natural habitat land should be determined by calculating reduced GHG emissions on the property resulting from avoided conversion to development of the existing number of legally entitled or zoned units and/or square feet on the preserved property. While the comment deems the proposed measure "feasible," it does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions to help achieve a net zero goal.

Notably, preservation of natural habitat land is already a component of the proposed Plan. In 1987, San Diego County voters approved TransNet, a half-cent sales tax to fund a variety of transportation improvements throughout the region. The TransNet Environmental Mitigation Program (EMP) was created as part of the TransNet Extension Ordinance to provide advanced mitigation for transportation infrastructure improvement projects and programs identified in the Regional Transportation Plan. The intent is to satisfy the mitigation requirements for these projects comprehensively rather than on a project-by-project basis to maximize opportunities for acquiring land early and restoring habitats. In turn, this funding enables SANDAG to help implement regional habitat conservation plans by targeting key acquisition areas for conservation, management, and monitoring. The TransNet EMP is unique to the San Diego region and it provides a critical source of funding to protect open space and preserve natural habitats. To date, the program has helped acquire and/or restore more than 9,215 acres of native habitats within the region with a total value of about $164 million, in part by leveraging $33.2 million from conservation partners. (2025 Regional Plan Appendix Q, Q.5).

SANDAG does not currently calculate avoided GHG for mitigation properties and is not aware of any entities that do. Methods for doing this are still evolving. Also, although it may be included in State policies and local climate action plans, this measure would be impractical to implement at a project level.

For these reasons, no changes to the EIR are required in response to this comment.

Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or private holdings within the Cleveland National Forest. Preservation of natural habitat land as GHG mitigation should include private property acquisition and conservation stewardship management in perpetuity. The amount of GHG mitigation provided by preservation of natural habitat land should be determined by calculating reduced GHG emissions on the property resulting from avoided conversion to development of the existing number of legally entitled or zoned units and/or square feet on the preserved property.

B-4.29 Cont.

- Direct replacement of GHG-emitting vehicles and equipment (e.g. diesel or natural gas generators) with electric vehicles and electric equipment including at any site under the authority of the Port of San Diego (including cargo and cruise ship terminals), of the Metropolitan Transit System, of the North County Transit District, of the San Diego Airport Authority, and of any San Diego County school district.

B-4.30

- Establish environmental justice grant programs in communities of concern for direct replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and any other energy efficiency improvements to businesses, residences, or community facilities.

B-4.31

- Cover as many parking spaces as possible with solar panels and batteries

B-4.32

- GHG offsite mitigation should be in addition to any existing laws, regulations, or plans already compelling reductions in GHG emissions.

B-4.33

- GHG offsite mitigation should be entirely within San Diego County.

B-4.34

- GHG offsite mitigation should be entirely within the same communities of concern as emissions.

B-4.35

C. Calculations of GHG Emissions from Regional Plan Projects Must Include the Actual Lifespan of the Projects.

CEQA Guidelines section 15064.4, subd. (a) requires an agency to make a "good-faith effort, based to the extent possible on scientific and factual data," to calculate the full GHG emissions expected from a project. The DEIR should include mitigation conditions specifying that calculations of GHG emissions of transportation and other projects contemplated under the Regional Plan must include the period of construction and the actual lifespan of the projects rather than an unsupported, arbitrarily limited lifespan such as the periods of 30 years sometimes utilized in CEQA review documents for development projects.

B-4.36

III. The Regional Plan Has Significant Transportation Impacts.

A. The Regional Plan Overly Emphasizes Roadway Construction and Fails to be Consistent with Statewide Climate Goals and Objectives.

B-4.37

Response B-4.30

The comment identifies a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions to help achieve a net zero goal. This comment suggests providing offsite GHG mitigation for transportation projects through the direct replacement of GHG-emitting vehicles and equipment (e.g. diesel or natural gas generators) with electric vehicles and electric equipment including at any site under the authority of the Port of San Diego (including cargo and cruise ship terminals), of the Metropolitan Transit System, of the North County Transit District, of the San Diego Airport Authority, and of any San Diego County school district.

MTS and NCTD already have zero-emission fleet transition plans as required by the Innovative Clean Transit Rule, and many other public agencies are subject to the State and Local Government Agency elements of the Advanced Clean Fleets Rule, which requires 50% of new vehicle purchases be ZEV starting in 2024, and 100% of new vehicle purchases be ZEV starting in 2027. Therefore, this additional mitigation measure would duplicate existing programs, and it would not be practical to implement at a project level.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.31

The comment identifies a mitigation measure the commenter deems "feasible," but does not provide any evidence to support its assertion that this measure would materially reduce GHG emissions to help achieve a net zero goal. This comment suggests providing offsite GHG mitigation for transportation projects by establishing environmental justice grant programs in communities of concern for direct replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and any other energy efficiency improvements to businesses, residences, or community facilities.

SANDAG currently has one incentive program that promotes the transition to of ZEVs in the San Diego region. The San Diego County

Incentive Project is an EV charger rebate program that provides rebates to property owners who install workplace and publicly accessible charging stations throughout the region. SANDAG co-funds the program with SDAPCD and the California Energy Commission. As of April 2024, 56% of program funds have gone toward installations in low-income and disadvantaged communities. The program is no longer accepting new applications (CSE 2025). SANDAG also prepared an implementation plan to establish a regional ZEV incentive program that will help reduce the cost of buying a ZEV for residents in low-income and underserved communities in San Diego County. As of September 2025, SANDAG is exploring ways to fund this program in the future. The EIR includes mitigation measure GHG-4c to support additional EV charging stations in communities where there has been little investment thus far. Additionally, the San Diego Air Pollution Control District offers the Clean Cars 4 All program that provides grants to income qualified residents in disadvantaged communities to replace older, polluting vehicles with cleaner options. Therefore, an additional mitigation measure to implement similar programs is not necessary, nor would it be practical to implement at a project level.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.32

The comment suggests mitigation to cover as many parking spaces as possible with solar panels and batteries.

Mitigation Measure GHG-4d describes measures that could be applied to future transportation projects constructed and operated under the proposed Plan. These measures include installing solar photovoltaic canopies over parking areas. Therefore, the proposed mitigation measure is a variation of one already included in the EIR, and there is no evidence that GHG reductions achieved would substantially contribute to achieve a net zero goal.

For these reasons, no changes to the EIR are required in response to this comment. Nevertheless, in response to the comment, the mitigation measure has been revised to installing solar photovoltaic canopies over parking areas "wherever feasible" see EIR page 4.8-51.

Response B-4.33

The comment states that GHG offsite mitigation should be in addition to any existing laws, regulations, or plans. The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning project level mitigation, including any offsite mitigation, will be evaluated during project-level environmental review.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.34

The comment states that GHG offsite mitigation should be entirely within San Diego County. See response to comment B-4.33. For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.35

The comment states that GHG offsite mitigation should be entirely within the same communities of concern as emissions. See response to comment B-4.33.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.36

The comment asserts that GHG emissions calculations of transportation and other projects included in the proposed Plan "must include the period of construction and the actual lifespan of the projects" instead of using "an unsupported, arbitrarily limited lifespan such as the periods of 30 years sometimes utilized in CEQA review documents for development projects." The EIR properly estimates GHG emissions under implementation of the proposed Plan including from construction activities resulting from regional growth and land use change and transportation network improvements and programs as described below.

The GHG emissions projections included in the EIR reflect GHG emissions that would be generated by activities associated with

implementing the two main physical components of the proposed Plan: regional growth and land use change, and transportation network improvements and programs. The EIR analyzes the combined emissions of these components.

The projections are reported out to 2050, because this is the horizon year of the proposed Plan. Further, CARB's 2022 Scoping Plan, as well as AB 1279, have a horizon year of 2045, as evaluated under the significance threshold for Impact GHG-4. Projecting Regional Plan GHG emissions beyond 2050 would be speculative due to likely but unknown changes in both economic activity and GHG reduction policies and technology.

Specifically, as explained in EIR Section 4.8.4, "Environmental Impacts and Mitigation Measures," the GHG emissions calculations included in the EIR include "14 emissions categories," one of which is the off-road equipment sector (EIR page 4.8-29). As explained in EIR Appendix E, the off-road equipment sector includes construction equipment emissions from implementation of regional growth and land use change and transportation network improvements and programs under the proposed Plan (EIR Appendix E pages G.34 and G.35). Thus, GHG emissions from construction of projects included in the proposed Plan are properly accounted for in the GHG emissions calculations included in the EIR.

The EIR does not use "an unsupported, arbitrarily limited lifespan such as the periods of 30 years." Further, the GHG emissions projections are not based on the "period of construction and the actual lifespan" of every individual transportation network improvement and land use development project included in the proposed Plan because the project specific details needed to perform such analysis are not available at this time (e.g., project design, site conditions, type and number of equipment needed, site conditions, construction start date and duration). As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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).

Response B-4.37

The comment cites case law that states that agencies like SANDAG are required to stay in step with evolving scientific knowledge and state regulatory schemes. The comment also summarizes GHG goals and targets cited in those cases, including Executive Order No. S-03-05 (80 percent below 1990 levels by 2050) and SB 32 (40 percent below 1990 levels by the year 2030), while also mentioning the adoption and intent of SB 375. The comment does not raise any issues with the adequacy of the EIR, and no further response is required.

Regardless, it is worth noting that the GHG analysis in the EIR is "in step" with evolving scientific knowledge and state regulatory schemes. Under Impact GHG-2, the analysis evaluates whether the proposed Plan would conflict with the SB 375 GHG emission reduction target for 2035. Under Impact GHG-4, the analysis evaluates whether the proposed plan would meet the targets of reducing GHG emissions by 2030 in line with SB 32 and GHG emissions by 2045 in line with AB 1279.

For these reasons, no changes to the EIR are required in response to this comment.

"CEQA requires public agencies like SANDAG to ensure that analysis stay in step with evolving scientific knowledge and state regulatory schemes." (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 504 ("CNFF I").) Executive Order No. S-03-05, enacted in 2005, established GHG reduction targets to 80 percent below 1990 levels by 2050. (Golden Door Properties, LLC v. County of San Diego (2018) 27 Cal.App.5th 892, 895 ("Golden Door I").) SB 32, enacted in 2016, "adopts a goal of reducing [GHG] emissions by 40 percent below 1990 levels by the year 2030"—a "necessary interim target to ensure that California meets its longer-range goal of reducing [GHG] emissions to 80 percent below 1990 levels by the year 2050." (Golden Door II, supra, 50 Cal.App.5th 467, 488.) In 2008, SB 375 was enacted to "reduce GHG emissions through improved land use and transportation planning." (Id. at 533, emphasis added.)

B-4.37 Cont.

The Regional Plan's emphasis on freeway construction is misguided and counterproductive to the goals of Executive Order No. S-03-05, SB 32, and SB 375. As the DEIR notes, on-road transportation of light-duty vehicles and passenger cars contributes the largest share of GHG emissions in the San Diego Region. (Table 4.8-4, DEIR, p. 4.8-4.) According to table 4.16-5 and -6, the Regional Plan significantly increases the total number of roadway lane miles within the region by 2035 and 2050, as compared with baseline. (DEIR, p. 4.16-27 and -29.) This includes increases in miles from freeways, managed lanes, state highways, and arterials. (Ibid.) The Regional Plan will also result in an increase of average daily vehicular trips of 838,369. (Ibid.)

B-4.38

The majority of new roadway miles over the period of the Plan are "managed" freeway lanes for the supposed benefit of bus rapid transit. But managed lanes will not be effective for bus rapid transit because these lanes will also be available for use by high occupancy and fee-payer vehicles that in turn will result in congestion and greatly reduced bus efficiency during critical daily periods of transportation congestion as evidenced by conditions on existing rapid bus/HOV lanes on Interstate 15, Interstate 805, Interstate 5, and elsewhere. Further, several managed lanes are proposed where there is no existing or planned bus rapid transit. In order to fully analyze transportation impacts, we request that SANDAG provide information on the performance of current bus rapid transit routes to compare operations during periods of congestion/non-congestion and determine whether these routes are effective when using the same lanes as HOVs and paying users.

B-4.39

B-4.40

And as shown in the Regional Plan list of projects, the Regional Plan includes several massive new infrastructure roadway projects to connect managed lanes between freeways and provide separate ramp infrastructure where buses must enter and exit freeways to access transit stations rather than the far more efficient method of bringing people directly to dedicated commuter rail or bus lanes.

B-4.41

B. The Regional Plan Subverts Statewide Goals by Increasing Vehicle Miles Travelled.

B-4.42

The Regional Plan results in an increase of 2,629,048 daily VMT above starting year 2019 conditions, 3,824,069 daily VMT above starting year under 2035 conditions, 4,170,149 daily

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Response B-4.38

The comment disagrees with the Regional Plan's alleged emphasis on freeway construction as it relates to the goals of Executive Order No. S-03-05, SB 32, and SB 375. The substance of the comment relates to components of the proposed Plan, not the analysis within the EIR. These comments do not speak to the adequacy of the EIR, and as such no response is required.

The comment summarizes EIR text that shows that on-road transportation of light-duty vehicles and passenger cars contributes the largest share of GHG emissions in the San Diego Region, and that the Regional Plan increases the total number of roadway lane miles within the region by 2035 and 2050 while increasing daily VMT.

As an initial matter, it should be noted that the increase in lane miles under the proposed Plan is from managed lanes, not general-purpose freeway lanes. The proposed Plan does not "emphasize" freeway construction, as asserted by the comment and in fact, there are no new general purpose freeway lanes in the proposed Plan. The proposed network analyzed in the EIR does include managed lanes and managed lane connectors most of which serve existing or planned transit. (2025 Regional Plan Appendix A, A.17, 47, and 63).

The comment states that the proposed Plan results in an increase of average daily vehicular trips of 838,369 by 2050 (relative to 2022). While average daily vehicular trips are expected to increase, VMT per resident, VMT per employee, and VMT per service population (the sum population and employment) are all expected to decrease (improve) by 2050 relative to 2022 (see Table 4.16-6). Moreover, average daily transit trips, average daily bicycle trips, and average daily pedestrian trips are all expected to increase (improve) by 2050 relative to 2022 (see Table 4.16-6). Therefore, while there would be an increase in vehicle trips by 2050 due to regional growth, the efficiency of these trips would increase due to the increase in transit, bicycle, and pedestrian mode shares and usage.

Thus, because the proposed Plan would reduce per capita VMT, this aspect the proposed Plan would help support the GHG reduction goals of Executive Order No. S-03-05, SB 32, and SB 375, as well as AB 1279. Nevertheless, total regional GHG emissions would still not

be reduced to levels consistent with the State's ability to achieve SB 32 and AB 1279 GHG reduction goals, as discussed in Impact GHG-4.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.39

The comment states that the majority of new roadway miles over the period of the Plan are "managed" freeway lanes for the supposed benefit of bus rapid transit, but that they will not be effective for bus rapid transit because these lanes will also be available for use by high occupancy and fee-payer vehicles that in turn will result in congestion and greatly reduced bus efficiency. The comment does not provide any evidence to support its assertion that bus efficiency is currently greatly reduced due to congestion on existing Rapid bus/HOV lanes. Additionally, the comment does not speak to the adequacy of the EIR and as such no further response is required.

However, the 2025 Regional Plan network analyzed in the EIR does include managed lanes and managed lane connectors to support the proposed transit network (2025 Regional Plan Appendix A, A.17, 47, and 63). Among the benefits of managed lanes, transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds, including for bus transit, may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Additionally, access to managed lanes can be restricted to transit/HOV use only during periods of high congestion. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand (2025 Regional Plan Appendix M, Table M.16). Where possible, the 2025 Regional Plan repurposes general purpose lanes or existing right of way to accommodate new managed lanes rather than constructing new roadway. Most of the managed lanes projects serve existing or new transit planned for the region. Where managed lanes are proposed without new or existing transit, those lanes support future changes to occupancy rules for personal vehicles, as described above. Eliminating these projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.40

The comment states that several managed lanes are proposed where there is no existing or planned bus rapid transit and requests information on the performance of current bus rapid transit routes to compare operations during periods of congestion/non-congestion and determine whether these routes are effective when using the same lanes as HOVs and paying users.

The 2025 Regional Plan includes managed lanes and managed lane connectors to support the proposed transit network. All but one of these projects augments existing transit service or serves new transit service. (2025 Regional Plan Appendix A, A.17, 47, and 63). In response to the request for information on route performance, the following peak hour and off peak on-performance measures were taken from SANDAG's internal Passenger Counting Program.

Route	Average of Early/ On-Time Arrival	Difference between Off Peak and Peak Average Early/On-Time Arrival
Rapid 225: Off Peak	92.2%	2.3%
Rapid 225: Peak	89.9%	
Rapid 235: Off Peak	86.8%	-3.9%
Rapid 235: Peak	90.7%	
Rapid 280: Off Peak	85.5%	3.0%
Rapid 280: Peak	82.5%	
Rapid 290: Off Peak	100%	8.4%
Rapid 290: Peak	91.6%	

Notes: Numbers are percentages of trips in the period and represent average weekday ridership in the month of September 2025.
Early = before Scheduled Time.
On-Time = 0-5 minutes of Scheduled Time.

The percent difference between peak and off-peak average early/on-time arrivals for the referenced Rapid routes is between -3.9% and 8.4%. For the Rapid 235, average arrival time during Peak commute

was better than average arrival time for the Off-Peak commute. On the other end of the range, the Rapid 290 average arrival time during Off-Peak commute was better than average arrival time for the Peak commute. Performance is similar between Peak and Off-Peak notwithstanding the differences in volume and congestion during these times, demonstrating that current Rapid routes do provide effective transportation on managed lanes with HOV and single occupancy access.

Additionally, managed lanes support more than transit and are an integral component of the regional transportation network, contributing to its overall efficiency. Configuring managed lanes as lanes open to only public transit would reduce flexibility in dynamically managing congestion on the freeway, leading to increased congestion during peak commute and limiting the effectiveness of these lanes in reducing overall air quality and GHG impacts. Additionally, when needed, access to managed lanes can be restricted to transit/HOV use only during periods of highest congestion. Therefore, eliminating multi-use managed lanes would likely increase congestion, reduce the efficiency of the overall network, and as a result, would not materially lessen the significant impacts of the proposed Plan.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.41

The comment asserts that the proposed Plan includes several massive new infrastructure roadway projects to connect managed lanes and provide separate ramp infrastructure for buses that the commenter says should be replaced by a more efficient method of bringing people directly to dedicated commuter rail or bus lanes. This is a comment on the proposed Plan rather than the adequacy of the EIR, and no further response is required. The comment does not provide any description of this alternative more efficient method. As described in responses to comments B-4.6, 4.14, 4.22, 4.23, and 4.39, managed lanes and managed lane connectors service transit, carpool and vanpool programs, which reduce the use of single occupant vehicles in the region.

In addition, direct access ramps are special freeway entrances where buses, carpoolers, and vanpoolers can directly enter managed lanes from a local road without having to merge onto a freeway from the right side which allows those users to enter freeways faster than other vehicles. (2025 Regional Plan Appendix A, A.6).

Response B-4.42

The comment states that the Regional Plan does not meet the VMT reduction goals by increasing VMT in 2035, 2045, and 2050 relative to the 2019 starting year, and that this increase is antithetical to the state's GHG reduction goals. Initially, please note that the comment attempts to reiterate (incorrectly) the EIR's VMT analysis and argues why regional VMT increases are inconsistent with State policy, but the comment does not allege any specific CEQA deficiencies in the EIR analysis.

Section 4.16 of the EIR analyzes the change in VMT and Section 4.8 analyzes the passenger car GHGs per capita reduction goal of SB 375. Section 4.16 of the EIR analyzes the change in total VMT and VMT per capita for each analysis year. Impact TRA-2 separately analyzes the significance of per capita and total VMT impacts based on whether the proposed Plan would achieve the substantial VMT reductions needed to help statewide GHG reduction goals, pursuant to AB 1279, of 85 percent reduction of anthropogenic GHG emissions and carbon neutrality by 2045. CARB's 2022 Scoping Plan recommends interim per capita VMT reduction targets of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045 to achieve AB 1279's goals. Impact TRA-2 quantitatively analyzes the proposed Plan's ability to meet these goals.

As discussed in the EIR, total VMT would increase for each analysis year, but VMT per capita would decrease for each analysis year, relative to Year 2019 conditions. For example, relative to Year 2019 conditions, total VMT would increase 5.0% by 2035, while VMT per capita would decrease 5.9%; VMT would increase 5.4% by 2045, while VMT per capita would decrease 7.7%; and total VMT would increase 5.6% by 2050, while VMT per capita would decrease 8.9% relative to 2022. (4.16-36 to 39.) This trend in promoting per-capita reductions despite the increase in total VMT is consistent with 2017 CARB document (CARB 2019) the commenter cites, which states the following on page 6:

> "It is important to note that both of CARB's planning scenarios assume that total VMT in California still continues to grow, though at a slower rate of growth. There is no expectation or endorsement of any policy that would require the total statewide VMT to decrease such as to limit population growth, limit new housing growth, support outmigration, or slow economic growth in the State."

Further, the comment is incorrect in stating that the Regional Plan fails to meet the GHG per capita reduction goal of 19% by 2035 as required by CARB pursuant to SB 375. SB 375 does not require CARB to establish post-2035 targets. As discussed on Pages 4.8-35 through 4.8-37 of the EIR, implementation of the proposed Plan 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 exceeds SB 375's 2035 target of a 19% reduction for the SANDAG region. Therefore, the proposed Plan would not conflict with SB 375 per capita GHG emission reduction targets for 2035.

For these reasons, no changes to the EIR are required in response to this comment.

VMT above starting year under 2045 conditions, and 4,343,189 daily VMT above starting year under 2050 conditions. (DEIR, pp. 4.16-36, -37, -38, and -39.) The Regional Plan thus fails to meet the qualitative significance threshold adopted by SANDAG—not only does the Regional Plan fail to "achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals," it actively increases VMT in the region throughout the life of the Plan. Increased VMT is completely antithetical to the state's GHG reduction goals. (California Air Resources Board, 2017 Scoping Plan-Identified VMT Reductions And Relationship To State Climate Goals, January 2019; Golden Door II, 50 Cal.App.5th 467, 544 ["VMT reduction is an integral part of California's strategy to reach 2030 and 2050 GHG emission reduction targets."].) Further, the Regional Plan fails to meet the VMT per capita reduction goal of 19% by 2035 as required by CARB (DEIR, p. 4.16-18.). The DEIR acknowledges that, "…the proposed Plan would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals" (DEIR, p. 4.16-38.)

B-4.42 Cont

C. Mitigation Measures for Transportation Impacts Must be Enforceable.

Mitigation measures must be enforceable. (Pub. Resources Code, § 21081.6, subd. (b); Lincoln Place Tenants Assn. v. City of Los Angeles (2007) 155 Cal.App.4th 425, 445.) The DEIR's stated mitigation measures for TRA-2, Achieve Further VMT Reductions for Transportation and Development Projects, permits local jurisdictions to implement such VMT reductions at their discretion. For example, the measure states that "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." (DEIR, p. 4.16-40). This discretionary language makes the mitigation measure non-enforceable if used by other local jurisdictions, and is thus in violation of CEQA.

B-4.43

IV. The DEIR Fails to Adequately Analyze and Mitigate Impacts to Biological Resources.

The Regional Plan fails to sufficiently protect biological resources by erroneously concluding that significant impacts are unavoidable and by failing to identify significant conflicts with several existing and planned regional habitat conservation plans. The Regional Plan also fails to implement adequate mitigation measures.

B-4.44

A. The Regional Plan is Inconsistent with Federal, State, and Local Goals to Protect Biological Resources.

The DEIR's assertion that Impact BIO-4 is less than significant lacks substantial evidence. The Regional Plan is in clear conflict with state and federal goals to protect 30% of land and water natural resources by 2030 (see Governor's Exec. Order No. N-82-20 (Oct. 7, 2020); Exec. Order No. 14008, 86 Fed. Reg. 7619 (Feb. 1, 2021)).

B-4.45

If SANDAG maintains its current conclusions of significant and unavoidable impacts to BIO-1, BIO-2, and BIO-3 biological resources, SANDAG must also necessarily conclude that there will

Response B-4.43

The comment refers to the use of the phrase "can and should" in transportation project mitigation measures that another agency, and not SANDAG, would have the responsibility to implement. Please see Global Response 2, which describes why the EIR's use of this language and mitigation approach are consistent with CEQA requirements, and why the mitigation measure is enforceable.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.44

The comment claims that the EIR's conclusion that Impact BIO-4 is less than significant lacks evidence and conflicts with state and federal goals to protect 30% of land and water resources by 2030. The comment notes that if impacts to BIO-1, BIO-2, and BIO-3 are considered significant and unavoidable, similar conflicts with these conservation goals and regional habitat plans must also be acknowledged for BIO-4 as they rely on the same mitigation measures.

Section 4.4, "Biological Resources," of the EIR analyzes the impact on biological resources at a programmatic level based on best available information, including impacts on vegetation communities and wetlands (see BIO-1), sensitive species (see BIO-2), wildlife movement (see BIO-3), and consistency with policies and approved HCPs (see BIO-4). Impacts were analyzed based on the footprint developed for the proposed Plan. Feasible mitigation measures for significant impacts were identified accordingly. Comments on the significant and unavoidable impact findings, habitat conservation plans, and mitigation measures, which identify programmatic mitigation measures, are addressed further below. In addition, please refer to Global Responses 2 and 3 regarding adequacy of the EIR's biological resources mitigation measures.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.45

The comment asserts that impacts addressed in BIO-4 are not less than significant based on the fact that the proposed Plan is purportedly in conflict with State and federal goals to protect 30 percent of land and water resources by 2030 (i.e., California Pathways to 30x30 Strategy), and that this goal would not be achieved if the impacts on BIO-1, BIO-2, and BIO-3 are unavoidable. Initially, please note that alleged conflicts with state and federal goals are not significant impacts under CEQA. Impact BIO-4 considers an impact significant if the proposed Plan would "conflict with the provisions of an adopted HCP, NCCP, or other conservation plan, or with any local policies or ordinances protecting biological resources." Conflicts with state and federal conservation goals are not included in the significance threshold for Impact BIO-4 nor are they included in the CEQA Guidelines Appendix G thresholds upon which the EIR's significance thresholds are based. Also, state and federal conservation goals are applicable at the statewide and national level respectively, not to each region within a state. Finally, please note that Executive Order 14008, which established the federal "30 by 30" conservation goal, was rescinded by Executive Order 14148 (90 Fed. Reg. 8237, January 25, 2025). Nevertheless, California continues its commitment to 30x30 and issued its 30x30 Annual Report in July 2025 including an example of San Diego efforts to habitat acquisition and access to nature at Mission Trails Regional Park (NRCA 2025).

The following response is nevertheless provided. According to the City of San Diego's official website (https://www.sandiego.gov/planning/work/mscp/summary/plan), the Multiple Species Conservation Program (MSCP) targets to protect 172,000 acres of natural lands (excluding agricultural lands); the Multiple Habitat Conservation Program (MHCP) targets to protect 19,000 acres. Approximately 100,000 acres of land in the planned North County MSCP will be unavailable for development. The majority of lands in the East County (approximately 90 percent) are public lands that are already conserved. The total amount of public lands (undeveloped or in open space) in San Diego County amounts to 1.7 million acres. With San Diego County having almost 3 million acres of landmass, of which approximately 2 million is undeveloped or planned for conservation, the conservation percentage of San Diego County far exceeds 30 percent. The San Diego County NCCPs are within or above their targets for to meeting their goals by the end of the plan years. For example, the MSCP South County Plan has a goal of acquiring and protecting 98,370 acres of habitat, which at the end of 2024 was at 85% of this target with 81,566 acres currently preserved (County of San Diego 2024). The City of San Diego is reporting a current status of 51,540 acres conserved which is 98% of a target of 52,72 acres of conserved lands (City of San Diego 2023). The local NCCPs are anticipated to meet their targets prior to the expiration of their respective plan years (i.e., 2048 for the City of San Diego's MSCP).

Finally, please note that each of the EIR's significance thresholds for biological resources (and other resources) is independent and there is no basis for the commenter's assertion that significant and unavoidable impacts for BIO-1, BIO-2, and BIO-3 requires the EIR to conclude that Impact BIO-4 is also significant and unavoidable. In particular, conflicts with state and federal conservation goals are not included in the significance threshold for Impact BIO-4. CEQA allows multiple significance thresholds to be used for biological impacts (see, e.g., CEQA Guidelines Appendix G, Questions IV(a) through IV(f)).

For these reasons, no changes to the EIR are required in response to this comment.

B-4.45 Cont. be similar significant and unavoidable conflicts with state and federal goals to protect 30% of land and water natural resources by 2030 and local regional habitat conservation plans (i.e., Impact BIO-4) given those plans' reliance on the same minimization and mitigation measures SANDAG asserts cannot be guaranteed under BIO-1, BIO-2, and BIO-3. (See Section III.B below.)

B-4.46 The Regional Plan is also in conflict with regional habitat conservation plans, which conflict must be discussed in the DEIR. (CEQA Guidelines § 15125, subd. (d).) The Regional Plan is in conflict with regional habitat conservation plans because it no longer includes establishment of an essential regional funding source previously included in the 2021 Regional Plan and necessary to implement existing and planned regional habitat conservation plans. Existing regional habitat conservation plans like the San Diego Multiple Species Conservation Plan and Multiple Habitat Conservation Program anticipate and require establishment of a regional funding source to support implementation of the plans. The Regional Plan is the most appropriate planning tool available to provide a regional funding source yet no longer includes establishment of the regional funding source.

B. The DEIR's Biological Resources Mitigation Measures Violate CEQA.

SANDAG significantly undermines the potential effectiveness of measures to minimize and mitigate impacts to biological resources by concluding that impacts will remain significant because other agencies implementing the plan may not fully implement mitigation measures described in the Regional Plan.

B-4.47 According to the Regional Plan DEIR, "Implementation of Mitigation Measures BIO-1a through BIO-1e would reduce or minimize this impact (BIO-1). However, while projects under SANDAG's control would implement these measures, there is no assurance that these mitigation measures would be implemented by non-SANDAG project sponsors.... Therefore, this impact (BIO-1) would remain significant and unavoidable." (DEIR, p. 4.4-67.) SANDAG's rationale here renders the mitigation measures non-enforceable, and is an abdication of SANDAG's own responsibility as a lead agency to reach sound conclusions of impacts to the environment and adopt effective mitigation. Rather than minimizing its own responsibility, SANDAG should include language in the DEIR mandating implementation of DEIR mitigation measures for its own projects and for any other agencies implementing projects under the Regional Plan to the extent that they are likely to tier their own CEQA review to the Regional Plan DEIR. Subsequent projects relying on the Regional Plan DEIR must incorporate the Regional Plan DEIR's mitigation measures. (CEQA Guidelines § 15168, subd.(c)(3)).

B-4.48

B-4.49 Finally, an EIR is required to discuss and adopt all feasible mitigation measures. (King & Gardiner Farms, LLC, supra, 45 Cal.App.5th 814, 865-66, 869.) One crucial additional mitigation measure should be added to BIO-4 requiring preparation of a detailed strategic plan to establish the regional funding source for the regional habitat conservation plans.

Response B-4.46

The comment asserts that the proposed Plan is in conflict with regional HCPs. All approved HCPs, and impacts thereon, have been included and addressed in the EIR; see discussion under Impact BIO-4 in Section 4.4, "Biological Resources," and Table 4.4-5 of the EIR. The conclusion in Impact BIO-4 correctly identifies that the EIR is not in conflict with any approved HCPs.

The comment states that because the proposed Plan no longer includes f a funding source for regional habitat conservation, the proposed Plan is in conflict with regional conservation plans. However, the comment does not identify which provision of which habitat conservation plan is the source of a potential proposed Plan conflict, or why the 2025 Regional Plan is the only document where a regional funding source must be proposed. Further, please note that potential inconsistency with a particular provision of a plan does not mean that the 2025 Regional Plan conflicts with a habitat conservation plan as a whole.

As stated in Regional Plan Appendix Q: Regional Habitat Conservation Vision, SANDAG will continue to coordinate the discussion around how the region can obtain the funding necessary to provide the local jurisdictions share of the regional habitat conservation plans. The regional habitat conservation plans l envisioned that funding would be provided by multiple sources: a third from new development, a third from state and federal sources, and a third from local jurisdictions. Each local jurisdiction that is signatory to the conservation plan and the Implementing Agreement with the Wildlife Agencies that provides the legal "take" authorizations identified in the conservation plan is obligated to fund local costs for land conservation, acquisition, management, and monitoring. A regional funding source would help offset the costs to local jurisdictions.

The TransNet Extension Ordinance and Expenditure plan include a provision that SANDAG would act on a regional funding measure to meet the long-term requirements for implementing habitat conservation plans in the San Diego region to be considered by the voters no later than four years after passage of the TransNet

Extension. Along with transit operations and stormwater management, regional funding for habitat conservation was included in a 2016 ballot measure to assist the region in meeting its underfunded infrastructure needs. The 2016 bond measure, referred to as Measure A, failed to achieve the 2/3 voter approval needed for its adoption leaving the option of regional funding for habitat conservation in question.

SANDAG continues to support and facilitate regional habitat conservation planning. SANDAG has and will continue to work with the local jurisdictions and state and federal agencies, to direct its mitigation efforts to maximize the build out of the regional habitat conservation preserve while meeting all the necessary regulatory permitting requirements. In addition, SANDAG continues to facilitate regional dialog around impediments and challenges in the planning and implementation of habitat conservation plans. The 2025 Regional Plan includes a near-term action to "complete the Regional Habitat Conservation Assessment" which will establish the needs and costs to complete the habitat conservation plans, and possible funding pathways.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.47

The comment recommends including language that requires measures for SANDAG projects and for agencies tiering CEQA review from the Regional Plan EIR, as allowed under CEQA Guidelines Section 15168(c)(3), to ensure effective mitigation and compliance. Please see Global Response 2, which explains why the EIR's approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements. As Global Response 2 explains, second-tier transportation project EIR mitigation measures, such as biological resource mitigation measures, would be implemented for transportation projects that SANDAG directly approves or carries out, and implementation of applicable and feasible mitigation measures would be a grant condition for capital projects funded by SANDAG's TransNet grant programs. Global Response 2 also explains why mitigation measures for all second-tier transportation and land use projects would be enforceable.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.48

The comment asserts that the EIR must include all feasible mitigation measures and recommends adding a strategic plan to establish a regional funding source for habitat conservation. Please see Global Response 2 which explains why the EIR's approach to mitigation measures to be implemented in second-tier projects is consistent with CEQA requirements. As discussed in response to comment B-4.20, regarding second-tier documents prepared by agencies implementing projects under the Regional Plan that tier CEQA review to the Regional Plan EIR, CEQA already requires these agencies to incorporate feasible mitigation measures in the Program EIR to later activities in the program. (CEQA Guidelines Section 15168(c)(3).) Regarding SANDAG's own projects, when CEQA findings are adopted, SANDAG will commit to implementing mitigation measures applicable to its own projects. Separate language in the EIR mandating implementation is unnecessary.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.49

The comment requests that an additional mitigation measure be added to BIO-4 requiring preparation of a detailed strategic plan to establish the regional funding source for the regional habitat conservation plans. See response to comment B-4.46 above regarding SANDAG's efforts to facilitate habitat conservation plan funding and implementation. Impact BIO-4 is not significant because there would be no conflicts with adopted habitat conservation plans. Thus, no mitigation measures are required for Impact BIO-4.

SANDAG has and will continue to work with the local jurisdictions and state and federal agencies, to direct its mitigation efforts to maximize the build out of the regional habitat conservation preserve while meeting all the necessary regulatory permitting requirements. In addition, SANDAG continues to facilitate regional dialog around impediments and challenges in the planning and implementation of habitat conservation plans. The 2025 Regional Plan includes a near-term action to "complete the Regional Habitat Conservation Assessment" which will establish the needs and costs to complete the

habitat conservation plans, and possible funding pathways. Please see response to comment B-4.46 regarding potential funding sources used as part of the ongoing assessment of habitat conservation costs.

The comment also proposes a mitigation measure to add or construct any new freeway lanes only within existing developed freeway footprints. Notably, the proposed Plan does not include any new general purpose freeway lanes. It does include managed lanes, managed lanes connectors, and interchanges that connect general purpose freeway lanes. Where feasible, the proposed Plan repurposes general purpose lanes or existing right of way to accommodate new managed lanes rather than constructing new roadway. See responses to comments B-4.6, 4.14, 4.22, 4.23, and 4.39. Also, new lanes within existing developed freeway footprints would be addressed by Mitigation Measure BIO-1a: 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.

As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts or proposed mitigation measures for 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).

For these reasons, no changes to the EIR are required in response to this comment.

B-4.49 Cont. Sierra Club has also previously suggested the following other entirely feasible measures to reduce harm from the Regional Plan to biological resources and that should be included as mitigation conditions in a revised and recirculated DEIR.

- Add or construct any new freeway lanes only within existing developed freeway footprints.

B-4.50
- Avoid construction of new transportation projects in natural habitat and especially sensitive habitat and populations of sensitive species including within existing transportation properties/rights-of-ways to the maximum extent feasible.

B-4.51
- Design roads and railways with green bridges, underpasses and wildlife corridors that allow animals to move safely across landscapes, reducing wildlife mortality.

B-4.52
- Provide enlarged space and habitat for wildlife movement between Marian Bear Park and MCAS Miramar as part of any projects at the SR-52/I-805 interchange.

B-4.53
- Transportation projects that include acquisition of mitigation property that will be open to the public should fund routine enforcement of recreation use rules and removal and habitat restoration for unauthorized trails.

B-4.54
- Prohibit deliberate planting of invasive non-native plants in transportation properties/ right-of-ways and provide a program for permanent control of any invasive non-native plants that will colonize transportation properties/right-of-ways over time, especially prioritizing areas adjacent to conserved lands.

B-4.55 Mitigation for impacts to biological resources should be located in the same local watershed as project impacts to the maximum extent feasible. Condemnation to secure private property for mitigation of biological resources should not be considered infeasible. For example, I-5 project

B-4.56 impacts to Rose Creek should be mitigated in Rose Creek between SR-52 and Mission Bay, I-805 or LOSSAN rail impacts to Carroll and Rose canyons should be mitigated in those same canyons, SR-78 project impacts to Buena Vista Creek should be mitigated in Buena Vista Creek, and LOSSAN rail realignment impacts to coastal wetlands should be mitigated in the same coastal wetland.

B-4.57 Based on the foregoing comments, we respectfully request that SANDAG revise the Regional Plan and recirculate the DEIR to achieve further GHG and VMT reductions, improve protections for biological resources, and resolve the issues addressed in this letter.

Sincerely,

Ron Askeland
Ron Askeland, Chair
San Diego Chapter Sierra Club Conservation Committee

David Hogan
David Hogan, Chair
San Diego Chapter Sierra Club Legal Committee

Response B-4.50

The comment proposes a mitigation measure to avoid construction of new transportation projects in natural habitat and sensitive habitat and populations of sensitive species including within existing transportation properties/rights-of-ways to the maximum extent feasible. This mitigation measure would be considered for second-tier transportation projects during project-specific reviews.

As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and does not analyze the project-specific impacts or proposed mitigation measures for 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).

The EIR already includes variations of this suggested measure: Mitigation Measure BIO-1a: Implement Design, Minimization, and Avoidance Measures for Sensitive Natural Vegetation Communities and Regulated Aquatic Resources (Section 4.4 page 4.4-64); and mitigation measure BIO-2a: Implement Design, Minimization, and Avoidance Measures for Special-Status Animal Species. Section 4.4 pages 4.4-74 through 4.4-75, are identified to minimize impacts to natural sensitive habitat and sensitive species during project-specific design and construction.

As explained in the EIR (page 4.4-78), implementation of Mitigation Measures BIO-1a through BIO-1e and BIO-2a through BIO-2c, would reduce impacts to special-status species and their habitats (Impact BIO-2). However, there is no assurance that these mitigation measures would be implemented for all projects or be equally effective due to the wide variety of circumstances, complexity of some sites, and complexity of impacts on special status species. Therefore, this impact (BIO-2) would remain significant and unavoidable. See Global Response 2 for further explanation of why

programmatic EIR mitigation measures may not apply to every second-tier project, and how they would be enforced.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.51

The comment proposes a mitigation measure to design roads and railways with green bridges, underpasses and wildlife corridors. This mitigation measure would be considered for second-tier transportation projects during project-specific reviews. Please see response to comment B-4.50. The EIR already includes variations of this suggested measure. Specifically, mitigation measure BIO-3a addresses design considerations to facilitate wildlife movement and connectivity. As discussed in Measure BIO-3a of the EIR (pages 4.4-84 through 4.4-86), project-specific impacts of the project on wildlife movement would be mitigated during planning, design, and project-level CEQA review of transportation network improvements or development projects. Measures included in mitigation measure BIO-3 (Facilitate Wildlife Movement) address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies, including wildlife movement studies, and before-after-control-impact-studies and shall include corridor widths and wildlife crossing structures design. These measures include retrofitting open-span bridges, installing wildlife crossings (i.e., overpasses strictly limited to wildlife usage, size-class soft bottom underpasses), and installing directional fencing. Please see Global Response 3.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.52

The comment proposes a project-specific mitigation measure. This mitigation measure would be considered for a second-tier transportation project during project-specific reviews. Please see response to comment B-4.50. The EIR already includes variations of this suggested measure.

Projects such as the SR-52/I-805 interchange would include a review the feasibility of project designs that would facilitate wildlife movement, as discussed in Mitigation Measure BIO-3a: Facilitate Wildlife Movement. As discussed in Measure BIO-3a of the EIR (pages 4.4-84 through 4.4-86), project-specific impacts of the project on wildlife movement would be mitigated during planning, design, and project-level CEQA review of transportation network improvements or development projects. Measures included in mitigation measure BIO-3 (Facilitate Wildlife Movement) address design considerations to facilitate wildlife movement and connectivity on a project-specific level based on best available studies, including wildlife movement studies, and before-after-control-impact-studies and shall include corridor widths and wildlife crossing structures design. Please see response to comment B-4.52 and Global Response 3.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.53

The comment proposes a project-specific mitigation measure to provide funding for enforcement of recreational use rules and habitat restoration when acquiring mitigation property that will be open to the public. This mitigation measure would be considered for second-tier transportation projects during project-specific reviews. Please see response to comment B-4.50.

Mitigation measures are reviewed and approved by regulatory and wildlife agencies and typically require a conservation easement that excludes public use. Funding for compensatory mitigation and long-term management of mitigation sites would be provided by the project sponsor for each individual project and would also be reviewed and approved by the regulatory and wildlife agencies.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.54

The comment proposes mitigation prohibiting planting of invasive non-native plants on transportation project rights of way and providing a program of permanent control of invasive non-native plants that will colonize transportation properties/rights of ways over time. This mitigation measure would be considered for second-tier transportation projects during project-specific reviews. Please see

response to comment B-4.50. The EIR already includes variations of this suggested measure.

Invasive plant protocols are address in Mitigation Measure BIO-1e: "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." The EIR describes the federal Executive Order 13112 that prevents the introduction of invasive species (page 4.4-42). Furthermore, the California Department of Food and Agriculture (CDFA) is mandated to protect the State from invasive species. By state law, seed lots cannot be sold when they contain any prohibited noxious weed seeds. Caltrans specifications also limit common (non-noxious) weed seed to less than 1.0 percent by weight. Therefore, no "deliberate" planting of invasive non-native plants would be allowed in any transportation properties/rights-of-way.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.55

The comment asserts that mitigation for impacts to biological resources should be located in the same local watershed as project impacts to the maximum extent feasible, and that condemnation to secure property for biological resource mitigation should not be considered infeasible. This mitigation approach would be considered for second-tier transportation projects during project-specific reviews. Please see response to comment B-4.50. The EIR already includes variations of this suggested measure.

See Mitigation Measure BIO-1b that discusses mitigation within the watershed or ecoregion in which the impact occurred. "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." The feasibility of condemnation to acquire mitigation property would be determined on a project specific basis during review of second-tier projects.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.56

The comment proposes project-specific mitigation measures for specific projects. This mitigation measure would be considered for second-tier transportation projects during project-specific reviews and regulatory permit applications. Federal and state agencies usually require through their orders and procedures that compensatory mitigation for waters of the US and waters of the state occur within the same watershed as the impacts. Please see response to comment B-4.50.

For these reasons, no changes to the EIR are required in response to this comment.

Response B-4.57

The comment is conclusory and requests revisions to the Regional Plan and EIR to address comments provided. SANDAG appreciates the comments received for consideration. Please refer to prior responses for in-depth discussions regarding the comments received. As discussed in response to comment B-4.4, Draft EIR circulation is not required because "significant new information" has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5.

Comment Letter B-5: Friends of Rose Canyon

Comment Letter B-5: Friends of Rose Canyon

Friends of Rose Canyon
PO Box 221051, San Diego, CA 92192-1051
858-525-1489 ✶ rosecanyon@iCloud.com

Oct. 13, 2025
Via Electronic Mail: regionalplanEIR@SANDAG.org

Friends of Rose Canyon submits the following comments on the Draft EIR for the 2025 Regional Plan.

B-5.1 SANDAG should decrease the environmental impacts of the Regional Plan and increase the benefits of the Regional Plan by making the following changes to the 2025 Regional Plan. These changes would decrease the 2025 Regional Plan's negative environmental impacts (in Soledad Canyon) and increase the Plan's environmental and other benefits by improving the travel time of the Blue Line.

B-5.2
1. **SANDAG should remove from the 2025 Regional Plan the Sorrento to Miramar 2 project.** This rail project would have immense negative environmental impacts on MSCP land in Soledad Canyon, which provides the last remaining wildlife corridor between MCAS Miramar and Rose Canyon to the south and Carrol Creek to the north. The project has an immense projected cost (c. $300 million dollars) and would **result in only a two-minute time-savings** on the one-hour train trip between downtown San Diego and Oceanside or the 3-hour train trip between Los Angeles and downtown San Diego. This wildlife corridor is regularly used by mule deer. It was identified in the City of San Diego's Pure Water Project EIR. There is no way to mitigate the devastating long-term impacts on Soledad Canyon.

B-5.3
2. **SANDAG should prioritize the construction of the Palomar St. Grade Separation in the City of Chula Vista.** This project would have multiple environmental and other benefits. According to SANDAG, the Blue Line has the most riders of any light rail in the country, serving an average of over 75,000 people a day. However, the trip is very slow. The Palomar St. Grade Separation would eliminate stops for vehicle traffic and improve reliability and frequency by separating the trolley from street-level traffic, allowing the trolley to pass through the intersection without waiting for cars and pedestrians.

   In June 2023, MTS and the City of Chula Vista were awarded $21.5 million for this project through the Rebuilding American Infrastructure with Sustainability and Equity (RAISE) program. The funds were for the project's design phase, which includes acquiring right-of-way and relocating utilities ahead of the start of construction. SANDAG should prioritize this project.

Sincerely,
Deborah Knight
Executive Director
Friends of Rose Canyon

Attachment: Palomar Street Grade Separation description and announcement of $21.5 mil grant

Response B-5.1

The comment is an introductory statement for the detailed comments in the letter. Generally, the comment states that SANDAG should reduce the environmental impacts and increase the benefits of the proposed Plan. Please refer to subsequent responses to comments below for detailed responses.

Response B-5.2

The comment requests the removal of the Sorrento to Miramar Phase 2 project from the proposed Plan. The 2025 Regional Plan includes the Sorrento to Miramar Phase 2 double track project in the 2035 phase. The Sorrento to Miramar Phase 2 project is needed for regional freight rail service. The project includes double tracking, curve straightening to reduce the risk of derailments, and seismic stability improvements to improve resiliency.

This segment of the LOSSAN rail corridor already exists as a single track. The EIR includes a mitigation measure addressing facilitation of wildlife movement and connectivity. See mitigation measure BIO-3a address design considerations to facilitate wildlife movement and connectivity. Connectivity assessment between Marian Bear Park and MCAS Miramar would occur on a project-specific level based on best available studies, including wildlife movement studies, and before-after control-impact studies and shall include corridor widths and wildlife crossing structures design. See also Global Response 3, which explains why the EIR's wildlife movement impact analysis and mitigation measures meet CEQA requirements. When the required permits for the Sorrento to Miramar Phase 2 project are obtained, all applicable conservation measures will be incorporated into the project. Staff has held meetings with Friends of Rose Canyon to discuss the concerns raised in this comment.

As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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). See Global Response 2 regarding the EIR's approach to mitigation measures for second-tier projects, and why it complies with CEQA requirements.

The comment provides no evidence that removing the Sorrento to Miramar Phase 2 project would substantially lessen the proposed Plan's significant impacts. Nor does the comment provide evidence that the Sorrento to Miramar Phase 2 project would result in unmitigable long-term impacts to Soledad Canyon. The comment remarks related to project cost and travel time do not address the adequacy of the EIR analysis or mitigation of significant environmental issues. For these reasons, no changes to the EIR are required in response to this comment.

Response B-5.3

The comment states that SANDAG should prioritize the construction of the Palomar Street Grade Separation in the City of Chula Vista. SANDAG, in partnership with the City of Chula Vista and Metropolitan Transit System (MTS), plans to construct a grade separation at the Palomar Street and MTS rail crossing at Industrial Boulevard. The planned grade separation will lower Palomar Street under the MTS rail tracks. The Palomar Street Grade Separation project is currently first on SANDAG's grade separation priority list.[2] As the comment notes, this project currently has funds for the project's design phase, which includes acquiring right-of-way and relocating utilities ahead of the start of construction. The project is completing environmental clearance and is at 30% design completion. Following completion of environmental clearance, project has funding to advance design to 60% completion, commence right-of-way appraisal and acquisition efforts and advance utility relocations. The project design effort is not fully funded, however, and additional funding will be needed for construction. For a discussion of funding issues related to the proposed Plan, see Global Response 4.

[2] https://www.sandag.org/projects-and-programs/transit/transit-projects/palomar-street-grade-separation

Individual Letters

Comment Letter C-1: Paul Jamason

Comment Letter C-1: Paul Jamason

From: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Sent: Wednesday, October 8, 2025 2:53 PM
To: Kathie Washington; Claudia Watts
Subject: FW: Removal of NACTO from SANDAG Regional Plan

From: paul jamason <pjamason@gmail.com>
Sent: Wednesday, September 24, 2025 10:53 AM
To: SANDAG PIO <pio@sandag.org>; RegionalPlanEIR <regionalplanEIR@sandag.org>
Cc: rjones@san-marcos.net; joelacava@sandiego.gov
Subject: Removal of NACTO from SANDAG Regional Plan

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

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

C-1.1 Hi, I'm confused as to how removing NACTO guidelines from the Regional Plan (https://pub-sandag.escribemeetings.com/filestream.ashx?DocumentId=6061) improves safety for bicyclists? Despite using flashing lights on my bike and "taking the lane" as vehicular cyclists insist, I still experience frequent close calls from motorists on their phones. Protected bike lanes provide at least some feedback to distracted and aggressive motorists to prevent them from potentially injuring/killing bicyclists.

C-1.2 Further, how do we increase ridership among newer, less confident riders if we expect them to "take the lane" with aggressive motorists driving 2-ton vehicles? I understand vehicular cyclists have the ear of Board of Directors members such as Mayor Jones, but SANDAG should design safe facilities for all bicyclists - not just the strong and fearless.

C-1.3 Please re-consider this proposed removal of NACTO guidelines, which would be contrary to SANDAG's goals of increasing ridership and providing safe facilities for all road users.

Thank you,
Paul Jamason

1

Response C-1.1

The comment questions how removing the NACTO guidelines from the proposed Plan improves safety for bicyclists and supports the use of protected bike lanes.

As described in Appendix K, *Active Transportation,* of the proposed Plan, SANDAG works closely with local partners to provide technical resources, education, and assistance in project and program design and implementation using the best currently available standards and guidelines.

This is a comment is about the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

Response C-1.2

The comment questions how to increase ridership among newer, less confident riders if they are expected to share roadway lanes with vehicles.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

As described in Tables 4.16-5 and Table 4.16-6 of the EIR, as summarized in the table below, the proposed Plan would substantially increase the total number of Class I and Class IV facilities and would therefore provide additional protected and separated bicycle facilities within the region.

Category of Bike Facilities	Baseline Year 2022	Year 2035 Proposed Plan	Year 2050 Proposed Plan	Change from Baseline Year 2022 to Year 2050
Class I	396	570	1,057	661
Class IV	55	577	1,903	1,848

As defined in Chapter 4.16, *Transportation*, of this EIR, on pages 4.16-7 to 4.16-8, Class I facilities provide a completely separated right-of-way designed for the exclusive use of bicycles and pedestrians, with crossflows by motorists minimized. Class IV facilities provide a right-of-way designated exclusively for bicycle travel within the roadway.

The comment in reference to the Board of Directors members and the mayor reflects the opinion of the commenter and is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-1.3

The comment requests SANDAG reconsider removing the reference to the NACTO guidelines in the proposed Plan. Please see responses to comments C-1.1 and C-1.2.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Comment Letter C-2: Albert Perdon

Comment Letter C-2: Albert Perdon

Good News for the City of San Diego and the City of Chula Vista

and maybe SANDAG

C-2.1 Today, there is good news for key SANDAG Board Members who represent the City of San Diego and the City of Chula Vista. By the end of the year, you will have the power to adopt a new 2025-2029 Regional Plan and shape the future for San Diego County businesses, transportation and housing.

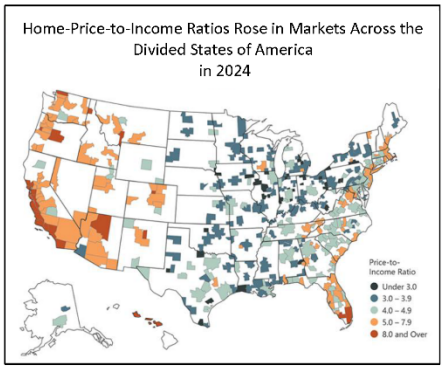
1. **New affordable housing and high-speed trains and connected local transit improvements**

In 2008, 17 million California voters approved a Bond Act that enables millions of current and future auto-dependent families to reduce their transportation costs, makes housing more affordable, and enables millions of dollars in increased life-time family wealth by investing a small portion of the cost savings in a public wealth fund interest-earning account. SANDAG has ignored the requirements voters imposed in the Bond Act, with devastating impact on family fortunes now and in the future.

SANDAG's current Draft 2025-2029 Regional Plan constrains new housing construction and drives up the price of new and existing homes. With home prices so high relative to household incomes, would-be buyers cannot afford a downpayment. Downpayments are already a significant barrier to homeownership, especially for first-time buyers, younger people and households of color.

Moreover, higher interest rates over the last few years have substantially boosted monthly mortgage payments and raised the minimum income required to afford a single-family home, or any home. Add to that the exorbitant costs and risks of homeowners who are dependent on owning two or more cars per family, and who must drive long distances and spend long hours each day to connect with people and places, depriving their children time with mom and dad.

C-2.2 Overall, these factors have the combined effect of pricing out many **prospective** homebuyers in San Diego County. This is especially true for many coastal cities where the Governor's Coastal Commission controls home pricing and availability. If price-to-income ratios remain high, all but the most-resourced buyers will be barred from homeownership's financial opportunities and may have less choice about the communities and types of homes in which they live.



Response C-2.1

The comment notes that the SANDAG Board of Directors will be presented with the proposed Plan for adoption by the end of the year.

SANDAG would like to thank you for your comments on the Draft EIR and for your participation in the environmental review process. This is not a comment on the adequacy of the EIR. Therefore, no further response is required.

Response C-2.2

The comment alleges that SANDAG has ignored requirements of a 2008 Bond Act, which would lower transportation costs for auto dependent families, make housing more affordable and would invest the cost savings into a public wealth fund interest-earning account. The comment also states that the proposed Plan restricts housing construction and drives up the prices of new and existing homes. These are not comments on the adequacy of the EIR and, as such, no further response is required.

SANDAG has complied and continues to comply with the requirements of the 2008 Proposition 1A High-speed Passenger Train Bond Act (2008 Bond Act). On November 4, 2008, voters approved Proposition 1A: Safe, Reliable High-Speed Passenger Train Bond Act for the 21st Century, which required the California Transportation Commission to allocate funds appropriated by the Legislature for capital improvements to the intercity rail lines, commuter rail lines, and urban rail systems that provide direct connectivity to the high-speed train system and its facilities, or are part of the construction of the high-speed train system. SANDAG has complied with all applicable requirements for eligible projects under this program and used allocated funding to complete the Blue Line Light Rail Improvements Project (Caltrans 2025d).

The proposed Plan does not restrict housing construction or drive up the prices of new or existing homes, and the comment provides no evidence suggesting this is the case. SANDAG does not have the

power to permit or develop housing nor set local standards for zoning, permitting, parking, and development decisions. These decisions properly rest with the cities and the County. While part of SANDAG's role is to conduct the state-required Regional Housing Needs Allocation and engage closely with state legislation that impacts local zoning authority, housing production, and transit-oriented development, SANDAG cannot otherwise direct state law or local housing programs or policies. SANDAG can and does, however, support local cities in interpreting and meeting state housing requirements.

The 2025 Regional Plan does include policies and programs that help to increase affordable housing, promote infill and transit-oriented development, and align growth with state goals and transportation investments. The Sustainable Communities Strategy (SCS), described in Chapter 2 of the proposed Plan, reflects city and county planning efforts to develop more housing in areas with access to public transit and other sustainable transportation choices. Eighty percent of future housing and employment growth is expected to occur in areas with existing or planned transportation investments, including key transit stations where people can easily access multiple transportation options.

SANDAG engages in the intergovernmental review process to help ensure future developments are aligned with the proposed Plan. The process evaluates the consistency of regionally significant development projects with the SCS. SANDAG also provides funding incentives to advance projects that further the Plan's goals. The SANDAG Housing Acceleration Program (HAP) provides technical and financial assistance for housing plan updates, streamlining, and compliance with state housing laws. HAP initiatives support affordable housing and sustainable growth, including the provision of $14.2 million in planning and capital grants for our local jurisdictions and a $14 million Affordable Housing Trust Fund supporting nearly 1,000 affordable housing units. Other HAP initiatives include a land value capture study to identify and evaluate value-capture opportunities. These would advance housing goals and raise revenues to implement projects in the proposed Plan.

The Smart Growth Incentive Program (SGIP) also supports local jurisdictions by funding comprehensive public infrastructure projects and planning activities that facilitate compact, mixed-use, transit-oriented development with increased housing and transportation choices. In the first five cycles, more than $60 million has been awarded to our local jurisdictions for projects throughout the region.

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

Home prices are directly influenced by a home's access and efficient connections to important destinations. In San Diego County, travel costs can consume as much as a third or more of family income. As the table below reveals, the nation's households spend, on average, $20,853 per year in travel costs.

C-2.2 Cont.

Useful Data You Should Know	
The Amount and Cost of Travel In the Divided States of America	
342,500,000	Population
3,100,000,000,000	Vehicle-Miles of Travel
15	Average Miles per Trip
$0.90	Cost per Mile
$2,790,000,000,000	The Nation's Annual Cost of Travel
133,793,103	Households
$20,853	Annual Household Travel Costs
$80,610	Annual Household Income
26%	Travel Costs vs Household Income

The good news is that as you prepare to vote on a new 2025-2029 Regional Plan, you now have the power to enable a reduction in housing and transportation costs and enable families to achieve millions of dollars in increased life-time wealth.

2. Saving hundreds of lives and injuries from traffic collisions per year

New and better predictive data processing technology, combined with better enforcement of current traffic laws, now make it possible for you to vastly reduce the county's traffic-related roadway auto and pedestrian collisions and deaths, and to reduce the rising expense of auto insurance, in ways not previously possible.

C-2.3

You have the power to apply this better enforcement and new technology that can restrict the ability of motorists to exceed posted speed limits. This can save the lives of your constituents, as well as reduce the high cost of owning and operating family cars that currently and unnecessarily results in over 24,000 collisions and 173 deaths per year. The cost of those collisions and deaths show up in insurance premiums that are rising at exorbitant rates. Fewer and fewer people are able to afford owning and driving a car. These collisions don't happen by accident. They are the result of auto dependence. For most people, they have no choice. You have the ability to change that.

3. Redeveloping existing cities and building new transit-oriented cities where a car is not needed

With home prices so high relative to household incomes, would-be buyers need to save more and for longer to afford a downpayment. Downpayments are already a significant barrier to homeownership, especially for first-time buyers, younger people, and households of color.

C-2.4

Moreover, higher interest rates over the last few years have substantially boosted monthly mortgage payments and raised the minimum income required to afford a home purchase. Overall, these factors have the combined effect of pricing out many prospective homebuyers in a growing number of markets. If price-to-income ratios remain high, all but the most-resourced buyers will be barred from homeownership's financial opportunities and may have less choice about the communities and types of homes in which they live.

2

Response C-2.3

The comment expresses the view that new predictive data processing technology, in combination with better enforcement of traffic laws, could vastly reduce the County's traffic related auto and pedestrian collisions and injuries, and as a result, auto insurance. The comment notes that over 24,000 collisions and 173 deaths occur every year. The comment then expresses the view that the crashes are a result of the auto dependent nature of the built environment in San Diego County. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans rights of way, specifically within conventional freeway segments, assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway).

The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Response C-2.4

The comment expresses concerns that high interest rates have resulted in prospective home buyers in San Diego County being priced out. The comment also expresses the view that new housing development costs could be reduced through the implementation of new regulations that allow for high-density, transit oriented, modular, hi-rise, or manufactured housing in specified areas around

the county, and that SANDAG is not bound to new state laws that limit housing construction along California's high-speed rail corridor.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. See response to comment C-2.2 related to the 2008 Bond Act and housing.

C-2.4 Cont.

The cost of housing in San Diego County's dominant auto-dependent suburban communities makes home ownership virtually impossible for millions of people today and in the future. New housing development costs can be vastly reduced by applying new regulations that allow high-density, transit oriented, hi-rise, modular and manufactured-housing in specified areas of the county. You are not bound to new state laws that limit housing construction along California's high-speed train corridor.

You have the power to revise current regulations that will enable re-development of existing communities and creation of beautiful new communities that are vastly more affordable and less impactful to the natural environment.

4. A true reduction in vehicle-miles travelled

C-2.5

SANDAG messaging suggests the Draft Regional Plan will result in less vehicle-miles-travelled (VMT) compared to the "no build" alternative. In fact, VMT will increase from 77.9 million miles in 2022 to 81.5 million miles in 2050 under the "build" alternative, if the Board approves the Draft Plan. The Draft Plan shows that in 2050 the percent of income consumed by out-of-pocket transportation system use will increase from 8% under the "no build" alternative to 9.4% under the "build" alternative.

You have the power to reverse these negative trends by adopting the recommendations previously submitted to SANDAG on July 17, 2025 in response to the invitation to submit comments on the Draft Plan.

Pending approval of Midway Rising's $3.9B rental housing, sports arena and 7,040 parking spaces development gives evidence that SANDAG is ignoring the legal mandates in the Bond Act requiring reduced auto-dependence. The project will result in 22,514 daily car-trips and 839,145 added vehicle-miles travelled. The Draft Plan denies people the improved business, transportation and housing opportunities they seek and are entitled to. Virtually all of the new housing and related developments currently under way and in the future will result in the same or worse cost and environmental impacts as that of Midway Rising's development.

You have the power to reverse that trend.

5. Redrawing voting districts to restore democracy to San Diego County and California

C-2.6

A social crisis brewing for decades has reached a level today not previously imagined or recognized in our lifetimes. Our communities, and our nation, are divided along tribal political boundaries that are threatening the fabric of the democracy imagined and fought for by our nation's founders. Advanced political science now provides the data not previously available to redraw those divisive boundaries in positive ways. The science confirms that Citizen Redistricting Commission regulations promote the tribal politics that have turned California into a divisive and politically-influenced and corrupt, un-democratic governing operation.

The good news is that you now have the power to redraw those political boundaries in ways that bring people of various backgrounds together who are now divided by tribal warfare reminiscent of the wars we have been unable to end since the beginning of time; including the time of our nation's Civil War and the war being witnessed today in communities torn by gun fire and deaths in classrooms, churches and neighborhood streets each day.

6. Only 9 city votes and 2 SANDAG Board Member votes are needed to secure approval of the new 2025-2029 Regional Plan

C-2.7

Perhaps the best news for SANDAG's 19-member Board of Directors is that, while reaching agreement on community issues has been tough in a dysfunctional governing framework with many

3

Response C-2.5

The comment inaccurately states that the proposed Plan will result in more Vehicle Miles Traveled (VMT) compared to the No Build Alternative, because VMT will increase from 77.9 million in 2022 to 81.5 million in 2050 under the "Build" Alternative. The comment incorrectly compares VMT in 2022 to VMT estimated for 2050. The proposed Plan results in regionwide total VMT of 81,713,116 in 2050, while regionwide total VMT without the proposed Plan is estimated to be 84,866,310 in 2050 (Table N4.1, 2025 Regional Plan). Therefore, implementation of the proposed Plan (Build) would result in a regionwide total VMT reduction of more than 3 million compared to the estimate without the proposed Plan (No Build).

The comment also describes the Midway Rising project which includes a $3.9 billion dollar rental housing and sport arena project that will create 7,040 parking spaces. The comment indicates that the project will result in 22,514 daily car trips and 839,145 added VMT, and alleges that SANDAG is ignoring the legal mandates in the 2008 Bond Act which requires reduced auto dependence. The comment expresses the view that virtually all of the new housing projects and related development will result in the same or worse costs and environmental impacts.

The Midway Rising project was identified as a cumulative project and analyzed throughout the EIR as part of the cumulative impact analysis. (See, e.g., EIR, p. 4-6). Please refer to response to comment C-2.2 related to the 2008 Bond Act and housing.

Response C-2.6

The comment reflects an opinion about redrawing voting districts.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. SANDAG does not have authority to redraw voting boundaries.

Response C-2.7

This comment inaccurately describes the voting composition of the SANDAG Board of Directors. This is not a comment on the adequacy of the EIR. Therefore, no further response is required.

The SANDAG Board of Directors is composed of representatives from each city in the San Diego region and the County of San Diego. To take final action on any item, a majority vote on the basis of one vote per member agency (tally vote) is required. After the tally vote, a weighted vote may be called by the board members of any two member agencies unless otherwise required by law. Approval under the weighted vote procedure requires the vote of not less than four board members representing separate member agencies and not less than 51 percent of the total weighted vote to supersede the original action of the Board (SANDAG 2024b).

often-divergent constituencies, your job is made easier today because only 2 SANDAG Board members are needed to reach agreement on the most critical and consequential current issue at hand – approval of a new 2025-2029 Regional Plan.

Nine designated city mayors and city council members of the City of San Diego and the City of Chula Vista have the power to decide what the votes of their representatives on the SANDAG Board will be. The fate of millions of people – parents, children and grandchildren – will be determined by 3 Chula Vista City Council members and 6 City of San Diego Mayor and City Council members.

C-2.7 Cont.

Their decisions will confirm the votes of two SANDAG Board Members. Chula Vista Deputy Mayor Chavez and San Diego City President Joe LaCava are currently identified as the two voting members for the SANDAG Board of Directors. Their votes – representing 51% of the population – will dictate the county's future direction for 3.4 million current residents and for millions more who will follow. The 49% of the population represented by the other 17 Board Members cannot stand in the way of the two majority-ruling Board Members. The votes of the other 17 Board members don't matter.

7. Passage of the High-Speed Train Bond Act enables a $750B infrastructure funding stream

What does matter is that on November 4, 2008, 71% of eligible San Diego County voters (1.5 million) approved or did not oppose the Proposition 1A High-Speed Train Bond Act. Had those who voted for the measure voted instead to oppose it, the state-wide Bond Act would have been defeated.

SANDAG's current Draft 2025-2029 Regional Plan does not align with the 2008 voter-approved plan and legal mandate for San Diego County. SANDAG's Draft Plan does not recognize the obligation for revised land-use plans and local funding contributions along the high-speed train corridor that the Bond Act mandates. The Bond Act establishes the financial relationship that obligates SANDAG and its 18-member cities and county government to provide local funds that accrue to the High-Speed Rail Authority; that financial liability is formally recognized as it is incurred, regardless of when the payment is made. SANDAG has a large outstanding financial obligation to provide those funds to the California High-Speed Rail Authority.

C-2.8

SANDAG's two majority-ruling Board Members have the time and power to amend the current Draft SANDAG Plan proposed by SANDAG staff so that it meets the legal requirements in the final Regional Plan. Any delays could jeopardize federal funding for the region's transportation investments. Billions of dollars in federal funding have already been lost because the State, and particularly its governor, have failed to comply with federal regulations relating to California's high-speed train project.

A funding plan has been presented to SANDAG that shows how local value-capture funding can provide the necessary and legally-mandated local revenues needed to quickly complete construction of the 24 new transit-oriented cities and linked 800-mile high-speed train and connected local rail and bus transit system that the Bond Act calls for.

SANDAG is not bound to restrictions on housing growth and densities that are imbedded in the two state bills – SB 9 and SB 10 – put forward by State Senators Toni Atkins and Scott Wiener and enacted by Governor Newsom's approval in 2021. These new laws would make it impossible for the high-speed train system to be built as called for in the Prop 1A HST Bond Act. The 2008 direct-voter-approved Proposition 1A Bond Act takes precedence over laws proposed and approved by state legislators.

The table on the following page describes the funding plan previously submitted to SANDAG and to the Governor that, if approved, will fund the high-speed train and connected local rail and bus system called for in the Bond Act. The table has been ignored by the Governor and by SANDAG.

4

Response C-2.8

The comment inaccurately states that Proposition 1A (2008 Bond Act) establishes an obligation for SANDAG and its 18 member cities to implement revised land use plans and allocate local funding contributions to the High Speed Rail Authority and incorrectly alleges that SANDAG has a long outstanding legal obligation to provide those funds to the High Speed Rail Authority. The comment states that the proposed Plan does not align with these obligations. This is not a comment on the adequacy of the EIR. Therefore, no further response is required.

Proposition 1A, or the 2008 Bond Act, does not establish an obligation for SANDAG and its member agencies to revise land use plans or allocate local funding to the High Speed Rail Authority. Therefore, SANDAG does not have long outstanding legal obligation to provide those funds to the High Speed Rail Authority. See also response to comment C-2.2.

The comment also expresses the view that the implementation of Senate Bill 9 and Senate Bill 10 would prevent the High Speed Rail system from being constructed as described in Prop 1A. The comment provides a table that shows net cash flow of Phases 1 and 2 of the California High Speed Rail project from 2025 to 2072. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

SANDAG has no role in implementing or applying Senate Bills 9 or 10. Also, the source of the provided table is unknown. As described above, Proposition 1A, or the 2008 Bond Act, does not establish an obligation for SANDAG and its member agencies to revise land use plans or allocate local funding to the High Speed Rail Authority. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues.

C-2.8 Cont.

Summary Net Project Cash Flow Phases 1 & 2 (YOE dollars in millions)

24-station+, 800-mile High Speed Train and Connected Local Transit System from Sacramento and San Francisco to Los Angeles, Inland Empire and San Diego	2025-2072
Operating Revenue	$634,077
Less: Operating & Maintenance (O&M) Costs	($175,127)
Net Operations Cash Flow (NOCF)	$458,950
Capital replacement costs	($66,192)
NOCF after capital replacement	$392,759
Value Capture (Local Benefit Assessment EIFD Funding)	$116,648
Phase 1 Capital cost (521 miles @ 228 million per mile) by 2039	($118,560)
Phase 2 Capital cost (279 miles) @ 337 million per mile) by 2042	($94,107)
Public Benefit Fund	($26,014)
Cumulative net project cash flow	$270,726
Cumulative Finance Cost by 2072	($236,361)
Cumulative Interest Earnings	$7,299
Cumulative net project cash flow after finance cost/interest	$41,665
Present value cumulative net project cash flow after finance cost + interest earnings	$10,385

C-2.9

8. Protecting coastal land for beaches and expanded LOSSAN rail service

"What Tourists Should Know About California's Disappearing Beaches Before Planning a Trip" by Olaoluwa Akinbayo reveals that:

According to the 2023 State of California Coast and Ocean Annual Report, popular tourist spots in San Diego, such as Oceanside, Del Mar and Encinitas, have seen beaches retreat by an average of about 2 feet per year. Although there have been restoration attempts, like adding sand back and building protective seawalls, these solutions are only temporary at best, in addition to being expensive and very disruptive to the natural environment. Expanses of sandy beaches along the coast have been turned into narrow strips not wide enough to lay out your towel. At times, some of these beaches have been completely submerged underwater. More will be in the years to come.

Governor Newsom and his Coastal Commission have failed to protect the state's premier coastal resources by focusing more on protecting coastal property owners than on protecting access to and use of public beaches. SANDAG's Draft Plan supports unaffordable costly seawall construction and efforts to relocate segments of the LOSSAN rail line. This support amounts to a dubious gift of billions-of-dollars in public funds for a small number of property owners, at the taxpayers' expense.

You have the power to revise the Draft Plan by eliminating the proposed rail relocation plan and replacing it with a redevelopment project to condemn and remove infringing developments, to recontour the land to expand the beaches, and to improve the rail corridor to accommodate added tracks and improved LOSSAN service. New, higher-density housing within the redevelopment area can fund the costs of the project.

5

Response C-2.9

The comment cites an article that describes how popular beaches and tourists spots such as Oceanside, Del Mar, and Encinitas have seen the beaches retreat by an average of about two feet per year. The comment expresses the view that while temporary solutions have been implemented, Governor Newsom and the Coastal Commission have failed to protect the State's coastal resources. The comment alleges that the proposed Plan supports the use of unaffordable seawall construction as well as the relocation of segments of the LOSSAN rail line. The comment then suggests that the proposed Plan should be revised to eliminate the proposed rail relocation plan, replace it with a redevelopment project that condemns and removes infringing developments, recontours the land to expand the beaches, and improve the rail corridor to accommodate added tracks and improved LOSSAN service.

Transportation improvements, including changes to the LOSSAN rail line, and their potential impacts on coastal resources, are evaluated throughout the EIR. Section 4.10, "Hydrology and Water Quality," of the EIR analyzed water quality and drainage impacts to water resources such as coastal resources within the San Diego Region. With compliance with existing regulations, impacts were determined to be less than significant. As described in Section 4.11, "Land Use and Planning," local coastal programs are components of local general plans and include specific sea level rise guidance such as identifying the areas at greatest risk of inundation, relevant infrastructure and community resiliency improvements prepared by local jurisdictions. The County of San Diego's Local Coastal Program includes several policies, such as Policy 2.7, which restricts the construction of new facilities in or adjacent to protected open space areas to improvements that provide or enhance public access or recreation activities. In addition, Policy 2.7 requires that the permitted structures would be designed to have the least impact on coastal resources, access and recreation. As stated in Section 4.11, the regional growth and land use change and transportation network improvements and programs would not conflict with local coastal programs.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific mitigation measures would be identified during that process. Coordination regarding project level impacts and required project level technical analysis, such as the identification of mitigation measures to reduce impacts will take place at that time and to protect coastal resources including publicly accessible beaches. It is the responsibility of CEQA lead agencies to determine and adopt mitigation measures for individual projects.

Appendix R of the proposed Plan also incorporates shoreline planning, including SANDAG's Shoreline Resilience program:

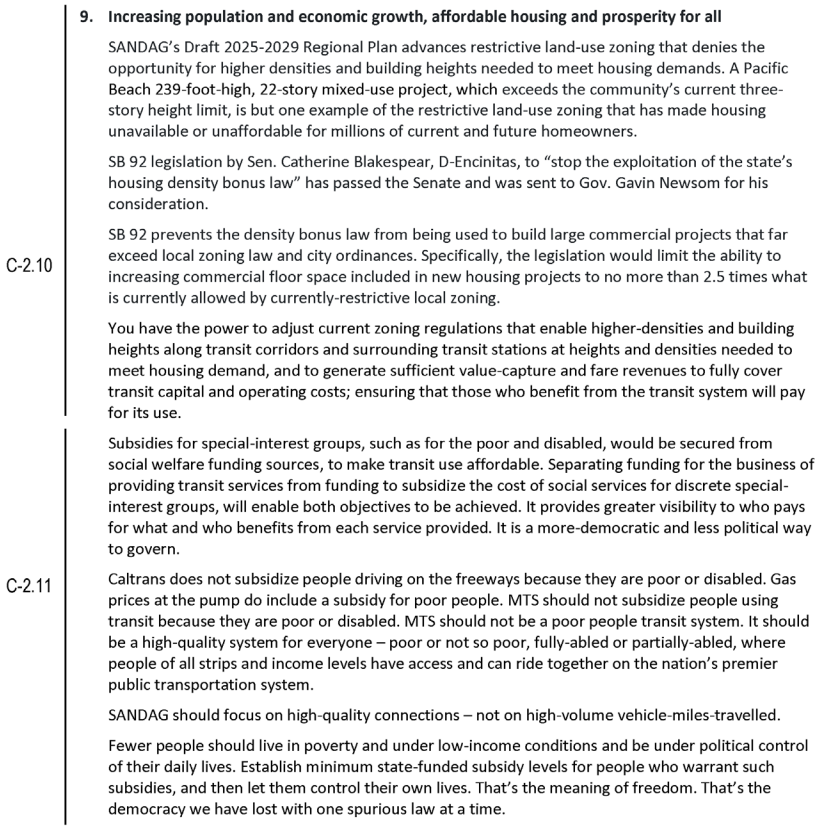
> The San Diego region's beaches and shoreline provide recreational opportunities and are a vital component of the economy while also providing protection from coastal flooding. SANDAG promotes coastal resilience though it's Shoreline Preservation Strategy which focuses on strategies to adapt to environmental hazards such as storm surge through shoreline management. For almost 30 years, SANDAG has monitored the status of the coastal sand sources to identify areas of significant erosion. This monitoring has led to the strategic decision to undergo two regional beach nourishment projects that have placed over 3.6 million cubic yards of sand in critical erosion hotspots. Funded in partnership with federal, state and local governments, this solution provides a natural way to protect critical infrastructure and housing, while promoting recreation and natural resource protection. A third regional beach nourishment project is in the planning phase.

SANDAG issued an updated Notice of Preparation of a Draft Environmental Impact Report for the LOSSAN Rail Realignment Project on May 16, 2024, describing the project as follows:

> SANDAG proposes to improve resiliency and reliability of the segment of the San Diego Subdivision within the cities of Del Mar and San Diego where the rail line runs along a terrace on the eroding coastal bluffs. This includes double tracking the alignment between the future Special Events Platform that will be constructed as part of the San Dieguito Double Track Project in the City of Del Mar and the north end of Sorrento Valley in the City of San Diego. The improved resiliency and double tracking of the alignment would reduce reliability risks caused by bluff erosion and provide greater track capacity for trains that use the corridor, enabling projected increases in service and minimizing conflicts with pedestrians. The Project may include removal of existing stabilization infrastructure, consistent with the CCC's conditions of approval for the Del Mar stabilization projects.

SANDAG is currently preparing a Draft EIR for the LOSSAN Rail Realignment Project and the possible alternative alignments will be studied in further detail in that project-specific environmental process.

The comment in reference to the Governor and Coastal Commission reflects the commenter's opinion and is not a comment on the adequacy of the EIR. As such, no further response is required.



9. Increasing population and economic growth, affordable housing and prosperity for all

SANDAG's Draft 2025-2029 Regional Plan advances restrictive land-use zoning that denies the opportunity for higher densities and building heights needed to meet housing demands. A Pacific Beach 239-foot-high, 22-story mixed-use project, which exceeds the community's current three-story height limit, is but one example of the restrictive land-use zoning that has made housing unavailable or unaffordable for millions of current and future homeowners.

SB 92 legislation by Sen. Catherine Blakespear, D-Encinitas, to "stop the exploitation of the state's housing density bonus law" has passed the Senate and was sent to Gov. Gavin Newsom for his consideration.

C-2.10

SB 92 prevents the density bonus law from being used to build large commercial projects that far exceed local zoning law and city ordinances. Specifically, the legislation would limit the ability to increasing commercial floor space included in new housing projects to no more than 2.5 times what is currently allowed by currently-restrictive local zoning.

You have the power to adjust current zoning regulations that enable higher-densities and building heights along transit corridors and surrounding transit stations at heights and densities needed to meet housing demand, and to generate sufficient value-capture and fare revenues to fully cover transit capital and operating costs; ensuring that those who benefit from the transit system will pay for its use.

Subsidies for special-interest groups, such as for the poor and disabled, would be secured from social welfare funding sources, to make transit use affordable. Separating funding for the business of providing transit services from funding to subsidize the cost of social services for discrete special-interest groups, will enable both objectives to be achieved. It provides greater visibility to who pays for what and who benefits from each service provided. It is a more-democratic and less political way to govern.

C-2.11

Caltrans does not subsidize people driving on the freeways because they are poor or disabled. Gas prices at the pump do include a subsidy for poor people. MTS should not subsidize people using transit because they are poor or disabled. MTS should not be a poor people transit system. It should be a high-quality system for everyone – poor or not so poor, fully-abled or partially-abled, where people of all strips and income levels have access and can ride together on the nation's premier public transportation system.

SANDAG should focus on high-quality connections – not on high-volume vehicle-miles-travelled.

Fewer people should live in poverty and under low-income conditions and be under political control of their daily lives. Establish minimum state-funded subsidy levels for people who warrant such subsidies, and then let them control their own lives. That's the meaning of freedom. That's the democracy we have lost with one spurious law at a time.

6

Response C-2.10

The comment inaccurately states that the proposed Plan advances restrictive land-use and zoning and expresses the view that it denies opportunities for higher densities and has made housing unavailable and unaffordable for current and future homeowners. The comment also incorrectly asserts that SANDAG has the power to adjust current zoning regulations to enable higher density developments that are needed to meet the current housing demand. This is not a comment on the adequacy of the EIR. As such, no further response is required.

As described in response to comment C-2.2, the proposed Plan does not restrict housing construction or drive up the prices of new or existing homes. SANDAG does not have the power to permit or develop housing nor set local standards for zoning, permitting, parking, and development decisions. These decisions properly rest with the cities and the County. While part of SANDAG's role is to conduct the state-required Regional Housing Needs Allocation and engage closely with state legislation that impacts local zoning authority, housing production, and transit-oriented development, SANDAG cannot otherwise direct state law or local housing programs or policies. SANDAG can and does, however, support local cities in interpreting and meeting state housing requirements. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues.

Response C-2.11

The comment expresses the view that subsidies for special interest groups such as the poor and disabled should be secured through social welfare funding sources to make transit use affordable. It also asserts that Caltrans does not subsidize people driving on the freeways and MTS should not subsidize people using transit. The comment asserts that SANDAG should focus on providing high quality connections, and not on high-volume vehicle miles traveled.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. Further information about project funding is available in Appendix I of the proposed Plan: Funding and Revenues.

C-2.12

The input presented to SANDAG follows the work performed and experienced gained over prior years that resulted in publication of the Wolford-Chalekian Brief: The Making of a Modern New California. (Contact albertperdon@gmail.com for further info). This experience is outlined below.

The Wolford-Chalekian Brief
The Author: Albert Perdon, Civil Engineer

Public Agency and Private Sector Experience

Graduate, University of Disneyland and Attraction Operator, Disneyland, Anaheim, CA
Instructor and Graduate, School of Engineering, Cal-State University, Long Beach, CA
Post Graduate Studies in City Planning, University of Southern California
Public Agency Management Certificate, Management Training Institute, University of Indiana.
California Professional Civil Engineer and Caltrans transportation engineer
Commuter Transportation Services, Inc., Director of Marketing: Commuter Computer Carpools
Los Angeles Community Redevelopment Agency and Los Angeles
Downtown People Mover Authority people mover planner
SCRTD/LACMTA (LA METRO) bus and rail executive officer and General Manager Pro Tem
In the private sector; Sverdrup/Jacobs Senior Project Manager

Founder/Owner, Albert Perdon & Associates

Southern California Association of Governments (SCAG), in cooperation with
California High-Speed Rail Commission, 300+mph High-Speed Maglev Program Manager
L.A./Orange Counties 15 local cities JPA; New Housing and High-Speed Maglev
Orangeline Development Authority Executive Director
San Diego Association of Governments (SANDAG) informal pro bono adviser
California High-Speed Rail Authority informal pro bono adviser

Boards, Commissions and Associations

Life-Member, American Society of Civil Engineers (ASCE)
Former Member Federal Urban Aid Commission (Governor Deukmejian appointment)
Former Board Member, U.S. High-Speed Ground Transportation Association
Former Elected Member and President City of Cerritos, CA Shadow Park Homeowners Association
Candidate for Board Member, ABC Unified School District, Cerritos, CA
Member, North San Diego Business Chamber

7

Response C-2.12

The comment provides a list of their relevant experience in the field of transportation as well as their public and private sector experience.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Comment Letter C-3: Mike Hampson

Comment Letter C-3: Mike Hampson

From: RegionalPlanEIR <RegionalPlanEIR@sandag.org>
Sent: Wednesday, October 8, 2025 2:53 PM
To: Kathie Washington; Claudia Watts
Subject: FW: Comments for the SANDAG 2025 Regional Plan EIR. From Mike Hampson in Hillcrest.

-----Original Message-----
From: Mike Hampson <mikewestcoast@yahoo.com>
Sent: Monday, September 8, 2025 3:24 PM
To: RegionalPlanEIR <regionalplaneir@sandag.org>
Subject: Comments for the SANDAG 2025 Regional Plan EIR. From Mike Hampson in Hillcrest.

[You don't often get email from mikewestcoast@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

Dear regionalplaneir@sandag.org,

Here are some of my suggestions for the 2025 SANDAG Regional Plan EIR.

Regards,

Mike Hampson
3820 Georgia Street, #14
San Diego, CA 92103

(619) 987-4322
mikewestcoast@yahoo.com

==========

Comment On Rail Transit:

C-3.1 | 1) Rail is the best form of mass transit. When you install rail, you are committing to that community that public transit is important to everyone who lives there.

C-3.2 | 2) Rail is much easier to use and understand than buses, is more comfortable than buses, is quieter than business and is safer than buses.

C-3.3 | 3) Make all Rapid Bus Lines into trolley lines (light rail).

C-3.4 | 4) We need the trolley to travel to the San Diego International Airport.

C-3.5 | 5) We need trolley service (light rail) and a passenger train service that starts at San Ysidro that travels along the I-805 freeway going north and then traveling along the I-15 and that goes to Escondido and/or possibly to Temecula and/or Murrieta.

C-3.6 | 6) We need to act now to get the California High Speed Rail into San Diego as soon as possible. We need to add California High Speed Rail tracks, freight train tracks and trolley tracks installed next to each other along the I-15 corridor with railroad stations.

Response C-3.1

The comment expresses the view that rail is the best form of mass transit.

This is not a comment on the adequacy of the EIR. As such, no further response is required. As described in the proposed Plan, SANDAG supports the expansion of rail transit options. The rail projects included in the proposed Plan can be found in Table 2-7, Table 2-8, Table 2-9 and Table 2-10 in Chapter 2, *Project Description,* of the EIR.

Response C-3.2

The comment expresses the view that rail is easier to use and understand, more comfortable, quieter, and safer than buses.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.3

The comment requests that the proposed Plan replace all Rapid bus routes with trolley lines. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

Improvements to rail, bus, and trolley transit are proposed as transportation network improvements in the 2025 Regional Plan as described on pages 2-12 to 2-31 of the EIR. As described in Section 4.16, "Transportation," local and express bus lines serve as vital transportation options in lower density areas that are not currently served by regional transit such as light rail and trolley services.

In addition, the infrastructure to support trolley service costs much more than implementing Rapid service. See Appendix H of the 2025 Regional Plan for further detail on the cost estimation methodology for each transportation type. Both federal and state transportation planning law and regulation require the proposed Plan to be revenue-constrained and capable of implementation. See also Global Response 4 for a discussion of funding requirements and constraints

for the 2025 Regional Plan. As described in the proposed Plan, light-rail services, trolley lines, and Rapid bus lines would all continue to be critical components of SANDAG's transportation network.

Response C-3.4

The comment expresses the view that the trolley should connect to the San Diego International Airport.

This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The San Diego Airport is accessible via the MTS Route 992, and it connects with three trolley lines, three Rapid bus lines, the COASTER, and Amtrak. The San Diego Flyer is a free airport shuttle that takes passengers between the Old Town Transit Center and San Diego national airport. Additional information about the MTS line and the San Diego Flyer can be found here: https://www.sdmts.com/getting-around/airport. These services are proposed to continue in the 2025 Regional Plan.

As described in Appendix A of the proposed Plan, SANDAG is evaluating the Airport Transit Connection project, which would create a direct link between the San Diego International Airport and regional transit services and the feasibility of a rail connection is being considered. This project is included in Table 2-7 and Table 2-9 of the EIR as project ID number TL001. Additional information about the Airport Transit Connection project can be found here: https://www.sandag.org/projects-and-programs/featured-projects/airport-transit-connection.

Response C-3.5

The comment expresses the view that trolley and passenger rail service is needed between San Ysidro and Escondido and/or Temecula and Murrieta via the I-805 and I-15. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

Expanded transit services in the proposed Plan by 2035 and by 2050 are shown in Figures 2-13 and 2-14 of the EIR, respectively. The San Ysidro Transit Hub is planned to be a component of the 2035 future transit and flexible fleet network, and regional rail and light rail services will provide expanded service around San Diego County, including light rail services heading north of San Ysidro and light rail and rapid bus services toward Escondido.

As described in response to comment C-3.3, the infrastructure to support trolley service costs much more than implementing Rapid service. This is also true for passenger rail service. See Appendix H of the 2025 Regional Plan for further detail on the cost estimation methodology for each transportation type. Both federal and state transportation planning law and regulation require the proposed Plan to be revenue-constrained and capable of implementation. See also Global Response 4 for a discussion of funding requirements and constraints for the 2025 Regional Plan.

Response C-3.6

The comment expresses the view that the region needs to act now to get the California High Speed Rail to San Diego as soon as possible. It requests that the proposed Plan add California High Speed Rail tracks, freight train tracks and trolley tracks next to each other along the I-15 corridor with stations. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

As described on page 4-6 of the EIR, the California High-Speed Rail Authority is currently evaluating potential alignment options to identify the best high-speed configuration through the Inland Empire, as well as interim improvements that can upgrade regional rail service in the corridor before completion of Phase I. This project would be implemented and funded by the California High Speed Rail Authority. SANDAG will track the project as it is developed by the State. The EIR outlines plans and programs in the proposed Plan that promote the expansion of rail transit systems and increased connectivity throughout the region (see page 4.16-21 of the EIR).

Additionally, Figures 2-12 through 2-14 of the proposed Plan show the transportation system as of 2022, the planned growth of the transportation system by 2035, and the planned growth of the transportation system by 2050, respectively. Expanded rail services and additional transit hubs are planned components of future transportation growth.

As described in response to comment C-3.3, the infrastructure to support trolley service costs much more than implementing Rapid

service. This is also true for passenger rail service. See Appendix H of the 2025 Regional Plan for further detail on the cost estimation methodology for each transportation type. Both federal and state transportation planning law and regulation require the proposed Plan to be revenue-constrained and capable of implementation. See also Global Response 4 for a discussion of funding requirements and constraints for the 2025 Regional Plan.

C-3.7 | 7) We need east to west trolleys service (light rail) throughout all of San Diego County. That is, we need trolley tracks going east and west on the I-56, then more trolley tracks going east and west on Mira Mesa Boulevard, then more east/west trolley tracks on Miramar Road, then east/west trolley tracks on the I-94, then east/west trolley tracks on the I-52, H Street and East H Street, Telegraph Canyon Road to Otay Lakes Road, Palomar Street, Olympic Parkway, Palm Avenue, Del Sol Boulevard and the I-905.

C-3.8 | 8) We need trolleys to go west into Ocean Beach and into Pacific Beach.

C-3.9 | 9) We need to eliminate as many bus routes as possible and replace buses with trolley cars (light rail).

Comment On Housing:

C-3.10 | 1) We can house everyone in San Diego, if we put our minds to it. We need well-designed and well-built housing that anyone on a low salary can afford (or if a person is retired).

C-3.11 | 2) How do we do this? It's based on need. If you have an engineer making tons of money, then they don't need help to purchase a house. If someone owns a house, they don't need help to buy another one.

C-3.12 | 3) If someone is a restaurant server who needs a house or condo, it should be cheap and affordable for them.

C-3.13 | 4) It should be one house (or condo) per person or family. And it should be very affordable.

C-3.14 | 5) I would recommend to house single people first. Single people who never had children are helping to reduce climate change. The number one contributor to climate change are people. Help single people (who never had children), first.

Comment On The Environment:

C-3.15 | 1) There are multiple new ways to help the environment. We need to clean the San Diego Bay from the stale water, oil, fuel and plastic. There are many new technologies that can clean water, including removing plastic.

C-3.16 | 2) We need to start specifying items that are NOT MADE FROM PLASTIC, to be used for retrofitting buildings, or the new construction of buildings to public transit.

C-3.17 | 3) There are companies now that are making, for example, plastic-type bags or sandwich bags that are made from kelp. The kelp "plastic" looks like plastic and acts like plastic but it is NOT plastic. Kelp "plastic" is made from kelp and is non-toxic and is biodegradable.

C-3.18 | 4) Change all city pools and schools pools to natural pools. Recommend that all people with pools do the same thing. Natural pools are cleaned by using water plants and good bacteria. There is no need to use toxic chemicals to clean pool water. There are websites and videos about natural pools that do not use toxic chemicals to keep pools clean.

C-3.19 | 5) We need to clean plastic and garbage from all the beaches. There are multiple new methods to do clean the beaches.

C-3.20 | 6) You can use special bricks that allow grow moss on buildings to clean the air and cool buildings.

C-3.21 | 7) You can also add plants to every city and urban areas. From hanging plants high above roadways, making small forests within a city, hanging plants from the sides of buildings and planting to rooftop gardens.

Comment About Farms:

C-3.22 | 1) We need to add city farms in all communities. Imagine having a 10 story (or higher) building that uses glass, metal and wood (not plastic) in every local community. Then people can walk to a city farm and purchase locally grown fresh produce. The city should require that all farms are organic or sustainable farms. Sustainable farms are those that follow all the organic practices without formally purchasing an expensive organic license.

C-3.23 | 2) We need funding from the city to help as many people as possible start small farms in San Diego. The city should require that all farms are organic or sustainable farms.

C-3.24 | 3) The more small organic/sustainable farms we have in San Diego County, will create a more stable society where fresh food is readily available without having that food travel long distances (by truck or rail) and therefore reducing climate change.

2

Response C-3.7

The comment requests that the proposed Plan include trolley service along SR 56, Mira Mesa Boulevard, Miramar Road, SR 94, SR 52, H Street and East H Street, Telegraph Canyon Road to Otay Lakes Road, Palomar Street, Olympic Parkway, Palm Avenue, Del Sol Boulevard, and SR 905.

This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

Expanded transit services in the proposed Plan by 2035 and by 2050 are shown in Figures 2-13 and 2-14 of the EIR, respectively. The San Ysidro Transit Hub is planned to be a component of the future transit network, and regional rail and light rail services will provide expanded service around San Diego County, including rapid bus service east-west along SR 56 and SR 905.

As described in response to comment C-3.3, the infrastructure to support trolley service costs much more than implementing Rapid service. This is also true for passenger rail service. See Appendix H of the 2025 Regional Plan for further detail on the cost estimation methodology for each transportation type. Both federal and state transportation planning law and regulation require the proposed Plan to be revenue-constrained and capable of implementation. See also Global Response 4 for a discussion of funding requirements and constraints for the 2025 Regional Plan.

Response C-3.8

The comment requests that the proposed Plan include trolley service into Ocean Beach and Pacific Beach. This is not comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

Expanded transit services in the proposed Plan by 2035 and by 2050 are shown in Figures 2-13 and 2-14 of the EIR, respectively, including Rapid bus service between Ocean Beach and Pacific Beach.

As described in response to comment C-3.3, the infrastructure to support trolley service costs much more than implementing Rapid service. This is also true for passenger rail service See Appendix H of

the 2025 Regional Plan for further detail on the cost estimation methodology for each transportation type. Both federal and state transportation planning law and regulation require the proposed Plan to be revenue-constrained and capable of implementation. See also Global Response 4 for a discussion of funding requirements and constraints for the 2025 Regional Plan.

Response C-3.9

The comment requests that the proposed Plan replace as many Rapid bus routes as possible with trolley lines.

This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. See response to comment C-3.3.

Response C-3.10

The comment expresses the view that the region can house everyone and that well-designed, well-built housing affordable for those on low or fixed incomes is needed.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

SANDAG does not have the power to permit or develop housing, nor set local standards for zoning, permitting, parking, and development decisions. These decisions properly rest with the cities and the County. While part of SANDAG's role is to conduct the state-required Regional Housing Needs Allocation and engage closely with state legislation that impacts local zoning authority, housing production, and transit-oriented development, SANDAG cannot otherwise direct state law or local housing programs or policies. SANDAG can and does, however, support local cities in interpreting and meeting state housing requirements.

The 2025 Regional Plan does include policies and programs that help to increase affordable housing, promote infill and transit-oriented development, and align growth with state goals and transportation investments. The Sustainable Communities Strategy (SCS), described in Chapter 2 of the proposed Plan, reflects city and county planning efforts to develop more housing in areas with access to public transit and other sustainable transportation choices. Eighty percent of future housing and employment growth is expected to occur in areas with existing or planned transportation investments, including key transit stations where people can easily access multiple transportation options.

SANDAG also provides funding incentives to advance housing projects and programs in the region. The SANDAG Housing Acceleration Program (HAP) provides technical and financial assistance for housing plan updates, streamlining, and compliance with state housing laws. HAP initiatives support affordable housing and sustainable growth, including the provision of $14.2 million in planning and capital grants for our local jurisdictions and a $14 million Affordable Housing Trust Fund supporting nearly 1,000 affordable housing units. Other HAP initiatives include a land value capture study to identify and evaluate value-capture opportunities. These would advance housing goals and raise revenues to implement projects in the proposed Plan.

The Smart Growth Incentive Program (SGIP) also supports local jurisdictions by funding comprehensive public infrastructure projects and planning activities that facilitate compact, mixed-use, transit-oriented development with increased housing and transportation choices. In the first five cycles, more than $60 million has been awarded to our local jurisdictions for projects throughout the region.

Response C-3.11

The comment expresses the view that housing assistance should be provided based on need.

This is not a comment on the adequacy of the EIR. As such, no further response is required. See response to comment C-3.10.

Response C-3.12

The comment expresses the view that a house or condo should be affordable for a restaurant server.

This is not a comment on the adequacy of the EIR. TAs such, no further response is required. See response to comment C-3.10.

Response C-3.13

The comment expresses the view that there should be one house or condo per person or family and it should be very affordable.

This is not a comment on the adequacy of the EIR. As such, no further response is required. See response to comment C-3.10.

Response C-3.14
The comment expresses the view that single people without children should be housed first because they contribute less to climate change.

This is not a comment on the adequacy of the EIR. As such, no further response is required. See response to comment C-3.10.

Response C-3.15
The comment expresses the view that the San Diego Bay must be cleaned to remove stale water, oil, fuel and plastic and that there are many new technologies that can be used.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.16
The comment expresses the view that non-plastic items should be used for retrofitting buildings or new construction of buildings and public transit.

This is not a comment on the adequacy of the EIR. Therefore, no further response is required.

The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific details concerning the design of individual projects and mitigation measures, potentially including the commenter's suggestions, would be identified during that process.

Response C-3.17
The comment describes companies that make plastic-type bags from kelp, which the comment asserts are non-toxic and biodegradable.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.18
The comment expresses the view that all city and school pools should be converted to natural pools and recommends the same for residential pools.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.19
The comment expresses the view that plastic and garbage needs to be cleaned from all beaches and there are new methods to do so.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.20
The comment describes special bricks that allow moss to grow on buildings to clean the air and cool buildings.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.21
The comment describes making small forests within a city by hanging plants from the sides of buildings and above roadways, and planting rooftop gardens.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.22
The comment expresses the view that organic and sustainable city farms should be added to all communities.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.23
The comment requests funding from cities to support new small farms in San Diego that are organic or sustainable.

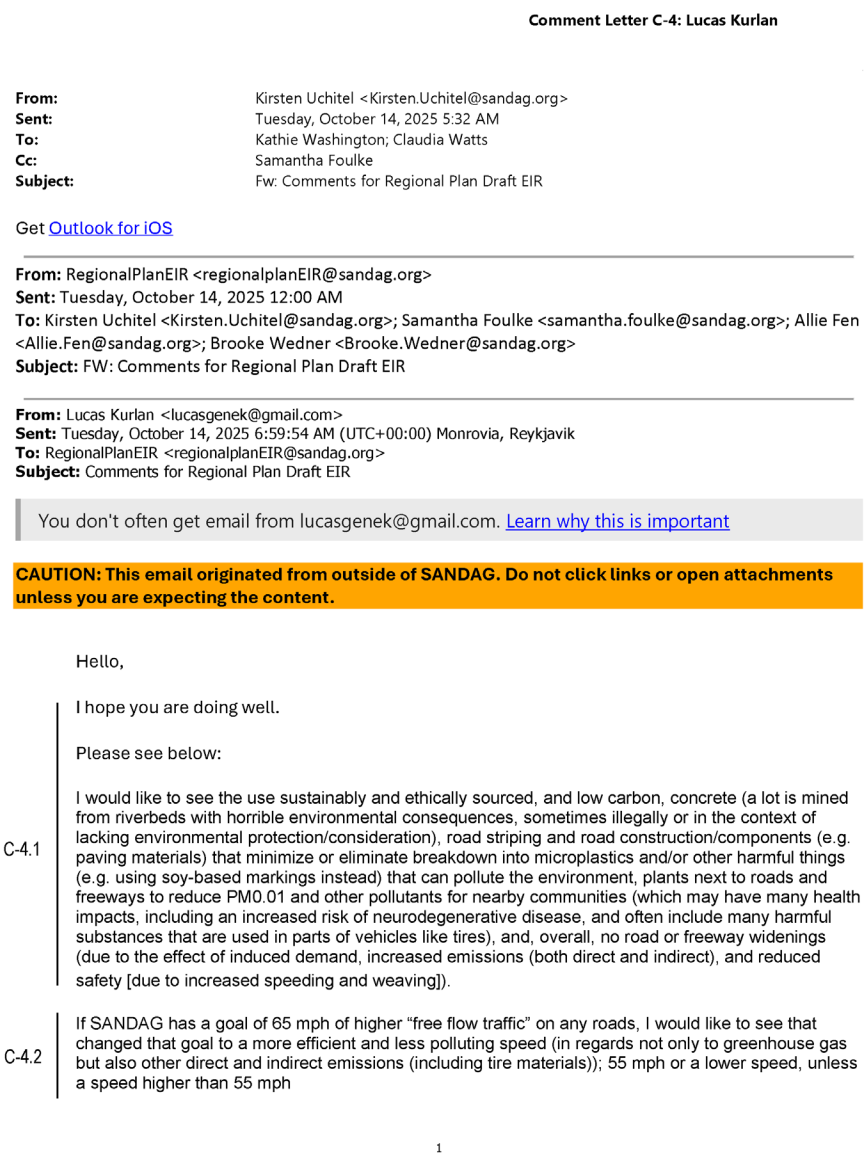
This is not a comment on the adequacy of the EIR. As such, no further response is required.

Response C-3.24

The comment expresses the view that more small, organic or sustainable farms in San Diego County will create a more stable society where fresh food is readily available without traveling long distances, thereby reducing climate change.

This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter C-4: Lucas Kurlan



Comment Letter C-4: Lucas Kurlan

From: Kirsten Uchitel <Kirsten.Uchitel@sandag.org>
Sent: Tuesday, October 14, 2025 5:32 AM
To: Kathie Washington; Claudia Watts
Cc: Samantha Foulke
Subject: Fw: Comments for Regional Plan Draft EIR

Get Outlook for iOS

From: RegionalPlanEIR <regionalplanEIR@sandag.org>
Sent: Tuesday, October 14, 2025 12:00 AM
To: Kirsten Uchitel <Kirsten.Uchitel@sandag.org>; Samantha Foulke <samantha.foulke@sandag.org>; Allie Fen <Allie.Fen@sandag.org>; Brooke Wedner <Brooke.Wedner@sandag.org>
Subject: FW: Comments for Regional Plan Draft EIR

From: Lucas Kurlan <lucasgenek@gmail.com>
Sent: Tuesday, October 14, 2025 6:59:54 AM (UTC+00:00) Monrovia, Reykjavik
To: RegionalPlanEIR <regionalplanEIR@sandag.org>
Subject: Comments for Regional Plan Draft EIR

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

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

Hello,

I hope you are doing well.

Please see below:

C-4.1 I would like to see the use sustainably and ethically sourced, and low carbon, concrete (a lot is mined from riverbeds with horrible environmental consequences, sometimes illegally or in the context of lacking environmental protection/consideration), road striping and road construction/components (e.g. paving materials) that minimize or eliminate breakdown into microplastics and/or other harmful things (e.g. using soy-based markings instead) that can pollute the environment, plants next to roads and freeways to reduce PM0.01 and other pollutants for nearby communities (which may have many health impacts, including an increased risk of neurodegenerative disease, and often include many harmful substances that are used in parts of vehicles like tires), and, overall, no road or freeway widenings (due to the effect of induced demand, increased emissions (both direct and indirect), and reduced safety [due to increased speeding and weaving]).

C-4.2 If SANDAG has a goal of 65 mph of higher "free flow traffic" on any roads, I would like to see that changed that goal to a more efficient and less polluting speed (in regards not only to greenhouse gas but also other direct and indirect emissions (including tire materials)); 55 mph or a lower speed, unless a speed higher than 55 mph

1

Response C-4.1

The comment requests that the construction of projects in the proposed Plan use sustainably and ethically sourced, low carbon concrete, implement road striping and construction that minimizes or eliminates breakdown into microplastics or other harmful materials, include planting next to roads and freeways, and remove road and freeway widenings.

This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

Mitigation Measure GHG-4d, Implement Measures to Reduce GHG Emissions from Transportation Projects, provides that 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). Among these GHG reduction measures is to use lighter-colored pavement, binding agents that are less GHG-intensive than Portland cement, and less GHG intensive asphalt pavements. Also, please see Global Response 2 regarding performance criteria that exist for further discussion of second-tier transportation and land use project mitigation measures, such as GHG-4d.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the

proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific mitigation measures, such as road striping requirements or planting next to roadways, would be identified during that process. Coordination regarding project level impacts and required project level technical analysis will also take place at that time. It is the responsibility of CEQA lead agencies to determine and adopt mitigation measures for individual projects.

Regarding road and freeway widenings, the 2025 Regional Plan proposes a connected network of managed lanes that improve traffic flow and promote carpooling, vanpooling, and transit. The plan focuses on staying within the current footprint of highways wherever possible. Compared to the 2021 Regional Plan, the proposed plan features a smaller managed lane network and less overall widening. The types of managed lanes and how they are operated will be decided after thorough project planning, analysis, and public outreach, including close coordination with key partners such as Caltrans.

Response C-4.2

The comment requests that the proposed Plan include a goal for a more efficient and less polluting vehicle speed of 55 mile per hour or lower, unless a high speed is found to be more efficient or reduces emissions. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required. However, the EIR evaluated an alternative incorporating speed reductions. Alternative 2 did not reduce the following air quality and greenhouse gas impacts to less than significant levels: AQ-4, AQ-5, AQ-6, C-AQ-1, GHG-1, GHG-2, GHG-3, GHG-4, and C-GHG-1. Please see Global Response 1 regarding the sufficiency of the alternatives analysis in the EIR.

C-4.2 Cont | is more efficient and/or reduces emissions (even if it is specific one at the expense of others if there is a good reason to focus on that).

C-4.3 | I would like to see consideration of "smart highway" infrastructure to improve safety and reduce emissions (both direct and indirect) like is being installed for a pilot project in Riverside county.

C-4.4 | I would like to see narrower lanes on surface streets (10'–11', and potentially less; see this study suggesting that 9' lanes are even safer) to reduce reckless driving and speeding and make more room for peds and cyclists. On freeways, I would like to see consideration of 11' lanes to reduce footprint; they have a mixed safety record when compared to wider lanes. This could likely help reduce speeding and aggressive driving and increasing bike and pedestrian mode share, improving the environmental impact of the plan.

C-4.5 | I would like to see SANDAG advocate for a change in state law to allow the use of speed cameras (including potentially ones that average speed over a distance) on the 67 and potentially other roadways. I would also like to see consideration of wrong-way detectors and warnings, and potentially other mechanisms to prevent wrong-way driving. I believe these will do a much better job of improving safety than widening, and will be much less expensive. It will also have the additional benefit of improving environmental quality through less emissions (both direct and indirect), by way of less aggressive driving and less speeding.

C-4.6 | Especially as opposed to measures that could increase emissions, I would like to see SANDAG look into autonomous or assistive technology methods of identifying dangerous driving behaviors like distracted and reckless driving. For example, see: https://www.youtube.com/watch?v=e2UzX3HWBQ0 . If necessary, I would like SANDAG to consider campaigning for changes in the law.

C-4.7 | Especially as opposed to measures that could increase emissions, I would like SANDAG to look into advocating for a change to state law, if possible, to make it easier for police to take action against unsafe drivers, such as those who speed, drive recklessly, violate safe passing laws with cyclists / harass with their horns. Specifically, one thing I would like to see is making it easier to take action even if the driver is not visible and/or the police are not present when the violation occurs — and, whether or not there is a law change, to educate police on how they might be able to hold violators accountable in those situations.

C-4.8 | I would like to see SANDAG explore public educational campaigns on safe and efficient transportation (e.g. re: tailgating [safety], speeding [safety and efficiency/emissions{both direct and indirect}], aggressive acceleration [wear of your vehicle and efficiency/emissions {both direct and indirect}]), the rights of peds and cyclists and why they have some of those rights in relation to safety (e.g. lane positioning with bikes in narrow lanes or near places where right turns are allowed, or when the conditions of the bike lane or right edge of the roadway are hazardous), and the legal obligations of drivers around them (e.g. daylighting, 3 ft rule [bikes], change lanes rule [bikes]). I would also like to see SANDAG encourage local jurisdictions implementing separated bikeways to educate the public, including potentially through road markings and signage, that cyclists may use the outside lane or (if available) painted bike lane, as separated bikeways are not legally considered bike lanes, meaning they are not mandatory use. SANDAG could also itself educate the public on this. These measures would help improve safety and status of those using

C-4.9 | I would like SANDAG to consider all possible steps, including those related to infrastructure, education, advocating for changing the law, and sales-related measures (like taxes or discounts on purchase) to reduce the use of more polluting modes of transportation and transition to more sustainable modes, such as walking and biking (including e-bikes).

C-4.10 | Did models account for induced demand in congestion and emissions (both direct and indirect)? If not, it should be considered (separate from VMT calculations mandated by law). If induced demand was not considered, emissions (greenhouse and otherwise) could decrease less than expected or even increase. Considerations should also focus on local pollution impacts (especially air quality (including PM0.01), and also sound and visual pollution).

2

Response C-4.3

The comment requests that the proposed Plan consider smart highway infrastructure to improve safety and reduce emissions similar to a pilot project in Riverside County. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

The proposed Plan includes Complete Corridors with transportation technology and Smart Intersection Systems (SIS) to reduce congestion and improve safety on roadways. Transportation technologies may include a wide range of elements such as traffic signal upgrades, ramp metering, changeable message signs, queue warning systems, freeway fiber communications, etc. SIS technologies may include a vulnerable road user detection system, transit and freight signal priority, and adaptive signal timing. (Appendix A, 2025 Regional Plan, at p A.7).

Response C-4.4

The comment requests that the proposed Plan include narrower lanes on surface streets and freeways to reduce speeding and improve safety for bicyclists and pedestrians.

This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required.

SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway).

The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network

and build out jurisdictions' complete streets networks, and fund educational programs.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific mitigation measures, such as road width, would be identified during that process. Coordination regarding project level impacts and required project level technical analysis will also take place at that time. It is the responsibility of CEQA lead agencies to determine and adopt mitigation measures for individual projects.

Response C-4.5

The comment requests that SANDAG advocate for a change in state law to allow the use of speed cameras on the SR 67 and potentially other roadways. It also requests consideration of wrong-way detectors and other mechanisms to prevent wrong-way driving.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

The Complete Corridors element of the proposed Plan includes data-driven "smart" transportation infrastructure, which would potentially include traffic signal upgrades, queue warning systems, vulnerable road user (VRU) detection systems, and adaptive signal timing to optimize the movement of traffic throughout the region. Complete Corridors would also account for active transportation and public transit users, simultaneously reducing traffic-related GHG emissions and reducing safety risks for all travelers.

Additionally, the proposed Plan includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Response C-4.6

The comment requests that SANDAG consider autonomous or assistive technology methods to identify dangerous driving behaviors that do not increase emissions and provides a link to a video. The comment also requests that SANDAG consider campaigning for changes in law if necessary. The video link provided by the commenter includes a video of a local news story in Minnesota where traffic enforcement officers employed the use of Artificial Intelligence (AI) cameras to detect and cite distracted drivers. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

SANDAG does not have jurisdiction to enforce driving laws. However, the proposed Plan includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Response C-4.7

The comment requests that SANDAG advocate for a change in state law to make it easier for law enforcement to take action against unsafe drivers, specifically when the driver is not visible or law enforcement is not present when the violation occurs. The comment also expresses the view that police should be educated on how they might be able to hold violators accountable in those specific situations.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see response to comment C-4.6.

Response C-4.8

The comment requests that SANDAG explore public educational campaigns on safe and efficient transportation, speeding, aggressive acceleration, the rights of pedestrians and cyclists, and the legal obligations of drivers around pedestrians and cyclists. The comment also requests that SANDAG encourage local jurisdictions to implement separated bikeways to educate the public on the use of outside lanes or painted bike lanes.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

SANDAG works closely with local agency and community organization partners to provide technical resources, education, and assistance in analyzing a range of transportation project design and implementation features that will improve roadway safety. Additionally, the proposed Plan includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Community engagement and education are key components of these traffic safety programs. The active transportation network in the 2025 Regional Plan proposes a complete network of safe connections to jobs, schools, and other regional activity centers for users of all ages and abilities. The goal is to develop safe infrastructure for the location and context in collaboration with the local city or county. As discussed in response to comment C-4.1, the EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. Specific facility design decisions are worked out during the project planning and design phase with input from each community.

Response C-4.9

The comment requests that SANDAG consider all possible steps to reduce the use of more polluting modes of transportation and transit to more sustainable modes, including those related to infrastructure, education, advocating for changing the law, and sales-related measures.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

The proposed Plan assumes that MTS and NCTD will transition to zero-emission vehicles over the next two decades, based on each agency's adopted Zero-Emission Bus Fleet Transition Plan prepared in response to the California Air Resources Board's Innovative Clean Transit rule. The MTS Trolley system already runs on electricity and produces zero emissions. SANDAG also works with Caltrans on the development of the California State Rail Plan and will consider accommodation for future electrification in statewide planning efforts. NCTD will evaluate available technologies and options for zero-emission rail equipment on its COASTER and SPRINTER services as its current vehicles reach the end of their lives.

Additionally, the 2025 Regional Plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans. The 2025 Regional Plan Active Transportation Network follows best practices by providing an average network bikeway density of approximately 1 mile so that vital connections between regional activity centers, schools, housing, employment, and transit stops are provided with safe infrastructure for all ages and abilities. SANDAG also offers a variety of programs that support the transition to Zero Emission Vehicles (ZEV) including support for public charging infrastructure, completion of a regional ZEV blueprint for trucks and buses, and participation in the Accelerate to Zero Emissions Collaborative, which produced an updated regional EV strategy. Both the blueprint and EV strategy included operational and safety considerations related to batteries, vehicles, and infrastructure.

Response C-4.10

The comment questions whether the transportation model accounts for induced demand in congestion and emissions, both direct and indirect.

Induced demand is included in the EIR's analysis of the proposed Plan. For a discussion of induced demand modeling protocols, see Appendix B to the proposed Plan at pages 4-5 and 36-38. The methodology for calculating GHG emissions, including an Induced Demand Adjustment Factor, can be found in Section 4.8, "Greenhouse Gas Emissions and Climate Change," at pages 4.8-35 and 4.8-36.

No changes to the EIR are required in response to this comment.

C-4.11 If the draft EIR argues that additional carpool lanes or HOT lanes will increase carpooling, I would like you to analyze how many drivers that already carpool are already using the roadway at times when average speeds both are currently and would be reduced after the installation of a new lane or lanes; if that number is already the capacity of a lane, then adding an HOV or lane is really just sorting all the carpoolers out of the general-use lanes and into the HOV lane, in essence creating a new non-carpool lane. Additionally, adding an HOT lane to an area where the amount of people that that HOT lane could hold already continue onto an existing HOT lane is unlikely to increase carpooling, unless potentially that new HOT lane is very long, though even in that case the likelihood of increasing carpooling may be low for the reasons listed above.

C-4.12 If mitigations involve reducing the number of cars on the road, I would like to see consideration of how induced demand might lead to those cars being replaced and mitigation of that, too. This may affect the plan's actual effects on VMT and emissions (both direct and indirect).

C-4.13 I would like SANDAG to convert 2+ carpool lanes to 3+, and add additional benefits to 3+ carpoolers on HOT lanes when compared to 2+ carpoolers. CALTRANS suggests that this may be more likely to increase carpooling, as opposed to just 2+ carpool lanes or 2+ free access to HOT lanes. I also believe that, since HOT lanes are toll lanes, you could use automated enforcement to make sure that people are following the rules and increase the likelihood of increasing carpooling.

C-4.14 With transit, I would like to see improved coordination, improved/more routing, and consideration of bus prioritization like dedicated lanes, queue jumper lanes, and signal prioritization to increase usage of public transportation to improve the environmental impact of the plan. I would also like to see SANDAG fund public transit to the fair, and allow for bus-on-the-shoulder along the 5 to improve the competitiveness of the bus and reduce the environmental impact of congestion related to the fair, as well as improving accessibility. More broadly, I would like the plan to explore bus on the shoulder everywhere a bus does or could run on a highway or freeway, or anywhere else with a shoulder.

C-4.15 I would like SANDAG to consider improving transit accessibility to outdoor recreation, like hiking. This would help reduce associated emissions and environmental impact.

C-4.16 I would also like to see consideration of a rapid bus route along the 5 through Pendleton to OC. This could improve the environmental impact of the plan.

Thank you,

Lucas K.

3

Response C-4.11

The comment states that if the Draft EIR argues that additional carpool lanes or High-Occupancy Toll (HOT) lanes will increase carpooling, then SANDAG should analyze how many drivers are already carpooling and what the average travel speeds would be before and after the implementation of the carpool lanes to confirm whether the existing carpool and HOT lanes are already at capacity.

The 2025 Regional Plan network analyzed in the EIR does include managed lanes and managed lane connectors (2025 Regional Plan Appendix A, A.17, 47, and 63). Among the benefits of managed lanes, transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds, including for bus transit, may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Additionally, access to managed lanes can be restricted to transit/HOV use only during periods of high congestion. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand (2025 Regional Plan Appendix M, Table M.16). The Complete Corridors in the proposed Plan include HOV and HOT and are fully analyzed in the EIR.

The mode-shift to carpooling expected from implementation of the proposed Plan is evaluated using ABM3, which already includes data inputs related to the number of drivers carpooling, average travel speeds, and changes in travel behavior related to implementation of the transportation improvements in the proposed Plan. For additional information about the ABM3 model, see Appendix M of the proposed Plan, "Travel Demand Modeling Tools."

For the reasons stated above, no changes to the EIR are required in response to this comment.

Response C-4.12

The comment requests that SANDAG evaluate the effectiveness of mitigation measures reducing the number of cars and explore

whether additional mitigation would be required to offset the impacts of induced demand if needed.

Induced demand is already included in the EIR's analysis of the proposed Plan and mitigation measures. For a discussion of induced demand see Appendix B to the proposed Plan at pages 4-5, 36-38. The methodology for calculating GHG emissions including an Induced Demand Adjustment Factor can be found in Section 4.8, "Greenhouse Gas Emissions and Climate Change," at pages 4.8-35 and 4.8-36.

The Transportation section of the EIR includes mitigation measure TRA-2, which focuses on project-specific mitigation measures that can and should be implemented to further reduce the region's total VMT and VMT per capita. Mitigation measure TRA-2 focuses on implementation of project-level VMT reduction measures (in addition to those included in the proposed Plan), such as TDM strategies (including vanpool and carshare programs), reduction of parking minimums, implementation of additional active transportation facilities not included in the proposed Plan, facilitation of VMT credit/banking programs and VMT exchange programs (page 4.16-41).

Additional mitigation measures presented in Section 4.8, "Greenhouse Gas Emissions and Climate Change," 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, and GHG-4e Implement Measures to Reduce GHG Emissions from Development Projects. In Mitigation Measure GHG-4a, SANDAG commits to two actions: (1) implementing a grant program(s) that allocate(s) funding on a competitive basis to underfunded GHG-reducing projects that implement strategies or measures included in an adopted climate action plan (CAP) or GHG reduction plan, and (2) as part of the next cycle of the TransNet Smart Growth Incentive and Active Transportation Grant Programs Smart Growth Incentive Program, continuing to require locally adopted CAPs or GHG reduction as prerequisites to be eligible for grant funding, and make funding available 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. This measure includes specific performance standards that the grant program(s) will be required to achieve.

In addition, the measure commits SANDAG to achieving additional *annual* GHG emissions reductions during the proposed Plan horizon by implementing projects that would otherwise not occur due to insufficient funding and additional *cumulative* GHG emissions reductions during the proposed Plan horizon by implementing projects ahead of schedule and realizing GHG reductions earlier than they would otherwise occur due to timing of funding availability. Second, to receive the competitively awarded grant funding, projects must be included in an adopted CAP or GHG reduction plan. Moreover, this measure includes a commitment by SANDAG to report annually to the Board of Directors on the estimated GHG reductions achieved by the projects funded through this grant program. (EIR pages 4.8-44 and 4.8-45.)

Similarly, in Mitigation Measure GHG-4b, SANDAG commits to three actions: establishing Climate Planning Services for member agencies, developing GHG-reducing planning policies, and supporting local implementation of GHG-reducing initiatives that align with the San Diego Regional Climate Action Roadmap. As part of this, SANDAG's Final Program Budget for Fiscal Year 2026 allocates funding to prepare the Climate Action Roadmap. This measure includes specific performance criteria SANDAG must meet, including funding updated GHG reduction plans and GHG-reduction measures that would otherwise not occur due to insufficient funding, staff capacity, or administrative burdens.

As part of Mitigation Measure GHG-4c, SANDAG commits to identifying programs and projects for which to provide funding for electric vehicle charging infrastructure, and requires that SANDAG allocate specific amounts to implement this program. This measure includes specific performance criteria SANDAG must meet: the expansion of electric vehicle charging infrastructure through the funding of specific project incentive programs and projects.

As for both Mitigation Measure GHG-4d and Mitigation Measure GHG-4e, these measures are designed to be implemented by future second-tier projects. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network

improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and will follow applicable laws and regulations, including coordination and permitting requirements of the local jurisdictions within which future development and transportation improvements fall. The performance measures are described in the text within each measure and are to be implemented during the design, construction, and operation of future transportation and development projects. Also, regarding performance criteria that exist for second-tier transportation and land use project mitigation measures such as GHG-4d and GHG-4e, please see Global Response 2.

Based on the above information, no changes to the EIR are required.

Response C-4.13

The comment requests that SANDAG convert all 2+ carpool lanes to 3+, add additional benefits to carpoolers carrying three or more passengers, and use automated enforcement measures to increase carpooling.

This is a comment on the proposed Plan rather than the EIR. As such, no further response is required.

The proposed Plan already includes carpool lane occupancy changes providing additional benefits to 3+ carpoolers. By 2035, vehicles traveling in managed lanes with three or more people can use those lanes at no cost, while vehicles with two people will receive a 50% discount and single-occupant vehicles will pay the full rate. (2025 Regional Plan Appendix M, Table M.16). As to automated enforcement measures, please see response to comment C-4.6.

Response C-4.14

The comment expresses that they would like to see improved coordination, additional routes, and consideration of transit priority lanes such as dedicated bus lanes, queue jumper lanes, and signal prioritization to increase usage of public transportation and to reduce environmental impacts associated with the plan.

This is a comment on the proposed Plan rather than the EIR. As such, no further response is required.

Data-driven "smart" transportation infrastructure is a component of the Complete Corridors in the 2025 Regional Plan. The proposed improvements would potentially include traffic signal upgrades, queue warning systems, vulnerable road user detection systems, and adaptive signal timing to optimize the movement of traffic throughout the region. Complete Corridors would also account for active transportation and public transit users, simultaneously reducing traffic-related GHG emissions and reducing safety risks for all travelers.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific design, such as dedicated bus lanes, would be identified during that process. Coordination regarding project level impacts and required project level technical analysis will also take place at that time. It is the responsibility of CEQA lead agencies to determine and adopt mitigation measures for individual projects.

Response C-4.15

The comment encourages SANDAG to improve transit accessibility to outdoor recreation activities such as hiking.

This is a comment on the proposed Plan rather than the EIR. As such, no further response is required.

The active transportation improvements included in the proposed Plan would provide greater access to recreational opportunities throughout the San Diego Region and would provide for additional opportunities to connect residents to outdoor recreational opportunities. Flexible Fleet projects including micro transit and neighborhood electric vehicles would also provide important first and last mile connections that would allow users to connect to regional transportation options or allow for travel to local areas, including outdoor recreational opportunities. Additionally, improvements to bus and rail transit routes throughout the region are planned through year 2050.

Response C-4.16

The commenter states that SANDAG should consider implementing a Rapid bus route along I-5 through Camp Pendleton to Orange County and that this could reduce the environmental impact associated with the proposed Plan.

This is a comment on the proposed Plan rather than the EIR. As such, no further response is required. The proposed Plan already includes a transit connection from Camp Pendleton to Orange County. The Regional Rail 398 project would include a new commuter rail station at Camp Pendleton in the Los Angeles to San Diego (LOSSAN) rail corridor that has existing commuter rail service to Orange County via Amtrak and Metrolink.

Comment Letter C-5: Brian Hoffman

Comment Letter C-5: Brian Hoffman

From: Brian Hoffman <ebikecargo@gmail.com>
Sent: Wednesday, August 27, 2025 2:40 PM
To: Kirsten Uchitel <kirsten.uchitel@sandag.org>
Subject: Public comment, Regional Plan

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

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

Hello Kirsten,

C-5.1 I tried to submit comments via the link on the online form, that didn't work, I tried to submit comments to the provided email, that didn't work. Good thing your tech is on point so you can receive and carefully consider all of the public comments.

Further evidence of the systemic, catastrophic failures of Sandag. My tax dollars at work, funding this absolute shitshow.

C-5.2 My comments:
Sandag continues to be part of the problem, rather than part of the solution. This board is held captive by the loudest boomers in the room. Sandag is building infrastructure for the present, not for the future. The Sandag board operates on 2 year time horizons when you should be planning decades in advance. You are collectively stuck in the past, mired in the politics of present while ignoring the needs of the people in the future.

How can you not see that the days of the automobile are winding down. The rest of the world has figured out that trains and bikes and connected transit systems are the future, yet Sandag continues to purport that a real rail system for the region is not realistic, keep spending growing for roads though!

You, the board of directors, lack even a basic understanding of peoples real mobility needs and you have no ability to imagine what is coming in the future. This transportation plan for the region, for the future, is disappointing and dangerous, shame.

Regards,
Brian Hoffman and the Ebike Cargo Team
ebikecargo@gmail.com
Call us at (619) 403-1148

Social Links:
https://www.facebook.com/Ebikecargocom-405859616648182/
https://www.instagram.com/ebikecargo/
https://twitter.com/ebikecargo
https://www.linkedin.com/in/brian-hoffman-40b07764/
https://www.pinterest.com/ebikecargo/

Response C-5.1

The comment states that the commenter experienced issues using the website links and was required to submit comments via email.

The website links were confirmed by SANDAG to be working during the public review period. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response C-5.2

The comment expresses concern about the SANDAG Board, asserts that SANDAG needs to plan for the long term future, and asserts that the SANDAG Board shows a lack of planning for necessary future infrastructure and lack of understanding about future mobility needs. The comment also asserts that trains and bikes and connected transit are the future of transportation, rather than roadways.

This is not a comment on the adequacy of the EIR and, as such, no further response is required.

SANDAG's 2025 Regional Plan is required by both federal and state law. Under federal law, SANDAG serves as a metropolitan planning organization (MPO), and is mandated to develop and implement a long-range Regional Transportation Plan (RTP) every four years. The proposed Plan covers a multi-year time frame out to 2050, SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. SANDAG also collaborates with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps identify which transit solutions are most appropriate. The plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as transit projects are developed in the coming years.

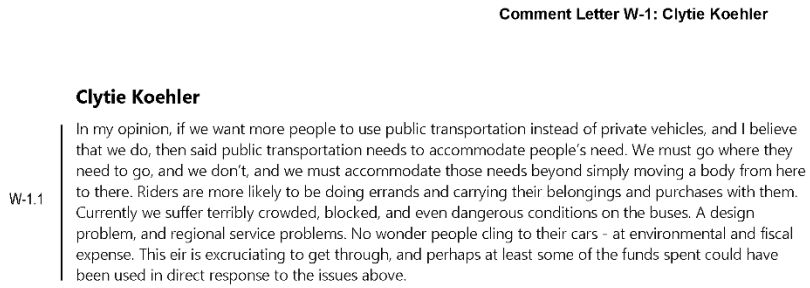
SANDAG shares the comment's stated priority of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The plan also includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

The 2025 Regional Plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans. The 2025 Regional Plan Active Transportation Network follows best practices by providing an average network bikeway density of approximately 1 mile so that vital connections between regional activity centers, schools, housing, employment, and transit stops are provided with safe infrastructure for all ages and abilities.

The comment's statements referencing the SANDAG Board of Directors reflect the opinion of the commenter and do not pertain to the adequacy of the analysis included in the EIR. Therefore, no further response is required.

3.3.4 Website Comments

Comment Letter W-1: Clytie Koehler



Comment Letter W-1: Clytie Koehler

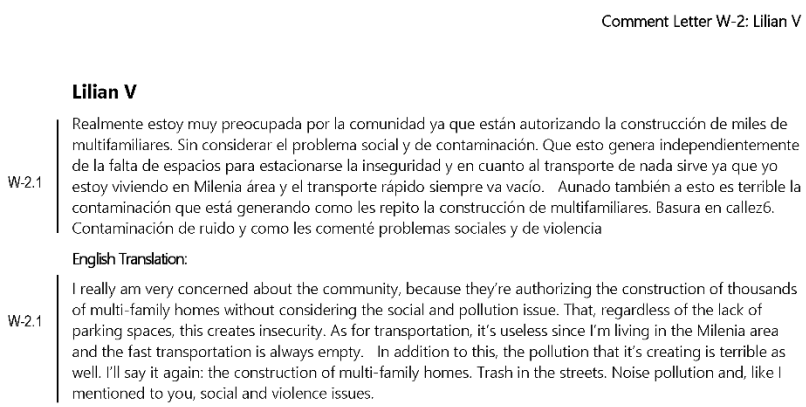
Clytie Koehler

W-1.1 In my opinion, if we want more people to use public transportation instead of private vehicles, and I believe that we do, then said public transportation needs to accommodate people's need. We must go where they need to go, and we don't, and we must accommodate those needs beyond simply moving a body from here to there. Riders are more likely to be doing errands and carrying their belongings and purchases with them. Currently we suffer terribly crowded, blocked, and even dangerous conditions on the buses. A design problem, and regional service problems. No wonder people cling to their cars - at environmental and fiscal expense. This eir is excruciating to get through, and perhaps at least some of the funds spent could have been used in direct response to the issues above.

Response W-1.1

The comment states opinions regarding how best to incentivize the use of public transportation. This is a comment on the content of the proposed Plan, rather than the adequacy of the EIR. As such, no further response is required. SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option and by investing in new infrastructure and striving constantly to improve service. It's important to note that a public transit system that attracts more riders will help us the region reach our state and federally mandated requirements for air quality and accessibility. SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. SANDAG also collaborates with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps to identify which transit solutions are most appropriate. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N*)*, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Comment Letter W-2: Lilian V



Comment Letter W-2: Lilian V

Lilian V

W-2.1 Realmente estoy muy preocupada por la comunidad ya que están autorizando la construcción de miles de multifamiliares. Sin considerar el problema social y de contaminación. Que esto genera independientemente de la falta de espacios para estacionarse la inseguridad y en cuanto al transporte de nada sirve ya que yo estoy viviendo en Milenia área y el transporte rápido siempre va vacío. Aunado también a esto es terrible la contaminación que está generando como les repito la construcción de multifamiliares. Basura en callez6. Contaminación de ruido y como les comenté problemas sociales y de violencia

English Translation:

W-2.1 I really am very concerned about the community, because they're authorizing the construction of thousands of multi-family homes without considering the social and pollution issue. That, regardless of the lack of parking spaces, this creates insecurity. As for transportation, it's useless since I'm living in the Milenia area and the fast transportation is always empty. In addition to this, the pollution that it's creating is terrible as well. I'll say it again: the construction of multi-family homes. Trash in the streets. Noise pollution and, like I mentioned to you, social and violence issues.

Response W-2.1

The comment expresses concerns with multi-family development and social and pollution issues. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. SANDAG recognizes the importance of housing production and sustainable growth, as well as the need to balance local decision-making and public input within each unique community. SANDAG does not have the power to permit or develop housing. Nor does SANDAG set local standards for zoning, permitting, parking, and development decisions. These decisions rest with the cities and the County. Local jurisdictions will decide how to best achieve their housing objectives because those jurisdictions understand the unique needs of their communities and geographies. Local jurisdictions also govern many of the topics raised by commenters, including short-term rentals, tenant protections, developer fees, and other housing concerns mentioned above.

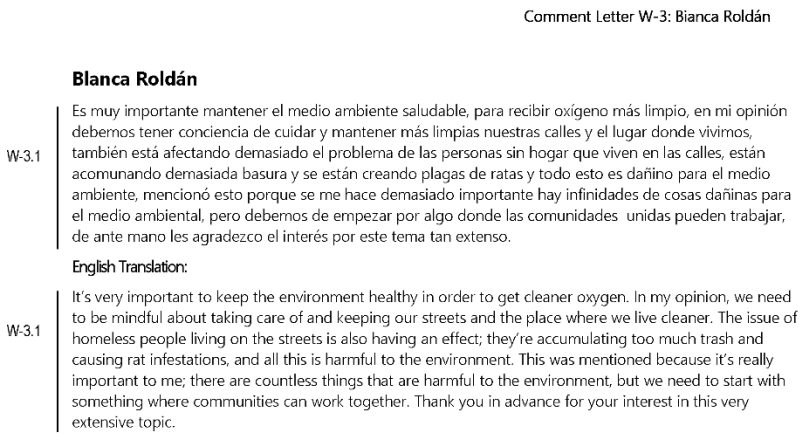
While part of SANDAG's role is to conduct the state-required Regional Housing Needs Allocation and engage closely with state legislation that impacts local zoning authority, housing production, and transit-oriented development, SANDAG cannot otherwise direct state law or local housing programs or policies. SANDAG can and does, however, support local cities in interpreting and meeting state housing requirements.

The 2025 Regional Plan does include policies and programs that help to increase affordable housing, promote infill and transit-oriented development, and align growth with state goals and transportation investments. The Sustainable Communities Strategy (SCS), described in Chapter 2, reflects city and county planning efforts to develop more housing in areas with access to public transit and other sustainable transportation choices. Eighty percent of future housing and employment growth is expected to occur in areas with existing or planned transportation investments, including key transit stations where people can easily access multiple transportation options. The SCS land use pattern is consistent with the jurisdictions' adopted land use plans (Appendix F, Figure F.6). SANDAG engages in the intergovernmental review process to help ensure future developments

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

SANDAG collaborates with local jurisdictions and transit agencies to identify opportunities for transit-oriented development (TOD) and reimagining underutilized land such as parking lots, commercial spaces, and other land classified under state surplus land rules. The Blue Line TOD Study is an example of how SANDAG examined how new housing, retail, and community spaces can be integrated around key Blue Line stations to support regional housing goals, improve transit access, and promote healthier, more connected communities. The Smart Growth Incentive Program (SGIP) also supports local jurisdictions by funding comprehensive public infrastructure projects and planning activities that facilitate compact, mixed-use, transit-oriented development with increased housing and transportation choices. In the first five cycles, more than $60 million has been awarded to our local jurisdictions for projects throughout the region. While future growth is considered and accounted for in the EIR, it does not authorize housing-related construction. The regional growth projections and land use assumptions included in the proposed Plan were designed to be consistent with local land use patterns which would include the development of new multifamily homes. Please see Section 4.14, "Population and Housing," for a more in-depth analysis of the planned distribution and types of housing planned through 2050. The EIR analyzes all environmental issues required by CEQA including air quality and noise as a result of the implementation of the proposed Plan. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Comment Letter W-3: Blanca Roldán



Comment Letter W-3: Bianca Roldán

Blanca Roldán

W-3.1 Es muy importante mantener el medio ambiente saludable, para recibir oxígeno más limpio, en mi opinión debemos tener conciencia de cuidar y mantener más limpias nuestras calles y el lugar donde vivimos, también está afectando demasiado el problema de las personas sin hogar que viven en las calles, están acomunando demasiada basura y se están creando plagas de ratas y todo esto es dañino para el medio ambiente, mencionó esto porque se me hace demasiado importante hay infinidades de cosas dañinas para el medio ambiental, pero debemos de empezar por algo donde las comunidades unidas pueden trabajar, de ante mano les agradezco el interés por este tema tan extenso.

English Translation:

W-3.1 It's very important to keep the environment healthy in order to get cleaner oxygen. In my opinion, we need to be mindful about taking care of and keeping our streets and the place where we live cleaner. The issue of homeless people living on the streets is also having an effect; they're accumulating too much trash and causing rat infestations, and all this is harmful to the environment. This was mentioned because it's really important to me; there are countless things that are harmful to the environment, but we need to start with something where communities can work together. Thank you in advance for your interest in this very extensive topic.

Response W-3.1

The comment expresses concerns about the environment and homelessness. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The local cities and the County of San Diego are primarily responsible for homelessness programs, services, and housing decisions. The County adopted a multi-step approach to ending homelessness, outlined in their Homelessness Solutions and Prevention Action Plan. Local jurisdictions have their own local plans, programs, and points of contact responsible for administering homelessness initiatives. If members of the public have concerns about unhoused populations in a particular area, we recommend visiting the website of that jurisdiction to find information about ongoing homelessness initiatives in that area.

Comment Letter W-4: Jeannette Aguilar

Jeannette Aguilar

W-4.1 Cualquier cambio positivo que se use en beneficio para la comunidad es Bienvenido . Los recursos que se usen en favor a la

Seguridad Social y el mejoramiento de la ciudad son necesarios para el gran crecimiento que está teniendo San Diego.

English Translation:

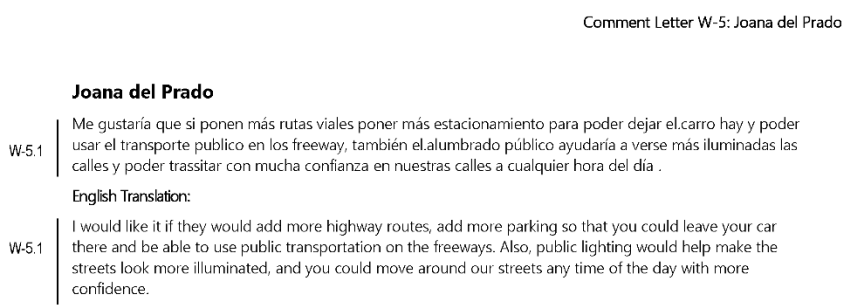
W-4.1 Any positive change that is used to benefit the community is welcome. Resources that are used for

Social Security and improving the city are necessary for the extensive growth that San Diego is experiencing.

Response W-4.1

This comment welcomes any positive changes to benefit the community. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

Comment Letter W-5: Joana del Prado



Comment Letter W-5: Joana del Prado

Joana del Prado

W-5.1 Me gustaría que si ponen más rutas viales poner más estacionamiento para poder dejar el.carro hay y poder usar el transporte publico en los freeway, también el.alumbrado público ayudaría a verse más iluminadas las calles y poder trassitar con mucha confianza en nuestras calles a cualquier hora del día .

English Translation:

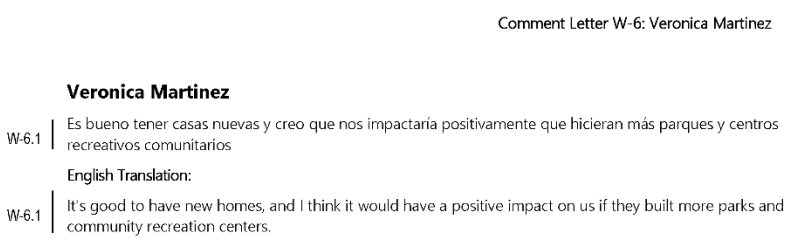
W-5.1 I would like it if they would add more highway routes, add more parking so that you could leave your car there and be able to use public transportation on the freeways. Also, public lighting would help make the streets look more illuminated, and you could move around our streets any time of the day with more confidence.

Response W-5.1

The commenter requests more highway routes, parking to use public transportation, and public lighting. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. 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 lane connectors (Appendix A, 2025 Regional Plan). 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. Decisions regarding public lighting and parking spots under the control of local jurisdictions. SANDAG does not have authority over these decisions. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals.

The local cities and the County of San Diego are responsible for decision regarding local lighting. SANDAG does not have authority over these decisions.

Comment Letter W-6: Veronica Martinez



Comment Letter W-6: Veronica Martinez

Veronica Martinez

W-6.1 | Es bueno tener casas nuevas y creo que nos impactaría positivamente que hicieran más parques y centros recreativos comunitarios

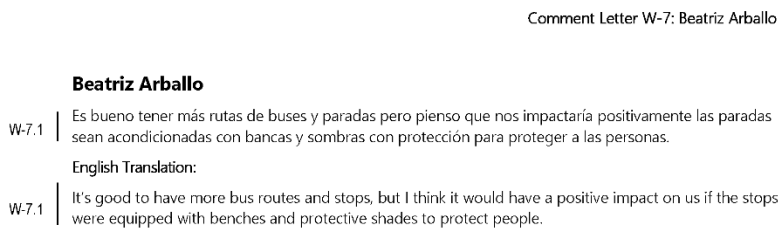
English Translation:

W-6.1 | It's good to have new homes, and I think it would have a positive impact on us if they built more parks and community recreation centers.

Response W-6.1

The comment expresses that having more parks and community recreation centers would have a positive impact. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks.

Comment Letter W-7: Beatriz Arballo



Comment Letter W-7: Beatriz Arballo

Beatriz Arballo

W-7.1 | Es bueno tener más rutas de buses y paradas pero pienso que nos impactaría positivamente las paradas sean acondicionadas con bancas y sombras con protección para proteger a las personas.

English Translation:

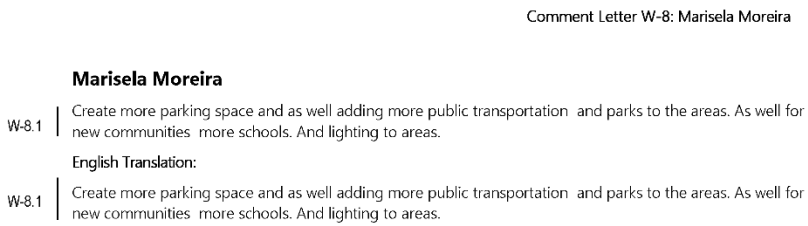
W-7.1 | It's good to have more bus routes and stops, but I think it would have a positive impact on us if the stops were equipped with benches and protective shades to protect people.

Response W-7.1

The comment expresses support for additional bus routes and stops as well as amenities such as benches and protective shades. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. The proposed Plan proposes an extensive increase in Rapid bus routes, as these projects are faster to implement and cost less compared with rail. Before adding new routes, SANDAG will conduct extensive analysis and work with stakeholders, other local government agencies, and members of the public to identify the best routes, stop locations, infrastructure needs, and operating plans for these services.

It should be noted that rail projects are not being "replaced" by Rapid projects in this Regional Plan. Instead, the plan includes both short-term Rapid projects that can provide transit connections more quickly, and longer-term rail projects that can provide higher capacity, speed, and reliability. SANDAG works with MTS and NCTD to meet the needs of current and future transit riders. We aim to continue expanding amenities to create a safe, secure, clean, and amenity-rich transit system. The plan includes $864 million for transit amenities. This includes security, improved restroom access and maintenance, Wi-Fi, and more. Subject to available funding, MTS and NCTD are committed to providing security for users, enforcing rules, and upgrading transit station amenities. (such as shade structures and signage) as funding becomes available.

Comment Letter W-8: Marisela Moreira



Comment Letter W-8: Marisela Moreira

Marisela Moreira

W-8.1 | Create more parking space and as well adding more public transportation and parks to the areas. As well for new communities more schools. And lighting to areas.

English Translation:

W-8.1 | Create more parking space and as well adding more public transportation and parks to the areas. As well for new communities more schools. And lighting to areas.

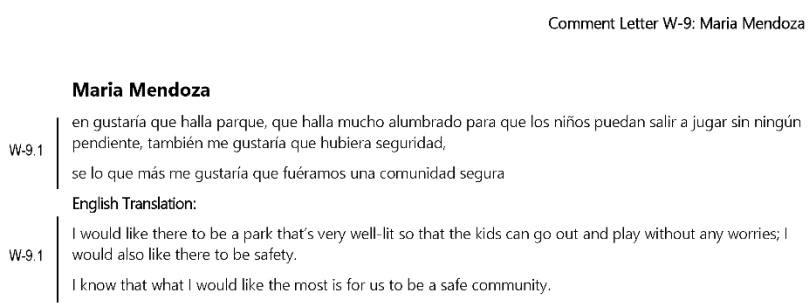
Response W-8.1

The comment requests additional parking, public transportation, parks, schools and lighting.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. Decisions regarding public lighting and parking spots under the control of local jurisdictions. SANDAG does not have authority over these decisions. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. SANDAG does not have authority over decisions regarding opening new schools.

Comment Letter W-9: Maria Mendoza



Comment Letter W-9: Maria Mendoza

Maria Mendoza

W-9.1 en gustaría que halla parque, que halla mucho alumbrado para que los niños puedan salir a jugar sin ningún pendiente, también me gustaría que hubiera seguridad,

se lo que más me gustaría que fuéramos una comunidad segura

English Translation:

W-9.1 I would like there to be a park that's very well-lit so that the kids can go out and play without any worries; I would also like there to be safety.

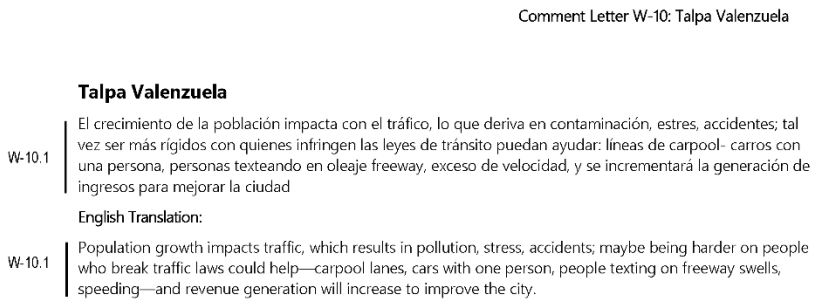
I know that what I would like the most is for us to be a safe community.

Response W-9.1

The comment expresses support for security lighting and greater safety in parks. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Decisions regarding public lighting are under the control of local jurisdictions. SANDAG does not have authority over these decisions. SANDAG has a Criminal Justice Research Division (CJRD) that serves as a vital source of accurate, timely, and actionable information on public safety and criminal justice matters in the San Diego region. The team is composed of experts who research, analyze data, and collaborate with regional partners to inform policy decisions, enhance public safety strategies, and support community well-being. They also participate as members of various local criminal justice-related committees, councils, and task forces to share trends and findings on these issues.

Through its Criminal Justice Clearinghouse, CJRD collects and disseminates data on crime trends and public safety, and examines substance use in local jails to better understand the connections between drugs, crime, and other societal challenges. The team continually updates its databases to provide current and reliable information. These efforts support the assessment of crime control program effectiveness and efficiency, helping to inform local criminal justice planning and policymaking. The division's work offers valuable insight into crime patterns and public safety challenges, supporting the development of crime-reduction strategies and responses to regional crime. Additionally, through its Independent Evaluations, the division provides comprehensive data analysis and impact assessments of public safety and criminal justice initiatives across the region. The Public Safety Committee (PSC), one of SANDAG's Policy Advisory Committees, composed of elected officials and public safety representatives, works to advise the Board of Directors on major policy-level matters related to public safety. The PSC aims to improve the quality of life in the region by promoting public safety and justice through collaboration, information sharing, effective technology, and objective monitoring and assessment.

Comment Letter W-10: Talpa Valenzuela



Comment Letter W-10: Talpa Valenzuela

Talpa Valenzuela

W-10.1 El crecimiento de la población impacta con el tráfico, lo que deriva en contaminación, estres, accidentes; tal vez ser más rígidos con quienes infringen las leyes de tránsito puedan ayudar: líneas de carpool- carros con una persona, personas texteando en oleaje freeway, exceso de velocidad, y se incrementará la generación de ingresos para mejorar la ciudad

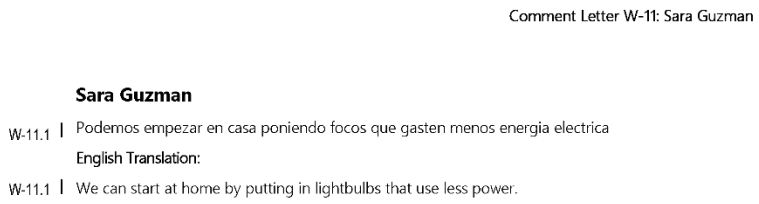
English Translation:

W-10.1 Population growth impacts traffic, which results in pollution, stress, accidents; maybe being harder on people who break traffic laws could help—carpool lanes, cars with one person, people texting on freeway swells, speeding—and revenue generation will increase to improve the city.

Response W-10.1

The comment suggests traffic violations as a revenue generator. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter W-11: Sara Guzman



Comment Letter W-11: Sara Guzman

Sara Guzman

W-11.1 | Podemos empezar en casa poniendo focos que gasten menos energia electrica

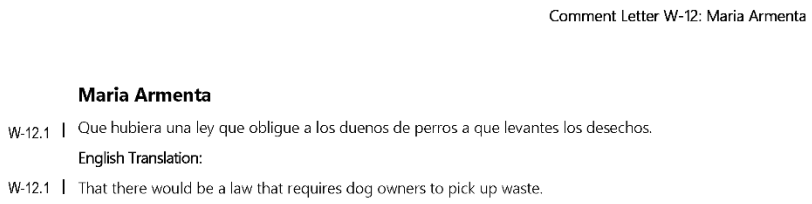
English Translation:

W-11.1 | We can start at home by putting in lightbulbs that use less power.

Response W-11.1

The comment suggests using lightbulbs that use less power. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter W-12: Maria Armenta



Comment Letter W-12: Maria Armenta

Maria Armenta

W-12.1 | Que hubiera una ley que obligue a los duenos de perros a que levantes los desechos.

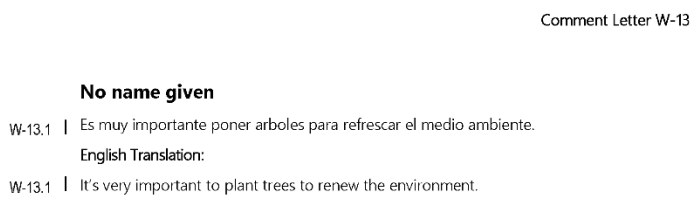
English Translation:

W-12.1 | That there would be a law that requires dog owners to pick up waste.

Response W-12.1

This comment expresses support for a law requiring dog owners to pick up their dog's waste. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter W-13: No name given



Comment Letter W-13

No name given

W-13.1 | Es muy importante poner arboles para refrescar el medio ambiente.

English Translation:

W-13.1 | It's very important to plant trees to renew the environment.

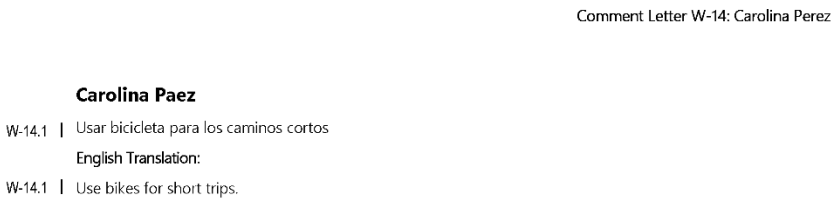
Response W-13.1

The comment suggests planting trees. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents.

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

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

Comment Letter W-14: Carolina Paez


Comment Letter W-14: Carolina Perez

Carolina Paez

W-14.1 | Usar bicicleta para los caminos cortos

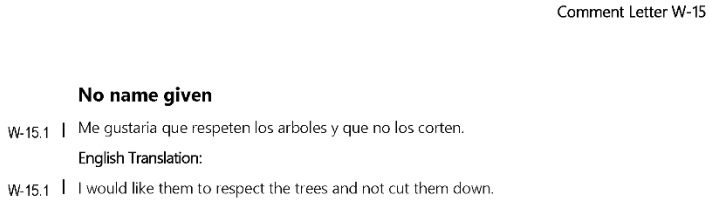
English Translation:

W-14.1 | Use bikes for short trips.

Response W-14.1

The comment suggests using bikes for short trips. This is not a comment on the adequacy of the EIR and, as such, no further response is required. The proposed Plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans. The 2025 Regional Plan Active Transportation Network follows best practices by providing an average network bikeway density of approximately 1 mile so that vital connections between regional activity centers, schools, housing, employment, and transit stops are provided with safe infrastructure for all ages and abilities.

Comment Letter W-15: No name given



Comment Letter W-15

No name given

W-15.1 | Me gustaria que respeten los arboles y que no los corten.

English Translation:

W-15.1 | I would like them to respect the trees and not cut them down.

Response W-15.1

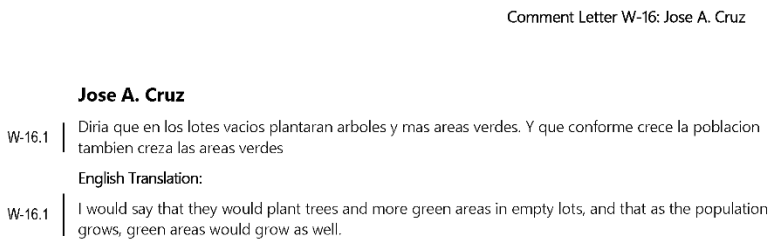
The comment requests that trees not be cut down. This is not a comment on the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks.

SANDAG collaborates with conservation stakeholders, including local jurisdictions, through the Regional Habitat Conservation Task Force. The goal is to implement the Regional Habitat Conservation Vision to protect, connect, and respect species and their natural habitats to prevent extinction in San Diego County (Appendix Q – Page Q-7). SANDAG also worked with regional partners to develop a regional Climate Action Roadmap, which includes urban greening and tree planting efforts. As described in the EIR, implementation of the proposed Plan has the potential to affect scenic resources, including trees. As described on pages 4.1-29 through 4.1-30, the damage or removal of trees due to construction activities would be restricted to the extent feasible. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required

mitigation measures would be identified during that process. This would include potential tree removal and associated mitigation measures required by relevant tree removal ordinances.

As described on pages 4.1-29 through 4.1-30, the damage or removal of trees due to construction activities would be restricted to the extent feasible. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential tree removal and associated mitigation measures, as well as potential impacts to public parks and recreation areas such as green spaces.

Comment Letter W-16: Jose A. Cruz



Comment Letter W-16: Jose A. Cruz

Jose A. Cruz

W-16.1 | Diria que en los lotes vacios plantaran arboles y mas areas verdes. Y que conforme crece la poblacion tambien creza las areas verdes

English Translation:

W-16.1 | I would say that they would plant trees and more green areas in empty lots, and that as the population grows, green areas would grow as well.

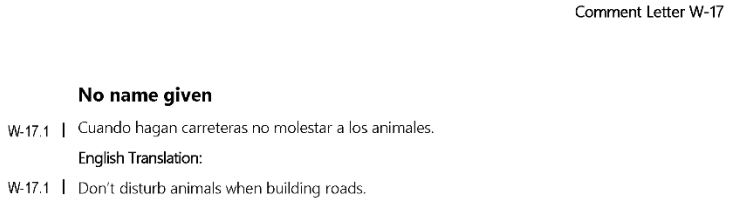
Response W-16.1

The comment suggests increasing green areas by planting trees. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents.

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

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

Comment Letter W-17: No name given



Comment Letter W-17

No name given

W-17.1 | Cuando hagan carreteras no molestar a los animales.

English Translation:

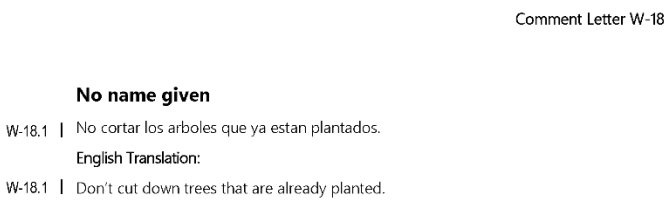
W-17.1 | Don't disturb animals when building roads.

Response W-17.1

The comment requests that disturbance to animals be avoided when building roads. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential impacts to protected animals and special status species.

As described in Section 4.4, "Biological Resources," of the EIR, construction of the proposed transportation improvements included in the proposed Plan has the potential to impact animals and special status species. To mitigate potential impacts to animal species during construction, the EIR includes mitigation measures BIO-2a, BIO-2b, BIO2c, and BIO-3a and would require project level CEQA analysis to implement these mitigation measures if the project has the potential to affect special status species or wildlife movement. The full text of these mitigation measures can be found on pages 4.4-74 through 4.4-86 of the EIR.

Comment Letter W-18: No name given



Comment Letter W-18

No name given

W-18.1 | No cortar los arboles que ya estan plantados.

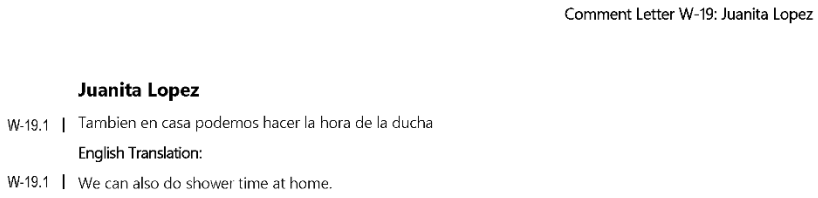
English Translation:

W-18.1 | Don't cut down trees that are already planted.

Response W-18.1

The comment states that trees shouldn't be cut down. The development described in the EIR has the potential to affect scenic resources, including trees. As described on pages 4.1-29 through 4.1-30, the damage or removal of trees due to construction activities would be restricted to the extent feasible. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential tree removal and associated mitigation measures.

Comment Letter W-19: Juanita Lopez


Comment Letter W-19: Juanita Lopez

Juanita Lopez

W-19.1 | Tambien en casa podemos hacer la hora de la ducha

English Translation:

W-19.1 | We can also do shower time at home.

Response W-19.1

The comment suggests reducing shower times at home. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter W-20: No name given

Comment Letter W-20

No name given

W-20.1 | Compartir el vehiculo para ir a los lugares que necesitamos ir, en lugar de que cada quien vaya en su propio carro.

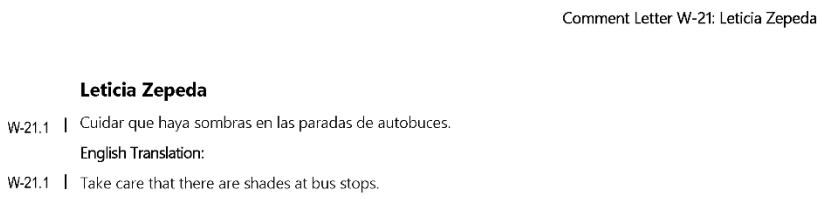
English Translation:

W-20.1 | Share a vehicle to get to the places where we need to go instead of everyone going in their own car.

Response W-20.1

The comment expresses support for carpooling. This is not a comment on the adequacy of the EIR. As such, no further response is required The Regional Plan supports a wide range of shared mobility services including the Regional Vanpool Program, carpooling, carshare, and micromobility. The 2025 Regional Plan also includes a connected network of managed lanes that improve traffic flow and promote carpooling, vanpooling, and transit.

Comment Letter W-21: Leticia Zepeda



Comment Letter W-21: Leticia Zepeda

Leticia Zepeda

W-21.1 | Cuidar que haya sombras en las paradas de autobuces.

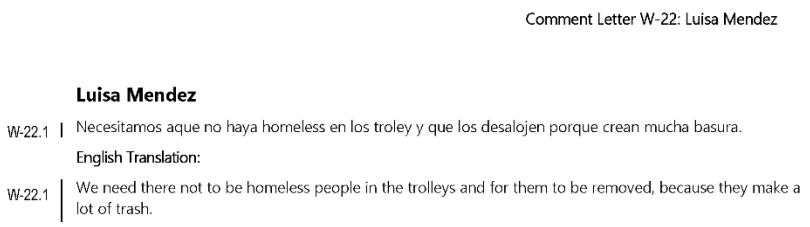
English Translation:

W-21.1 | Take care that there are shades at bus stops.

Response W-21.1

The comment requests shades at bus stops. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG works with MTS and NCTD to meet the needs of current and future transit riders. We aim to continue expanding amenities to create a safe, secure, clean, and amenity-rich transit system. The plan includes $864 million for transit amenities. This includes security, improved restroom access and maintenance, Wi-Fi, and more. Subject to available funding, MTS and NCTD are committed to providing security for users, enforcing rules, and upgrading transit station amenities. (such as shade structures and signage) as funding becomes available.

Comment Letter W-22: Luisa Mendez



Comment Letter W-22: Luisa Mendez

Luisa Mendez

W-22.1 | Necesitamos aque no haya homeless en los troley y que los desalojen porque crean mucha basura.

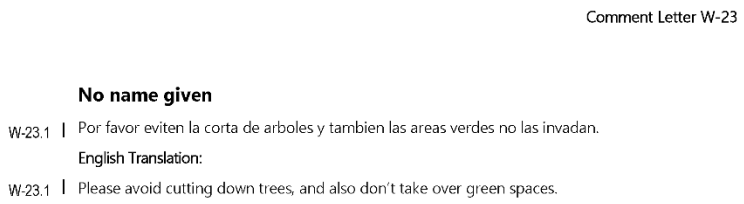
English Translation:

W-22.1 | We need there not to be homeless people in the trolleys and for them to be removed, because they make a lot of trash.

Response W-22.1

The comment expresses concerns related to homelessness This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The local cities and the County of San Diego are primarily responsible for homelessness programs, services, and housing decisions. The County adopted a multi-step approach to ending homelessness, outlined in their Homelessness Solutions and Prevention Action Plan. Local jurisdictions have their own local plans, programs, and points of contact responsible for administering homelessness initiatives. If members of the public have concerns about unhoused populations in a particular area, we recommend visiting the website of that jurisdiction to find information about ongoing homelessness initiatives in that area.

Comment Letter W-23: No name given



Comment Letter W-23

No name given

W-23.1 | Por favor eviten la corta de arboles y tambien las areas verdes no las invadan.

English Translation:

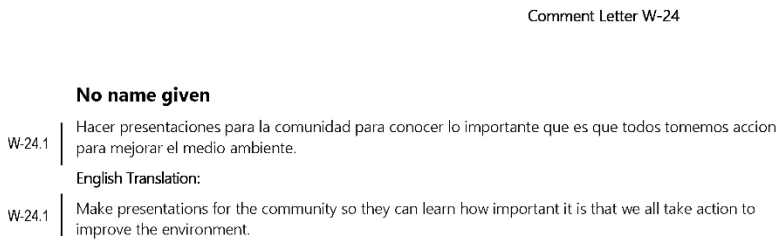
W-23.1 | Please avoid cutting down trees, and also don't take over green spaces.

Response W-23.1

The comment requests that trees not be cut down and that green space be preserved. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. SANDAG collaborates with conservation stakeholders, including local jurisdictions, through the Regional Habitat Conservation Task Force. The goal is to implement the Regional Habitat Conservation Vision to protect, connect, and respect species and their natural habitats to prevent extinction in San Diego County (Appendix Q – Page Q-7). SANDAG also worked with regional partners to develop a regional Climate Action Roadmap, which includes urban greening and tree planting efforts.

As described on pages 4.1-29 through 4.1-30, the damage or removal of trees due to construction activities would be restricted to the extent feasible. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential tree removal and associated mitigation measures, as well as potential impacts to public parks and recreation areas such as green spaces.

Comment Letter W-24: No name given



Comment Letter W-24

No name given

W-24.1 Hacer presentaciones para la comunidad para conocer lo importante que es que todos tomemos accion para mejorar el medio ambiente.

English Translation:

W-24.1 Make presentations for the community so they can learn how important it is that we all take action to improve the environment.

Response W-24.1

The comment suggests presentations for the community to inform the public about actions to improve the environment. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Throughout the development of the 2025 Regional Plan, SANDAG's outreach team and community-based organization partners offered small- and large-scale opportunities to learn about the Regional Plan and how to provide input about their transportation needs to shape its contents. As outlined in Appendix J of our Plan, SANDAG embedded education and input opportunities into many existing community events and other locations where members of the public congregate, such as busy transit centers, grocery stores, food distributions, recreation centers, schools, libraries and more. These events occurred at times of day that varied to provide a way for residents with different schedules to participate. The workshops were kept to 90 minutes or shorter to be respectful of the public's time, and unstructured Q&A was a feature of these events. In addition, SANDAG provided childcare, light dinner, and interpretation at these larger public workshops. Other avenues (such as the RegionalPlan@sandag.org email, and the Regional Plan hotline) were made available to the public to send follow-up questions to staff after the events concluded. The CEQA environmental review process for the proposed Plan also included community outreach and scoping process. SANDAG also provided the opportunity for the public to provide comments on the scope of the EIR either by letter, by email, or online. Notices were sent to all interested parties, including community organizations, individuals and stakeholders.

Comment Letter W-25: No name given

Comment Letter W-25

No name given

W-25.1 La comunidaad debe ser mas conciente y participar en limpiezas locales.

Por favor educar a la comunidad para crear conciencia sobre la importancia del medio ambiente saludable.

English Translation:

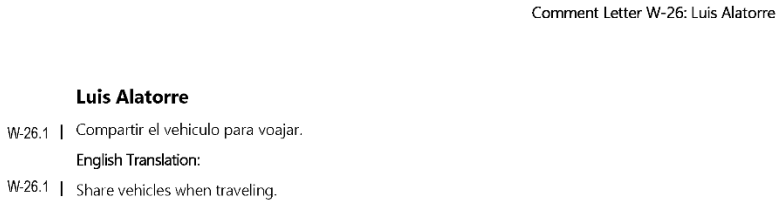
W-25.1 The community needs to be more mindful and to participate in local cleanups.

Please educate the community in order to raise awareness about the importance of a healthy environment.

Response W-25.1

This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-24.1.

Comment Letter W-26: Luis Alatorre



Comment Letter W-26: Luis Alatorre

Luis Alatorre

W-26.1 | Compartir el vehiculo para voajar.

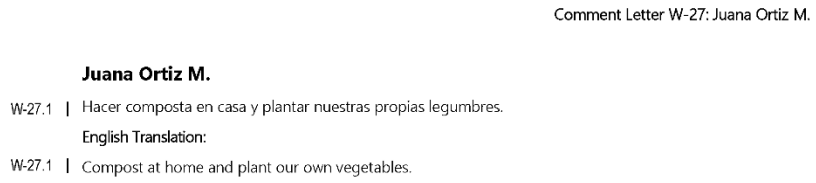
English Translation:

W-26.1 | Share vehicles when traveling.

Response W-26.1

The comment expresses support for ridesharing. This is not a comment on the adequacy of the EIR. As such, no further response is required The Regional Plan supports a wide range of shared mobility services including the Regional Vanpool Program, carpooling, carshare, and micromobility. The 2025 Regional Plan also includes a connected network of managed lanes that improve traffic flow and promote carpooling, vanpooling, and transit.

Comment Letter W-27: Juana Ortiz M.



Comment Letter W-27: Juana Ortiz M.

Juana Ortiz M.

W-27.1 | Hacer composta en casa y plantar nuestras propias legumbres.

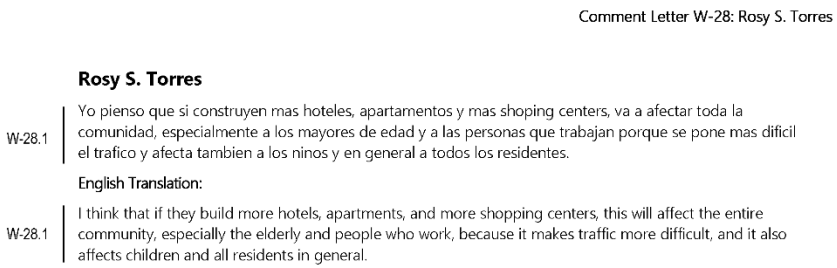
English Translation:

W-27.1 | Compost at home and plant our own vegetables.

Response W-27.1

This comment expresses support for composting and planting vegetables at home. This is not a comment on the adequacy of the EIR. As such, no further response is required.

Comment Letter W-28: Rosy S. Torres



Comment Letter W-28: Rosy S. Torres

Rosy S. Torres

W-28.1 Yo pienso que si construyen mas hoteles, apartamentos y mas shoping centers, va a afectar toda la comunidad, especialmente a los mayores de edad y a las personas que trabajan porque se pone mas dificil el trafico y afecta tambien a los ninos y en general a todos los residentes.

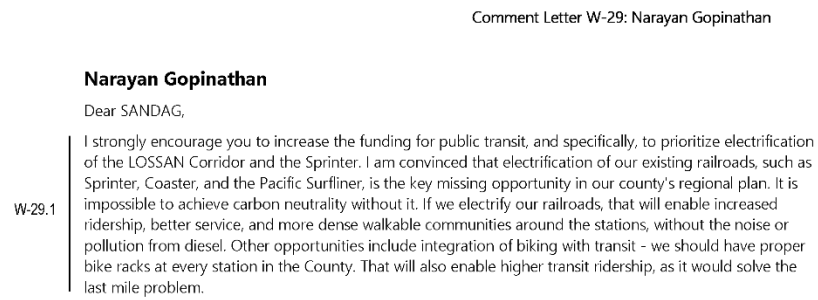
English Translation:

W-28.1 I think that if they build more hotels, apartments, and more shopping centers, this will affect the entire community, especially the elderly and people who work, because it makes traffic more difficult, and it also affects children and all residents in general.

Response W-28.1

This comment expresses concern about development and traffic impacts of new hotels, apartments, and shopping centers. This is not a comment on the adequacy of the EIR and, as such, no further response is required. While future growth is considered and accounted for in the EIR, it does not authorize housing-related construction. The regional growth projections and land use assumptions included in the proposed Plan were designed to be consistent with local land use patterns which would include the development of new multifamily homes. Please see Section 4.14, "Population and Housing," for a more in-depth analysis of the planned distribution and types of housing planned through 2050. The EIR analyzes all environmental issues required by CEQA including air quality and noise as a result of the implementation of the proposed Plan. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Comment Letter W-29: Narayan Gopinathan



Comment Letter W-29: Narayan Gopinathan

Narayan Gopinathan

Dear SANDAG,

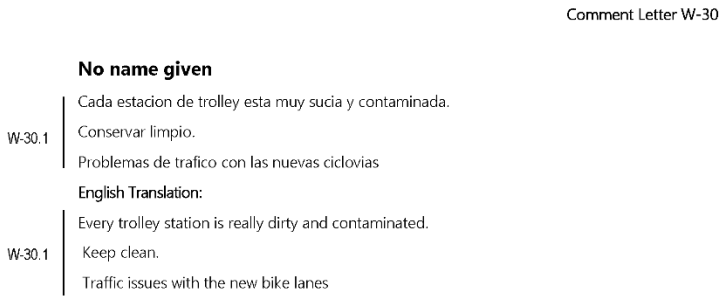
W-29.1 I strongly encourage you to increase the funding for public transit, and specifically, to prioritize electrification of the LOSSAN Corridor and the Sprinter. I am convinced that electrification of our existing railroads, such as Sprinter, Coaster, and the Pacific Surfliner, is the key missing opportunity in our county's regional plan. It is impossible to achieve carbon neutrality without it. If we electrify our railroads, that will enable increased ridership, better service, and more dense walkable communities around the stations, without the noise or pollution from diesel. Other opportunities include integration of biking with transit - we should have proper bike racks at every station in the County. That will also enable higher transit ridership, as it would solve the last mile problem.

Response W-29.1

The comment encourages increases in funding for public transit, integration of biking with transit to increase ridership and requests prioritization of electrification of the LOSSAN Corridor and the Sprinter. SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option and by investing in new infrastructure and striving constantly to improve service. It's important to note that a public transit system that attracts more riders will help us the region reach our state and federally mandated requirements for air quality and accessibility. SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. SANDAG also collaborates with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps to identify which transit solutions are most appropriate. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N*)*, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

The proposed Plan assumes that MTS and NCTD will transition to zero-emission vehicles over the next two decades, based on each agency's adopted Zero-Emission Bus Fleet Transition Plan prepared in response to the California Air Resources Board's Innovative Clean Transit rule. The MTS Trolley system already runs on electricity and has zero emissions. SANDAG works with Caltrans on the development of the California State Rail Plan and will consider accommodation for future electrification in statewide planning efforts. NCTD will evaluate available technologies and options for zero-emission rail equipment on its COASTER and SPRINTER services as its current vehicles reach the end of their lives.

Comment Letter W-30: No name given



Comment Letter W-30

No name given

Cada estacion de trolley esta muy sucia y contaminada.

W-30.1 Conservar limpio.

Problemas de trafico con las nuevas ciclovias

English Translation:

Every trolley station is really dirty and contaminated.

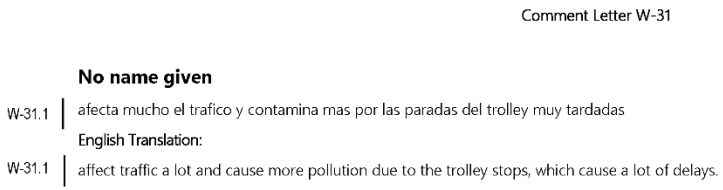
W-30.1 Keep clean.

Traffic issues with the new bike lanes

Response W-30.1

The comment expresses concern over unclean trolley stations and traffic issues associated with bike lanes. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Although SANDAG plans, designs, and constructs transportation projects, local cities and other government agencies take ownership of these facilities once they are built. Those cities and government agencies are responsible for maintaining them. SANDAG does not have authority over those maintenance decisions. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential hazards/hazardous materials and traffic impacts associated with the construction and operation of new bicycle lanes.

Comment Letter W-31: No name given



Comment Letter W-31

No name given

W-31.1 | afecta mucho el trafico y contamina mas por las paradas del trolley muy tardadas

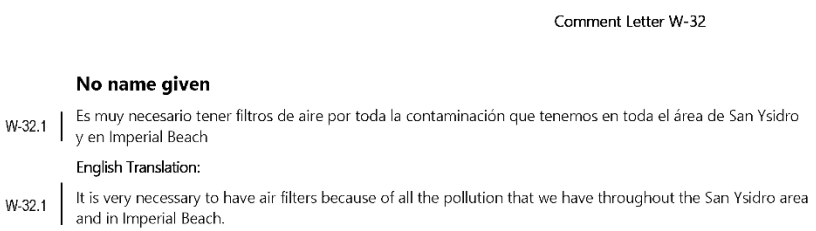
English Translation:

W-31.1 | affect traffic a lot and cause more pollution due to the trolley stops, which cause a lot of delays.

Response W-31.1

The comment expresses concern related to traffic delays and pollution resulting from trolley stops. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Operational and safety decisions related to the trolley and light rail are made by MTS and NCTD, respectively, and are subject to state regulation. SANDAG does not have authority over those operational or safety decisions. As described on Pages 4.3-33 and 4.3-34 of the Draft EIR, the proposed Regional Plan would implement Smart Intersection Systems (SIS) to reduce congestion and improve roadway safety, as well as continued implementation of Transportation Control Measures (TCMs) to reduce adverse impacts to air quality. These TCMs include traffic flow improvements, which would reduce idling and associated emissions. Traffic signal improvements at intersections would reduce delays, consequently reducing idling time and related emissions. Section 4.3, "Air Quality," of the EIR describes the current air quality conditions of the San Diego region and planned improvements to restrict the release of harmful pollutants. Pollutant reduction would primarily come from stricter regulations on vehicle idling and improvements to traffic flow. Tables 4.3-9 and 4.3-12 show reductions in adverse health outcomes following Plan implementation by 2035 and 2050. Therefore, implementation of the proposed Plan would reduce adverse health outcomes by reducing the release of harmful pollutants, namely $PM_{2.5}$ and PM_{10} over time.

Comment Letter W-32: No name given



Comment Letter W-32

No name given

W-32.1 | Es muy necesario tener filtros de aire por toda la contaminación que tenemos en toda el área de San Ysidro y en Imperial Beach

English Translation:

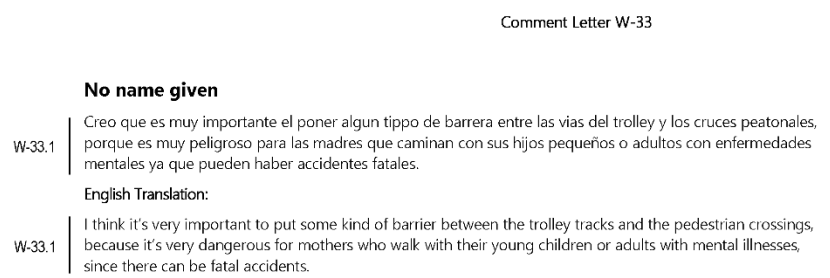
W-32.1 | It is very necessary to have air filters because of all the pollution that we have throughout the San Ysidro area and in Imperial Beach.

Response W-32.1

The comment expresses concerns related to pollution. This is not a comment on the adequacy of the EIR and, as such, no further response is required. As described on Pages 4.3-33 and 4.3-34 of the Draft EIR, the proposed Regional Plan would implement Smart Intersection Systems (SIS) to reduce congestion and improve roadway safety, as well as continued implementation of Transportation Control Measures (TCMs) to reduce adverse impacts to air quality. These TCMs include traffic flow improvements, which would reduce idling and associated emissions. Traffic signal improvements at intersections would reduce delays, consequently reducing idling time and related emissions. SANDAG is aware of the long idling times of cars waiting to cross the California-Mexico border. SANDAG and Caltrans are working with state and federal partners in the U.S. and Mexico to create a new point of entry (POE) for the San Diego-Baja California region. This project, called the State Route 11 (SR 11)/Otay Mesa East Port of Entry (OME POE) project is described on Page 4.16-46 of the EIR and would reduce border crossing congestion and related GHG emissions. Additional information regarding the OME POE project can be accessed here: https://www.sandag.org/projects-and-programs/featured-projects/sr-11-otay-mesa-port-of-entry. Section 4.3, "Air Quality," of the EIR describes the current air quality conditions of the San Diego region and planned improvements to restrict the release of harmful pollutants. Pollutant reduction would primarily come from stricter regulations on vehicle idling and improvements to traffic flow. Tables 4.3-9 and 4.3-12 show reductions in adverse health outcomes following Plan implementation by 2035 and 2050. Therefore, implementation of the proposed Plan would reduce adverse health outcomes by reducing the release of harmful pollutants, namely $PM_{2.5}$ and PM_{10} over time. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required

mitigation measures would be identified during that process. This would include potential air quality (including indoor air quality) impacts in significantly impacted areas.

Comment Letter W-33: No name given



Comment Letter W-33

No name given

W-33.1 Creo que es muy importante el poner algun tippo de barrera entre las vias del trolley y los cruces peatonales, porque es muy peligroso para las madres que caminan con sus hijos pequeños o adultos con enfermedades mentales ya que pueden haber accidentes fatales.

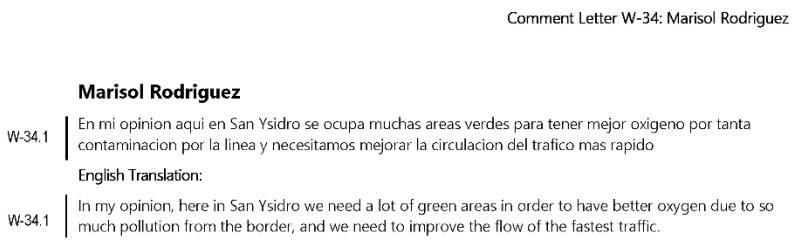
English Translation:

W-33.1 I think it's very important to put some kind of barrier between the trolley tracks and the pedestrian crossings, because it's very dangerous for mothers who walk with their young children or adults with mental illnesses, since there can be fatal accidents.

Response W-33.1

The comment suggests a barrier between the trolley tracks and the pedestrian crossings for safety. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. Although SANDAG plans, designs, and constructs transportation projects, local cities and other government agencies take ownership of these facilities once they are built. Those cities and government agencies are responsible for maintaining and operating them, including making decisions related to safety which are also subject to state regulation. SANDAG does not have authority over those decisions. SANDAG works with MTS and NCTD to meet the needs of current and future transit riders, expanding amenities to create a safe, secure, clean, and amenity-rich transit system.

Comment Letter W-34: Marisol Rodriguez



Comment Letter W-34: Marisol Rodriguez

Marisol Rodriguez

W-34.1 | En mi opinion aqui en San Ysidro se ocupa muchas areas verdes para tener mejor oxigeno por tanta contaminacion por la linea y necesitamos mejorar la circulacion del trafico mas rapido

English Translation:

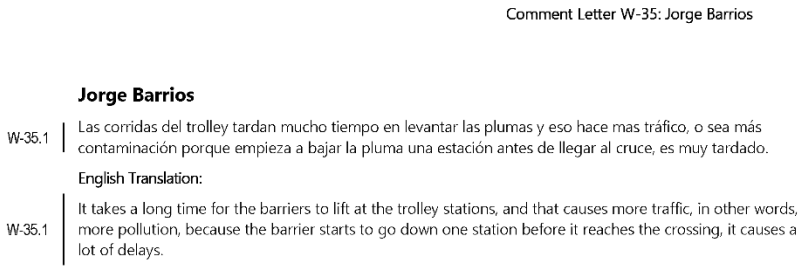
W-34.1 | In my opinion, here in San Ysidro we need a lot of green areas in order to have better oxygen due to so much pollution from the border, and we need to improve the flow of the fastest traffic.

Response W-34.1

The comment requests additional green spaces in San Ysidro to offset pollution associated with traffic at the border. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. As described on Pages 4.3-33 and 4.3-34 of the Draft EIR, the proposed Regional Plan would implement Smart Intersection Systems (SIS) to reduce congestion and improve roadway safety, as well as continued implementation of Transportation Control Measures (TCMs) to reduce adverse impacts to air quality. These TCMs include traffic flow improvements, which would reduce idling and associated emissions. Traffic signal improvements at intersections would reduce delays, consequently reducing idling time and related emissions. SANDAG is aware of the long idling times of cars waiting to cross the California-Mexico border. SANDAG and Caltrans are working with state and federal partners in the U.S. and Mexico to create a new point of entry (POE) for the San Diego-Baja California region. This project, called the State Route 11 (SR 11)/Otay Mesa East Port of Entry (OME POE) project is described on Page 4.16-46 of the EIR and would reduce border crossing congestion and related GHG emissions. Additional information regarding the OME POE project can be accessed here: https://www.sandag.org/projects-

and-programs/featured-projects/sr-11-otay-mesa-port-of-entry. Section 4.3, "Air Quality," of the EIR describes the current air quality conditions of the San Diego region and planned improvements to restrict the release of harmful pollutants. Pollutant reduction would primarily come from stricter regulations on vehicle idling and improvements to traffic flow. Tables 4.3-9 and 4.3-12 show reductions in adverse health outcomes following Plan implementation by 2035 and 2050. Therefore, implementation of the proposed Plan would reduce adverse health outcomes by reducing the release of harmful pollutants, namely $PM_{2.5}$ and PM_{10} over time. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential air quality impacts in significantly impacted areas.

Comment Letter W-35: Jorge Barrios



Comment Letter W-35: Jorge Barrios

Jorge Barrios

W-35.1 Las corridas del trolley tardan mucho tiempo en levantar las plumas y eso hace mas tráfico, o sea más contaminación porque empieza a bajar la pluma una estación antes de llegar al cruce, es muy tardado.

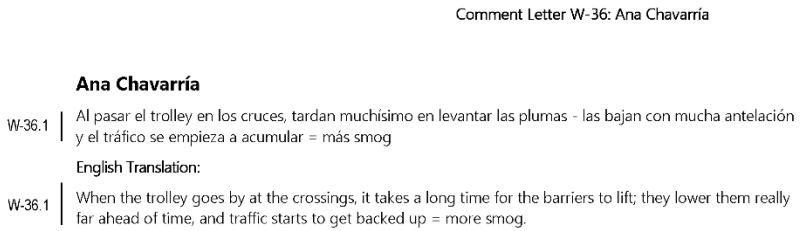
English Translation:

W-35.1 It takes a long time for the barriers to lift at the trolley stations, and that causes more traffic, in other words, more pollution, because the barrier starts to go down one station before it reaches the crossing, it causes a lot of delays.

Response W-35.1

The comment expresses concern related to traffic delays and pollution related to trolley stops. Please see Response W-31.1.

Comment Letter W-36: Ana Chavarría



Comment Letter W-36: Ana Chavarría

Ana Chavarría

W-36.1 | Al pasar el trolley en los cruces, tardan muchísimo en levantar las plumas - las bajan con mucha antelación y el tráfico se empieza a acumular = más smog

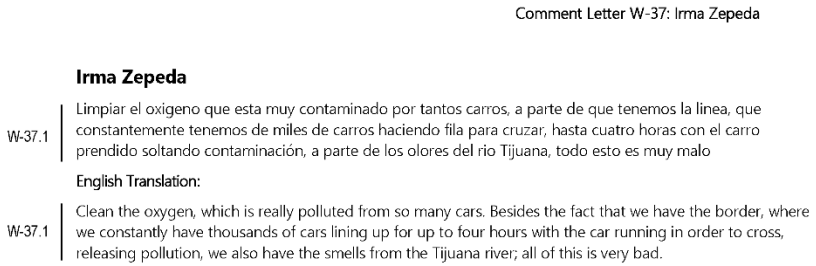
English Translation:

W-36.1 | When the trolley goes by at the crossings, it takes a long time for the barriers to lift; they lower them really far ahead of time, and traffic starts to get backed up = more smog.

Response W-36.1

The comment expresses concern related to traffic delays and pollution related to trolley stops. Please see Response W-31.1. Please see Response W-35.

Comment Letter W-37: Irma Zepeda



Comment Letter W-37: Irma Zepeda

Irma Zepeda

W-37.1 Limpiar el oxigeno que esta muy contaminado por tantos carros, a parte de que tenemos la linea, que constantemente tenemos de miles de carros haciendo fila para cruzar, hasta cuatro horas con el carro prendido soltando contaminación, a parte de los olores del rio Tijuana, todo esto es muy malo

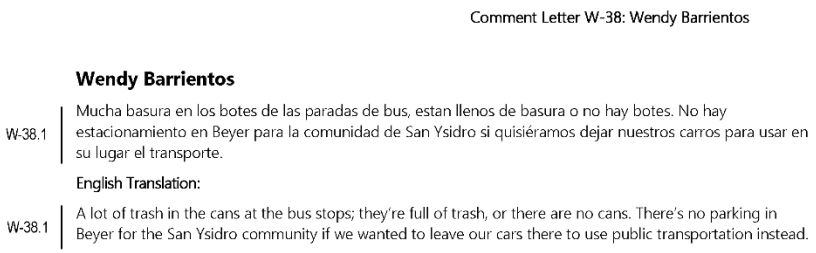
English Translation:

W-37.1 Clean the oxygen, which is really polluted from so many cars. Besides the fact that we have the border, where we constantly have thousands of cars lining up for up to four hours with the car running in order to cross, releasing pollution, we also have the smells from the Tijuana river; all of this is very bad.

Response W-37.1

The comment expresses concern related to pollution due to traffic at the border as well as the Tijuana River. Please see Response W-34.1 regarding pollution due to traffic at the border. SANDAG is also developing the California-Baja California Border Resiliency Plan (BRP), which is a binational effort that aims to maintain and strengthen binational coordination between the U.S. and Mexico on climate and environmental justice issues. Proposed infrastructure improvements could also help reduce water, air, and climate pollution throughout the border region, enhancing the quality of life for residents, visitors, and commuters.

Comment Letter W-38: Wendy Barrientos



Comment Letter W-38: Wendy Barrientos

Wendy Barrientos

W-38.1 Mucha basura en los botes de las paradas de bus, estan llenos de basura o no hay botes. No hay estacionamiento en Beyer para la comunidad de San Ysidro si quisiéramos dejar nuestros carros para usar en su lugar el transporte.

English Translation:

W-38.1 A lot of trash in the cans at the bus stops; they're full of trash, or there are no cans. There's no parking in Beyer for the San Ysidro community if we wanted to leave our cars there to use public transportation instead.

Response W-38.1

The comment expresses concern related to trash at bus stops and a lack of parking spaces. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Although SANDAG plans, designs, and constructs bus projects, local cities and other government agencies take ownership of these facilities once they are built. Those cities and government agencies are responsible for maintaining them. SANDAG does not have authority over those maintenance decisions. Similarly, decision-making regarding parking spots is under the control of local jurisdictions. SANDAG does not have authority over these decisions. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals.

Comment Letter W-39: No name given

Comment Letter W-39

No name given

W-39.1 Se crea mucho trafico porque las plumas se bajan con mucha anticipacion y eso crea mucho trafico y por consiguiente crea contaminación por el trafico, en cada estación del trolley

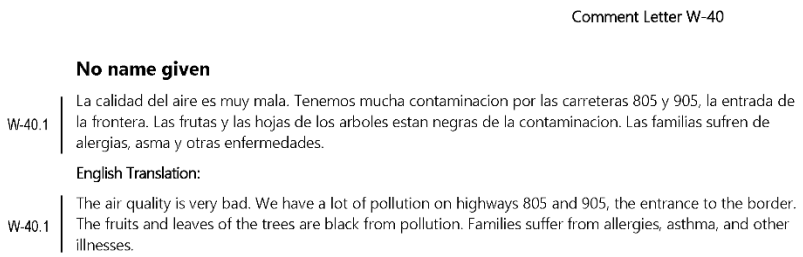
English Translation:

W-39.1 A lot of traffic is created because the barriers are lowered really far ahead of time, and that creates a lot of traffic, and thus creates traffic pollution at each trolley station.

Response W-39.1

The comment expresses concern related to traffic delays and pollution. Please see Response W-35.

Comment Letter W-40: No name given



Comment Letter W-40

No name given

W-40.1 La calidad del aire es muy mala. Tenemos mucha contaminacion por las carreteras 805 y 905, la entrada de la frontera. Las frutas y las hojas de los arboles estan negras de la contaminacion. Las familias sufren de alergias, asma y otras enfermedades.

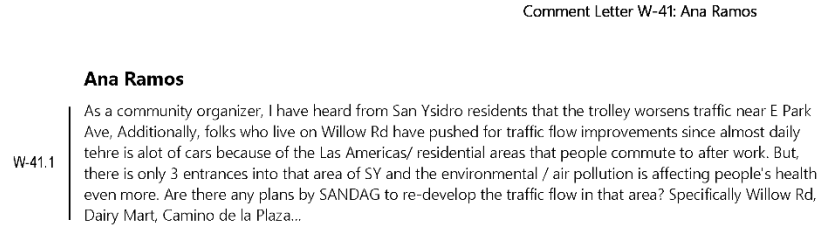
English Translation:

W-40.1 The air quality is very bad. We have a lot of pollution on highways 805 and 905, the entrance to the border. The fruits and leaves of the trees are black from pollution. Families suffer from allergies, asthma, and other illnesses.

Response W-40.1

The comment expresses concern over air quality pollution and the associated health impacts. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Section 4.3 of the EIR, "Air Quality," describes the current air quality conditions of the San Diego region and planned improvements to restrict the release of harmful pollutants. Pollutant reduction would primarily come from stricter regulations on vehicle idling, especially construction vehicles. Tables 4.3-9 and 4.3-12 show reductions in adverse health outcomes following Plan implementation by 2035 and 2050. In short, implementation of the proposed Plan both at the regional and local levels, would reduce adverse health outcomes by reducing the release of harmful pollutants, namely $PM_{2.5}$ and PM_{10} over time. Please also see Response W-37.

Comment Letter W-41: Ana Ramos



Comment Letter W-41: Ana Ramos

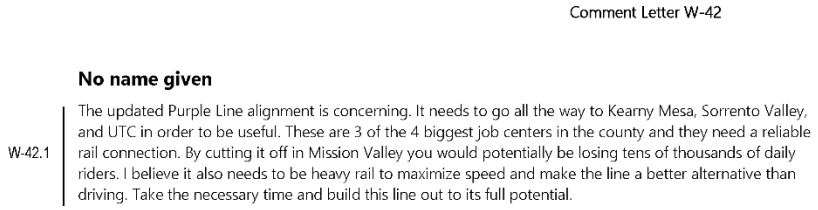
Ana Ramos

W-41.1 As a community organizer, I have heard from San Ysidro residents that the trolley worsens traffic near E Park Ave, Additionally, folks who live on Willow Rd have pushed for traffic flow improvements since almost daily tehre is alot of cars because of the Las Americas/ residential areas that people commute to after work. But, there is only 3 entrances into that area of SY and the environmental / air pollution is affecting people's health even more. Are there any plans by SANDAG to re-develop the traffic flow in that area? Specifically Willow Rd, Dairy Mart, Camino de la Plaza...

Response W-41.1

The comment expresses concern about traffic flow and air pollution issues in the San Ysidro area. Please see Response W-34.1.

Comment Letter W-42: No name given



Comment Letter W-42

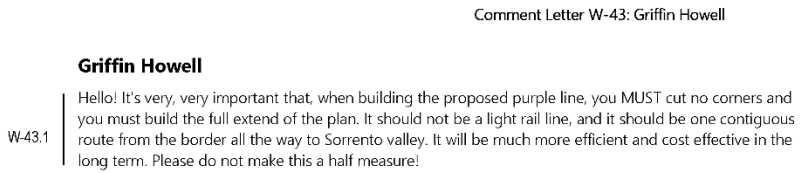
No name given

W-42.1 The updated Purple Line alignment is concerning. It needs to go all the way to Kearny Mesa, Sorrento Valley, and UTC in order to be useful. These are 3 of the 4 biggest job centers in the county and they need a reliable rail connection. By cutting it off in Mission Valley you would potentially be losing tens of thousands of daily riders. I believe it also needs to be heavy rail to maximize speed and make the line a better alternative than driving. Take the necessary time and build this line out to its full potential.

Response W-42.1

The comment expresses support for the Purple Line being the full extent and not a light rail line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-43: Griffin Howell



Comment Letter W-43: Griffin Howell

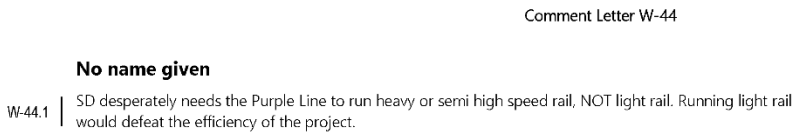
Griffin Howell

W-43.1 Hello! It's very, very important that, when building the proposed purple line, you MUST cut no corners and you must build the full extend of the plan. It should not be a light rail line, and it should be one contiguous route from the border all the way to Sorrento valley. It will be much more efficient and cost effective in the long term. Please do not make this a half measure!

Response W-43.1

The comment expresses support for the Purple Line being the full extent and not a light rail line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-44: No name given



Comment Letter W-44

No name given

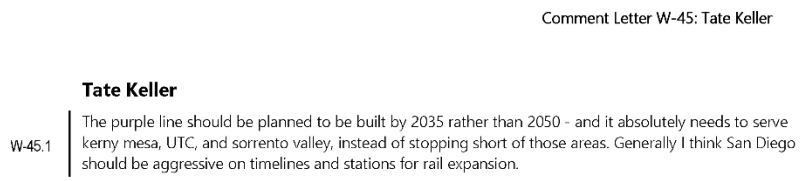
W-44.1 | SD desperately needs the Purple Line to run heavy or semi high speed rail, NOT light rail. Running light rail would defeat the efficiency of the project.

Response W-44.1

Please refer to response W-43.1.

The comment expresses support for the Purple Line not being a light rail line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-45: Tate Keller



Comment Letter W-45: Tate Keller

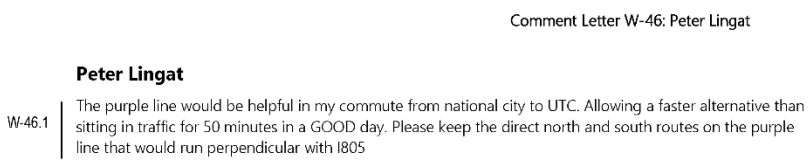
Tate Keller

W-45.1 The purple line should be planned to be built by 2035 rather than 2050 - and it absolutely needs to serve kerny mesa, UTC, and sorrento valley, instead of stopping short of those areas. Generally I think San Diego should be aggressive on timelines and stations for rail expansion.

Response W-45.1

The comment expresses support for the Purple Line being the full extent and being completed earlier. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-46: Peter Lingat



Comment Letter W-46: Peter Lingat

Peter Lingat

W-46.1 The purple line would be helpful in my commute from national city to UTC. Allowing a faster alternative than sitting in traffic for 50 minutes in a GOOD day. Please keep the direct north and south routes on the purple line that would run perpendicular with I805

Response W-46.1

The comment expresses support for the direct north and south routes on Purple Line that run perpendicular to I-805. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-47: Jonathan Rosen

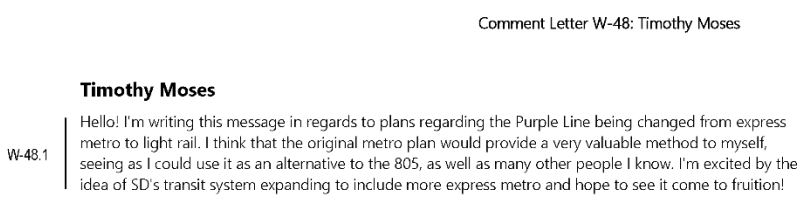
Jonathan Rosen

W-47.1 | Fully building the SDMTS Purple Line is absolutely vital and it should travel through Sorrento Valley to its original end point. It would benefit the city and county to build this line sooner rather than later.

Response W-47.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-48: Timothy Moses



Comment Letter W-48: Timothy Moses

Timothy Moses

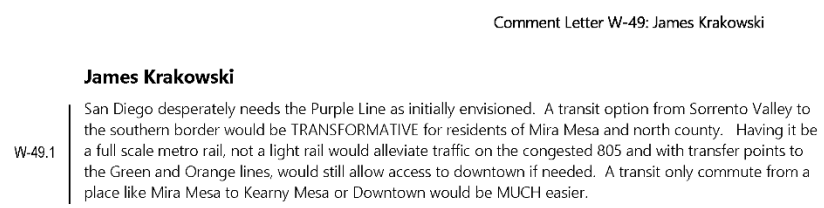
W-48.1 Hello! I'm writing this message in regards to plans regarding the Purple Line being changed from express metro to light rail. I think that the original metro plan would provide a very valuable method to myself, seeing as I could use it as an alternative to the 805, as well as many other people I know. I'm excited by the idea of SD's transit system expanding to include more express metro and hope to see it come to fruition!

Response W-48.1

The comment expresses support for the Purple Line being the express metro rather than light rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

This comment does not pertain to the adequacy of the analysis included in the Draft EIR. Therefore, no further response is required.

Comment Letter W-49: James Krakowski



Comment Letter W-49: James Krakowski

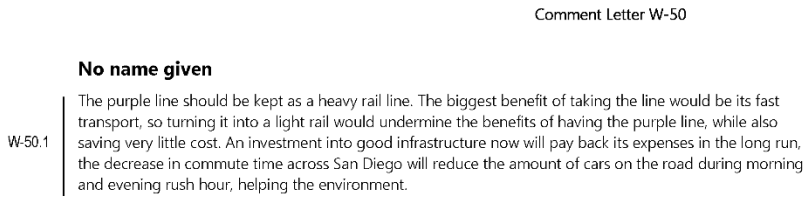
James Krakowski

W-49.1 San Diego desperately needs the Purple Line as initially envisioned. A transit option from Sorrento Valley to the southern border would be TRANSFORMATIVE for residents of Mira Mesa and north county. Having it be a full scale metro rail, not a light rail would alleviate traffic on the congested 805 and with transfer points to the Green and Orange lines, would still allow access to downtown if needed. A transit only commute from a place like Mira Mesa to Kearny Mesa or Downtown would be MUCH easier.

Response W-49.1

The comment expresses support for the Purple Line being the full extent and being metro rail rather than light rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-50: No name given



Comment Letter W-50

No name given

W-50.1 The purple line should be kept as a heavy rail line. The biggest benefit of taking the line would be its fast transport, so turning it into a light rail would undermine the benefits of having the purple line, while also saving very little cost. An investment into good infrastructure now will pay back its expenses in the long run, the decrease in commute time across San Diego will reduce the amount of cars on the road during morning and evening rush hour, helping the environment.

Response W-50.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-51: Zach Woods



Comment Letter W-51: Zach Woods

Zach Woods

Not sure if the EIR feedback is the correct place to share this but I'm very disappointed with the latest developments to the transit plan regarding the Purple Line:

W-51.1 - First the purple line was downgraded from heavy rail to light rail. Not ideal but fine at least we're getting a rail line that connects some of the most heavily trafficked areas of the city (UTC, North Park/City Heights, Chula Vista, Border).

- Next the purple line no longer is planned to go all the way to UTC? Isn't that one of the most crucial segments? Very disappointing!

W-51.2 Very disappointing to see crucial transit projects get cut (which will significantly reduce car usage and emissions) and still see billions of dollars go towards highway and road improvements (which only further solidify SD's long-standing car dependence).

(P.S. really like seeing the mid-city bike improvements, keep those coming!)

Response W-51.1

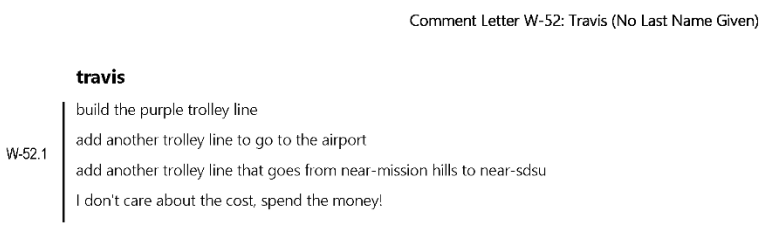
The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-51.2

The comment expresses concern about reductions in transit projects and continued funding for roadway projects. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option and by investing in new infrastructure and striving constantly to improve service. It's important to note that a public transit system that attracts more riders will help us the region reach our state and federally mandated requirements for air quality and accessibility. SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. SANDAG also collaborates with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps to identify which

transit solutions are most appropriate. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes. 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 lane connectors (Appendix A, 2025 Regional Plan). 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 because transit would be limited to travel in congested general-purpose lanes during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

Comment Letter W-52: Travis



Comment Letter W-52: Travis (No Last Name Given)

travis

W-52.1

build the purple trolley line

add another trolley line to go to the airport

add another trolley line that goes from near-mission hills to near-sdsu

I don't care about the cost, spend the money!

Response 52.1

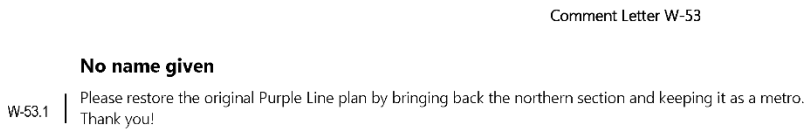
The comment expresses support for the purple line, trolley to the airport, and a trolley line from near-Mission Hills to near-SDSU This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

The plan includes both near-term and long-term solutions for the Airport Transit Connection (ATC) to benefit residents, visitors, and airport employees. In the shorter term, proposed investments include improvements to existing bus service. In the longer term, a rail connection to the airport is included in the plan. SANDAG is collaborating with local partner agencies to identify the type of rail connection that is most suitable for the region to implement. Both short- and long-term options will help existing transit hubs like Santa Fe Depot and Old Town Transit Center offer better ways for residents and visitors to reach the airport from all over the region.

SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan also includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. We use a

number of tools to anticipate how well this proposed transportation network will serve the region (see Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes. Transportation projects take a long time to implement. Project timelines can grow because of studies required in the planning, environmental analysis, design, and construction phases. These studies aim to ensure that the resulting infrastructure best serves the region, while minimizing negative impacts. Time is also spent securing funding for these projects, including competing for funds with regions across the state and country.

Comment Letter W-53: No name given



Comment Letter W-53

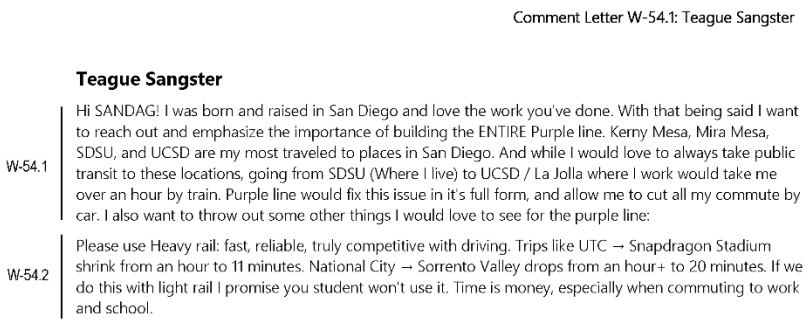
No name given

W-53.1 | Please restore the original Purple Line plan by bringing back the northern section and keeping it as a metro. Thank you!

Response 53.1

The comment expresses support for the Purple Line being the full extent and being metro rather than light rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-54: Teague Sangster



Comment Letter W-54.1: Teague Sangster

Teague Sangster

W-54.1 Hi SANDAG! I was born and raised in San Diego and love the work you've done. With that being said I want to reach out and emphasize the importance of building the ENTIRE Purple line. Kerny Mesa, Mira Mesa, SDSU, and UCSD are my most traveled to places in San Diego. And while I would love to always take public transit to these locations, going from SDSU (Where I live) to UCSD / La Jolla where I work would take me over an hour by train. Purple line would fix this issue in it's full form, and allow me to cut all my commute by car. I also want to throw out some other things I would love to see for the purple line:

W-54.2 Please use Heavy rail: fast, reliable, truly competitive with driving. Trips like UTC → Snapdragon Stadium shrink from an hour to 11 minutes. National City → Sorrento Valley drops from an hour+ to 20 minutes. If we do this with light rail I promise you student won't use it. Time is money, especially when commuting to work and school.

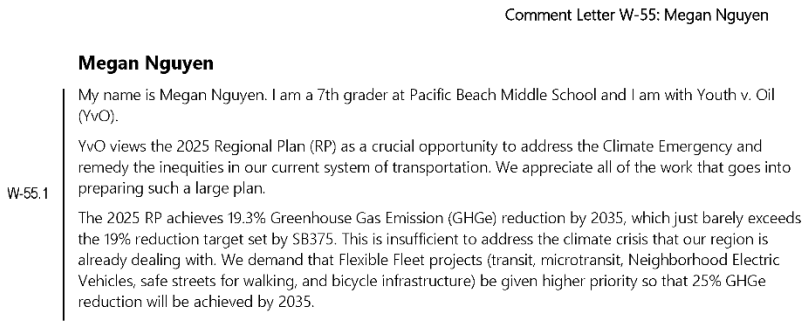
Response 54.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response 54.2

The comment expresses support for heavy rail over light rail to reduce travel times This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. SANDAG will continue to evaluate feasible transportation technologies based on the needs of each particular travel corridor in future project planning studies. All transit projects must be studied in much greater detail and be informed by collaboration with other government agencies, analysis of travel patterns and transportation demand, and feedback from the public.

Comment Letter W-55: Megan Nguyen



Comment Letter W-55: Megan Nguyen

Megan Nguyen

My name is Megan Nguyen. I am a 7th grader at Pacific Beach Middle School and I am with Youth v. Oil (YvO).

YvO views the 2025 Regional Plan (RP) as a crucial opportunity to address the Climate Emergency and remedy the inequities in our current system of transportation. We appreciate all of the work that goes into preparing such a large plan.

W-55.1

The 2025 RP achieves 19.3% Greenhouse Gas Emission (GHGe) reduction by 2035, which just barely exceeds the 19% reduction target set by SB375. This is insufficient to address the climate crisis that our region is already dealing with. We demand that Flexible Fleet projects (transit, microtransit, Neighborhood Electric Vehicles, safe streets for walking, and bicycle infrastructure) be given higher priority so that 25% GHGe reduction will be achieved by 2035.

Response 55.1

This comment states that Flexible Fleet projects be given higher priority so that 25% GHG emissions reduction will be achieved by 2035. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.

While SANDAG's 2025 Regional Plan includes flexible fleet service areas, these projects would be implemented by local jurisdictions or transit agencies. SANDAG has funded a limited number of Flexible Fleet pilot projects around the region to learn about the potential of these services to provide greater mobility and community connections. But current funding can only be used for pilot projects, and SANDAG does not currently have an eligible funding source for the long-term operations of flexible fleet services. The funding currently provided by SANDAG can only be used only for pilot projects. SANDAG continues to seek eligible funding sources for flexible fleet operations. Also, the Flexible Fleets Strategic Implementation Strategic Plan in Appendix E to the proposed Plan includes a section on funding to help guide jurisdictions who would like to operate these services.

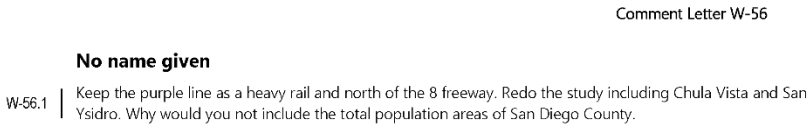
SANDAG is required by law to develop a Regional Plan and Sustainable Communities Strategy every four years. It must meet the state's requirement to reduce GHG emissions by reducing vehicle miles traveled from passenger vehicles by 19% per capita by 2035 compared with 2005 levels (mandated by California Senate Bill (SB) 375, 2008). Meeting this target is an important step toward California's broader climate goals and the State's commitment to reaching carbon neutrality. How much and how quickly the region can reduce GHGs will depend not only on SANDAG, but also on strong collaboration with local jurisdictions, state and federal agencies, and community partners. SANDAG sets regionwide objectives to reduce GHGs, however, meeting those objectives is limited by many factors including local jurisdiction plans and land use decisions, funding availability, and how quickly various industries are converting to clean technology.

The 2025 Regional Plan identifies strategies to reduce emissions, expand travel choices, and support sustainable growth. Appendix A

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

As discussed in Section 4.8.4, "Environmental Impacts and Mitigation Measures," of the EIR, the 2025 Regional Plan achieves a 19.3% per capita reduction in greenhouse gas emissions by 2035, meeting the target set by SB 375. However, as discussed on page 4.8-39 to 4.8-53 of the EIR, it does not meet the state goals under SB 32 and AB 1279, which require deeper reductions by 2030 and 2045. 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 Impact GHG-4 may be reduced, but not to a less-than-significant level and therefore greenhouse gas impacts remain significant and unavoidable through 2050.Overall, the EIR acknowledges that the project would result in this significant and unavoidable impacts, as identified and fully analyzed in Section 4.8, "Greenhouse Gas Emissions and Climate Change," of the EIR. All feasible mitigation measures have been incorporated to reduce these impacts to the extent possible; however, some residual effects would remain significant.

Comment Letter W-56: No name given



Comment Letter W-56

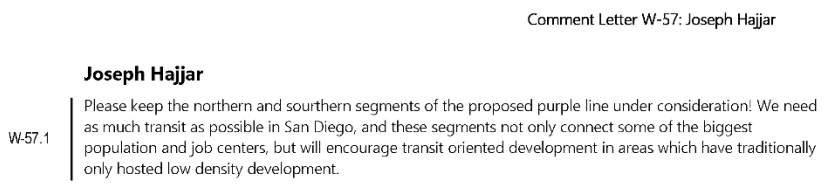
No name given

W-56.1 | Keep the purple line as a heavy rail and north of the 8 freeway. Redo the study including Chula Vista and San Ysidro. Why would you not include the total population areas of San Diego County.

Response 56.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

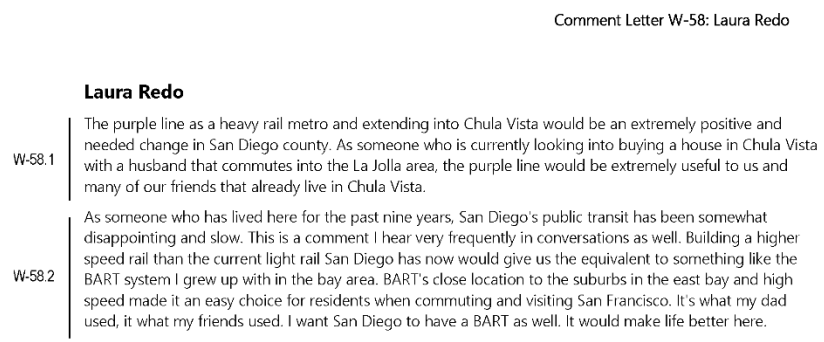
Comment Letter W-57: Joseph Hajjar



Response 57.1

The comment expresses support for the Purple Line being the full extent and for transit oriented development (TOD). This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified. SANDAG collaborates with local jurisdictions and transit agencies to identify opportunities for TOD and reimagining underutilized land such as parking lots, commercial spaces, and other land classified under state surplus land rules. The Blue Line TOD Study is an example of how SANDAG examined how new housing, retail, and community spaces can be integrated around key Blue Line stations to support regional housing goals, improve transit access, and promote healthier, more connected communities. The Smart Growth Incentive Program (SGIP) also supports local jurisdictions by funding comprehensive public infrastructure projects and planning activities that facilitate compact, mixed-use, transit-oriented development with increased housing and transportation choices. In the first five cycles, more than $60 million has been awarded to our local jurisdictions for projects throughout the region.

Comment Letter W-58: Laura Redo



Comment Letter W-58: Laura Redo

Laura Redo

W-58.1 The purple line as a heavy rail metro and extending into Chula Vista would be an extremely positive and needed change in San Diego county. As someone who is currently looking into buying a house in Chula Vista with a husband that commutes into the La Jolla area, the purple line would be extremely useful to us and many of our friends that already live in Chula Vista.

W-58.2 As someone who has lived here for the past nine years, San Diego's public transit has been somewhat disappointing and slow. This is a comment I hear very frequently in conversations as well. Building a higher speed rail than the current light rail San Diego has now would give us the equivalent to something like the BART system I grew up with in the bay area. BART's close location to the suburbs in the east bay and high speed made it an easy choice for residents when commuting and visiting San Francisco. It's what my dad used, it what my friends used. I want San Diego to have a BART as well. It would make life better here.

Response W-58.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. The comment expresses support for a higher speed rail system throughout San Diego similar to the BART in San Francisco. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

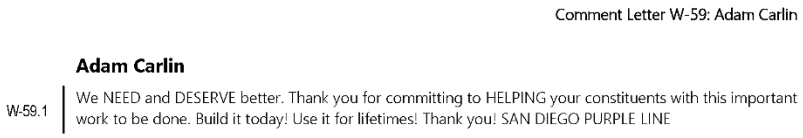
SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option and by investing in new infrastructure and striving constantly to improve service. It's important to note that a public transit system that attracts more riders will help us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

benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N*)*, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Response W-58.2

The comment expresses support for faster public transit. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years.

Comment Letter W-59: Adam Carlin



Comment Letter W-59: Adam Carlin

Adam Carlin

W-59.1 We NEED and DESERVE better. Thank you for committing to HELPING your constituents with this important work to be done. Build it today! Use it for lifetimes! Thank you! SAN DIEGO PURPLE LINE

Response W-59.1

The comment expresses support for the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-60: No name given



Comment Letter W-60

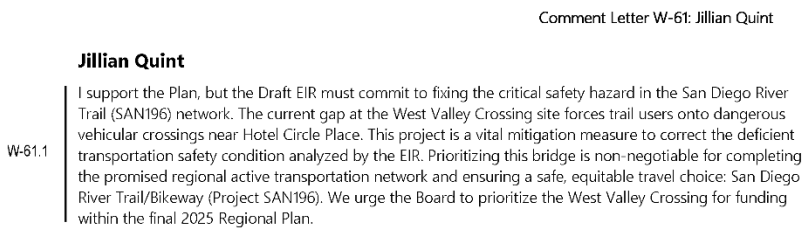
No name given

W-60.1 | Please build the original purple line.

Response W-60.1

The comment expresses support for the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-61: Jillian Quint



Comment Letter W-61: Jillian Quint

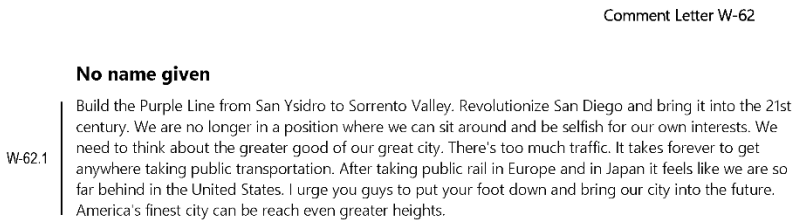
Jillian Quint

W-61.1 I support the Plan, but the Draft EIR must commit to fixing the critical safety hazard in the San Diego River Trail (SAN196) network. The current gap at the West Valley Crossing site forces trail users onto dangerous vehicular crossings near Hotel Circle Place. This project is a vital mitigation measure to correct the deficient transportation safety condition analyzed by the EIR. Prioritizing this bridge is non-negotiable for completing the promised regional active transportation network and ensuring a safe, equitable travel choice: San Diego River Trail/Bikeway (Project SAN196). We urge the Board to prioritize the West Valley Crossing for funding within the final 2025 Regional Plan.

Response W-61.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan.

Comment Letter W-62: No name given



Comment Letter W-62

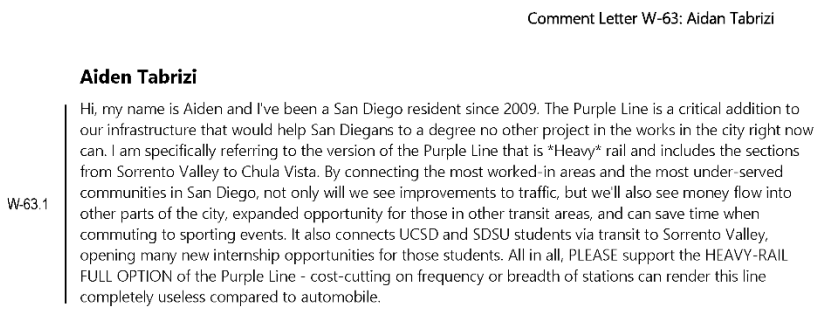
No name given

W-62.1 Build the Purple Line from San Ysidro to Sorrento Valley. Revolutionize San Diego and bring it into the 21st century. We are no longer in a position where we can sit around and be selfish for our own interests. We need to think about the greater good of our great city. There's too much traffic. It takes forever to get anywhere taking public transportation. After taking public rail in Europe and in Japan it feels like we are so far behind in the United States. I urge you guys to put your foot down and bring our city into the future. America's finest city can be reach even greater heights.

Response W-62.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-63: Aiden Tabrizi



Comment Letter W-63: Aidan Tabrizi

Aiden Tabrizi

W-63.1 Hi, my name is Aiden and I've been a San Diego resident since 2009. The Purple Line is a critical addition to our infrastructure that would help San Diegans to a degree no other project in the works in the city right now can. I am specifically referring to the version of the Purple Line that is *Heavy* rail and includes the sections from Sorrento Valley to Chula Vista. By connecting the most worked-in areas and the most under-served communities in San Diego, not only will we see improvements to traffic, but we'll also see money flow into other parts of the city, expanded opportunity for those in other transit areas, and can save time when commuting to sporting events. It also connects UCSD and SDSU students via transit to Sorrento Valley, opening many new internship opportunities for those students. All in all, PLEASE support the HEAVY-RAIL FULL OPTION of the Purple Line - cost-cutting on frequency or breadth of stations can render this line completely useless compared to automobile.

Response W-63.1

The comment expresses support for the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-64: No name given

Comment Letter W-64

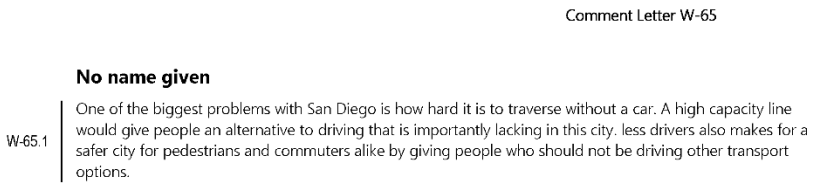
No name given

W-64.1 | Please build the full purple line including the northern section you are trying to cut. Yes, we noticed.

Response W-64.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-65: No name given



Comment Letter W-65

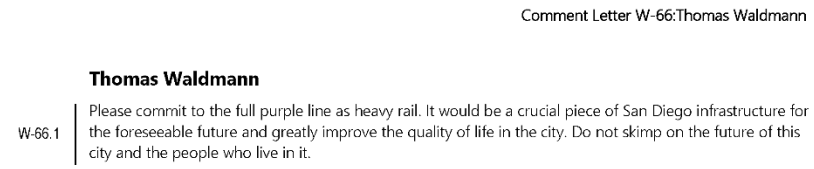
No name given

W-65.1 One of the biggest problems with San Diego is how hard it is to traverse without a car. A high capacity line would give people an alternative to driving that is importantly lacking in this city. less drivers also makes for a safer city for pedestrians and commuters alike by giving people who should not be driving other transport options.

Response W-65.1

The comment expresses support for a high-capacity line as a public transit option. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines.

Comment Letter W-66: Thomas Waldmann



Comment Letter W-66:Thomas Waldmann

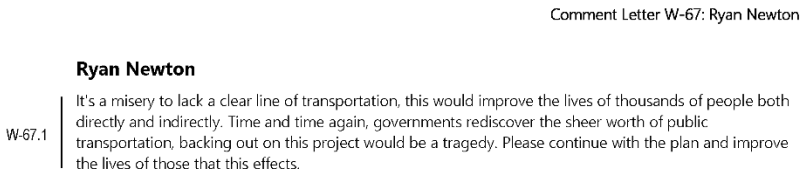
Thomas Waldmann

W-66.1 Please commit to the full purple line as heavy rail. It would be a crucial piece of San Diego infrastructure for the foreseeable future and greatly improve the quality of life in the city. Do not skimp on the future of this city and the people who live in it.

Response W-66.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-67: Ryan Newton



Comment Letter W-67: Ryan Newton

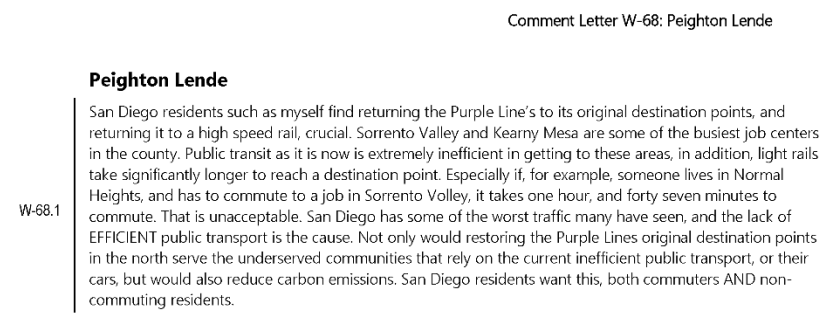
Ryan Newton

W-67.1 It's a misery to lack a clear line of transportation, this would improve the lives of thousands of people both directly and indirectly. Time and time again, governments rediscover the sheer worth of public transportation, backing out on this project would be a tragedy. Please continue with the plan and improve the lives of those that this effects.

Response W-67.1

The comment expresses support for a clear line of transportation. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Comment Letter W-68: Peighton Lende



Comment Letter W-68: Peighton Lende

Peighton Lende

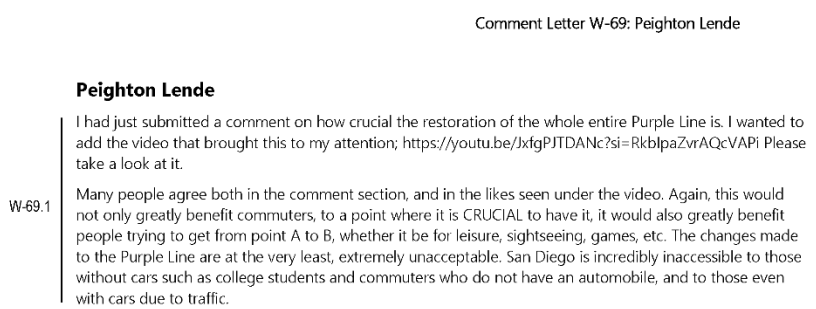
W-68.1 San Diego residents such as myself find returning the Purple Line's to its original destination points, and returning it to a high speed rail, crucial. Sorrento Valley and Kearny Mesa are some of the busiest job centers in the county. Public transit as it is now is extremely inefficient in getting to these areas, in addition, light rails take significantly longer to reach a destination point. Especially if, for example, someone lives in Normal Heights, and has to commute to a job in Sorrento Volley, it takes one hour, and forty seven minutes to commute. That is unacceptable. San Diego has some of the worst traffic many have seen, and the lack of EFFICIENT public transport is the cause. Not only would restoring the Purple Lines original destination points in the north serve the underserved communities that rely on the current inefficient public transport, or their cars, but would also reduce carbon emissions. San Diego residents want this, both commuters AND non-commuting residents.

Response W-68.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified. SANDAG's goal is to improve overall quality of life in the Region by making transit a more convenient and reliable travel option and by investing in new infrastructure and striving constantly to improve service. SANDAG proposes specific transit routes based on thorough analyses, looking at factors like where groups of people in our region frequently go, and which populations are most likely to use transit. SANDAG also collaborates with the San Diego Metropolitan System (MTS), the North County Transit District (NCTD), and other local government agencies, and seek feedback from the public on transportation needs. All of this helps to identify which transit solutions are most appropriate. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle

service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Comment Letter W-69: Peighton Lende



Comment Letter W-69: Peighton Lende

Peighton Lende

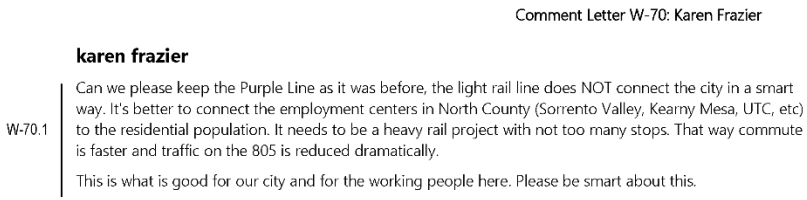
I had just submitted a comment on how crucial the restoration of the whole entire Purple Line is. I wanted to add the video that brought this to my attention; https://youtu.be/JxfgPJTDANc?si=RkblpaZvrAQcVAPi Please take a look at it.

W-69.1 Many people agree both in the comment section, and in the likes seen under the video. Again, this would not only greatly benefit commuters, to a point where it is CRUCIAL to have it, it would also greatly benefit people trying to get from point A to B, whether it be for leisure, sightseeing, games, etc. The changes made to the Purple Line are at the very least, extremely unacceptable. San Diego is incredibly inaccessible to those without cars such as college students and commuters who do not have an automobile, and to those even with cars due to traffic.

Response W-69.1

The comment expresses submitted a video on the Purple Line in support of the comment. Please see Response W-68.1. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-70: Karen Frazier



Comment Letter W-70: Karen Frazier

karen frazier

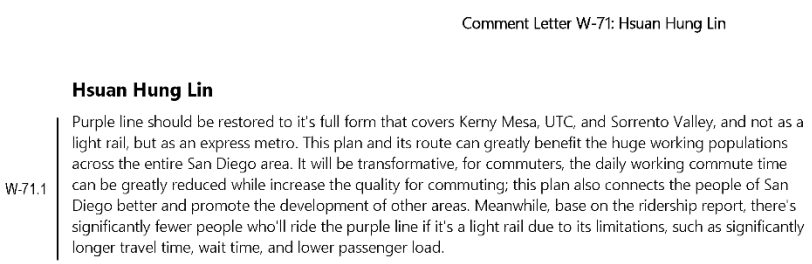
W-70.1 Can we please keep the Purple Line as it was before, the light rail line does NOT connect the city in a smart way. It's better to connect the employment centers in North County (Sorrento Valley, Kearny Mesa, UTC, etc) to the residential population. It needs to be a heavy rail project with not too many stops. That way commute is faster and traffic on the 805 is reduced dramatically.

This is what is good for our city and for the working people here. Please be smart about this.

Response W-70.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-71: Hsuan Hung Lin



Comment Letter W-71: Hsuan Hung Lin

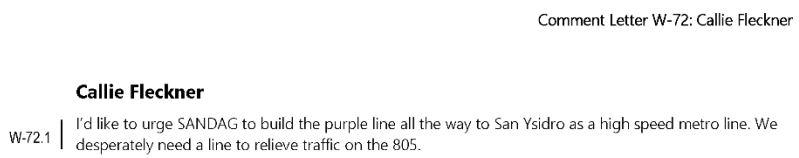
Hsuan Hung Lin

W-71.1 Purple line should be restored to it's full form that covers Kerny Mesa, UTC, and Sorrento Valley, and not as a light rail, but as an express metro. This plan and its route can greatly benefit the huge working populations across the entire San Diego area. It will be transformative, for commuters, the daily working commute time can be greatly reduced while increase the quality for commuting; this plan also connects the people of San Diego better and promote the development of other areas. Meanwhile, base on the ridership report, there's significantly fewer people who'll ride the purple line if it's a light rail due to its limitations, such as significantly longer travel time, wait time, and lower passenger load.

Response W-71.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-72: Callie Fleckner



Comment Letter W-72: Callie Fleckner

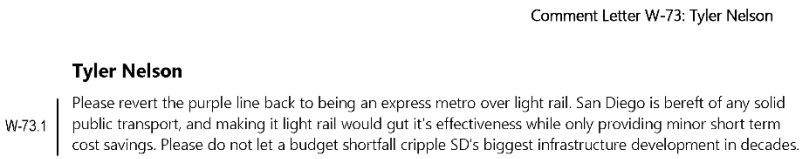
Callie Fleckner

W-72.1 I'd like to urge SANDAG to build the purple line all the way to San Ysidro as a high speed metro line. We desperately need a line to relieve traffic on the 805.

Response W-72.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-73: Tyler Nelson



Comment Letter W-73: Tyler Nelson

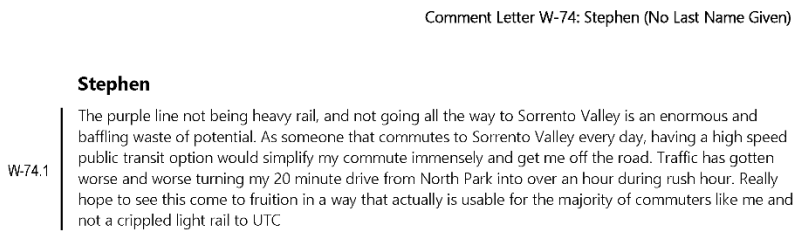
Tyler Nelson

W-73.1 Please revert the purple line back to being an express metro over light rail. San Diego is bereft of any solid public transport, and making it light rail would gut it's effectiveness while only providing minor short term cost savings. Please do not let a budget shortfall cripple SD's biggest infrastructure development in decades.

Response W-73.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-74: Stephen



Comment Letter W-74: Stephen (No Last Name Given)

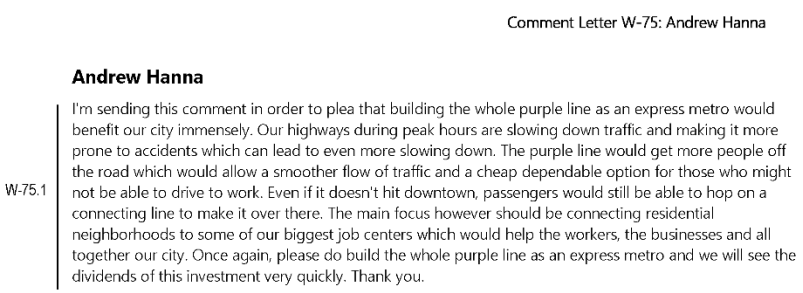
Stephen

W-74.1 The purple line not being heavy rail, and not going all the way to Sorrento Valley is an enormous and baffling waste of potential. As someone that commutes to Sorrento Valley every day, having a high speed public transit option would simplify my commute immensely and get me off the road. Traffic has gotten worse and worse turning my 20 minute drive from North Park into over an hour during rush hour. Really hope to see this come to fruition in a way that actually is usable for the majority of commuters like me and not a crippled light rail to UTC

Response W-74.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-75: Andrew Hanna



Comment Letter W-75: Andrew Hanna

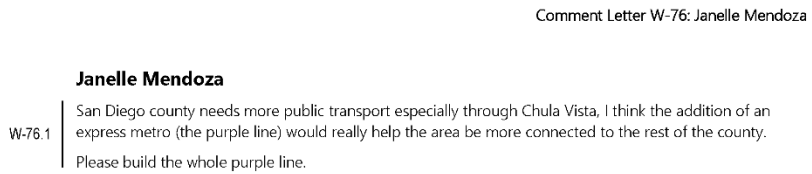
Andrew Hanna

W-75.1 I'm sending this comment in order to plea that building the whole purple line as an express metro would benefit our city immensely. Our highways during peak hours are slowing down traffic and making it more prone to accidents which can lead to even more slowing down. The purple line would get more people off the road which would allow a smoother flow of traffic and a cheap dependable option for those who might not be able to drive to work. Even if it doesn't hit downtown, passengers would still be able to hop on a connecting line to make it over there. The main focus however should be connecting residential neighborhoods to some of our biggest job centers which would help the workers, the businesses and all together our city. Once again, please do build the whole purple line as an express metro and we will see the dividends of this investment very quickly. Thank you.

Response W-75.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-76: Janelle Mendoza



Comment Letter W-76: Janelle Mendoza

Janelle Mendoza

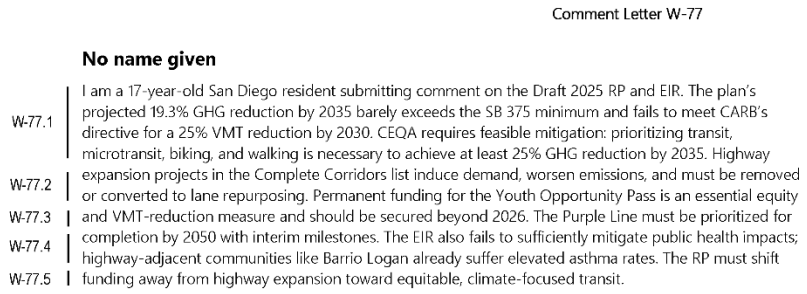
W-76.1 San Diego county needs more public transport especially through Chula Vista, I think the addition of an express metro (the purple line) would really help the area be more connected to the rest of the county.

Please build the whole purple line.

Response W-76.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-77: No name given



Comment Letter W-77

No name given

W-77.1 I am a 17-year-old San Diego resident submitting comment on the Draft 2025 RP and EIR. The plan's projected 19.3% GHG reduction by 2035 barely exceeds the SB 375 minimum and fails to meet CARB's directive for a 25% VMT reduction by 2030. CEQA requires feasible mitigation: prioritizing transit, microtransit, biking, and walking is necessary to achieve at least 25% GHG reduction by 2035. Highway

W-77.2 expansion projects in the Complete Corridors list induce demand, worsen emissions, and must be removed or converted to lane repurposing. Permanent funding for the Youth Opportunity Pass is an essential equity

W-77.3 and VMT-reduction measure and should be secured beyond 2026. The Purple Line must be prioritized for

W-77.4 completion by 2050 with interim milestones. The EIR also fails to sufficiently mitigate public health impacts; highway-adjacent communities like Barrio Logan already suffer elevated asthma rates. The RP must shift

W-77.5 funding away from highway expansion toward equitable, climate-focused transit.

Response W-77.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. The comment states that mitigation in the form of prioritizing transit, microtransit, biking and walking is required to achieve a 25% GHG reduction by 2035.
SANDAG is required by law to develop a Regional Plan and Sustainable Communities Strategy every four years. It must meet the state's requirement to reduce GHG emissions by reducing vehicle miles traveled from passenger vehicles by 19% per capita by 2035 compared with 2005 levels (mandated by California Senate Bill (SB) 375, 2008). Meeting this target is an important step toward California's broader climate goals and the State's commitment to reaching carbon neutrality. How much and how quickly the region can reduce GHGs will depend not only on SANDAG, but also on strong collaboration with local jurisdictions, state and federal agencies, and community partners. SANDAG sets regionwide objectives to reduce GHGs, however, meeting those objectives is limited by many factors including local jurisdiction plans and land use decisions, funding availability, and how quickly various industries are converting to clean technology.

The 2025 Regional Plan identifies strategies to reduce emissions, expand travel choices, and support sustainable growth. Appendix A of the Regional Plan describes the many projects, policies, and programs that reduce pollution, improve public health, and protect the environment. The proposed Plan also provides an analysis, as required by Assembly Bill 805, identifying vulnerable communities in the region and outlining projects, policies, and programs in the Plan that work together to reduce pollution exposure in these communities. (See Appendix A, Attachment A1). Appendix F presents the SCS land use pattern that supports the transportation network and preserves natural resources and agricultural lands. Chapter 3 outlines the proposed Plan's performance measures and identifies specific actions for achieving the Plan's goals. Appendix G documents where emissions come from in the region and projected emissions of GHGs to 2050, and Appendix R addresses flood prevention and resilience considerations for transportation

infrastructure and surrounding communities. SANDAG has also developed a regional Climate Action Roadmap through an EPA grant to provide a long-term vision to reduce carbon emissions by 2045.

As discussed in Section 4.8.4, "Environmental Impacts and Mitigation Measures," of the EIR, the 2025 Regional Plan achieves a 19.3% per capita reduction in greenhouse gas emissions by 2035, meeting the target set by SB 375. However, as discussed on page 4.8-39 to 4.8-53 of the EIR, it does not meet the state goals under SB 32 and AB 1279, which require deeper reductions by 2030 and 2045. 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 Impact GHG-4 may be reduced, but not to a less-than-significant level and therefore greenhouse gas impacts remain significant and unavoidable through 2050.Overall, the EIR acknowledges that the project would result in this significant and unavoidable impacts, as identified and fully analyzed in Section 4.8, "Greenhouse Gas Emissions and Climate Change," of the EIR. All feasible mitigation measures have been incorporated to reduce these impacts to the extent possible; however, some residual effects would remain significant. Section 4.16, "Transportation," of the EIR includes a discussion of VMT reduction targets. SANDAG acknowledges that VMT per capita by 2030 would be reduced by about 4.1% below 2019 levels, which is less than the 25% reduction target set by CARB. VMT per capita by 2050 would be reduced by 8.9% below 2019 levels, which is also less than the 30% reduction target established by CARB. SANDAG acknowledges that these impacts would be considered significant. Pages 4.16-39 to 4.16-42 of the EIR describe mitigation measures that would be implemented to achieve further VMT reductions. Transportation demand management (TDM) strategies, additional active transportation facilities, and VMT credit/banking programs are a few of the proposed strategies to further reduce impacts related to VMT. SANDAG cannot require local agencies to adopt the proposed mitigation measures, and it would be the responsibility of the CEQA lead agency of each project to determine and adopt mitigation.

Response W-77.2

The comment states that highway expansion projects must be removed or converted to lane repurposing. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. 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 lane connectors (Appendix A, 2025 Regional Plan). 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 because transit would be limited to travel in congested general-purpose lanes during peak commute hours. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would reduce the scope of transit and limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

Response W-77.3

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The YOP program is a pilot program currently funded through June 30, 2026. The proposed Plan assumes the YOP program will continue. SANDAG, MTS, and NCTD are currently seeking funding solutions to make this a reality.

The 2025 Regional Plan does not make any immediate changes to YOP or transit fares in general. It does include fare subsidies starting in 2029. Before making any changes to regional transit fares,

SANDAG will collaborate extensively with MTS and NCTD to gather feedback from the public on how much it should cost to ride transit, and which population groups should be eligible for discounts.

Response W-77.4

The comment expresses support for the Purple Line being prioritized for earlier completion. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-77.5

The comment states that the EIR fails to mitigate public health outcomes of the proposed Plan. The comment further states that the Regional Plan must move funding away from highway expansion and towards transit. Section 4.3, "Air Quality," of the EIR describes the current air quality conditions of the San Diego region and planned improvements to restrict the release of harmful pollutants. Pollutant reduction would primarily come from stricter regulations on vehicle idling, especially construction vehicles. Tables 4.3-9 and 4.3-12 show reductions in adverse health outcomes following Plan implementation by 2035 and 2050. In short, implementation of the proposed Plan would reduce adverse health outcomes by reducing the release of harmful pollutants, namely $PM_{2.5}$ and PM_{10} over time. The majority of project funding comes with constraints. SANDAG does not have the discretion to move funds designated for roadway projects to fund transit or active transportation investments. Similarly, SANDAG cannot take funds designated by the funding agency for roadway projects and utilize them to advance phasing of transit projects. Please see Global Response 4 for a discussion of funding constraints for the proposed Plan. Please also see Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. Draft EIR recirculation is not required because "significant new information," has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment. Please also see Response W-77.2.

Comment Letter W-78: Lexie H

Lexie H

W-78.1 I am a 17-year-old San Diego resident submitting comment on the Draft 2025 RP and EIR. The plan's projected 19.3% GHG reduction by 2035 barely exceeds the SB 375 minimum and fails to meet CARB's directive for a 25% VMT reduction by 2030. CEQA requires feasible mitigation: prioritizing transit, microtransit, biking, and walking is necessary to achieve at least 25% GHG reduction by 2035. Highway

W-78.2 expansion projects in the Complete Corridors list induce demand, worsen emissions, and must be removed or converted to lane repurposing. Permanent funding for the Youth Opportunity Pass is an essential equity

W-78.3 and VMT-reduction measure and should be secured beyond 2026. The Purple Line must be prioritized for

W-78.4 completion by 2050 with interim milestones. The EIR also fails to sufficiently mitigate public health impacts;

W-78.5 highway-adjacent communities like Barrio Logan already suffer elevated asthma rates. The RP must shift funding away from highway expansion toward equitable, climate-focused transit.

Response W-78.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. Please see Response W-77.1.

Response W-78.2

The comment states that highway expansion projects must be removed or converted to lane repurposing. Please see Response W-77.2.

Response W-78.3

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. This is a comment on the proposed Plan, not the adequacy of the EIR. Please see Response W-77.3.

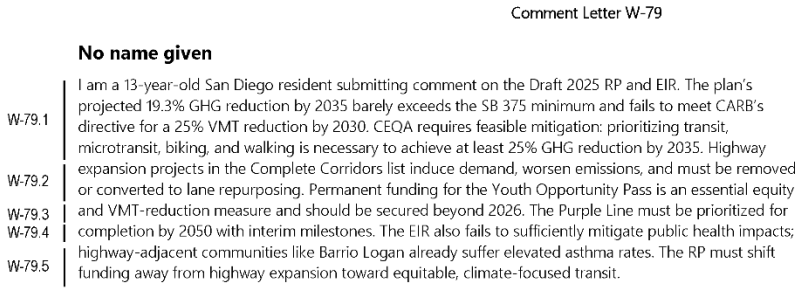
Response W-78.4

The comment expresses support for the Purple Line being prioritized for earlier completion. Please see Response W-77.4.

Response W-78.5

The comment states that the EIR fails to mitigate public health outcomes of the proposed Plan. Please see Response W-77.5.

Comment Letter W-79: No name given



Comment Letter W-79

No name given

W-79.1 I am a 13-year-old San Diego resident submitting comment on the Draft 2025 RP and EIR. The plan's projected 19.3% GHG reduction by 2035 barely exceeds the SB 375 minimum and fails to meet CARB's directive for a 25% VMT reduction by 2030. CEQA requires feasible mitigation: prioritizing transit, microtransit, biking, and walking is necessary to achieve at least 25% GHG reduction by 2035. Highway

W-79.2 expansion projects in the Complete Corridors list induce demand, worsen emissions, and must be removed or converted to lane repurposing. Permanent funding for the Youth Opportunity Pass is an essential equity

W-79.3 and VMT-reduction measure and should be secured beyond 2026. The Purple Line must be prioritized for

W-79.4 completion by 2050 with interim milestones. The EIR also fails to sufficiently mitigate public health impacts;

W-79.5 highway-adjacent communities like Barrio Logan already suffer elevated asthma rates. The RP must shift funding away from highway expansion toward equitable, climate-focused transit.

Response W-79.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. Please see Response W-77.1.

Response W-79.2

The comment states that highway expansion projects must be removed or converted to lane repurposing. Please see Response W-77.2.

Response W-79.3

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. Please see Response W-77.3.

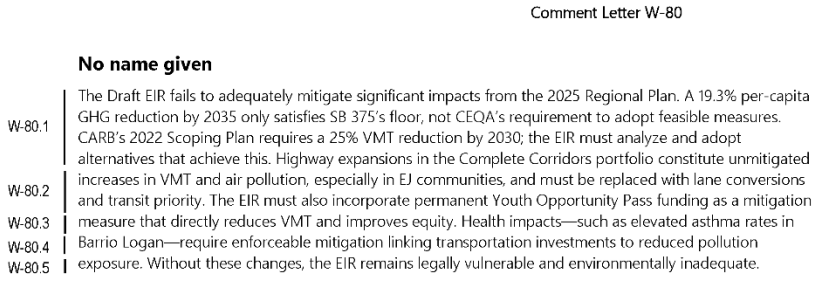
Response W-79.4

The comment expresses support for the Purple Line being prioritized for earlier completion. Please see Response W-77.4.

Response W-79.5

The comment states that the EIR fails to mitigate public health outcomes of the proposed Plan. Please see Response W-77.5.

Comment Letter W-80: No name given



Comment Letter W-80

No name given

W-80.1 The Draft EIR fails to adequately mitigate significant impacts from the 2025 Regional Plan. A 19.3% per-capita GHG reduction by 2035 only satisfies SB 375's floor, not CEQA's requirement to adopt feasible measures. CARB's 2022 Scoping Plan requires a 25% VMT reduction by 2030; the EIR must analyze and adopt alternatives that achieve this. Highway expansions in the Complete Corridors portfolio constitute unmitigated

W-80.2 increases in VMT and air pollution, especially in EJ communities, and must be replaced with lane conversions and transit priority. The EIR must also incorporate permanent Youth Opportunity Pass funding as a mitigation

W-80.3 measure that directly reduces VMT and improves equity. Health impacts—such as elevated asthma rates in

W-80.4 Barrio Logan—require enforceable mitigation linking transportation investments to reduced pollution

W-80.5 exposure. Without these changes, the EIR remains legally vulnerable and environmentally inadequate.

Response W-80.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. Please see Response W-77.1.

Response W-80.2

The comment states that highway expansion projects must be removed or converted to lane repurposing. Please see Response W-77.2.

Response W-80.3

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. Please see Response W-77.3.

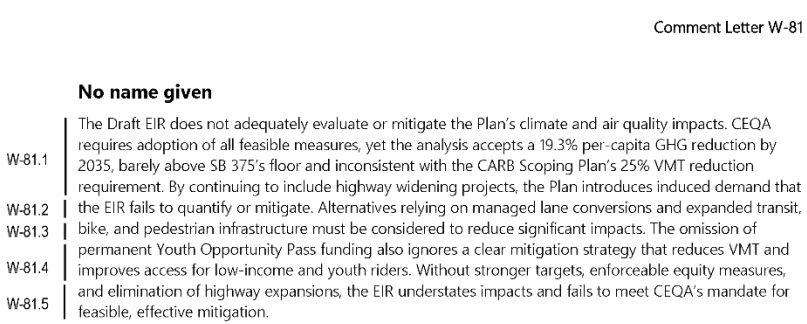
Response W-80.4

The comment expresses support for the Purple Line being prioritized for earlier completion. Please see Response W-77.4.

Response W-80.5

The comment states that the EIR fails to mitigate public health outcomes of the proposed Plan. Please see Response W-77.5.

Comment Letter W-81: No name given



Comment Letter W-81

No name given

W-81.1 The Draft EIR does not adequately evaluate or mitigate the Plan's climate and air quality impacts. CEQA requires adoption of all feasible measures, yet the analysis accepts a 19.3% per-capita GHG reduction by 2035, barely above SB 375's floor and inconsistent with the CARB Scoping Plan's 25% VMT reduction requirement. By continuing to include highway widening projects, the Plan introduces induced demand that

W-81.2 the EIR fails to quantify or mitigate. Alternatives relying on managed lane conversions and expanded transit,

W-81.3 bike, and pedestrian infrastructure must be considered to reduce significant impacts. The omission of

W-81.4 permanent Youth Opportunity Pass funding also ignores a clear mitigation strategy that reduces VMT and improves access for low-income and youth riders. Without stronger targets, enforceable equity measures,

W-81.5 and elimination of highway expansions, the EIR understates impacts and fails to meet CEQA's mandate for feasible, effective mitigation.

Response W-81.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. Please see Response W-77.1.

Response W-81.2

The comment states that highway expansion projects must be removed or converted to general lane repurposing. Please see Response W-77.2.

Response W-81.3

The comment states that alternatives relying on managed lane conversions and expanded transit and active transportation infrastructure must be considered. The proposed Plan already incorporates managed lane conversions and expanded transit, bike, and pedestrian infrastructure and does not need to add this element to the EIR's discussion of alternatives. Please also see Response W-77.2. Please see Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response W-81.4

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. Please see Response W-77.3.

Response W-81.5

The comment states that without stronger targets, enforceable equity measures, and elimination of highway expansion, the EIR understates impacts and thus fails to provide feasible and effective mitigation. The comment provides no evidence that the EIR understates the impacts of the proposed Plan. Instead the comment identifies proposed mitigation.

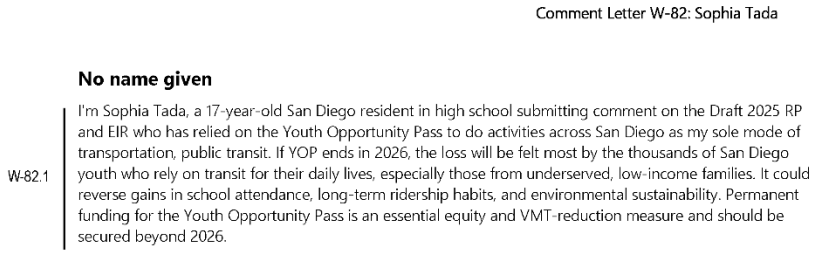
Specific to stronger targets, the comment does not identify which targets analyzed in the EIR should be strengthened. In addition, the comment provides no evidence that stronger targets by themselves would substantially lessen the proposed Plan's significant impacts.

Specific to equity measures, the EIR integrates equity considerations throughout the analysis of transportation, air quality, and greenhouse gas emissions, and references state requirements under Senate Bill 535 and Assembly Bill 1532, which direct benefits of climate and transportation investments to disadvantaged communities as identified through CalEnviroScreen. In addition, the 2025 Regional Plan incorporates policies and strategies intended to expand equitable access to mobility, improve public health, and prioritize investments in underserved communities. These commitments ensure that regional planning and implementation are consistent with the intent of California's environmental justice policies, even though CEQA itself does not require a distinct Environmental Justice analysis.

As to the suggestion to eliminate highway expansion, 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 lane connectors (Appendix A, 2025 Regional Plan). 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. Among the benefits of managed lanes is that transit may utilize those lanes during peak hour congestion on freeways. For example, forecasted ABM3 model results indicate that along the I-805 and I-15 facilities, managed lane speeds may be 20% faster compared to general purpose lanes and travel times may experience up to a 23% reduction. Future changes in occupancy rules (three occupants required for toll-free travel) and pricing for single-occupant or two-occupant vehicles are reflected in the model to facilitate these faster travel speeds while managing demand. Eliminating those projects would limit the effectiveness of transit and vehicle occupancy policies in reducing VMT and other impacts of the proposed Plan.

The comment does not address the adequacy of the EIR's analysis or mitigation of significant environmental issues pursuant to Guidelines section 15204(a). Neither does the comment identify inadequacies in the EIR. Based on the above information, no revisions to the EIR are needed in response to this comment.

Comment Letter W-82: No name given



Comment Letter W-82: Sophia Tada

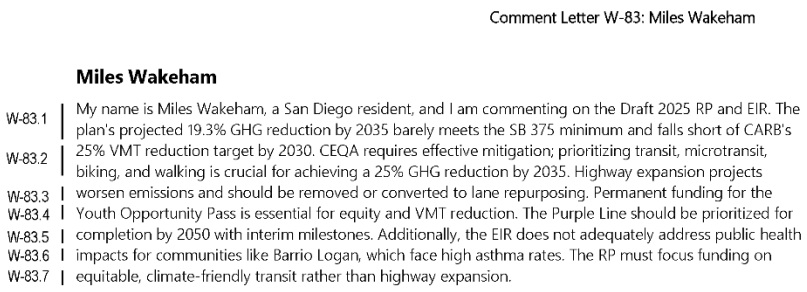
No name given

W-82.1 I'm Sophia Tada, a 17-year-old San Diego resident in high school submitting comment on the Draft 2025 RP and EIR who has relied on the Youth Opportunity Pass to do activities across San Diego as my sole mode of transportation, public transit. If YOP ends in 2026, the loss will be felt most by the thousands of San Diego youth who rely on transit for their daily lives, especially those from underserved, low-income families. It could reverse gains in school attendance, long-term ridership habits, and environmental sustainability. Permanent funding for the Youth Opportunity Pass is an essential equity and VMT-reduction measure and should be secured beyond 2026.

Response W-82.1

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. Please see Response W-77.3.

Comment Letter W-83: Miles Wakeham



Comment Letter W-83: Miles Wakeham

Miles Wakeham

W-83.1 | My name is Miles Wakeham, a San Diego resident, and I am commenting on the Draft 2025 RP and EIR. The plan's projected 19.3% GHG reduction by 2035 barely meets the SB 375 minimum and falls short of CARB's
W-83.2 | 25% VMT reduction target by 2030. CEQA requires effective mitigation; prioritizing transit, microtransit, biking, and walking is crucial for achieving a 25% GHG reduction by 2035. Highway expansion projects
W-83.3 | worsen emissions and should be removed or converted to lane repurposing. Permanent funding for the
W-83.4 | Youth Opportunity Pass is essential for equity and VMT reduction. The Purple Line should be prioritized for
W-83.5 | completion by 2050 with interim milestones. Additionally, the EIR does not adequately address public health
W-83.6 | impacts for communities like Barrio Logan, which face high asthma rates. The RP must focus funding on
W-83.7 | equitable, climate-friendly transit rather than highway expansion.

Response W-83.1

The comment states that proposed Plan barely exceeds the SB 375 minimum GHG reduction goal by 2035 and fails to meet CARB's goal of 25% VMT reduction by 2030. Please see Response W-77.1.

Response W-83.2

The comment states that CEQA requires effective mitigation. Please see Response W-81.5. The comment also states that prioritizing transit, microtransit, biking, and walking is crucial for achieving a 25% GHG reduction by 2035. Please see Response W-77.1.

Response W-83.3

The comment states that highway expansion projects should be removed or converted to lane repurposing. Please see Response W-77.2.

Response W-83.4

The comment expresses support for funding Youth Opportunity Passes (YOP) beyond 2026. Please see Response W-77.3.

Response W-83.5

The comment expresses support for the Purple Line being prioritized for earlier completion. Please see Response W-77.4.

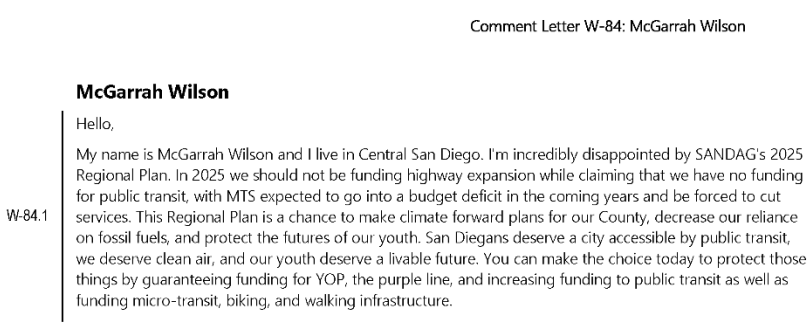
Response W-83.6

The comment states that the EIR fails to mitigate public health outcomes of the proposed Plan. Please see Response W-77.5.

Response W-83.7

The comment states that the RP must focus funding on equitable transit rather than highway expansion. Please see Responses W-77.2 and W-81.5.

Comment Letter W-84: McGarrah Wilson



Comment Letter W-84: McGarrah Wilson

McGarrah Wilson

W-84.1

Hello,

My name is McGarrah Wilson and I live in Central San Diego. I'm incredibly disappointed by SANDAG's 2025 Regional Plan. In 2025 we should not be funding highway expansion while claiming that we have no funding for public transit, with MTS expected to go into a budget deficit in the coming years and be forced to cut services. This Regional Plan is a chance to make climate forward plans for our County, decrease our reliance on fossil fuels, and protect the futures of our youth. San Diegans deserve a city accessible by public transit, we deserve clean air, and our youth deserve a livable future. You can make the choice today to protect those things by guaranteeing funding for YOP, the purple line, and increasing funding to public transit as well as funding micro-transit, biking, and walking infrastructure.

Response W-84.1

The comment expresses dissatisfaction with the proposed Plan. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. Please see Responses W-77.1 through W-77.5.

Comment Letter W-85: Sofia Carrasco

Sofia Carrasco

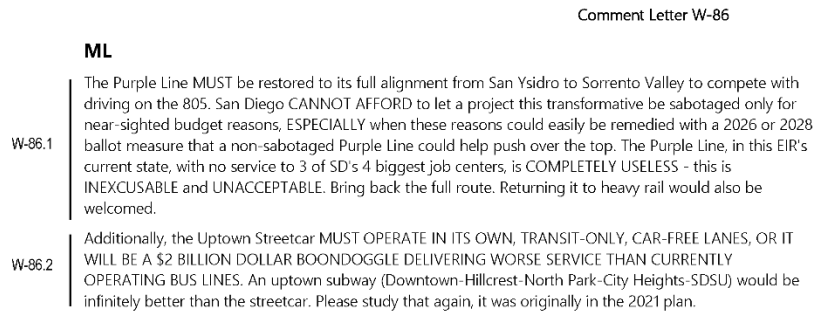
Hello SANDAG,

W-85.1 My name is Sofia Carrasco and I am a resident of Carmel Valley / San Diego. I would like to express disapproval of the current Regional Transit Plan and urge the board to adopt greater priorities toward public transit. As a resident who cares deeply about reducing San Diego's carbon emissions and finds the trolley extremely limited when travelling to meet my loved ones, I find the current RP inadequate. Please prioritize Flexible Fleet + Purple Line funding, eliminate highway expansions (including managed lanes), establish permanent funding for the Youth Opportunity Pass (YOP), and secure a bicycle share program. These goals should be specific and targeted towards a 25% GHG reduction by 2035. Our RP must meet the needs of ALL San Diegans, including those who struggle with immobility and pollution from our car-dominated transportation system.

Response W-85.1

The comment expresses dissatisfaction with the proposed Plan. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. Please see Responses W-77.1 through W-77.5.

Comment Letter W-86: ML



Comment Letter W-86

ML

W-86.1 The Purple Line MUST be restored to its full alignment from San Ysidro to Sorrento Valley to compete with driving on the 805. San Diego CANNOT AFFORD to let a project this transformative be sabotaged only for near-sighted budget reasons, ESPECIALLY when these reasons could easily be remedied with a 2026 or 2028 ballot measure that a non-sabotaged Purple Line could help push over the top. The Purple Line, in this EIR's current state, with no service to 3 of SD's 4 biggest job centers, is COMPLETELY USELESS - this is INEXCUSABLE and UNACCEPTABLE. Bring back the full route. Returning it to heavy rail would also be welcomed.

W-86.2 Additionally, the Uptown Streetcar MUST OPERATE IN ITS OWN, TRANSIT-ONLY, CAR-FREE LANES, OR IT WILL BE A $2 BILLION DOLLAR BOONDOGGLE DELIVERING WORSE SERVICE THAN CURRENTLY OPERATING BUS LINES. An uptown subway (Downtown-Hillcrest-North Park-City Heights-SDSU) would be infinitely better than the streetcar. Please study that again, it was originally in the 2021 plan.

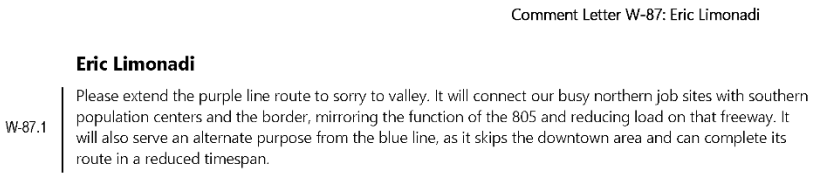
Response W-86.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-86.2

The comment expresses support for an uptown subway (Downtown-Hillcrest-North Park-City Heights-SDSU), included in the Amended 2021 Plan. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. Design has not been finalized for the project referenced in the (TL013 in the proposed Plan).

Comment Letter W-87: Eric Limonadi



Comment Letter W-87: Eric Limonadi

Eric Limonadi

W-87.1 Please extend the purple line route to sorry to valley. It will connect our busy northern job sites with southern population centers and the border, mirroring the function of the 805 and reducing load on that freeway. It will also serve an alternate purpose from the blue line, as it skips the downtown area and can complete its route in a reduced timespan.

Response W-87.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-88: No name given

Comment Letter W-88

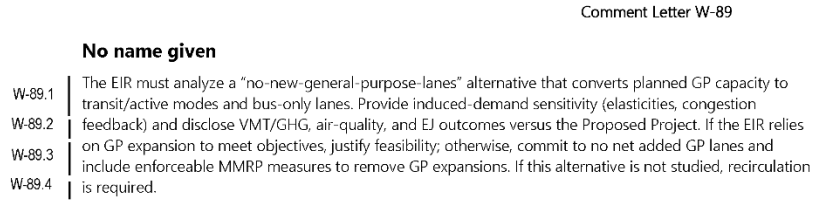
No name given

W-88.1 San Diego residents want a 25-30% reduction in GHGs. DO better SANDAG. No more highway expansion, you are failing us. We dont want more highways, we dont want more managed lanes, we want improved public transit

Response W-88.1

The comment expresses dissatisfaction with the proposed Plan, opposition to highways and managed lanes, and support for improved public transit. This is a comment on the proposed Plan, not the EIR. As such, no further response is required. Please see Responses W-77.1 and W-77.2. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N), focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Comment Letter W-89: No name given



Comment Letter W-89

No name given

W-89.1 The EIR must analyze a "no-new-general-purpose-lanes" alternative that converts planned GP capacity to transit/active modes and bus-only lanes. Provide induced-demand sensitivity (elasticities, congestion
W-89.2 feedback) and disclose VMT/GHG, air-quality, and EJ outcomes versus the Proposed Project. If the EIR relies
W-89.3 on GP expansion to meet objectives, justify feasibility; otherwise, commit to no net added GP lanes and include enforceable MMRP measures to remove GP expansions. If this alternative is not studied, recirculation
W-89.4 is required.

Response W-89.1

The comment states that the EIR must analyze an alternative that converts planned general purpose lane capacity to transit/active modes and bus-only lanes.

There are no new general purpose freeway lanes in the proposed Plan, therefore, the proposed Plan already incorporates the suggested element and does not need to add this element to the EIR's discussion of alternatives. Please refer to Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response W-89.2

The comment requests data related to the suggested alternative in comment W-89.1 and a comparison of that data to the proposed Plan data.

As described in Response W-89.1, the proposed Plan already incorporates the suggested element and does not need to add this element to the EIR's discussion of alternatives. Please refer to Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response W-89.2

The comment states that the feasibility of general-purpose lane expansion must be justified if the EIR relies on general purpose lane expansion to meet its objectives. There are no new general purpose freeway lanes in the proposed Plan, As such, neither the proposed Plan nor the EIR depends on general purpose lane expansion to meet the outlined objectives. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response W-89.4

The comment asserts that recirculation of the DEIR would be required if the suggested alternative described in comment W-89.1 is not evaluated.

As described in Response W-89.1, the proposed Plan already incorporates the suggested element and does not need to add this element to the EIR's discussion of alternatives. Please refer to Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements.

Additionally, Draft EIR recirculation is not required because "significant new information," has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5.

This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-90: No name given

Comment Letter W-90

No name given

W-90.1 | Disclose all VMT/GHG model assumptions (fleet mix, EMFAC version, TNCs, telework, land use, baseline speeds, price signals). Provide a bounding case without post-processing adjustments and show compliance
W-90.2 | with SB 375 targets under lower-benefit scenarios. Commit to transit-first phasing with interim GHG caps and
W-90.3 | VMT triggers in the MMRP; if triggers are missed, reallocate highway funds to transit/AT mitigation. If results depend on speculative assumptions, revise and recirculate.

Response W-90.1

The comment requests data related to fleet mix, EMFAC version, TNCs, telework, land use, baseline speeds, price signals. ABM3 modeling assumptions and data, including the data requested in the comment, can be found in Appendices B and M to the 2025 Regional Plan. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment. The activity-based model and other analyses used to inform the proposed Plan have been reviewed through SANDAG's peer review process and documented in the technical methodology submitted to CARB, which is also included in Appendix B. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Response W-90.2

The comment requests that the proposed Plan provide a bounding case with post-processing adjustments and show compliance with SB 375 targets under lower-benefit scenarios.

Senate Bill 375 requires metropolitan planning organizations, such as SANDAG, to coordinate with the California Air Resources Board (CARB) on the technical methodology used to demonstrate achievement of GHG emissions reduction targets. SANDAG significantly updated the activity-based model (ABMs) used for the proposed Plan compared to prior plans. While state law does not require that SANDAG provide a bounding case or show compliance under lower-benefit scenarios, SANDAG conducted several sensitivity tests to evaluate the responses of the model to key inputs and factors which is discussed in the *Technical Methodology to Estimate Greenhouse Gas Emissions for the 2025 Regional Plan and Sustainable Communities Strategy from the San Diego Association of Governments* (SANDAG 2025b) and Appendix M to the proposed Plan. CARB accepted that SANDAG's technical methodology operates accurately to yield estimates of greenhouse gas emissions on February 7, 2025.

The post-processing adjustments noted in Appendix B to the proposed Plan for EMFAC (2007-2014) and induced demand are required by CARB. As described in the 2025 Regional Plan Technical

Methodology, ABM3 also included new components that were previously estimated with off-model calculators. As a result, only two strategies, Vanpool and Carpool, were estimated off model for the proposed Plan. While those were found to operate accurately by CARB, it is worth noting that the proposed Plan still achieves the region's SB 375 targets set by CARB without those adjustments.

For the reasons noted above, no revisions to the EIR are needed in response to this comment.

Response W-90.3

The comment proposes transit-first phasing with interim GHG caps and VMT triggers in the MMRP that require reallocation of highway funds to transit/active transportation if triggers are missed. The comment asserts that recirculation of the DEIR should be revised and recirculated if the results of analysis suggested in the comment are speculative. The majority of project funding comes with constraints. SANDAG does not have the discretion to move funds designated for roadway projects to fund transit or active transportation investments. Similarly, SANDAG cannot take funds designated by the funding agency for roadway projects and utilize them to advance phasing of transit projects. Please see Global Response 4 for a discussion of funding constraints for the proposed Plan. Please also see Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. Draft EIR recirculation is not required because "significant new information," has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-91: No name given

Comment Letter W-91

No name given

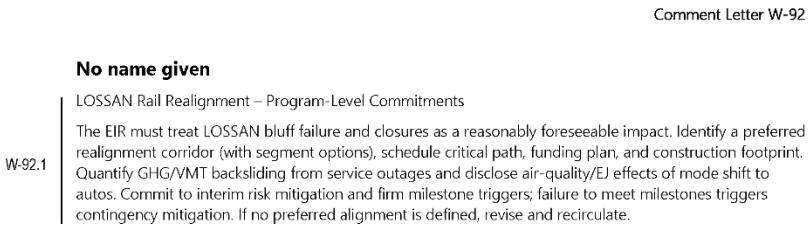
Adopt the Environmentally Superior Alternative

W-91.1 Identify the Environmentally Superior Alternative (lowest VMT/GHG/criteria pollutants, strongest mode shift). If not the Proposed Project, the Board must adopt it or make detailed infeasibility findings supported by substantial evidence. At minimum, incorporate all ESA transit/active-transportation elements as binding mitigation (with schedules, budgets, and performance metrics) in the MMRP. Provide a side-by-side table of impacts and enforceable commitments.

Response W-91.1

The comment expresses support for the Environmentally Superior Alternative. Please see Global Response 1 for a discussion of how the EIR alternatives analysis complies with CEQA requirements. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-92: No name given



Comment Letter W-92

No name given

LOSSAN Rail Realignment – Program-Level Commitments

W-92.1 The EIR must treat LOSSAN bluff failure and closures as a reasonably foreseeable impact. Identify a preferred realignment corridor (with segment options), schedule critical path, funding plan, and construction footprint. Quantify GHG/VMT backsliding from service outages and disclose air-quality/EJ effects of mode shift to autos. Commit to interim risk mitigation and firm milestone triggers; failure to meet milestones triggers contingency mitigation. If no preferred alignment is defined, revise and recirculate.

Response W-92.1

The comment states that the EIR must treat LOSSAN bluff failure as a reasonably foreseeable impact and identify a preferred realignment corridor as well as a funding plan and construction footprint. The comments also requests quantification of GHG/VMT backsliding and air quality/EJ effects of mode shift to autos resulting from service outages. The comment expresses support for interim risk mitigation and related triggers for contingency mitigation. The comment asserts that recirculation of the DEIR would be required if a preferred alignment is not defined.

The LOSSAN Rail Corridor improvements are included in the 2025 Regional Plan and were analyzed throughout the EIR as part of the regional transportation network. Specific LOSSAN improvements are listed in Tables 2-7 through 2-10 of the EIR and include double-tracking, grade separations, bridge replacements, realignment in Del Mar, and the proposed Miramar Tunnel. These improvements are considered part of the regional rail system evaluated under the EIR's cumulative transportation, air quality, biological, aesthetic, and wildfire analyses.

The LOSSAN improvements are reasonably foreseeable and analyzed as integral components of the proposed Plan's regional rail network. The EIR serves as a first-tier, program-level document that provides a foundation for subsequent CEQA reviews, rather than analyzing project-specific impacts. Details for future transportation and land use projects, such as the Regional Rail 598 Project which includes the LOSSAN rail corridor, will vary significantly and are appropriately deferred to later, site-specific environmental documents. This tiered approach, deferring project-specific details to subsequent environmental review, is consistent with CEQA guidance (In re Bay Delta [2008] 43 Cal.4th 1143, 1174).

Notably, SANDAG is currently preparing a Draft EIR for the LOSSAN Rail Realignment Project and the possible alternative alignments will be studied in further detail in that project-specific environmental process.

Additionally, Draft EIR recirculation is not required because "significant new information," has not been added to the Draft EIR that would trigger Draft EIR recirculation under CEQA Guidelines Section 15088.5. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-93: No name given

Comment Letter W-93

No name given

Purple Line – Mode, Phasing, and Performance Standards

W-93.1 Evaluate Purple Line as high-capacity urban rail (trolley-compatible) with staged openings. For each stage, disclose capital footprint, ridership, travel time, headways, and mode-shift. Include binding performance standards in the MMRP (e.g., ≤10-min peak headways, 90th-percentile travel time, reliability >95%). If commuter-rail-style alternatives underperform on VMT/GHG, explain feasibility and adopt the superior urban-rail option or integrate its elements as mitigation.

Response W-93.1

The comment expresses support for the Purple Line as a commuter rail service. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements, such as the Purple Line. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Comment Letter W-94: No name given

Comment Letter W-94

No name given

6. Core Network First – Enforceable Phasing

W-94.1 Before any suburban expansions, commit to minimum service levels in dense urban corridors: bus grid ≤10-min all-day, trolley ≤7.5-min peak, weekend ≤10-min, plus bus-only lanes, TSP at ≥100 intersections/year, and all-door boarding. Put these into the MMRP with dated milestones and budget lines. If milestones slip, obligate reallocation from roadway capacity to operations/capital that restores the metrics. Provide a VMT/GHG delta showing this phasing materially reduces impacts.

Response W-94.1

The comment states that minimum transit service in dense urban corridors should be prioritized before suburban expansion of transit. The comment states that this phased development approach should be in the MMRP with milestones and that failure to meet the milestones triggers reallocation of roadway capacity to operations/capital. The comment requests development of a VMT/GHG delta showing that phasing reduces impacts. The EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process. The recommended service levels provided by the commenter for inclusion into the Mitigation, Monitoring and Reporting Program (MMRP), are not considered feasible mitigation measures under CEQA per Section 10597 of the CEQA Guidelines.

Because the EIR is programmatic in nature, its analysis focuses on the regional transportation system as a whole and does not establish or commit to specific minimum service levels (such as a set number of trains per hour or minimum daily frequency). Instead, the EIR evaluates systemwide performance and potential environmental effects using regional modeling and policy-level metrics, such as travel demand, ridership, and mode share improvements, rather than fixed operational standards. For example, Chapter 2, Project Description, and Section 4.16, "Transportation," of the EIR, describe that the Plan's transit improvements include expanded and more frequent services across the regional network, but the EIR does not define numeric service thresholds. This approach is consistent with the purpose of a program-level environmental document, which assesses collective regional outcomes and establishes a framework for future project-level CEQA review.

As specific transportation improvements advance to implementation, they will undergo subsequent, project-level CEQA review that can evaluate and disclose operational details, including proposed service frequency, capacity, and scheduling. Those future environmental documents will be the appropriate mechanism to identify and assess minimum service levels, if applicable.

The majority of project funding comes with constraints. SANDAG does not have the discretion to move funds designated for roadway projects to fund transit or active transportation investments. Similarly, SANDAG cannot take funds designated by the funding agency for roadway projects and utilize them to advance phasing of transit projects. Please see Global Response 4 for a discussion of funding constraints for the proposed Plan. This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-95: No name given

Comment Letter W-95

No name given

Micromobility Interoperability as Mitigation

W-95.1 Analyze a regionally interoperable, dock-forward bikeshare/scooter system (common payment, intercity trips, parking corrals) as a VMT/GHG mitigation. Quantify first/last-mile capture to transit and disclose curb/sidewalk footprints, parking management, and safety infrastructure (protected lanes, slow-streets). Add enforceable deployment targets (stations per sq-mi, fleet size, coverage) and agency coordination mechanisms. If rejected, provide evidence of infeasibility; otherwise add to the MMRP.

Response W-95.1

The comment requests analysis of a regionally interoperable bikeshare/scooter system as a mitigation measure. While a regionally interoperable bikeshare/scootershare system might close a first/last-mile gap to transit for some individuals, the comment hasn't provided evidence that adoption of such mobility technology would occur across demographic groups and in a manner to significantly reduce GHG emissions or VMT to a less than significant level. After a period of rapid growth between 2018 and 2023, jurisdictional bikeshare and scootershare programs have ceased operation and there are currently no app based or regional providers for e-bike or e-scooter rentals within the San Diego region with the exception of localized shop-based rentals for e-bikes and e-scooters are available within the downtown and beach communities. Section 4.16, p 12.

However, the proposed Plan still includes 36 Flexible Fleet service areas that fill gaps in the transit network to provide mobility options across the region. These services are expected to be operated by local jurisdictions or transit agencies. The hours and service areas can be adapted over time in response to community needs and resource availability. The cost of Flexible Fleet services and the forms of payment accepted are analyzed and determined when the operating agency plans the service. .

This comment does not identify inadequacies in the EIR. Accordingly, no revisions to the EIR are needed in response to this comment.

Comment Letter W-96: No name given

Comment Letter W-96

No name given

Active Transportation Network – Protected, Continuous, Scheduled

W-96.1 | Commit to a protected, connected bike/walk network linking job/housing centers across jurisdictions (e.g.,
W-96.2 | 4th/5th, Pershing, Rose Creek analogs). Provide a map of corridors, typical sections, protected intersections,
W-96.3 | and an annual delivery schedule (lane-miles/year) with funding. Model VMT/GHG and collision reductions;
W-96.4 | include noise and air-quality co-benefits in EJ areas. Place delivery milestones and maintenance obligations
in the MMRP, with corrective actions if targets are missed.

Response W-96.1

The comment expresses support for a protected, connected bike/walk network linking job/housing centers across jurisdictions. The proposed Plan already includes the suggested bike/walk network component as further described below. Also, this is not a comment on the adequacy of the EIR. For these reasons, no further response is required and no revisions to the EIR are needed in response to this comment.

The 2025 Regional Plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans.

The 2025 Regional Plan Active Transportation Network follows best practices by providing an average network bikeway density of approximately 1 mile so that vital connections between regional activity centers, schools, housing, employment, and transit stops are provided with safe infrastructure for all ages and abilities. (2025 Regional Plan, Appendix A).

As described in Tables 4.16-5 and Table 4.16-6 of the EIR and summarized in the table below, the proposed Plan would substantially increase the total number of Class I and Class IV facilities and would therefore provide additional protected and separate bicycle facilities within the region.

Category of Bike Facilities	Baseline Year 2022	Year 2035 Proposed Plan	Year 2050 Proposed Plan	Change from Baseline Year 2022 to Year 2050
Class I	396	570	1,057	661
Class IV	55	577	1,903	1,848

As defined in Chapter 4.16, *Transportation*, of this EIR, Class I facilities provide a completely separated right-of-way designed for the exclusive use of bicycles and pedestrians with crossflows by motorists

minimized. Class IV facilities provide a right-of-way designated exclusively for bicycle travel within the roadway.

Response W-96.2

The comment requests a map of corridors, typical sections, protected intersections, and an annual delivery schedule (lane-miles/year) with funding. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Appendix A to the proposed Plan does include a project list and maps of the active transportation network in 2035 and 2050. (2025 Regional Plan, Appendix A). As described in Appendix K, *Active Transportation,* of the proposed Plan, SANDAG works closely with local partners to provide technical resources, education, and assistance in project and program design and implementation using the best currently available standards and guidelines.

The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County; specific details concerning individual projects will be evaluated during project-level design and environmental review. The EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process.

Because the EIR is programmatic in nature, its analysis focuses on the regional transportation system as a whole and does not establish or commit to annual project delivery schedules. Instead, the EIR evaluates systemwide performance and potential environmental effects using regional modeling and policy-level metrics, such as travel demand, ridership, and mode share improvements, rather than fixed operational standards. This approach is consistent with the purpose of a program-level environmental document, which assesses collective regional outcomes and establishes a framework for future project-level CEQA review. As specific transportation improvements advance to implementation, they will undergo subsequent, project-level CEQA review that can evaluate and disclose operational details, including proposed service frequency, capacity, and scheduling. Those future environmental documents will be the appropriate mechanism to identify and assess minimum service levels, if applicable.

For the reasons stated above, no revisions to the EIR are needed in response to this comment.

Response W-96.3

The comment requests modeling of the VMT, GHG, and collision reductions, including noise and air quality co-benefits in environmental justice communities associated with the protected bike/walk network described in Comment W-96.1. This is not a comment on the adequacy of the EIR. As such, no further response is required. The proposed Plan already includes the suggested bike/walk network component, as described in Response W-96.1. Environmental Justice is not an issue analyzed under CEQA. The VMT, GHG, and noise impacts of the proposed Plan, including the bike/walk network component, have been modeled and analyzed in the EIR. See Sections 4.8, 4.13, and 4.16. As explained in EIR Chapter 4, "Environmental Impact Analysis Approach," (EIR pages 4-1 to 4-2), this EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan and 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.

SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway). The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a

transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

For these reasons, no changes to the EIR are required in response to this comment.

Response W-96.4

The commenter suggests the inclusion of milestones and maintenance obligations in the MMRP for the protected bike/walk network described in Comment W-96.1. As described in Response W-96.1, the proposed Plan already includes the suggested bike/walk network component. Therefore, adding a mitigation measure is not required. See also Response W-96.2 describing the level of analysis required for the Regional Plan and EIR. Additionally, the EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process. The MMRP reflects this programmatic scope and identifies the process by which subsequent implementing projects, undertaken by SANDAG or local jurisdictions, will refine, assign, and monitor specific mitigation commitments during future, project-level environmental review.

The inclusion of project-specific delivery milestones or maintenance obligations is outside the purpose and scope of a program-level MMRP, as these details depend on future project design, funding, and implementation schedules that have not yet been developed. Such information will appropriately be incorporated into subsequent project-level environmental documents or implementing agreements when individual transportation improvements move forward.

Nevertheless, the MMRP provides sufficient procedural direction to ensure that all mitigation measures are implemented and monitored as required under CEQA. As future projects tier from this Program EIR, SANDAG and partner agencies will identify detailed schedules, performance criteria, and maintenance responsibilities consistent with the applicable mitigation measures.

For these reasons, no revisions to the EIR are needed in response to this comment.

Comment Letter W-97: No name given

Comment Letter W-97

No name given

Air Quality & EJ Hotspots – Highway vs. Transit Tradeoffs

W-97.1 The EIR must quantify localized PM2.5/NOx changes from canceling highway widenings and shifting funds to transit/AT in communities with existing burdens. Provide receptor-level analysis near schools/housing and construction emissions for major rail/highway projects. Commit to zero-emission construction equipment where feasible, Tier 4 otherwise, on-site monitoring, and adaptive mitigation. If the project increases pollutants in EJ areas, identify additional feasible mitigation or revise the project.

Response W-97.1

The comment requests quantification of localized $PM_{2.5}$ and NO_X emissions resulting from canceled highway widenings and shifting funds from roadway projects to transit and active transportation projects in environmental justice communities. The comment also proposes committing to zero-emission construction equipment where feasible. This is not a comment on the adequacy of the EIR. As such, no further response is required. Section 4.3, "Air Quality," of the EIR quantifies $PM_{2.5}$ and NO_X emissions as part of its regional air quality modeling, consistent with CARB and EPA-approved State Implementation Plan (SIP) methodologies. As shown in Table 4.3-5 of the EIR, the proposed Plan results in substantial reductions in both NO_X and $PM_{2.5}$ emissions relative to baseline and No Project conditions, reflecting decreased per-capita VMT and increased use of transit and active modes, The EIR serves as a first-tier, program-level document that provides a foundation for subsequent CEQA reviews, rather than analyzing project-specific impacts. Details for future transportation and land use projects will vary significantly and are appropriately deferred to later, site-specific environmental documents. This tiered approach, deferring project-specific details to subsequent EIRs, is consistent with CEQA guidance (In re Bay Delta [2008] 43 Cal.4th 1143, 1174). SANDAG does not have the discretion to move funds designated for roadway projects to fund transit or active transportation investments in environmental justice communities or other communities. Please see Global Response 4 for a discussion of funding constraints for the proposed Plan. Additionally, Environmental Justice is not an issue analyzed under CEQA. Nonetheless, the EIR integrates equity considerations throughout the analysis of transportation, air quality, and greenhouse gas emissions, and references state requirements under Senate Bill 535 and Assembly Bill 1532, which direct benefits of climate and transportation investments to disadvantaged communities as identified through CalEnviroScreen. In addition, the 2025 Regional Plan incorporates policies and strategies intended to expand equitable access to mobility, improve public health, and prioritize investments in underserved communities. These commitments ensure that regional planning and implementation are

consistent with the intent of California's environmental justice policies, even though CEQA itself does not require a distinct Environmental Justice analysis.

Specific to clean construction equipment, the EIR already includes this mitigation measure. Mitigation Measure GHG-4d, Implement Measures to Reduce GHG Emissions from Transportation Projects, provides that 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. Those measures include, but are 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). Also, please see Global Response 2 regarding performance criteria that exist for second-tier transportation and land use project mitigation measures such as GHG-4d. The EIR analyzes regional emissions for the proposed Plan.

For these reasons, no revisions to the EIR are needed in response to this comment.

Comment Letter W-98: No name given

Comment Letter W-98

No name given

W-98.1 | Provide an Appendix F energy analysis for operations and construction, including bus fleet electrification schedules, trolley traction power demand, and grid interconnection constraints. Commit to near-term all-
W-98.2 | door boarding and TSP (reduced dwell/idling), depot solar+storage, and clean-construction specs. Add
W-98.3 | binding milestones and contingency procurement (e.g., LCFS revenue reinvestment) to the MMRP. If constraints are cited, supply utility correspondence and a mitigation path; otherwise revise.

Response W-98.1

The comment requests that an Appendix F energy analysis be provided for operations and construction, including bus fleet electrification schedules, trolley traction power demand, and grid interconnection constraints. CEQA Guidelines Appendix F requires that energy impacts be analyzed, but it does not require the analysis to be presented in a separate appendix. The EIR includes a comprehensive energy assessment in Section 4.6, "Energy," which evaluates whether implementation of the proposed Plan would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy during project construction or operations (EN-1), or conflict with or obstruct a state or local plan for renewable energy or energy efficiency (EN-2). The EIR analysis in Section 4.6 concludes that impacts from implementation of the proposed Plan are less than significant. Preparation of a separate Energy Analysis is not required for CEQA compliance.

Specific to bus fleet electrification schedules, MTS and NCTD already have zero-emission fleet transition plans as required by the Innovative Clean Transit Rule, and many other public agencies are subject to the State and Local Government Agency elements of the Advanced Clean Fleets Rule, which requires 50% of new vehicle purchases be ZEV starting in 2024, and 100% of new vehicle purchases be ZEV starting in 2027. Therefore, this suggested addition is already included in the proposed Plan.

For these reasons, no revisions to the EIR are needed in response to this comment.

Response W-98.2

The comment requests a commitment to near-term all-door boarding and TSP, depot solar and storage, and clean-construction specifications.

The proposed Plan assumes all-door boarding for Rapid bus routes by 2035. Figure B.7 of proposed Plan Appendix B depicts Transit Priority Areas, which are areas within a half mile of a major transit stop. Major transit stops include a Bus Rapid Transit station with all-

door boarding and transit signal priority, as defined by Public Resources Code Sections 21060.2 and 21064.3. Additionally, transportation technology investments described in proposed Plan Appendix A include transit signal priority, among others. While all-door boarding and transit signal priority are already components of the proposed Plan, the comment doesn't provide evidence that those strategies would reduce the significant impacts of the proposed Plan to less than significant levels.

Specific to depot solar and storage, MTS and NCTD already have zero-emission fleet transition plans as required by the Innovative Clean Transit Rule as described in Response W-98.1, Therefore, this suggested component is also already included in the proposed Plan.

Specific to clean construction specifications, the EIR already includes this mitigation measure. Mitigation Measure GHG-4d, Implement Measures to Reduce GHG Emissions from Transportation Projects, provides that 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. Those measures include, but are 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). Also, please see Global Response 2 regarding performance criteria that exist for second-tier transportation and land use project mitigation measures such as GHG-4d.

For these reasons, no revisions to the EIR are needed in response to this comment.

Response W-98.3

The comment suggests the inclusion of milestones and contingency procurement in the MMRP.

The EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process. The MMRP reflects this programmatic scope and identifies the process by which subsequent implementing projects, undertaken by SANDAG or local jurisdictions, will refine, assign, and monitor specific mitigation commitments during future, project-level environmental review.

The inclusion of project-specific delivery milestones or contingency procurements is outside the purpose and scope of a program-level MMRP, as these details depend on future project design, funding, and implementation schedules that have not yet been developed. Such information will appropriately be incorporated into subsequent project-level environmental documents or implementing agreements when individual transportation improvements move forward.

Nevertheless, the MMRP provides sufficient procedural direction to ensure that all mitigation measures are implemented and monitored as required under CEQA. As future projects tier from this Program EIR, SANDAG and partner agencies will identify detailed schedules, performance criteria, and maintenance responsibilities consistent with the applicable mitigation measures.

For these reasons, no revisions to the EIR are needed in response to this comment.

Comment Letter W-99: No name given

Comment Letter W-99

No name given

W-99.1 Define measurable performance metrics (all-day headways, on-time performance, transit share, per-capita VMT/GHG) with 6-, 12-, 24-month checkpoints in the MMRP. Specify corrective actions if metrics are missed: freeze roadway capacity spending; reallocate to transit/AT O&M and capital that closes the gap. Publish annual public reports and independent audits. Absence of enforceable triggers renders mitigation vague/unverifiable; fix or recirculate.

Response W-99.1

The comment requests measurable performance metrics be defined with 6-, 12-, 24-month checkpoints in the MMRP. The EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process. The MMRP reflects this programmatic scope and identifies the process by which subsequent implementing projects, undertaken by SANDAG or local jurisdictions, will refine, assign, and monitor specific mitigation commitments during future, project-level environmental review.

The inclusion of project-specific delivery milestones or maintenance obligations is outside the purpose and scope of a program-level MMRP, as these details depend on future project design, funding, and implementation schedules that have not yet been developed. Such information will appropriately be incorporated into subsequent project-level environmental documents or implementing agreements when individual transportation improvements move forward.

Nevertheless, the MMRP provides sufficient procedural direction to ensure that all mitigation measures are implemented and monitored as required under CEQA. As future projects tier from this Program EIR, SANDAG and partner agencies will identify detailed schedules, performance criteria, and maintenance responsibilities consistent with the applicable mitigation measures.

For these reasons, no revisions to the EIR are needed in response to this comment.

Comment Letter W-100: No name given

Comment Letter W-100

No name given

W-100.1 Analyze cumulative sea-level-rise and erosion impacts on the transportation network (LOSSAN, coastal arterials) under mid/high SLR scenarios. Compare "armoring/maintain" vs. "realign/retreat" with GHG/VMT and service-loss implications. Commit to a preferred adaptation pathway with time-bound triggers and funding. If key information (failure probabilities, outage durations) was unavailable, disclose and recirculate when new significant information becomes available.

Response W-100.1

The comment requests the analysis of cumulative sea-level-rise and erosion impacts on the transportation network (LOSSAN, coastal arterials) under mid/high SLR scenarios along with a comparative analysis of armoring/maintain and realign/retreat approaches to managing sea level rise. The comment also requests that the EIR commit to a preferred adaptation pathway with triggers and funding.

The Regional Resilience Framework provides step-by-step guidance to adaptation planning, resilience tools for practitioners, and relevant resources for local jurisdictions, including preparation for extreme heat, sea level rise, and other natural hazards influenced by climate change.

Appendix R of the proposed Plan has been revised to include the following language describing SANDAG's Regional Resilience Framework:

> Adaptation involves taking actions that manage risks and reduce impacts, which over time contribute to a more resilient community. In the San Diego region, adaptation planning focuses on how to best adapt to the coastal storm surge, increased flooding, landslides, extreme temperatures, and wildfires. Adaptation planning builds capacity to better prepare our communities for these impacts and work towards a resilient region. SANDAG has prepared a Regional Resilience Framework that aims to simplify, unify, and streamline the adaptation planning process for the San Diego region.

In addition, text was added to Appendix R to specifically describe work being completed on the LOSSAN Rail Realignment Project:

> SANDAG also incorporates resilience solutions into its rail projects, like the LOSSAN Rail Realignment Project that aims to improve safety, reliability and operational flexibility of the rail corridor by double tracking the segment, minimizing risks from coastal flooding and bluff erosion and providing for greater track capacity and enabling increases in service.

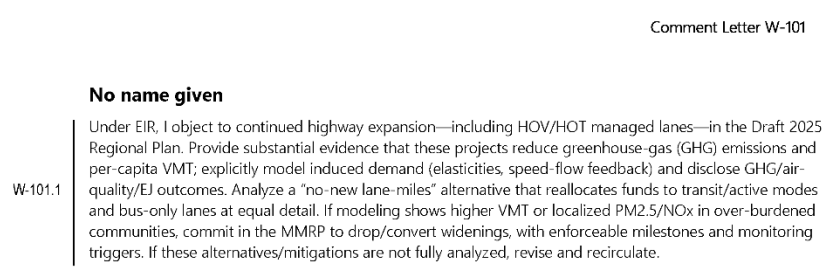
SANDAG and Caltrans have also developed the San Diego Region Coastal Sea Level Rise Analysis Report (2016) describing future scenarios for sea level rise along the region's coastline based on the latest scientific guidance. The report offers design water level guidance for local projects, an adaptive management strategy, and general recommendations for construction along the North Coast Corridor (NCC).

Consistency of the proposed Plan with relevant Local Coastal Programs is analyzed in Section 4.11, "Land Use and Planning," of the EIR. As described in Section 4.11, local coastal programs are components of local general plans and include specific sea level rise guidance such as identifying the areas at greatest risk of inundation based on the Coastal Commission's sea level rise guidance; relevant infrastructure and community resiliency improvements are prepared by local jurisdictions. Impact LU-2 in Section 4.11 analyzed conflicts with land use plans, policies, and regulations, including local coastal programs and concluded the regional growth and land use change and transportation network improvements and programs would not conflict with local coastal programs. The EIR reviewed sea level rise projections and potential impacts associated with sea level rise within the climate change analyses that are included in the EIR's Chapter 4 environmental setting sections for the affected resources.

The proposed Plan is a long-range transportation plan covering a 25-year time horizon and the entire San Diego region, including its 18 cities and the unincorporated County. The EIR prepared for the proposed Plan is a first-tier Program EIR, consistent with CEQA Guidelines Section 15168. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to subsequent environmental review, and any site-specific existing conditions, impacts, and required mitigation measures would be identified during that process. Projects moving forward within the Coastal Zone would need to comprehensively analyze and address sea level rise through project siting, design, and mitigation.

For these reasons, no revisions to the EIR are needed in response to this comment.

Comment Letter W-101: No name given



Comment Letter W-101

No name given

W-101.1 Under EIR, I object to continued highway expansion—including HOV/HOT managed lanes—in the Draft 2025 Regional Plan. Provide substantial evidence that these projects reduce greenhouse-gas (GHG) emissions and per-capita VMT; explicitly model induced demand (elasticities, speed-flow feedback) and disclose GHG/air-quality/EJ outcomes. Analyze a "no-new lane-miles" alternative that reallocates funds to transit/active modes and bus-only lanes at equal detail. If modeling shows higher VMT or localized PM2.5/NOx in over-burdened communities, commit in the MMRP to drop/convert widenings, with enforceable milestones and monitoring triggers. If these alternatives/mitigations are not fully analyzed, revise and recirculate.

Response W-101.1

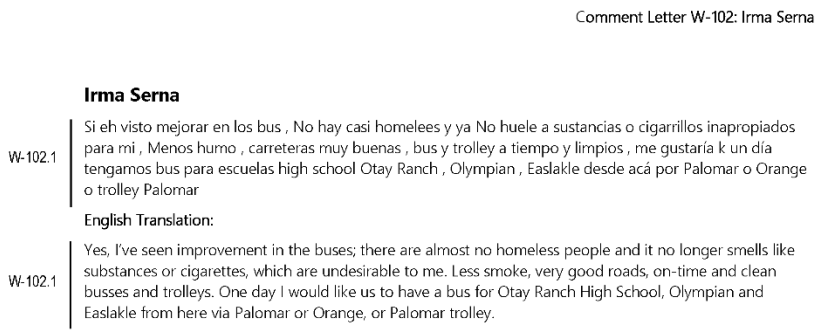
The comment expresses opposition to continued highway expansion—including HOV/HOT managed lanes. Section 4.8, "Greenhouse Gas Emissions and Climate Change," of the EIR further describes the methodology for calculating per capita GHG emissions. As described on page 4.8-34 of the EIR, GHG emissions projections were calculated with an Induced Demand Adjustment Factor. As stated in Section 4.16, "Transportation," implementation of the proposed transportation improvements would result in a decrease in individual VMT in the years 2035, 2045, and 2050.

The EIR integrates equity considerations throughout the analysis of transportation, air quality, and greenhouse gas emissions, and references state requirements under Senate Bill 535 and Assembly Bill 1532, which direct benefits of climate and transportation investments to disadvantaged communities as identified through CalEnviroScreen. In addition, the 2025 Regional Plan incorporates policies and strategies intended to expand equitable access to mobility, improve public health, and prioritize investments in underserved communities. These commitments ensure that regional planning and implementation are consistent with the intent of California's environmental justice policies, even though CEQA itself does not require a distinct Environmental Justice analysis.

The inclusion of project-specific performance metrics and checkpoints are outside the purpose and scope of a program-level MMRP as described in Section 15097 of the CEQA Guidelines, as these details depend on future project design, funding, and implementation schedules that have not yet been developed. Such information will appropriately be incorporated into subsequent project-level environmental documents or implementing agreements when individual transportation improvements move forward.

See Global Response 1 which discusses the reasonable range of alternatives.

Comment Letter W-102: Irma Serna



Comment Letter W-102: Irma Serna

Irma Serna

W-102.1 Si eh visto mejorar en los bus , No hay casi homelees y ya No huele a sustancias o cigarrillos inapropiados para mi , Menos humo , carreteras muy buenas , bus y trolley a tiempo y limpios , me gustaría k un día tengamos bus para escuelas high school Otay Ranch , Olympian , Easlakle desde acá por Palomar o Orange o trolley Palomar

English Translation:

W-102.1 Yes, I've seen improvement in the buses; there are almost no homeless people and it no longer smells like substances or cigarettes, which are undesirable to me. Less smoke, very good roads, on-time and clean busses and trolleys. One day I would like us to have a bus for Otay Ranch High School, Olympian and Easlakle from here via Palomar or Orange, or Palomar trolley.

Response W-102.1

The comment suggests additional bus routes. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. The proposed Plan proposes an extensive increase in Rapid bus routes, as these projects are faster to implement and cost less compared with rail. Before adding new routes, SANDAG will conduct extensive analysis and work with stakeholders, other local government agencies, and members of the public to identify the best routes, stop locations, infrastructure needs, and operating plans for these services. The proposed Plan includes both short-term Rapid projects that can provide transit connections more quickly.

Comment Letter W-103: Blanca Roldan

Blanca Roldan

W-103.1 | Mi comentario es positivo, para mí es buen servicio de autobuses y carreteras accesibles.

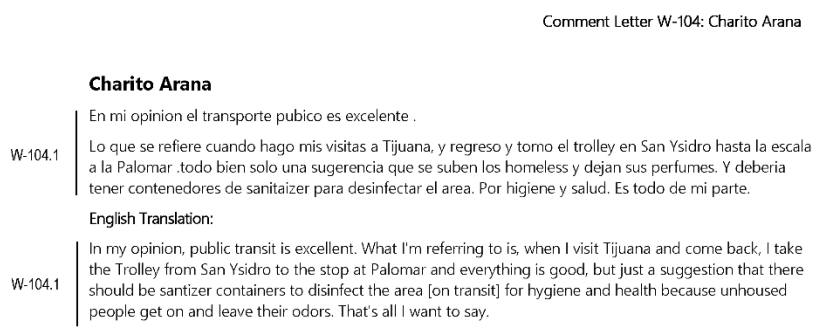
English Translation:

W-103.1 | My comment is positive; to me it's good bus service, and accessible roads.

Response W-103.1

The comment expresses support for the existing bus service. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required.

Comment Letter W-104: Charito Arana



Comment Letter W-104: Charito Arana

Charito Arana

En mi opinion el transporte pubico es excelente .

W-104.1 Lo que se refiere cuando hago mis visitas a Tijuana, y regreso y tomo el trolley en San Ysidro hasta la escala a la Palomar .todo bien solo una sugerencia que se suben los homeless y dejan sus perfumes. Y deberia tener contenedores de sanitaizer para desinfectar el area. Por higiene y salud. Es todo de mi parte.

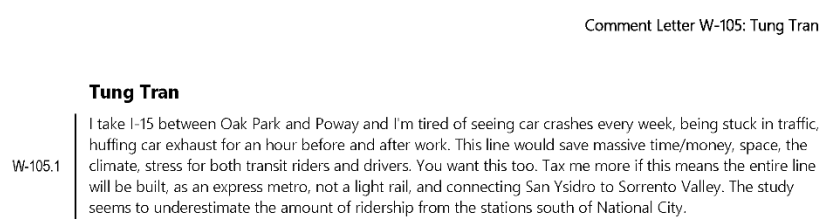
English Translation:

W-104.1 In my opinion, public transit is excellent. What I'm referring to is, when I visit Tijuana and come back, I take the Trolley from San Ysidro to the stop at Palomar and everything is good, but just a suggestion that there should be santizer containers to disinfect the area [on transit] for hygiene and health because unhoused people get on and leave their odors. That's all I want to say.

Response W-104.1

The comment expresses support for the existing public transit system and suggests adding sanitizer containers on the trolley. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG works with MTS and NCTD to meet the needs of current and future transit riders. We aim to continue expanding amenities to create a safe, secure, clean, and amenity-rich transit system. The plan includes $864 million for transit amenities. This includes security, improved restroom access and maintenance, Wi-Fi, and more. Subject to available funding, MTS and NCTD are committed to providing security for users, enforcing rules, and upgrading transit station amenities. (such as shade structures and signage) as funding becomes available.

Comment Letter W-105: Tung Tran



Comment Letter W-105: Tung Tran

Tung Tran

W-105.1 I take I-15 between Oak Park and Poway and I'm tired of seeing car crashes every week, being stuck in traffic, huffing car exhaust for an hour before and after work. This line would save massive time/money, space, the climate, stress for both transit riders and drivers. You want this too. Tax me more if this means the entire line will be built, as an express metro, not a light rail, and connecting San Ysidro to Sorrento Valley. The study seems to underestimate the amount of ridership from the stations south of National City.

Response W-105.1

The comment expresses support for an express metro line from San Ysidro to Sorrento Valley. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-106: No name given

Comment Letter W-106

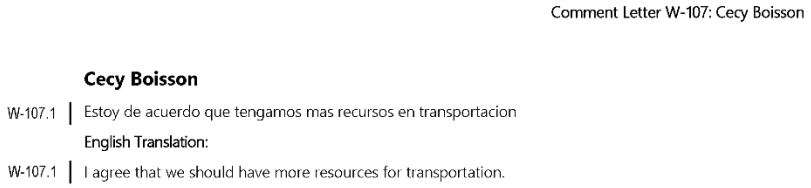
No name given

W-106.1 I fully stand behind the construction of the Purple Line as a metro as originally planned, and I would personally prefer this over it be another trolley line.

Response W-106.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-107: Cecy Boisson



Comment Letter W-107: Cecy Boisson

Cecy Boisson

W-107.1 | Estoy de acuerdo que tengamos mas recursos en transportacion

English Translation:

W-107.1 | I agree that we should have more resources for transportation.

Response W-107.1

The comment expresses support for additional resources for transportation. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Comment Letter W-108: No Name Given

Comment Letter W-108

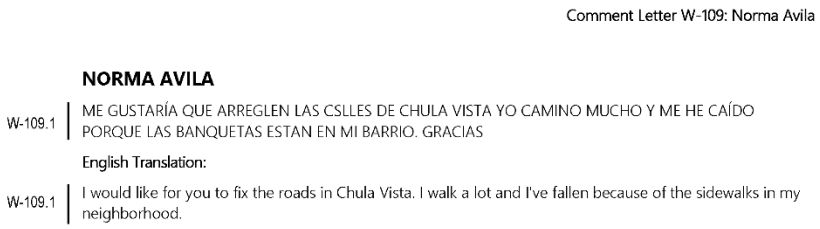
Pcasas@ csbcs.org

W-108.1 | Coming better but we need more enforce our community transportation

Response W-108.1

The comment expresses support for community transportation. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Comment Letter W-109: Norma Avila



Comment Letter W-109: Norma Avila

NORMA AVILA

W-109.1 | ME GUSTARÍA QUE ARREGLEN LAS CSLLES DE CHULA VISTA YO CAMINO MUCHO Y ME HE CAÍDO PORQUE LAS BANQUETAS ESTAN EN MI BARRIO. GRACIAS

English Translation:

W-109.1 | I would like for you to fix the roads in Chula Vista. I walk a lot and I've fallen because of the sidewalks in my neighborhood.

Response W-109.1

The comment raises concerns about local road and sidewalk conditions. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Although SANDAG plans, designs, and constructs walkway and roadway projects, local cities and other government agencies take ownership of these facilities once they are built. Those cities and government agencies are responsible for maintaining them. SANDAG has shared comments about the current conditions and operations of existing roadways and walkways with each relevant local partner agency.

Comment Letter W-110: Aurora Kolbe

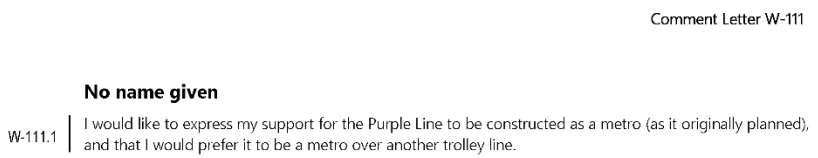
Aurora Kolbe

W-110.1 | I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line.

Response W-110.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-111: No name given



Comment Letter W-111

No name given

W-111.1 | I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line.

Response W-111.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-112: No name given

Comment Letter W-112

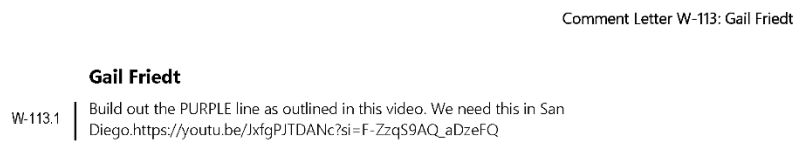
No name given

W-112.1 I support the Plan, but the Draft EIR must commit to fixing the critical gap and safety hazard in the San Diego River Trail(SAN196) network at the West Valley Crossing in Mission Valley. Prioritizing this class 1 pedestrian and bike bridge is essential for completing the promised regional active transportation network and ensuring a safe, equitable travel choice: San Diego River Trail/Bikeway (Project SAN196). We urge the Board to prioritize the West Valley Crossing for funding within the final 2025 Regional Plan.

Response W-112.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan.

Comment Letter W-113: Gail Friedt



Comment Letter W-113: Gail Friedt

Gail Friedt

W-113.1 | Build out the PURPLE line as outlined in this video. We need this in San Diego.https://youtu.be/JxfgPJTDANc?si=F-ZzqS9AQ_aDzeFQ

Response W-113.1

The comment expresses support for the Purple Line and submits a video in support of the comment. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-114: No Name Given

Comment Letter W-114

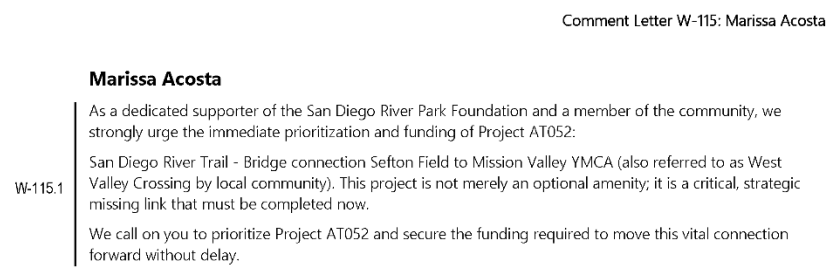
hom.alyssa@gmail.com

W-114.1 Hello, As a San Diego resident, I think SANDAG needs to build the entire purple line as a high speed rail line. I think the north San Diego stops (Kearny Mesa, UTC, Sorrento Valley, and City heights) are crucial to providing a true alternative to driving, which will help reduce freeway congestion and improve air quality.

Response W-114.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-115: Marissa Acosta



Comment Letter W-115: Marissa Acosta

Marissa Acosta

As a dedicated supporter of the San Diego River Park Foundation and a member of the community, we strongly urge the immediate prioritization and funding of Project AT052:

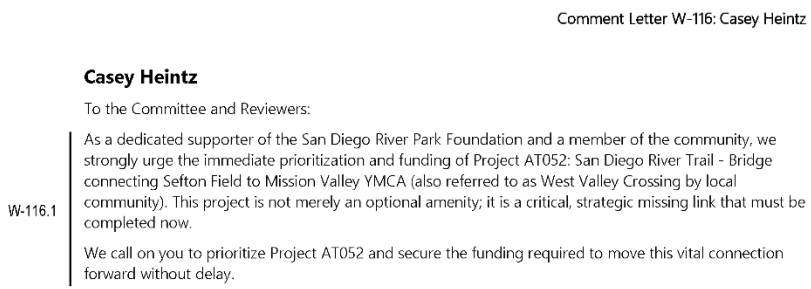
W-115.1 San Diego River Trail - Bridge connection Sefton Field to Mission Valley YMCA (also referred to as West Valley Crossing by local community). This project is not merely an optional amenity; it is a critical, strategic missing link that must be completed now.

We call on you to prioritize Project AT052 and secure the funding required to move this vital connection forward without delay.

Response W-115.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan.

Comment Letter W-116: Casey Heintz



Comment Letter W-116: Casey Heintz

Casey Heintz

To the Committee and Reviewers:

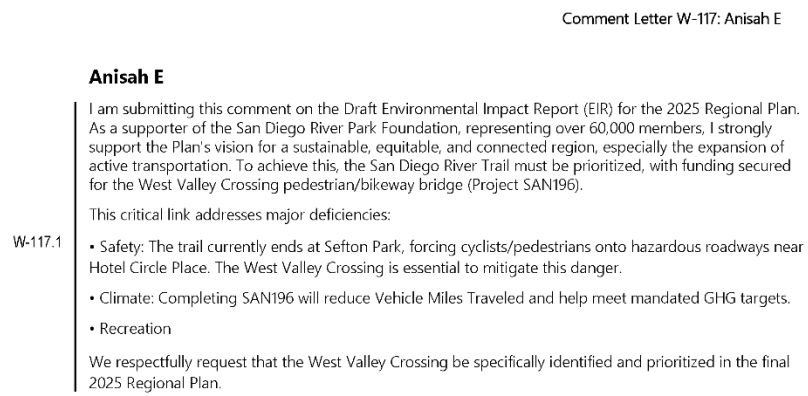
W-116.1 As a dedicated supporter of the San Diego River Park Foundation and a member of the community, we strongly urge the immediate prioritization and funding of Project AT052: San Diego River Trail - Bridge connecting Sefton Field to Mission Valley YMCA (also referred to as West Valley Crossing by local community). This project is not merely an optional amenity; it is a critical, strategic missing link that must be completed now.

We call on you to prioritize Project AT052 and secure the funding required to move this vital connection forward without delay.

Response W-116.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1.

Comment Letter W-117: Anisah E



Comment Letter W-117: Anisah E

Anisah E

I am submitting this comment on the Draft Environmental Impact Report (EIR) for the 2025 Regional Plan. As a supporter of the San Diego River Park Foundation, representing over 60,000 members, I strongly support the Plan's vision for a sustainable, equitable, and connected region, especially the expansion of active transportation. To achieve this, the San Diego River Trail must be prioritized, with funding secured for the West Valley Crossing pedestrian/bikeway bridge (Project SAN196).

This critical link addresses major deficiencies:

W-117.1

• Safety: The trail currently ends at Sefton Park, forcing cyclists/pedestrians onto hazardous roadways near Hotel Circle Place. The West Valley Crossing is essential to mitigate this danger.

• Climate: Completing SAN196 will reduce Vehicle Miles Traveled and help meet mandated GHG targets.

• Recreation

We respectfully request that the West Valley Crossing be specifically identified and prioritized in the final 2025 Regional Plan.

Response W-117.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-118: Isaac Caballero

Isaac Caballero

W-118.1 I am submitting this comment on the Draft Environmental Impact Report (EIR) for the 2025 Regional Plan. As a supporter of the San Diego River Park Foundation, representing over 60,000 members, I strongly support the Plan's vision for a sustainable, equitable, and connected region, especially the expansion of active transportation. To achieve this, the San Diego River Trail must be prioritized, with funding secured for the West Valley Crossing pedestrian/bikeway bridge (Project SAN196).

This critical link addresses major deficiencies:

We respectfully request that the West Valley Crossing be specifically identified and prioritized in the final 2025 Regional Plan.

Response W-118.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-119: Emma Smith

Emma Smith

I am submitting this comment on the Draft Environmental Impact Report (EIR) for the 2025 Regional Plan. As a supporter of the San Diego River Park Foundation, representing over 60,000 members, I strongly support the Plan's vision for a sustainable, equitable, and connected region, especially the expansion of active transportation. To achieve this, the San Diego River Trail must be prioritized, with funding secured for the West Valley Crossing pedestrian/bikeway bridge (Project SAN196).

W-119.1

This critical link addresses major deficiencies:

• Safety: The trail currently ends at Sefton Park, forcing cyclists/pedestrians onto hazardous roadways near Hotel Circle Place. The West Valley Crossing is essential to mitigate this danger.

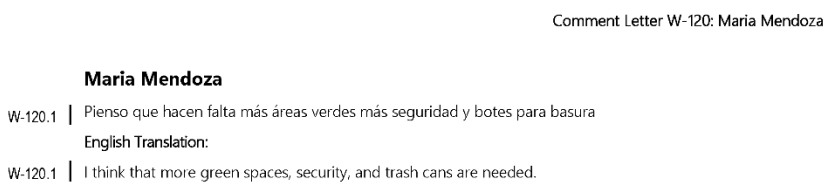
• Climate: Completing SAN196 will reduce Vehicle Miles Traveled and help meet mandated GHG targets.

We respectfully request that the West Valley Crossing be specifically identified and prioritized in the final 2025 Regional Plan.

Response W-119.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-120: Maria Mendoza



Comment Letter W-120: Maria Mendoza

Maria Mendoza

W-120.1 | Pienso que hacen falta más áreas verdes más seguridad y botes para basura

English Translation:

W-120.1 | I think that more green spaces, security, and trash cans are needed.

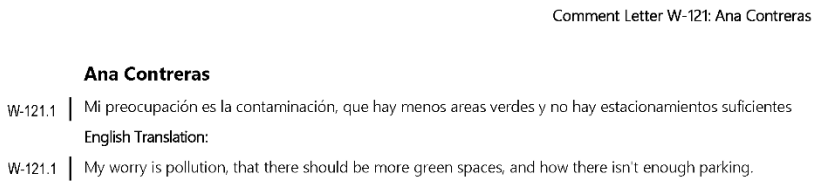
Response W-120.1

The comment expresses support for additional green space, security and trash cans. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. The local cities and the County of San Diego are responsible for trash removal programs and services. SANDAG does not have authority over those services and programs.

SANDAG has a Criminal Justice Research Division (CJRD) that serves as a vital source of accurate, timely, and actionable information on public safety and criminal justice matters in the San Diego region. The team is composed of experts who research, analyze data, and collaborate with regional partners to inform policy decisions, enhance public safety strategies, and support community well-being. They also participate as members of various local criminal justice-related committees, councils, and task forces to share trends and findings on these issues. Through its Criminal Justice Clearinghouse, CJRD collects and disseminates data on crime trends and public safety, and examines substance use in local jails to better understand the connections between drugs, crime, and other societal challenges. The team continually updates its databases to provide current and reliable information. These efforts support the assessment of crime control program effectiveness and efficiency, helping to inform local

criminal justice planning and policymaking. The division's work offers valuable insight into crime patterns and public safety challenges, supporting the development of crime-reduction strategies and responses to regional crime. Additionally, through its Independent Evaluations, the division provides comprehensive data analysis and impact assessments of public safety and criminal justice initiatives across the region. The Public Safety Committee (PSC), one of SANDAG's Policy Advisory Committees, composed of elected officials and public safety representatives, works to advise the Board of Directors on major policy-level matters related to public safety. The PSC aims to improve the quality of life in the region by promoting public safety and justice through collaboration, information sharing, effective technology, and objective monitoring and assessment.

Comment Letter W-121: Ana Contreras



Comment Letter W-121: Ana Contreras

Ana Contreras

W-121.1 | Mi preocupación es la contaminación, que hay menos areas verdes y no hay estacionamientos suficientes

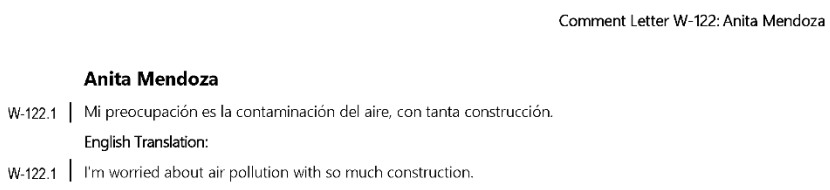
English Translation:

W-121.1 | My worry is pollution, that there should be more green spaces, and how there isn't enough parking.

Response W-121.1

The comment expresses concern over pollution and a lack of parking and support for more green spaces. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Decision-making regarding parking spots is under the control of local jurisdictions and not under SANDAG's jurisdiction. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. Please note that parking impacts are no longer required to be analyzed under CEQA. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks.

Comment Letter W-122: Anita Mendoza



Comment Letter W-122: Anita Mendoza

Anita Mendoza

W-122.1 | Mi preocupación es la contaminación del aire, con tanta construcción.

English Translation:

W-122.1 | I'm worried about air pollution with so much construction.

Response W-122.1

The comment expresses concern related to pollution associated with construction. This is not a comment on the adequacy of the EIR and, as such, no further response is required. As discussed in Section 4.3 "Air Quality," (pages 4.3-38 through 4.3-46) of the EIR, air pollution from construction activities are expected to exceed regional thresholds during construction, which are considered significant impacts under CEQA. The EIR includes mitigation measures such as AQ-3a (best management practices for dust control), AQ-3b (reducing diesel emissions from off-road equipment), and AQ-3c (reducing diesel emissions from on-road vehicles) to help minimize these impacts. However, even with these measures, the EIR concludes that construction-related air quality impacts remain significant and unavoidable, as discussed on pages 4.3-45 and 4.3-46. Health risk assessments are also addressed in Tables 4.3-13 through 4.3-20 of the EIR, which evaluate exposure to toxic air contaminants and particulate matter. These findings acknowledge the concern and show that while mitigation would reduce emissions, some level of impact is unavoidable during large-scale construction. Section 4.3.5 discusses the cumulative impact analysis for air quality (C-AQ-1). With implementation of the mitigation measures identified in Section 4.3, the proposed Plan's incremental contributions to cumulative air quality impacts in years 2035 and 2050 would remain cumulatively considerable post-mitigation. The EIR analysis does not include specific construction phasing for individual projects. The EIR serves as a first-tier, program-level document that provides a foundation for subsequent CEQA reviews, rather than analyzing project-specific impacts. Details for future transportation and land use projects will vary significantly and are appropriately deferred to later, site-specific environmental documents. This tiered approach, deferring project-specific details to subsequent EIRs, is consistent with CEQA guidance (In re Bay Delta [2008] 43 Cal.4th 1143, 1174).

Comment Letter W-123: No name given

Comment Letter W-123

No name given

We urge SANDAG to prioritize Project AT052: West Valley Crossing.

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-123.1 Safety: The current trail ends abruptly, forcing users onto dangerous Friars Road. This crossing ensures a safe, Class I Bikeway.

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Blocking this trail link nullifies the station's utility for a large user base.

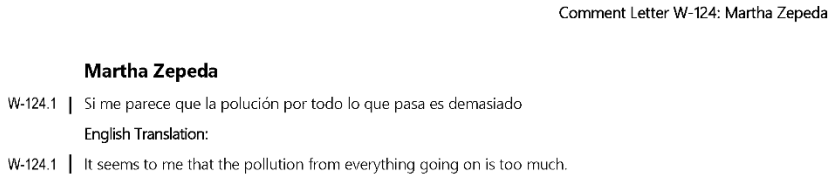
Future: Mission Valley's population will triple by 2050. We must build this non-vehicular infrastructure now to serve this growth and reduce GHG emissions.

Prioritize AT052 and complete the Snapdragon to the Sea! path. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-123.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-124: Martha Zepeda



Comment Letter W-124: Martha Zepeda

Martha Zepeda

W-124.1 | Si me parece que la polución por todo lo que pasa es demasiado

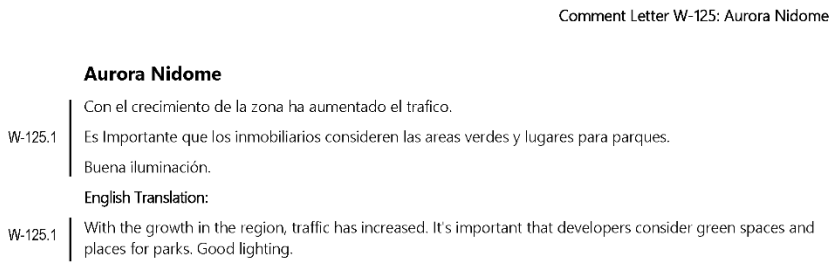
English Translation:

W-124.1 | It seems to me that the pollution from everything going on is too much.

Response W-124.1

The comment expresses concern related to pollution. Please see Response W-122.1.

Comment Letter W-125: Aurora Nidome



Comment Letter W-125: Aurora Nidome

Aurora Nidome

Con el crecimiento de la zona ha aumentado el trafico.

W-125.1 Es Importante que los inmobiliarios consideren las areas verdes y lugares para parques.

Buena iluminación.

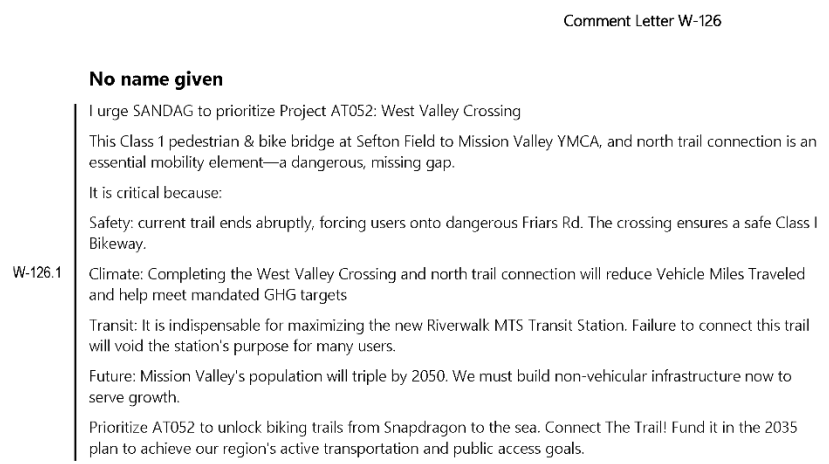
English Translation:

W-125.1 With the growth in the region, traffic has increased. It's important that developers consider green spaces and places for parks. Good lighting.

Response W-125.1

The comment expresses support for green spaces and parks with good lighting. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. The local cities and the County of San Diego are responsible for decision regarding local lighting in parks. SANDAG does not have authority over these decisions.

Comment Letter W-126: No name given



Comment Letter W-126

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-126.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

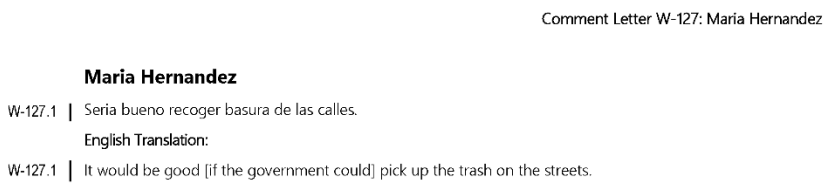
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-126.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-127: Maria Hernandez



Comment Letter W-127: Maria Hernandez

Maria Hernandez

W-127.1 | Seria bueno recoger basura de las calles.

English Translation:

W-127.1 | It would be good [if the government could] pick up the trash on the streets.

Response W-127.1

The comment expresses support for trash removal on the streets. This is not a comment on the adequacy of the EIR and, as such, no further response is required. The local cities and the County of San Diego are responsible for trash removal programs and services. SANDAG does not have authority over those services and programs.

Comment Letter W-128: Ernestina Ramirez



Comment Letter W-128: Ernestina Ramirez

Ernestina Ramirez

W-128.1 | Las banquetas y semaforos.

English Translation:

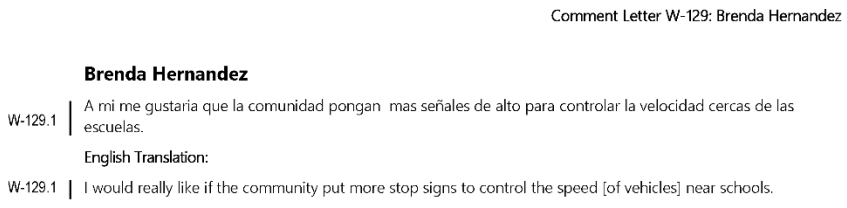
W-128.1 | Sidewalks and stoplights

Response W-128.1

The comment expresses support for sidewalks and stoplights.

This is not a comment on the adequacy of the EIR and, as such, no further response is required. Voters in the San Diego region passed an extension of the half-cent sales tax (TransNet Extension & Ordinance) for transportation infrastructure in 2004. This ordinance allocates 2 percent of total annual revenues for the Bicycle, Pedestrian, and Neighborhood Safety Program. This provides funding for bikeway facilities and connectivity improvements, pedestrian and walkable community projects, bicycle and pedestrian safety projects and programs, and traffic-calming projects. The objective is to create a balanced regional transportation system that makes non-motorized transportation (such as walking, rolling, and riding a bike) safer, easier, and more attractive for people of all ages and abilities. SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway). The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Comment Letter W-129: Brenda Hernandez



Comment Letter W-129: Brenda Hernandez

Brenda Hernandez

W-129.1 | A mi me gustaria que la comunidad pongan mas señales de alto para controlar la velocidad cercas de las escuelas.

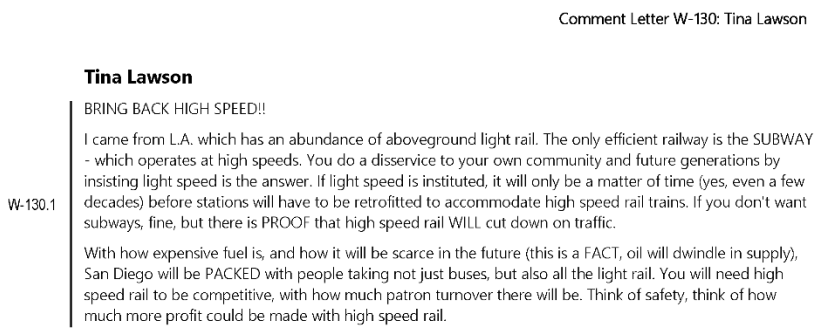
English Translation:

W-129.1 | I would really like if the community put more stop signs to control the speed [of vehicles] near schools.

Response W-129.1

The comment expresses support for stop signs near schools. This is not a comment on the EIR and, as such, no further response is required. SANDAG and Caltrans worked together to identify regional-level improvement and safety projects for the proposed Plan. In addition, Caltrans facilitates a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway). The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Comment Letter W-130: Tina Lawson



Comment Letter W-130: Tina Lawson

Tina Lawson

BRING BACK HIGH SPEED!!

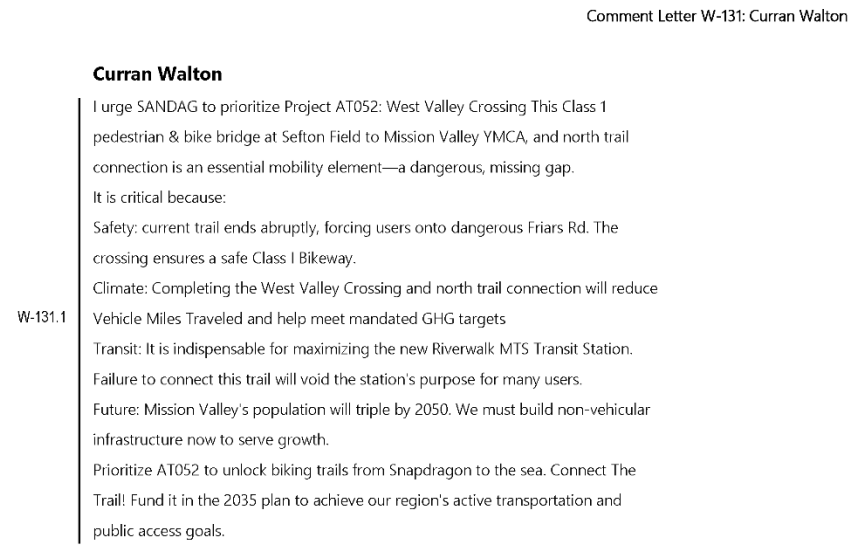
W-130.1 I came from L.A. which has an abundance of aboveground light rail. The only efficient railway is the SUBWAY - which operates at high speeds. You do a disservice to your own community and future generations by insisting light speed is the answer. If light speed is instituted, it will only be a matter of time (yes, even a few decades) before stations will have to be retrofitted to accommodate high speed rail trains. If you don't want subways, fine, but there is PROOF that high speed rail WILL cut down on traffic.

With how expensive fuel is, and how it will be scarce in the future (this is a FACT, oil will dwindle in supply), San Diego will be PACKED with people taking not just buses, but also all the light rail. You will need high speed rail to be competitive, with how much patron turnover there will be. Think of safety, think of how much more profit could be made with high speed rail.

Response W-130.1

The comment expresses support for high speed rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further comment is required. While California High-Speed Rail may extend to the San Diego region in a future phase (consistent with the California State Rail Plan), such an extension will likely be beyond 2050. California High-Speed Rail would be implemented and funded by the California High-Speed Rail Authority and is included in the plan's Unconstrained Project list, located in Appendix A to the Regional Plan in Table A.7.

Comment Letter W-131: Curran Walton



Comment Letter W-131: Curran Walton

Curran Walton

I urge SANDAG to prioritize Project AT052: West Valley Crossing This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce

W-131.1 Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

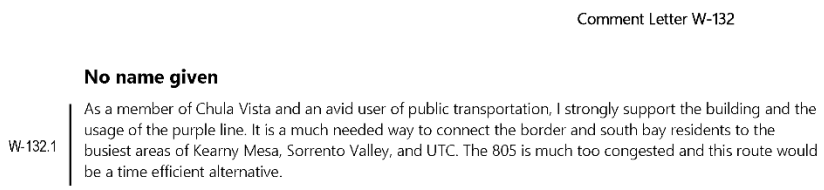
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-131.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-132: No name given



Comment Letter W-132

No name given

W-132.1 As a member of Chula Vista and an avid user of public transportation, I strongly support the building and the usage of the purple line. It is a much needed way to connect the border and south bay residents to the busiest areas of Kearny Mesa, Sorrento Valley, and UTC. The 805 is much too congested and this route would be a time efficient alternative.

Response W-132.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-133: Miranda

Comment Letter W-133: Miranda (no last name given)

Miranda

W-133.1 I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line.

Response W-133.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-134: No name given

Comment Letter W-134

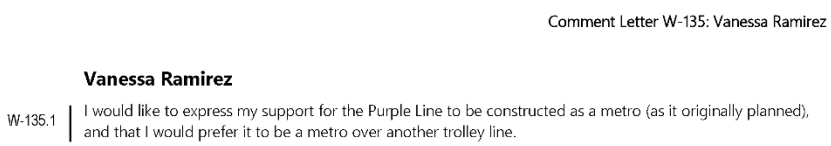
No name given

W-134.1 Other countries around the world have high-speed trains, why can't such a rich city such as San Diego have the same. Ignore the entitled rich folks that live in their "pure" neighborhoods and build a public transportation that will help commuters, business, and neighborhoods flourish

Response W-134.1

The comment expresses support for high speed rail. Please see Response W-130.1.

Comment Letter W-135: Vanessa Ramirez



Comment Letter W-135: Vanessa Ramirez

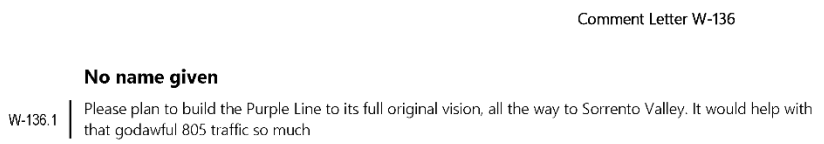
Vanessa Ramirez

W-135.1 | I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line.

Response W-135.1

The comment expresses support for the Purple being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-136: No name given



Comment Letter W-136

No name given

W-136.1 Please plan to build the Purple Line to its full original vision, all the way to Sorrento Valley. It would help with that godawful 805 traffic so much

Response W-136.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-137: No name given

Comment Letter W-137

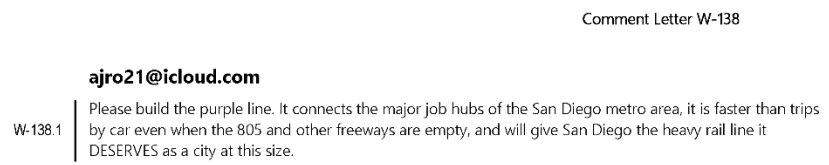
No name given

W-137.1 The purple line is being stripped of its viability with recent changes proposed. I, and others I have spoken to of this topic, vehemently oppose the weakening of its purpose proposed recently. The line being cut short on the North end of the formerly proposed line is, frankly, short sighted and misinformed. Sorrento Valley, while being very car dependent, would still benefit from having rails run to it. UTC would be very important as well, given not only the retail (Especially considering Westfield would likely aid in the funding of the rail if it went near their mall), but also the local banking, capital, and small industry. Cutting the largest economic centers, and cutting some of the densest populated sectors of the county is a spit in the face not only to people now, but to your, and our, posterity. Return to the original plan, I beg. Hell, I grovel.

Response W-137.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-138: ajro21@icloud.com



Comment Letter W-138

ajro21@icloud.com

W-138.1 Please build the purple line. It connects the major job hubs of the San Diego metro area, it is faster than trips by car even when the 805 and other freeways are empty, and will give San Diego the heavy rail line it DESERVES as a city at this size.

Response W-138.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-139: No name given

Comment Letter W-139

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-139.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

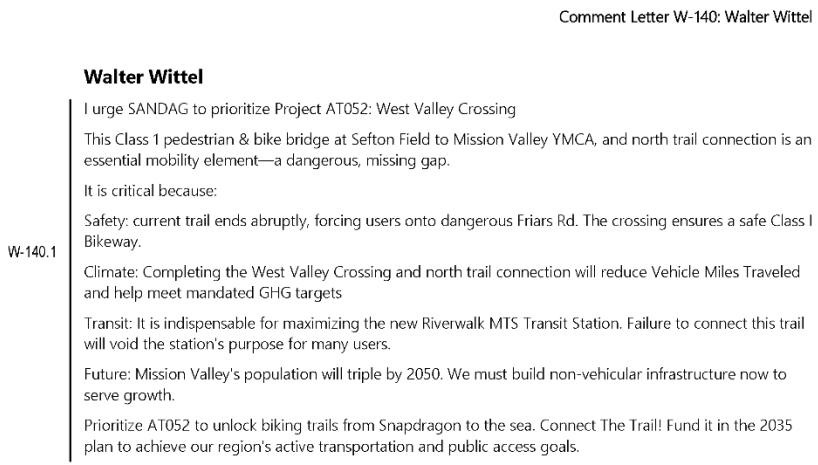
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-139.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-140: Walter Wittel



Comment Letter W-140: Walter Wittel

Walter Wittel

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-140.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-140.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-141: Yosuf Mansour

Comment Letter W-141: Yosuf Mansour

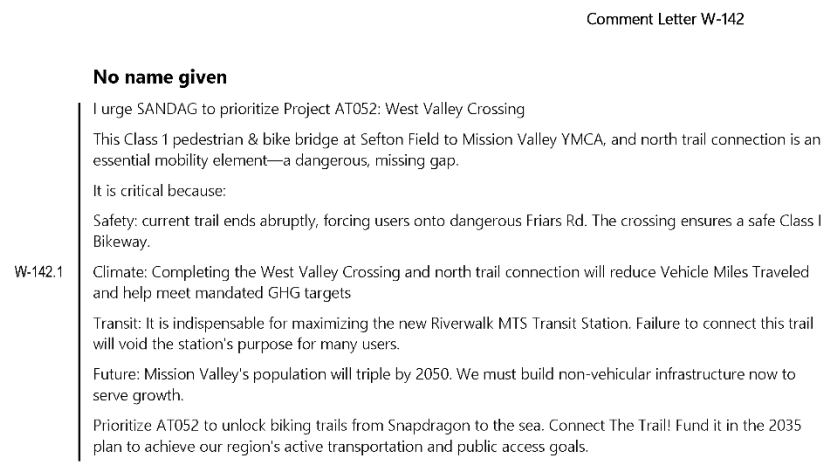
yosuf mansour

W-141.1 Im voicing my concern that we should build the whole people line as a metro line. It would be transformative to daily life in san diego, and provide thousands with jobs, easier commutes, and safer travel for our residents.

Response W-141.1

The comment expresses concern related to the Purple Line. This is not a comment on the adequacy of the DEIR. As such, no further response is required. Much more extensive planning is needed to finalize where the Purple Line's route will go and its specific stops; comments we received on these topics will be saved to inform those future planning efforts. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be more than 15 years. At the same time, connecting these communities with transit is a high priority: thus, the Rapid 688 Bus will provide a near-term transit solution that is feasible to implement by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases due to how long the route is and the cost to implement. The parts of the Purple Line that will serve the most riders will be built first (starting in South San Diego County and terminating at SDSU Mission Valley), but the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-142: No name given



Comment Letter W-142

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-142.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-142.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-143: No name given



Comment Letter W-143

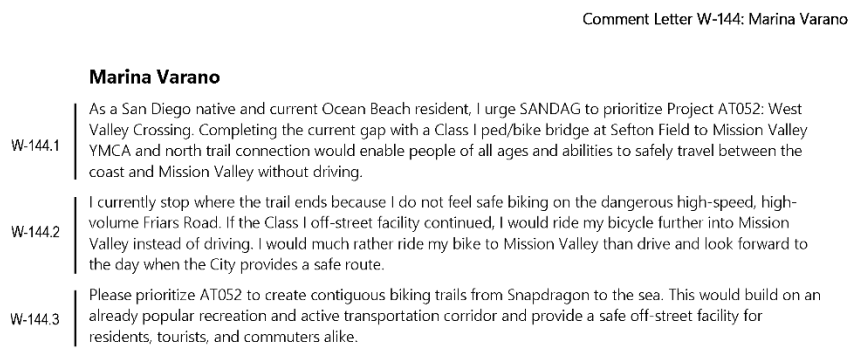
No name given

W-143.1 | BUILD the whole purple line!

Response W-143.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-144: Marina Varano



Comment Letter W-144: Marina Varano

Marina Varano

W-144.1 As a San Diego native and current Ocean Beach resident, I urge SANDAG to prioritize Project AT052: West Valley Crossing. Completing the current gap with a Class I ped/bike bridge at Sefton Field to Mission Valley YMCA and north trail connection would enable people of all ages and abilities to safely travel between the coast and Mission Valley without driving.

W-144.2 I currently stop where the trail ends because I do not feel safe biking on the dangerous high-speed, high-volume Friars Road. If the Class I off-street facility continued, I would ride my bicycle further into Mission Valley instead of driving. I would much rather ride my bike to Mission Valley than drive and look forward to the day when the City provides a safe route.

W-144.3 Please prioritize AT052 to create contiguous biking trails from Snapdragon to the sea. This would build on an already popular recreation and active transportation corridor and provide a safe off-street facility for residents, tourists, and commuters alike.

Response W-144.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1.

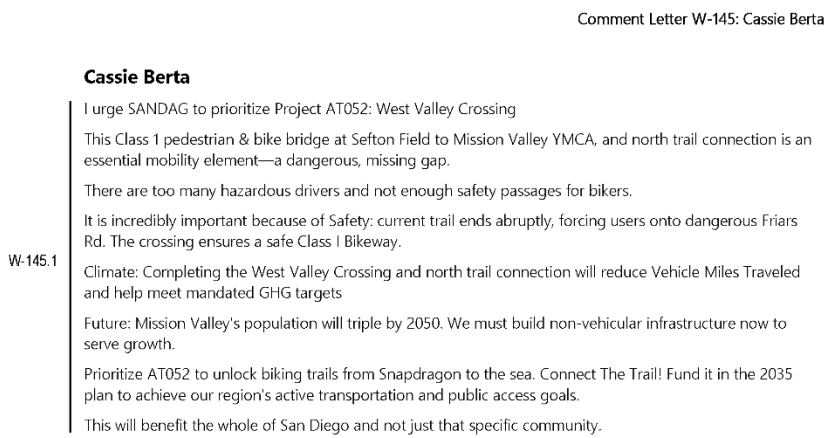
Comment W-144.2

Please see Response W-144.1.

Comment W-144.3

Please see Response W-144.1.

Comment Letter W-145: Cassie Berta



Comment Letter W-145: Cassie Berta

Cassie Berta

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

There are too many hazardous drivers and not enough safety passages for bikers.

It is incredibly important because of Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-145.1

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

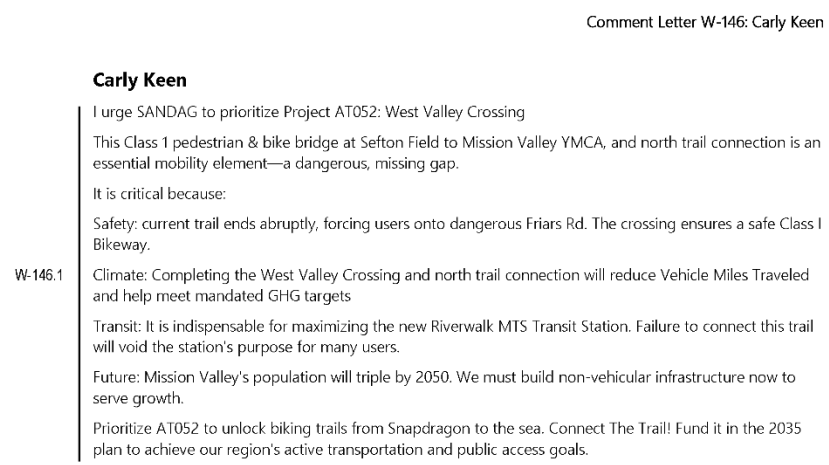
Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

This will benefit the whole of San Diego and not just that specific community.

Response W-145.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-146: Carly Keen



Comment Letter W-146: Carly Keen

Carly Keen

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-146.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

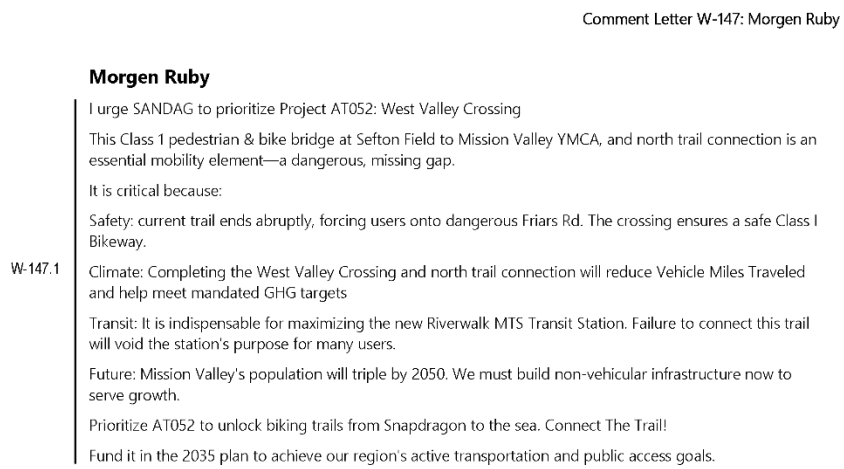
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-146.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-147: Morgen Ruby



Comment Letter W-147: Morgen Ruby

Morgen Ruby

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-147.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail!

Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-147.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-148: No name given

Comment Letter W-148

No name given

W-148.1 | Buenas tardes Rosa estoy usando el troley y autobús y lo recomiendo por los horarios voy a tijuana y llego rápido

English Translation:

Response W-148.1

This comment requests greater frequency for trolley and bus service to Tijuana and requests faster schedules. This is not a comment on the adequacy of the EIR and, as such, no further response is required. The proposed Plan does include increased frequency of Trolley and Rapid service to Tijuana (2025 Regional Plan Appendix A at pp. A.152, 154-55).

Comment Letter W-149: Vicky Bond

Vicky Bond

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-149.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

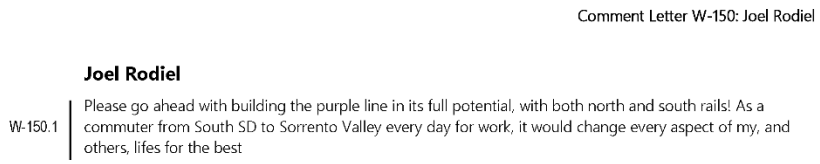
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Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-149.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-150: Joel Rodiel



Comment Letter W-150: Joel Rodiel

Joel Rodiel

W-150.1 Please go ahead with building the purple line in its full potential, with both north and south rails! As a commuter from South SD to Sorrento Valley every day for work, it would change every aspect of my, and others, lifes for the best

Response W-150.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-151: Alexa Lewis-Rosenfeld

Alexa Lewis-Rosenfeld

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-151.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

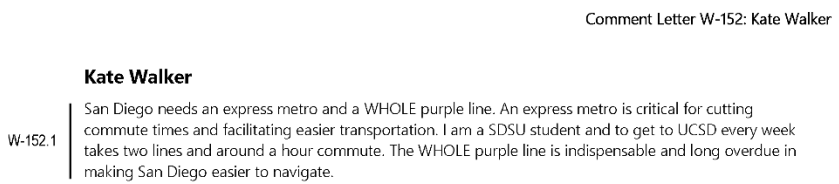
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-151.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-152: Kate Walker



Comment Letter W-152: Kate Walker

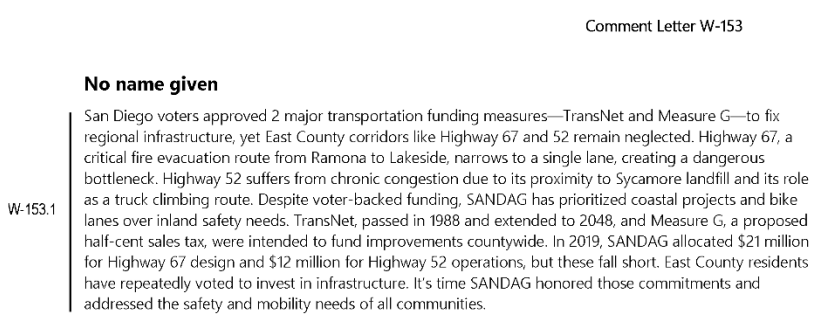
Kate Walker

W-152.1 San Diego needs an express metro and a WHOLE purple line. An express metro is critical for cutting commute times and facilitating easier transportation. I am a SDSU student and to get to UCSD every week takes two lines and around a hour commute. The WHOLE purple line is indispensable and long overdue in making San Diego easier to navigate.

Response W-152.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-153: No name given



Comment Letter W-153

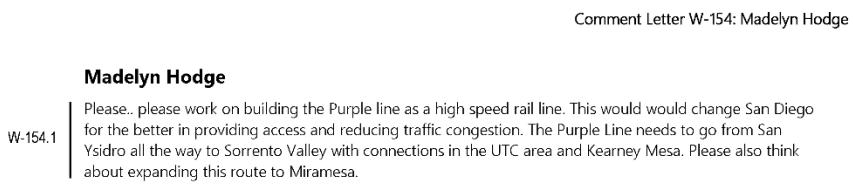
No name given

W-153.1 San Diego voters approved 2 major transportation funding measures—TransNet and Measure G—to fix regional infrastructure, yet East County corridors like Highway 67 and 52 remain neglected. Highway 67, a critical fire evacuation route from Ramona to Lakeside, narrows to a single lane, creating a dangerous bottleneck. Highway 52 suffers from chronic congestion due to its proximity to Sycamore landfill and its role as a truck climbing route. Despite voter-backed funding, SANDAG has prioritized coastal projects and bike lanes over inland safety needs. TransNet, passed in 1988 and extended to 2048, and Measure G, a proposed half-cent sales tax, were intended to fund improvements countywide. In 2019, SANDAG allocated $21 million for Highway 67 design and $12 million for Highway 52 operations, but these fall short. East County residents have repeatedly voted to invest in infrastructure. It's time SANDAG honored those commitments and addressed the safety and mobility needs of all communities.

Response W-153.1

The comment requests investment in the safety and mobility of transportation infrastructure in East County. This comment is on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The 2025 Regional Plan breaks down projects proposed into subregions, including East County and Rural Areas, by project categories in Appendix A: Transportation Projects, Programs, Policies, and Phasing. Projects can be viewed by transportation type including active transportation, complete corridors (highway improvements), transportation management, transit, and flexible fleets. Appendix A includes a variety of projects that facilitate evacuation, like highway curve straightening, shoulder widening, intersection improvements, and technology upgrades. Specific projects in the proposed Plan addressing issues on SR 52 and SR 67 are: new freeway managed and truck lanes on SR 52 between I-15 and I-125 and widening SR 67 between Lakeside and Ramona. Additionally, Caltrans is analyzing several of the planned SR 52 and SR 67 improvements for implementation. Additional proposed Plan projects in East County are improvements to rural interchanges on I-8 east of El Cajon, and intersection improvements, wider shoulders, and road straightening on SR 76 east of I-15 and SR 94 east of Jamul. These projects are all safety and evacuation improvements (SANDAG and Caltrans 2022; pp 61-61, 79-80).

Comment Letter W-154: Madelyn Hodge



Comment Letter W-154: Madelyn Hodge

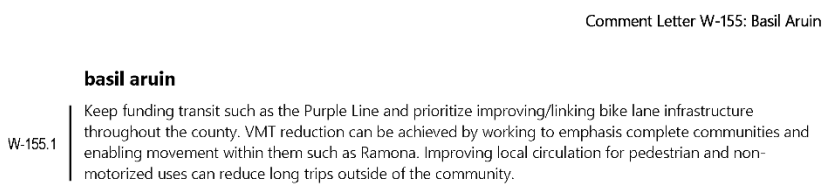
Madelyn Hodge

W-154.1 Please.. please work on building the Purple line as a high speed rail line. This would would change San Diego for the better in providing access and reducing traffic congestion. The Purple Line needs to go from San Ysidro all the way to Sorrento Valley with connections in the UTC area and Kearney Mesa. Please also think about expanding this route to Miramesa.

Response W-154.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This comment also suggests further expansion of the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-155: Basil Aruin



Comment Letter W-155: Basil Aruin

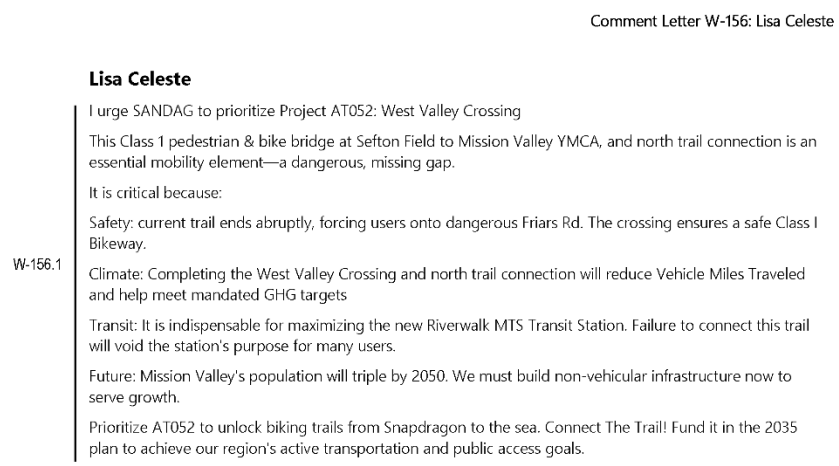
basil aruin

W-155.1 Keep funding transit such as the Purple Line and prioritize improving/linking bike lane infrastructure throughout the county. VMT reduction can be achieved by working to emphasis complete communities and enabling movement within them such as Ramona. Improving local circulation for pedestrian and non-motorized uses can reduce long trips outside of the community.

Response W-155.1

The comment expresses support for funding the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified. For a discussion of transportation infrastructure in East County please see Response W-153.1.

Comment Letter W-156: Lisa Celeste



Comment Letter W-156: Lisa Celeste

Lisa Celeste

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-156.1

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

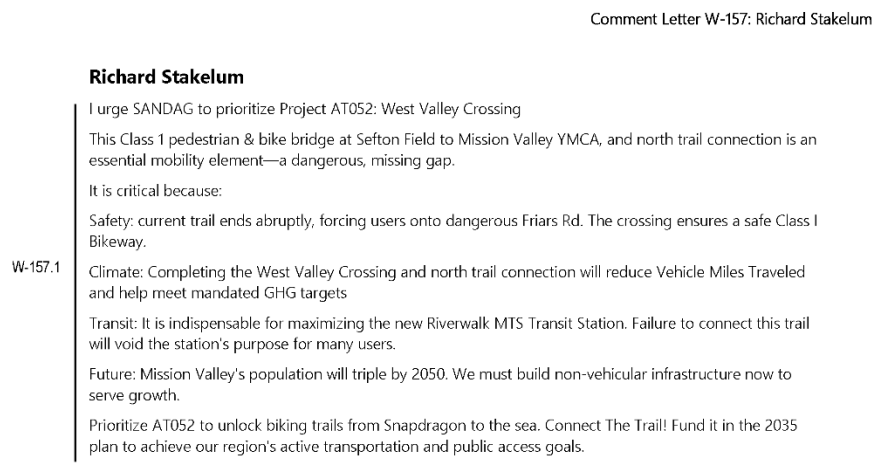
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-156.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-157: Richard Stakelum



Comment Letter W-157: Richard Stakelum

Richard Stakelum

I urge SANDAG to prioritize Project AT052: West Valley Crossing

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It is critical because:

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W-157.1

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

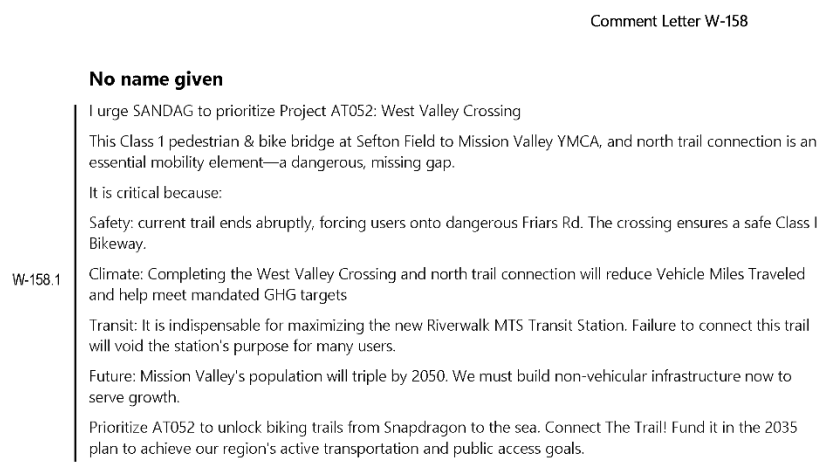
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-157.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-158: No name given



Comment Letter W-158

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-158.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-158.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-159: No name given



Comment Letter W-159

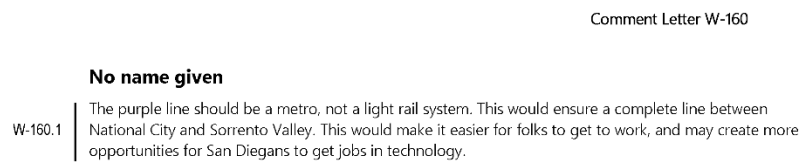
No name given

W-159.1 | Yes for Ramona improvements

Response W-159.1

The comment expresses support for improvements in Ramona. This is a comment on the proposed Plan, not a comment on the adequacy of the EIR. As such, no further response is required. Please see Response W-153.1.

Comment Letter W-160: No name given



Comment Letter W-160

No name given

W-160.1 The purple line should be a metro, not a light rail system. This would ensure a complete line between National City and Sorrento Valley. This would make it easier for folks to get to work, and may create more opportunities for San Diegans to get jobs in technology.

Response W-160.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-161: No name given

Comment Letter W-161

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-161.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-161.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-162: Patricia Rojano



Comment Letter W-162: Patricia Rojano

Patricia Rojano

W-162.1 | Afecta mucho para el estacionamiento.

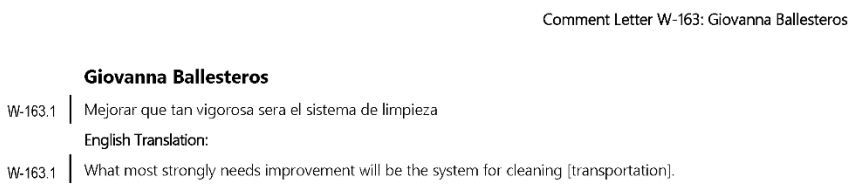
English Translation:

W-162.1 | It greatly affects parking.

Response W-162.1

The comment expresses concern related to parking. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Decision-making regarding parking spots is under the control of local jurisdictions and not under SANDAG's jurisdiction. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. Please note that parking impacts are no longer required to be analyzed under CEQA.

Comment Letter W-163: Giovanna Ballesteros



Comment Letter W-163: Giovanna Ballesteros

Giovanna Ballesteros

W-163.1 | Mejorar que tan vigorosa sera el sistema de limpieza

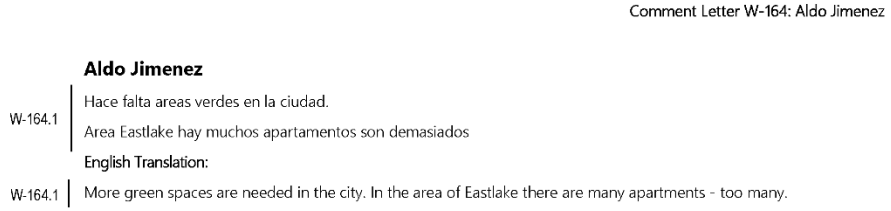
English Translation:

W-163.1 | What most strongly needs improvement will be the system for cleaning [transportation].

Response W-163.1

The comment expresses support for a cleaner transportation. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. Keeping our region's existing infrastructure in good condition is a high priority, and the 2025 Regional Plan includes a Fix It First Policy (Appendix A). This supports safety, the environment, and neighborhood economic vitality. It should be noted that after SANDAG plans, designs, and builds transportation infrastructure, it is the responsibility of the operating agency (a local city, San Diego County, or a state agency) to preserve and maintain it.

Comment Letter W-164: Aldo Jimenez



Comment Letter W-164: Aldo Jimenez

Aldo Jimenez

W-164.1 Hace falta areas verdes en la ciudad.

Area Eastlake hay muchos apartamentos son demasiados

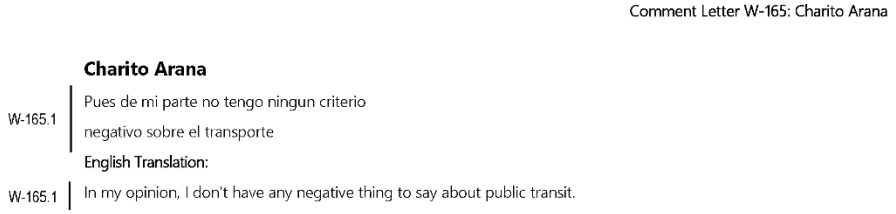
English Translation:

W-164.1 More green spaces are needed in the city. In the area of Eastlake there are many apartments - too many.

Response W-164.1

The comment expresses support for more green space and concern about development This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks. While future growth is considered and accounted for in the EIR, it does not authorize housing-related construction. The regional growth projections and land use assumptions included in the proposed Plan were designed to be consistent with local land use patterns which would include the development of new multifamily homes. Please see Section 4.14, "Population and Housing," for a more in-depth analysis of the planned distribution and types of housing planned through 2050. The EIR analyzes all environmental issues required by CEQA including air quality and noise as a result of the implementation of the proposed Plan. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Comment Letter W-165: Charito Arana



Comment Letter W-165: Charito Arana

Charito Arana

W-165.1 Pues de mi parte no tengo ningun criterio negativo sobre el transporte

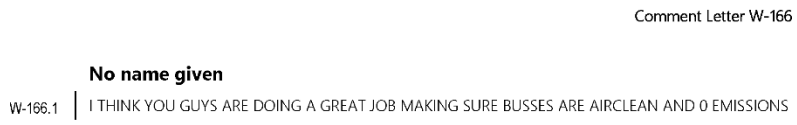
English Translation:

W-165.1 In my opinion, I don't have any negative thing to say about public transit.

Response W-165.1

The comment expresses support for public transit. This is a not a comment on the adequacy of the EIR and, as such, no further response is required.

Comment Letter W-166: No name given



Comment Letter W-166

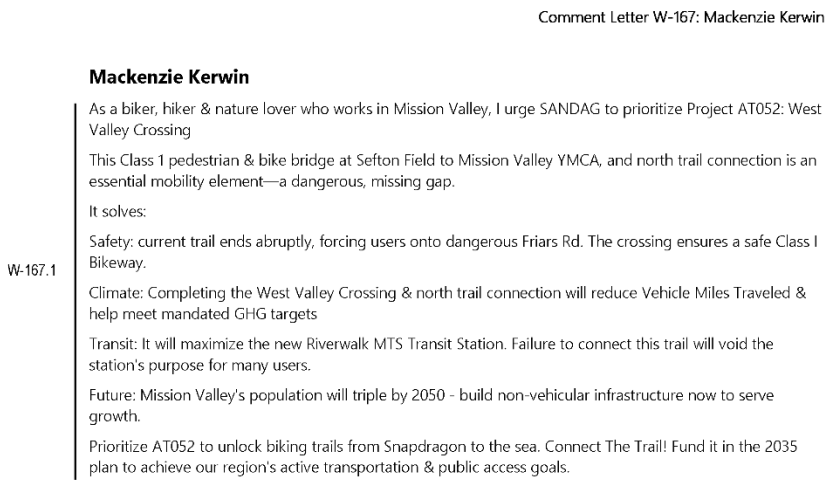
No name given

W-166.1 | I THINK YOU GUYS ARE DOING A GREAT JOB MAKING SURE BUSSES ARE AIRCLEAN AND 0 EMISSIONS

Response W-166.1

The comment expresses support for clean fleets. This is not a comment on the adequacy of the EIR and, as such, no further response is required. The proposed Plan assumes that MTS and NCTD will transition to zero-emission vehicles over the next two decades, based on each agency's adopted Zero-Emission Bus Fleet Transition Plan prepared in response to the California Air Resources Board's Innovative Clean Transit rule.

Comment Letter W-167: Mackenzie Kerwin



Comment Letter W-167: Mackenzie Kerwin

Mackenzie Kerwin

As a biker, hiker & nature lover who works in Mission Valley, I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It solves:

W-167.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing & north trail connection will reduce Vehicle Miles Traveled & help meet mandated GHG targets

Transit: It will maximize the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

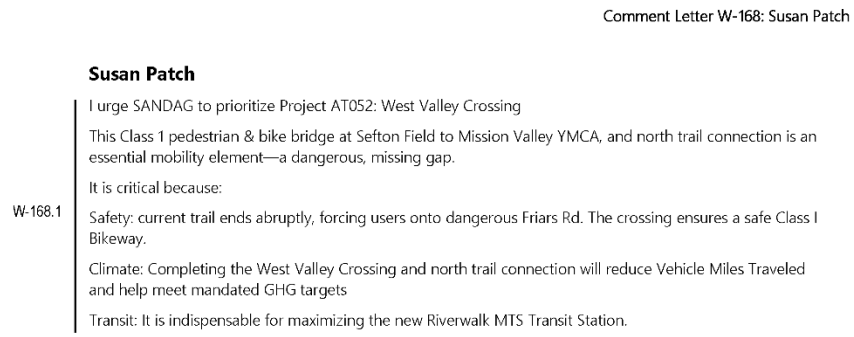
Future: Mission Valley's population will triple by 2050 - build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation & public access goals.

Response W-167.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-168: Susan Patch



Comment Letter W-168: Susan Patch

Susan Patch

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-168.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station.

Response W-168.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-169: Mary

Comment Letter W-169: Mary (no last name given)

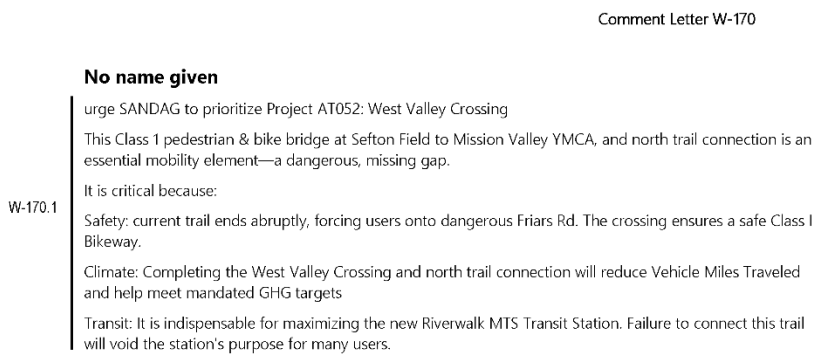
Mary

W-169.1 It's interesting that this is the first time I've seen an article about this section of the river. I've walked the MV portion of the trail many times and the most western portion ends sadly at Fashion Valley. So I fully support this action!

Response W-169.1

The comment expresses support for the extension of the San Diego River Trail. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-170: No name given



Comment Letter W-170

No name given

W-170.1

urge SANDAG to prioritize Project AT052: West Valley Crossing

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It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

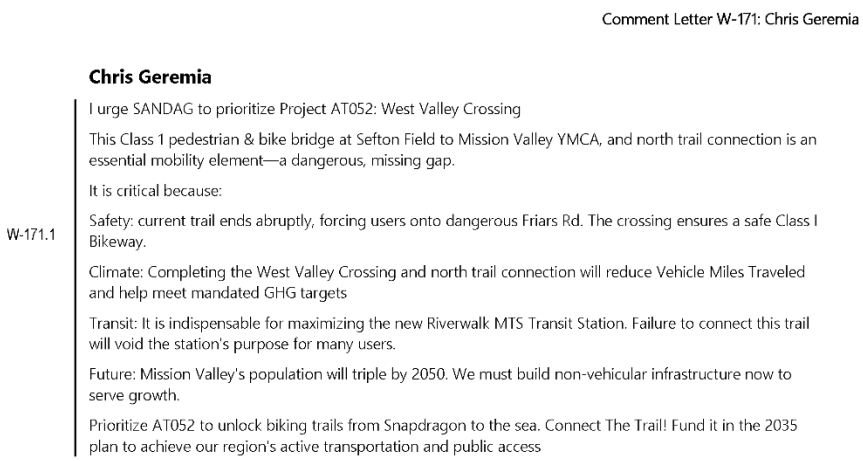
Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

Response W-170.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-171: Chris Geremia



Comment Letter W-171: Chris Geremia

Chris Geremia

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-171.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

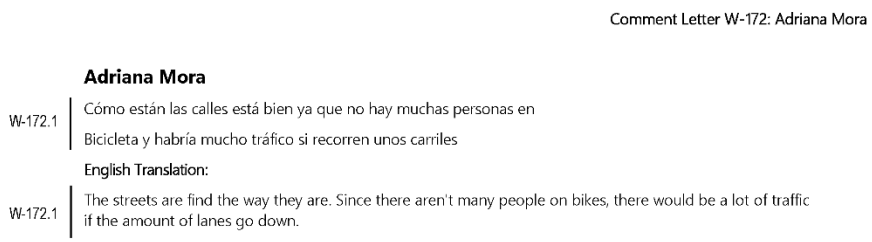
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access

Response W-171.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-172: Adriana Mora



Comment Letter W-172: Adriana Mora

Adriana Mora

W-172.1 Cómo están las calles está bien ya que no hay muchas personas en Bicicleta y habría mucho tráfico si recorren unos carriles

English Translation:

W-172.1 The streets are find the way they are. Since there aren't many people on bikes, there would be a lot of traffic if the amount of lanes go down.

Response W-172.1

The comment expresses concern related to bike lanes and traffic. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The active transportation network in the 2025 Regional Plan proposes a complete network of safe connections to jobs, schools, and other regional activity centers for users of all ages and abilities. Specific facility design decisions are worked out during the project planning and design phase with input from each community. The goal is to develop safe infrastructure for the location and context in collaboration with the local city or county.

Comment Letter W-173: No name given

Comment Letter W-173

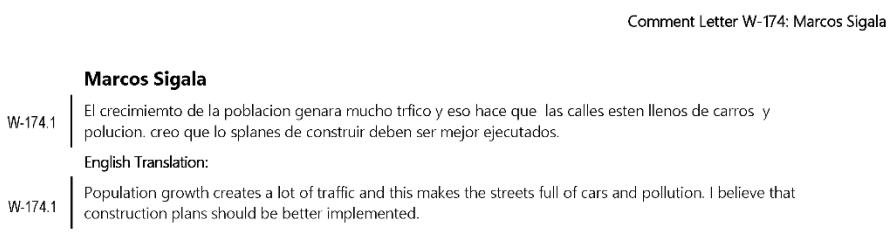
No name given

W-173.1 The Purple Line connecting Sorrento to San Ysidro would be a complete game changer for San Diego and could drastically reduce the number of cars on our freeways. Connecting these two major hubs and multiple populous neighborhoods along the way, as well as crucial job centers, would make San Diego an even better city.

Response W-173.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-174: Marcos Sigala



Comment Letter W-174: Marcos Sigala

Marcos Sigala

W-174.1 El crecimiemto de la poblacion genara mucho trfico y eso hace que las calles esten llenos de carros y polucion. creo que lo splanes de construir deben ser mejor ejecutados.

English Translation:

W-174.1 Population growth creates a lot of traffic and this makes the streets full of cars and pollution. I believe that construction plans should be better implemented.

Response W-174.1

The comment expresses concern related to traffic and pollution resulting from population growth and construction. This is not a comment on the adequacy of the EIR and, as such, no further response is required. While future growth is considered and accounted for in the EIR, it does not authorize housing-related construction. The regional growth projections and land use assumptions included in the proposed Plan were designed to be consistent with local land use patterns which would include the development of new multifamily homes. Please see Section 4.14, "Population and Housing," for a more in-depth analysis of the planned distribution and types of housing planned through 2050. The EIR analyzes all environmental issues required by CEQA including air quality and noise as a result of the implementation of the proposed Plan. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review in compliance with CEQA, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process.

Comment Letter W-175: No name given

Comment Letter W-175

No name given

W-175.1 | El nuevo Gaylord trae mucho trafico a la communidad de Chula Vista y genera polucion

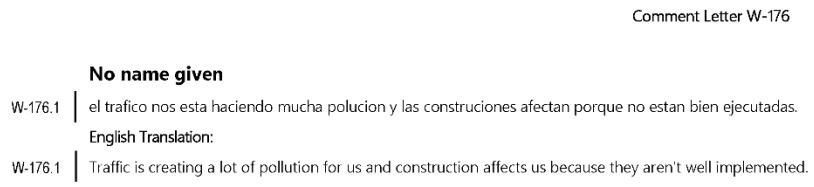
English Translation:

W-175.1 | The new Gaylord [resort] brings a lot of traffic to the Chula Vista community and creates pollution.

Response W-175.1

The comment expresses concern related to traffic resulting from the new Gaylord resort in Chula Vista. This is not a comment on the adequacy of the EIR and, as such, no further comment is required.

Comment Letter W-176: No name given



Comment Letter W-176

No name given

W-176.1 el trafico nos esta haciendo mucha polucion y las construciones afectan porque no estan bien ejecutadas.

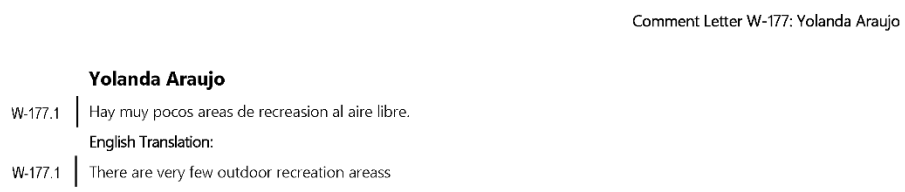
English Translation:

W-176.1 Traffic is creating a lot of pollution for us and construction affects us because they aren't well implemented.

Response W-176.1

The comment expresses concern related to pollution and traffic. This is not a comment on the adequacy of the EIR and, as such, no further response is required. As described on Pages 4.3-33 and 4.3-34 of the Draft EIR, the proposed Regional Plan would implement Smart Intersection Systems (SIS) to reduce congestion, shorten traffic delays, and improve overall traffic flow. Additionally, the San Diego Regional Air Quality Strategy and State Implementation Plan (RAQS), described on Pages 4.3-27 to 4.3-28 of the Draft EIR, implemented several Transportation Control Measures (TCMs) to reduce adverse impacts to air quality. These TCMs included improvements in traffic flow, which would reduce idling and associated emissions. In addition, as described in Section 4.3, "Air Quality," of the EIR under Impact AQ-3, implementation of the proposed transportation improvements could result in a substantial increase in construction-related emissions exceeding daily thresholds. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential air quality and pollution impacts that are anticipated during the construction of the project.

Comment Letter W-177: Yolanda Araujo



Comment Letter W-177: Yolanda Araujo

Yolanda Araujo

W-177.1 | Hay muy pocos areas de recreasion al aire libre.

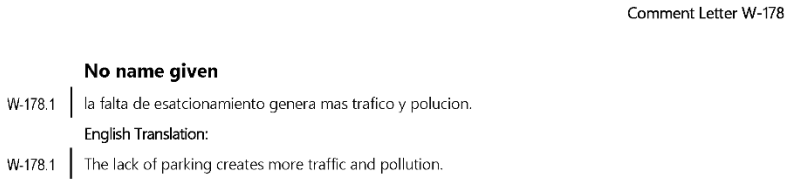
English Translation:

W-177.1 | There are very few outdoor recreation areass

Response W-177.1

The comment expresses concern related to a lack of outdoor recreational areas. This is a comment on the proposed Plan rather than the adequacy of the EIR. As such, no further response is required. SANDAG does not have the authority to decide how specific land is used and developed. These decisions, including zoning classifications and identification of future parks and open spaces, are made by cities and the County. The 2025 Regional Plan forecasts more than 50% of the region preserved as open space, parks, or habitat (Appendix F, Figure F.4). The land use pattern shows open space, parks, and recreation types, consistent with local jurisdictions' plans and designations. SANDAG works collaboratively with the cities and County of San Diego so that the Regional Plan captures local general plans, community plans, specific plans, and other relevant planning documents. The Regional Plan supports improved access to parks and open space through investments in different types of transportation that connect communities to these areas. The Plan evaluates its future performance (Appendix N) by measuring how the region's transportation network improves access to daily needs, including parks.

Comment Letter W-178: No name given



Comment Letter W-178

No name given

W-178.1 | la falta de esatcionamiento genera mas trafico y polucion.

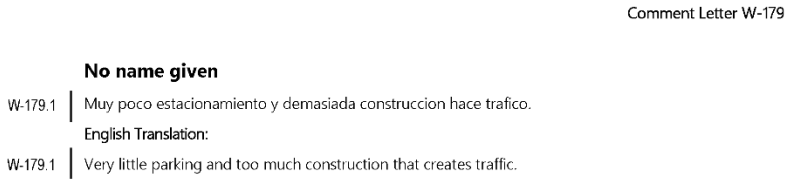
English Translation:

W-178.1 | The lack of parking creates more traffic and pollution.

Response W-178.1

The comment expresses concern related to pollution and traffic resulting from a lack of parking spots. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Decision-making regarding parking spots is under the control of local jurisdictions and not under SANDAG's jurisdiction. Although parking impacts are no longer required to be analyzed under CEQA, TRA-4 on pages 4.16-44 to 4.16-46 of the EIR evaluate the Regional Plan's potential impacts related to parking supply within the plan area. It was determined that, between now and 2050, impacts related to a lack of parking supply and resulting environmental effects would be less than significant. Parking strategies focus on more efficient management of the existing parking supply and reducing associated VMT levels. SANDAG has developed a *Parking Strategies for Smart Growth* guide in 2010. The guide provides example policies that individual jurisdictions may implement to better manage parking demand, including at public transit hubs. In addition, SANDAG has also developed a regional parking management toolbox that provides jurisdictions within the San Diego region with a framework for evaluating, implementing, and managing parking management strategies that support their economic development, sustainability, and mobility goals. Please note that parking impacts are no longer required to be analyzed under CEQA.

Comment Letter W-179: No name given



Comment Letter W-179

No name given

W-179.1 | Muy poco estacionamiento y demasiada construccion hace trafico.

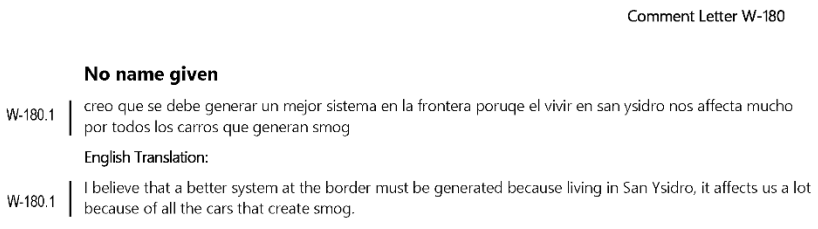
English Translation:

W-179.1 | Very little parking and too much construction that creates traffic.

Response W-179.1

The comment expresses concern related to traffic. Please see Response W-178.1. The EIR prepared for the proposed Plan is a first-tier Program EIR. "Second-tier projects" that would implement the proposed Plan include site-specific transportation network improvements and development projects. As part of the implementation of the proposed Plan, individual projects under the Plan are subject to environmental review, and any site-specific existing conditions, impacts and required mitigation measures would be identified during that process. This would include potential impacts to traffic during construction.

Comment Letter W-180: No name given



Comment Letter W-180

No name given

W-180.1 | creo que se debe generar un mejor sistema en la frontera poruqe el vivir en san ysidro nos affecta mucho por todos los carros que generan smog

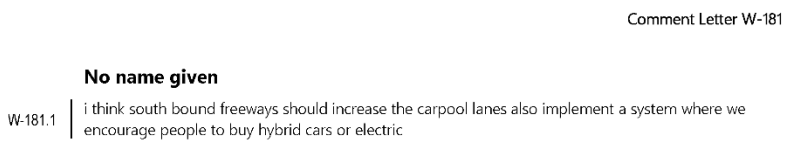
English Translation:

W-180.1 | I believe that a better system at the border must be generated because living in San Ysidro, it affects us a lot because of all the cars that create smog.

Response W-180.1

The comment expresses concern related to pollution and traffic at the border. This is not a comment on the adequacy of the EIR and, as such, no further comment is required. SANDAG is aware of the long idling times of cars waiting to cross the California-Mexico border. SANDAG and Caltrans are working with state and federal partners in the U.S. and Mexico to create a new point of entry (POE) for the San Diego-Baja California region. This project, called the State Route 11 (SR 11)/Otay Mesa East Port of Entry (OME POE) project is described on Page 4.16-46 of the EIR and would reduce border crossing congestion and related GHG emissions. Additional information regarding the OME POE project can be accessed here: https://www.sandag.org/projects-and-programs/featured-projects/sr-11-otay-mesa-port-of-entry.

Comment Letter W-181: No name given



Comment Letter W-181

No name given

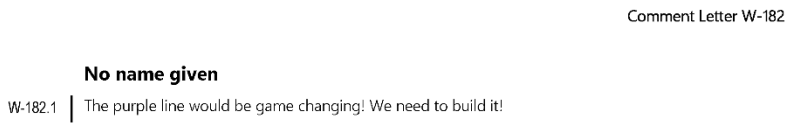
W-181.1 i think south bound freeways should increase the carpool lanes also implement a system where we encourage people to buy hybrid cars or electric

Response W-181.1

The comment expresses support for south bound carpool lanes and incentives to buy electric vehicles. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The proposed Plan includes Complete Corridors, which would incorporate various transportation improvements such as managed lanes projects that would offer priority access to people using transit, carpooling, rideshare, motorcycles, vanpooling and some low-emission vehicles. Appendix A to the 2025 Regional Plan includes maps of the Complete Corridors in the proposed Plan. SANDAG currently has one incentive program that promotes the transition to ZEVs in the San Diego region. The San Diego County Incentive Project is an EV charger rebate program that provides rebates to property owners who install workplace and publicly accessible charging stations throughout the region. SANDAG co-funds the program with SDAPCD and the California Energy Commission. As of April 2024, 56% of program funds have gone toward installations in low-income and disadvantaged communities. The program is no longer accepting new applications (SANDAG 2025b). SANDAG also prepared an implementation plan to establish a regional ZEV incentive program that will help reduce the cost of buying a ZEV for residents in low-income and underserved communities in San Diego County. As of September 2025, SANDAG is exploring ways to fund this program in the future.

SANDAG is currently in the process of developing programs meant to encourage people to transition to zero.

Comment Letter W-182: No name given



Comment Letter W-182

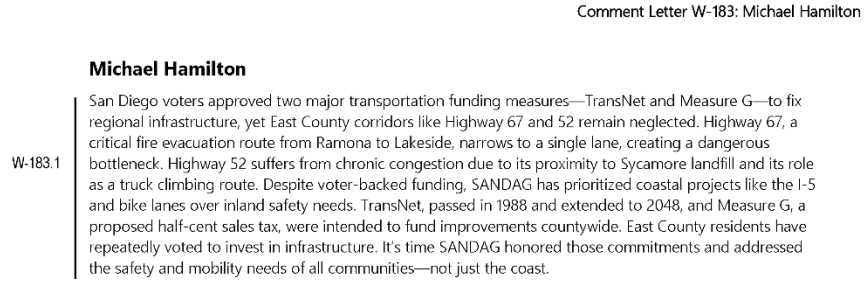
No name given

W-182.1 | The purple line would be game changing! We need to build it!

Response W-182.1

The comment expresses support for the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-183: Michael Hamilton



Comment Letter W-183: Michael Hamilton

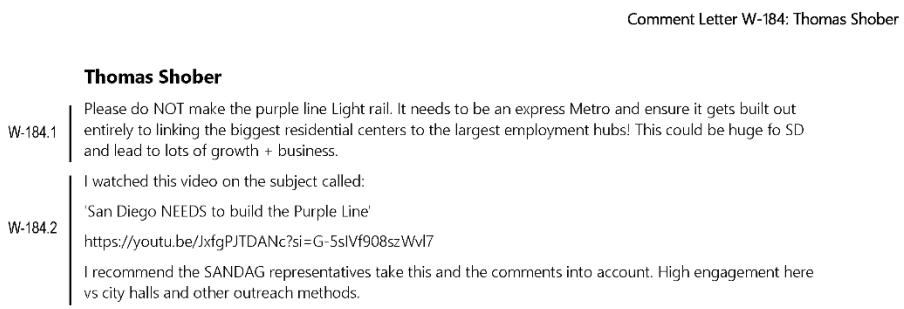
Michael Hamilton

W-183.1 San Diego voters approved two major transportation funding measures—TransNet and Measure G—to fix regional infrastructure, yet East County corridors like Highway 67 and 52 remain neglected. Highway 67, a critical fire evacuation route from Ramona to Lakeside, narrows to a single lane, creating a dangerous bottleneck. Highway 52 suffers from chronic congestion due to its proximity to Sycamore landfill and its role as a truck climbing route. Despite voter-backed funding, SANDAG has prioritized coastal projects like the I-5 and bike lanes over inland safety needs. TransNet, passed in 1988 and extended to 2048, and Measure G, a proposed half-cent sales tax, were intended to fund improvements countywide. East County residents have repeatedly voted to invest in infrastructure. It's time SANDAG honored those commitments and addressed the safety and mobility needs of all communities—not just the coast.

Response W-183.1

The comment requests investment in the safety and mobility of transportation infrastructure in East County. Please see Response W-153.1.

Comment Letter W-184: Thomas Shober



Comment Letter W-184: Thomas Shober

Thomas Shober

W-184.1 Please do NOT make the purple line Light rail. It needs to be an express Metro and ensure it gets built out entirely to linking the biggest residential centers to the largest employment hubs! This could be huge fo SD and lead to lots of growth + business.

W-184.2 I watched this video on the subject called:

'San Diego NEEDS to build the Purple Line'

https://youtu.be/JxfgPJTDANc?si=G-5sIVf908szWvl7

I recommend the SANDAG representatives take this and the comments into account. High engagement here vs city halls and other outreach methods.

Response W-184.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, we understand that connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-184.2

The comment submits a video in support of the Purple Line being the full extent and being heavy rail. See Response W-184.1.

Comment Letter W-185: Kimball Banwell



Comment Letter W-185: Kimball Banwell

Kimball Banwell

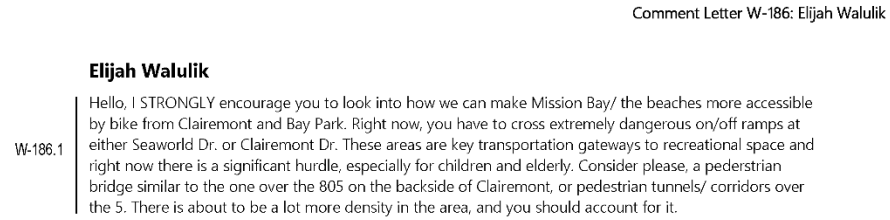
W-185.1 This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because the current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway. I lived in Ocean Beach and bike-commuted to work, and found it absolutely dangerous. Let's encourage more biking and walking in this great city!

Response W-185.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-186: Elijah Walulik



Comment Letter W-186: Elijah Walulik

Elijah Walulik

W-186.1 Hello, I STRONGLY encourage you to look into how we can make Mission Bay/ the beaches more accessible by bike from Clairemont and Bay Park. Right now, you have to cross extremely dangerous on/off ramps at either Seaworld Dr. or Clairemont Dr. These areas are key transportation gateways to recreational space and right now there is a significant hurdle, especially for children and elderly. Consider please, a pederstrian bridge similar to the one over the 805 on the backside of Clairemont, or pedestrian tunnels/ corridors over the 5. There is about to be a lot more density in the area, and you should account for it.

Response W-186.1

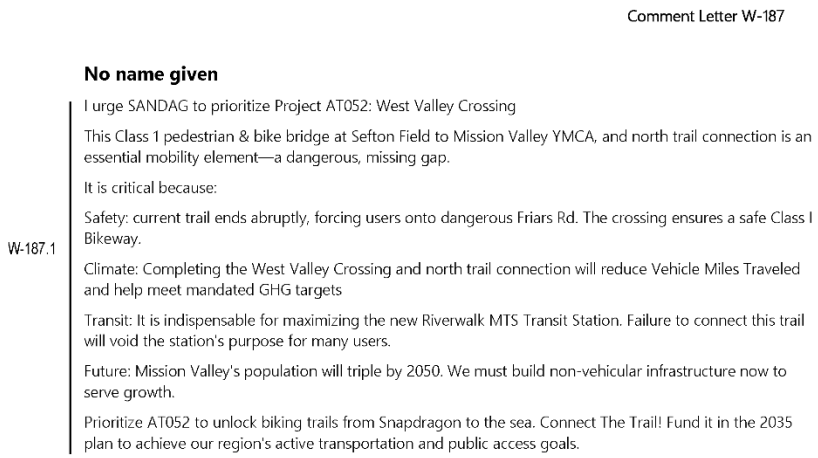
The comment requests bike accessibility to Mission Bay and the beaches from Clairemont and Bay Park. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. The proposed Plan includes several active transportation projects that would improve the accessibility to Mission Bay and publicly accessible beaches; these projects include AT022, AT037, AT046, and AT047. Additional information about these projects and the associated improvements can be found in Appendix A to the 2025 Regional Plan.

The 2025 Regional Plan's Active Transportation Network combines both regional and local bike projects. This encompasses nearly 600 miles of bikeways first included in the 2015 Regional Plan, combined with approximately 300 more miles of bikeways, factoring in routes that were later adopted as part of other local bikeway planning efforts or regional comprehensive multimodal corridor plans. The active transportation network in the 2025 Regional Plan proposes a complete network of safe connections to jobs, schools, and other regional activity centers for users of all ages and abilities. Specific facility design decisions are worked out during the project planning and design phase with input from each community. The goal is to develop safe infrastructure for the location and context in collaboration with the local city or county.

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

a State Highway Operation and Protection Program (SHOPP) for the region, which identifies safety and operational improvements for the freeways, including state owned assets such as bicycle and pedestrian facilities (Caltrans 2025e). Each Active Transportation project intersecting Caltrans right of way specifically within conventional freeway segments assumes these improvements, either grade separated (Off-Street Bikeway) or within the under/overpass interchanges (On-Street Bikeway). The proposed Plan also includes a Vision Zero program, which is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. Vision Zero utilizes crash data to identify safety issues and recommend solutions, develop a regional safety policy, further construct the regional bike network and build out jurisdictions' complete streets networks, and fund educational programs.

Comment Letter W-187: No name given



Comment Letter W-187

No name given

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-187.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

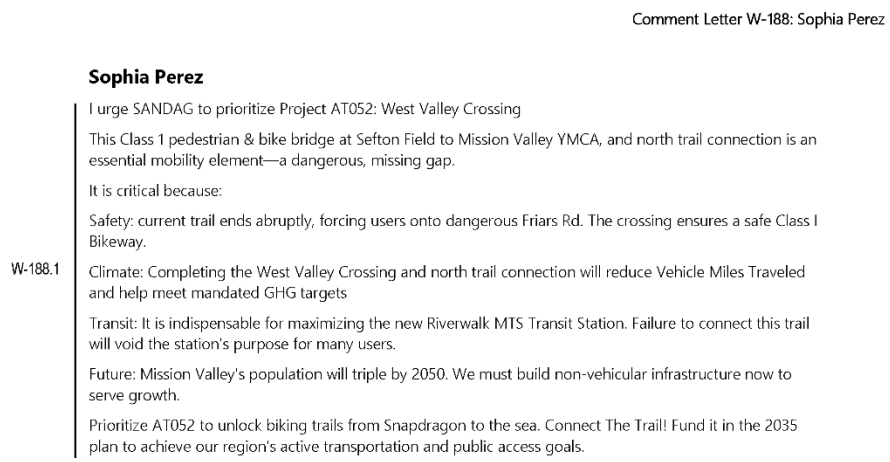
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-187.1

The commenter encourages the prioritization of the West Valley Crossing Project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-188: Sophia Perez



Comment Letter W-188: Sophia Perez

Sophia Perez

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

W-188.1 Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

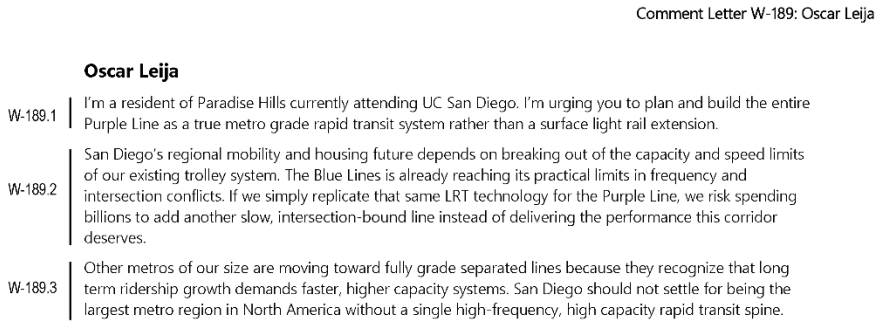
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-187.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-189: Oscar Leija



Comment Letter W-189: Oscar Leija

Oscar Leija

W-189.1 I'm a resident of Paradise Hills currently attending UC San Diego. I'm urging you to plan and build the entire Purple Line as a true metro grade rapid transit system rather than a surface light rail extension.

W-189.2 San Diego's regional mobility and housing future depends on breaking out of the capacity and speed limits of our existing trolley system. The Blue Lines is already reaching its practical limits in frequency and intersection conflicts. If we simply replicate that same LRT technology for the Purple Line, we risk spending billions to add another slow, intersection-bound line instead of delivering the performance this corridor deserves.

W-189.3 Other metros of our size are moving toward fully grade separated lines because they recognize that long term ridership growth demands faster, higher capacity systems. San Diego should not settle for being the largest metro region in North America without a single high-frequency, high capacity rapid transit spine.

Response W-189.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

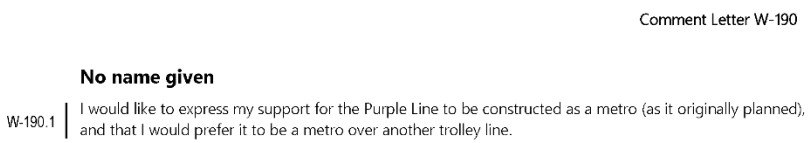
Response W-189.2

The comment expresses concern about the Purple Lane using LRT technology. Please see Response W-189.1.

Response W-189.3

The comment expresses support for fully grade separated lines. Please see Response W-189.1.

Comment Letter W-190: No name given



Comment Letter W-190

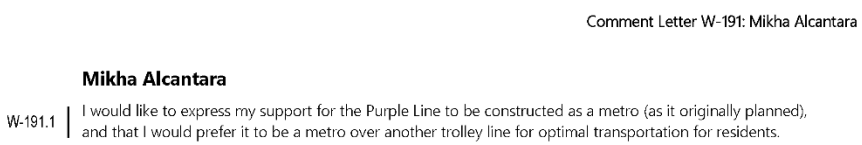
No name given

W-190.1 | I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line.

Response W-190.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-191: Mikha Alcantara



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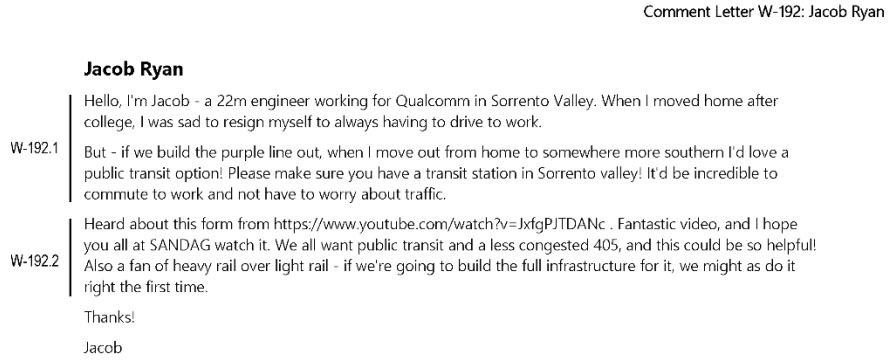
Mikha Alcantara

W-191.1 | I would like to express my support for the Purple Line to be constructed as a metro (as it originally planned), and that I would prefer it to be a metro over another trolley line for optimal transportation for residents.

Response W-191.1

The comment expresses support for the Purple Line being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-192: Jacob Ryan



Comment Letter W-192: Jacob Ryan

Jacob Ryan

Hello, I'm Jacob - a 22m engineer working for Qualcomm in Sorrento Valley. When I moved home after college, I was sad to resign myself to always having to drive to work.

W-192.1 But - if we build the purple line out, when I move out from home to somewhere more southern I'd love a public transit option! Please make sure you have a transit station in Sorrento valley! It'd be incredible to commute to work and not have to worry about traffic.

W-192.2 Heard about this form from https://www.youtube.com/watch?v=JxfgPJTDANc . Fantastic video, and I hope you all at SANDAG watch it. We all want public transit and a less congested 405, and this could be so helpful! Also a fan of heavy rail over light rail - if we're going to build the full infrastructure for it, we might as do it right the first time.

Thanks!

Jacob

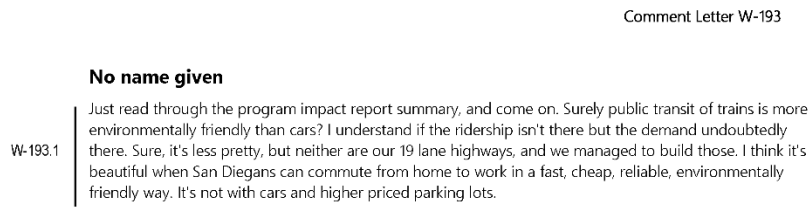
Response W-192.1

The comment expresses support for the Purple Line being the full extent. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-192.2

The comment submits a video in support of the Purple Line being the full extent and being heavy rail. See Response W-192.1.

Comment Letter W-193: No name given



Comment Letter W-193

No name given

W-193.1 Just read through the program impact report summary, and come on. Surely public transit of trains is more environmentally friendly than cars? I understand if the ridership isn't there but the demand undoubtedly there. Sure, it's less pretty, but neither are our 19 lane highways, and we managed to build those. I think it's beautiful when San Diegans can commute from home to work in a fast, cheap, reliable, environmentally friendly way. It's not with cars and higher priced parking lots.

Response W-193.1

The comment expresses support for public transit over cars This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required.. The proposed Plan includes expanded public transit services – in the form of rail, bus, and trolley lines – and improved bicycle and pedestrian facilities in order to accommodate growth and improve circulation around the San Diego region. The proposed Plan reflects feedback SANDAG received from members of the public and other government agencies, evaluation of which routes would serve the most people, and the need to balance costs – both building costs and operation and maintenance costs - with available revenues. Before adding new transit routes or change existing ones, SANDAG and other local government agencies must carefully consider potential outcomes, and listen to the public to identify transit types, route maps and stops, infrastructure needs, and operating plans. Appendix A of the 2025 Regional Plan contains the anticipated operating characteristics of existing and planned routes in 2035 and 2050, including projections of route frequency and service hours. Most routes will see improved service through either more frequent operations or operating earlier in the morning, later at night, and/or on the weekends. Investments in transit priority technology and other infrastructure will improve reliability and enable more consistent scheduling for rail lines. The proposed Plan includes many transit projects that are still in the early stages of planning, so detailed information is not yet available for every project. More information, including costs and benefits, will become available as each transit project is studied and developed in the coming years. SANDAG shares the community's vision of a well-connected regional transit network that makes it easier for people to get where they need and want to be. The proposed Plan includes improvements to highways, expansion of neighborhood shuttle service areas and bikeways, and technology upgrades to support trips across the region and connect people more efficiently to transit stops. SANDAG uses a number of tools to anticipate how well this proposed transportation network will serve the region (see 2025 Regional Plan, Appendix N*)*, focusing on the system's ability to connect people to destinations like employment centers, medical facilities, education, retail, parks, coastal access, and more via transit and other travel modes.

Comment Letter W-194: Sami Ryan

Sami Ryan

W-194.1 The heavy rail purple line would be a net positive on the environment and would reduce traffic on the 805 enormously. I would use the purple line to visit my brother.

Response W-194.1

The comment submits a video in support of the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-195: Francis Redublado

Francis Redublado

W-195.1 The EIR appears mostly correct. It identifies driving as a major issue, as passenger cars contributed 34.9% of all Greenhouse gasses in the region. It also points out public transportation as a key remedy.

W-195.2 However, sentiments in this EIR are contradicted in the 2025 Regional Plan's vision for the Purple Line. This plan truncated the Purple Line below I-8. Splitting the Purple Line will cripple it. A connection to Kearny Mesa and Sorrento Valley is critical to the Purple Line's intended use cases and provides critical support to transit operations there. Additionally, the Purple Line is listed as light rail. Using light rail instead of heavy rail would be a waste for the Purple Line. Light Rail lacks the capacity and speed for this line.

W-195.3 SANDAG should prioritize the Purple Line and other transit improvements in the 2025 Regional Plan to better reflect the data and ideas seen in the EIR. The climate commitments mentioned in this EIR will not be met without robust public transit.

Response W-195.1

The comment states the EIR is correct in identifying cars as a major source of GHG emissions. This is not a comment on the adequacy of the EIR and, as such, no further response is required.

Response W-195.2

The comment expresses confusion related to the vision for the Purple Line. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Response W-195.3

The comment requests prioritization of the Purple Line and other transit improvements in the 2025 Regional Plan to meet the climate commitments discussed in the EIR SANDAG acknowledges the significance of public transportation in reducing VMT and transportation-related GHG emissions. Pages 4.16-31 to 4.16-44 of the EIR describe the proposed transportation network improvements to be implemented by 2050, as well as the benefits of the improvements as they relate to GHG emissions. Increased connections between transit hubs, as well as accessibility to public transit users, cyclists, pedestrians, and motorists, are a focus of the transportation improvement programs.

Comment Letter W-196: No name given

Comment Letter W-196

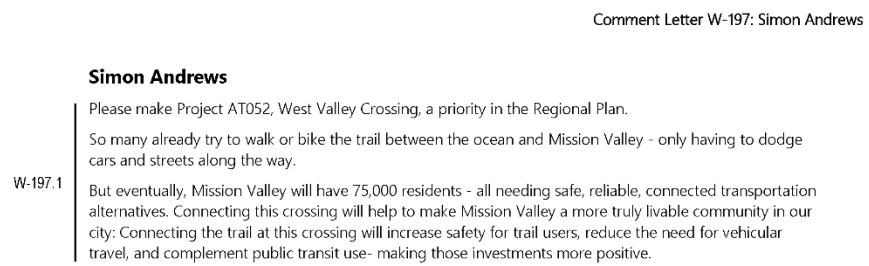
No name given

W-196.1 I want SANDAG to build the entire Purple Line as an express Metro instead of a light rail so that commuters have a great alternative to using the 805, which is one of the most congested freeways in the city.

Response W-196.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

Comment Letter W-197: Simon Andrews



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Simon Andrews

Please make Project AT052, West Valley Crossing, a priority in the Regional Plan.

So many already try to walk or bike the trail between the ocean and Mission Valley - only having to dodge cars and streets along the way.

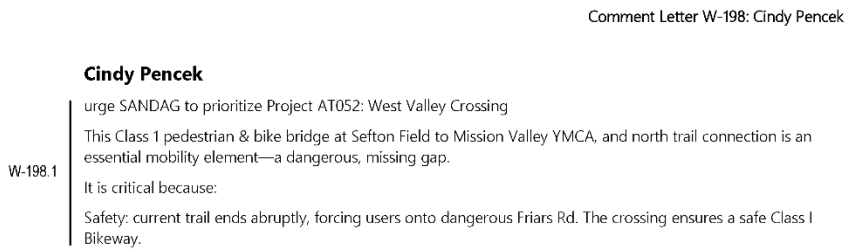
W-197.1

But eventually, Mission Valley will have 75,000 residents - all needing safe, reliable, connected transportation alternatives. Connecting this crossing will help to make Mission Valley a more truly livable community in our city: Connecting the trail at this crossing will increase safety for trail users, reduce the need for vehicular travel, and complement public transit use- making those investments more positive.

Response W-197.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-198: Cindy Pencek



Comment Letter W-198: Cindy Pencek

Cindy Pencek

W-198.1

urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

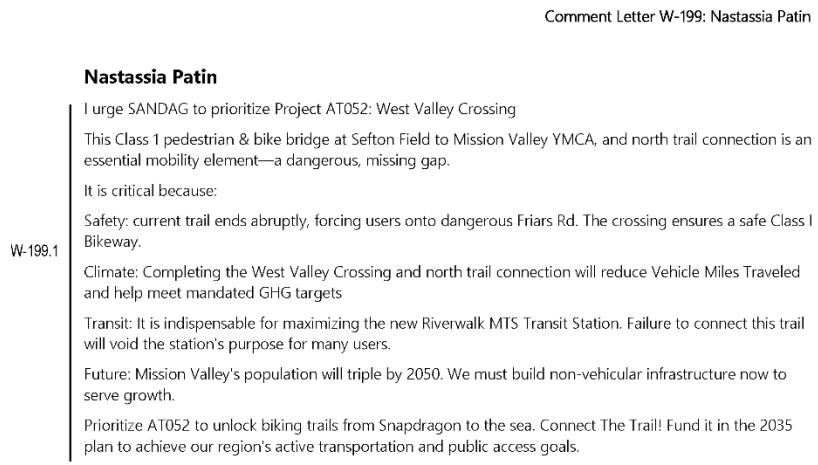
It is critical because:

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Response W-198.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-199: Nastassia Patin



Comment Letter W-199: Nastassia Patin

Nastassia Patin

I urge SANDAG to prioritize Project AT052: West Valley Crossing

This Class 1 pedestrian & bike bridge at Sefton Field to Mission Valley YMCA, and north trail connection is an essential mobility element—a dangerous, missing gap.

It is critical because:

W-199.1

Safety: current trail ends abruptly, forcing users onto dangerous Friars Rd. The crossing ensures a safe Class I Bikeway.

Climate: Completing the West Valley Crossing and north trail connection will reduce Vehicle Miles Traveled and help meet mandated GHG targets

Transit: It is indispensable for maximizing the new Riverwalk MTS Transit Station. Failure to connect this trail will void the station's purpose for many users.

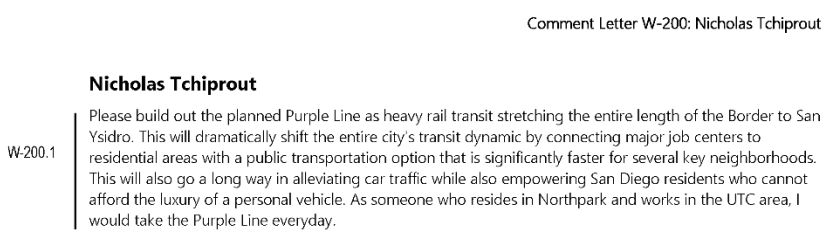
Future: Mission Valley's population will triple by 2050. We must build non-vehicular infrastructure now to serve growth.

Prioritize AT052 to unlock biking trails from Snapdragon to the sea. Connect The Trail! Fund it in the 2035 plan to achieve our region's active transportation and public access goals.

Response W-199.1

This comment requests that the proposed Plan include the West Valley Crossing active transportation project. This is not a comment on the adequacy of the EIR and, as such, no further response is required. AT052 is included in the 2035 phase year of the proposed Plan. This is not a comment on the adequacy of the EIR and, as such, no further response is required. Please see Response W-115.1

Comment Letter W-200: Nicholas Tchiprout



Comment Letter W-200: Nicholas Tchiprout

Nicholas Tchiprout

W-200.1 Please build out the planned Purple Line as heavy rail transit stretching the entire length of the Border to San Ysidro. This will dramatically shift the entire city's transit dynamic by connecting major job centers to residential areas with a public transportation option that is significantly faster for several key neighborhoods. This will also go a long way in alleviating car traffic while also empowering San Diego residents who cannot afford the luxury of a personal vehicle. As someone who resides in Northpark and works in the UTC area, I would take the Purple Line everyday.

Response W-200.1

The comment expresses support for the Purple Line being the full extent and being heavy rail. This is a comment on the proposed Plan, not the adequacy of the EIR. As such, no further response is required. As part of the Purple Line Conceptual Planning study, a realistic timeline for this megaproject was identified to be longer than 15 years. At the same time, connecting these communities with transit is a high priority. Accordingly, the Rapid 688 Bus will provide a near-term solution that is feasible by 2035. More planning is needed to evaluate the right mode of transit for the Purple Line, but the initial planning study indicated that the stop distribution and ridership levels did not support heavy rail. While the long-term vision of the project is still to connect San Ysidro to Sorrento Mesa, the project will need to be constructed in phases because of how long the route is and its cost. The parts of the Purple Line that will serve the most riders will be built first, starting in South San Diego County and terminating at SDSU Mission Valley. But the extension to Sorrento Mesa could occur after 2050, or sooner if additional funding is identified.

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