



LATE: Public Correspondence VMT Workshop

January 6, 2022

Mr. Michael Edwards, Chairman
San Diego County Planning Commission
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: Item 2 – OPPOSE IMPLEMENTING VEHICLE MILES TRAVELED POLICY

Dear Chairman Edwards and Planning Commission Members:

The Pacific Southwest Association of REALTORS® (PSAR) is concerned about access to affordable home ownership opportunities in San Diego County. Homeownership is the bedrock of building strong communities and intergenerational wealth. PSAR has been a vocal advocate for the construction of new housing. We have vigorously raised awareness of this critical need at the ballot box, in City Council meetings, in the community, and in the courts. REALTORS® know firsthand that buyers are moving to Riverside, Imperial Valley and Mexico to own a property and build a future. They subsequently commute for hours on San Diego freeways, defeating the intent of the VMT policies.

We oppose the outright adoption of the Vehicle Miles Traveled policy by the Board of Supervisors and urge the Board to hold a Housing Summit to determine how to produce the range of housing choices the region needs and how to avoid gentrification of neighborhoods, which would displace long term residents who will then be priced out of the first-time homeowner housing market and in turn destroy the small community businesses that depend upon local residents as their primary customers.

There are numerous economic and regulatory barriers that discourage developers from building both attached and detached “for-purchase” housing for all levels of income. If the County is forced to adopt a Vehicle Miles Traveled (VMT) planning tool that is being considered with a regional planning focus, the cost of new housing in the unincorporated portions of our region will be increased significantly, adding to the current housing shortfall.

In the absence of entry-level housing, California may focus only on the construction of investor-owned apartment buildings. This policy will severely restrict future generations from realizing the dream of homeownership and a better quality of life for themselves and generations to come.

On behalf of the 3,500 Real Estate professionals in San Diego County who belong to PSAR, thank you for your consideration to adopt a long-range housing strategy.

Sincerely,

Max Zaker

Max Zaker
President, PSAR

Richard D'Ascoli

Richard D'Ascoli
CEO, PSAR



January 5, 2022

Honorable Chair Mike Edwards
Members of the Planning Commission
County of San Diego

Re: Update on Vehicle Miles Traveled Analysis in the Unincorporated Region
Agenda Item 2, January 7, 2022

Honorable Chair Edwards and Commissioners:

Please accept these comments to Agenda Item 2 on your Agenda of January 7, 2022. This letter is to propose a solution, incorporating input from representatives of various stakeholders in the County, to the challenges of VMT mitigation in the unincorporated County. On behalf of these stakeholders and unincorporated County communities, we respectfully request your Commission recommend the Board consider the following:

County TDM Ordinance: a Balanced Solution to VMT Reduction

1. *Focus on the County:* Adopt a revised TSG setting the threshold of significance for VMT at OPR-recommended (15% below regional average) for residential and retail projects, 100% of regional average for industrial projects, and screen out projects in Transportation Opportunity Areas, 50% affordable housing projects inside defined Infill Areas and 100% affordable housing projects, small projects with less than 516¹ total vehicle miles, and include an LMA component. However, acknowledge that it is not feasible to fully mitigate VMT without overburdening housing costs. Without new market-rate housing, there is no opportunity for new mobility improvements or new affordable housing in the unincorporated County. A regionwide VMT mitigation program, even if feasible, would result in a large amount of VMT mitigation going into incorporated areas where VMT reduction is more cost-efficient, but leaving existing unincorporated County communities behind. Therefore, follow the City of San Diego's lead by shifting the focus from full mitigation to creating a common-sense, County-appropriate Transportation Demand Management (TDM) Ordinance that balances all of the County's goals (economic development, affordable housing, increasing housing supply, job creation, and building out the General Plan) with the goal of reducing VMT for future and existing communities.

2. *All Projects Do Their Part:* Instead of requiring projects to pay a cost-prohibitive VMT fee (per mile) to fully mitigate down to the threshold, require all projects to include appropriate TDMs at a certain minimum level of "points." Then, set a lower level of TDMs for certain types of projects in locations or "zones" that the County wants to incentivize (e.g., infill projects;

¹ 110 ADT divided by 10 ADT per unit = 11 units times 2.9 people per unit = 31.9 people times 85 percent of 19.0 regional VMT per capita (16.15 vehicle miles per capita) = 515 total vehicle mile limit to define small projects.

projects in mobility hubs; projects in environmental justice/economically disadvantaged areas²; affordable projects; solar, wind and other resource-based projects where the resource dictates the location), and exclude projects that would be screened from VMT analysis. Exhibit B sets forth an example. Because TDMs are project-based, a TDM program is superior to a regionwide VMT mitigation program because it avoids the need to establish a comprehensive mobility improvement plan, with a nexus study, as the basis for a VMT mitigation fee. Instead, the requirement for projects to contribute TDMs would be included in a County TDM Ordinance, using the County regulatory authority, not CEQA mitigation authority. The Ordinance would assign a TDM point level to various TDM measures that are more appropriate for County village, semi-rural, and rural-areas (such as telecommuting). A list of example TDMs is attached as Exhibit A, but other options may exist based on a project's specific land use mix and location.

3. *Opt-In for Co-Benefits:* For projects that decide implementing TDM programs are too burdensome, allow them to pay an TDM Opt-In Fee for each TDM point they are not able to implement through their project. For example if a project needed 4 points of TDM to comply with the County TDM Ordinance and could only earn 2 TDM points through implementation of a ride share program, then it would pay a fee based on average cost per TDM point to go into a County Fund for creating TDMs that are more appropriately implemented on a program basis. Not only will this accomplish more efficient VMT reduction, it will also ensure that priority unincorporated County communities receive co-benefits from County investments and are not left behind. For example, the County can collect the TDM Opt-In Fees and spend them on TDM programs in high priority areas of the County (e.g. infill projects; projects in mobility hubs; projects in environmental justice (EJ)/economically disadvantaged areas; and affordable projects). This approach is superior to the VMT mitigation fee approach where the County sends its hard-earned fees to the City just so the City can build-out its mobility infrastructure. The City can build its own bike lanes, but the County should be able to keep the TDM Opt-In Fees local to help the County develop its own mobility infrastructure. Of course, the County can always choose to partner with an incorporated area on a mobility project the County believes is balanced and equitable to the County, but the program should not automatically redirect County TDM Opt-In Fees to another jurisdiction simply because it maximizes VMT benefits, without considering co-benefits to unincorporated County communities.

4. *Exchange Maximizes TDM Opportunities:* Similar to the TDM Opt-In Fee, the County should also create a TDM Credit Exchange that would provide more opportunities to accomplish TDMs in the County. For example, if Project A opts not to implement TDM programs, but owes 4 TDM units under the County's TDM Ordinance and Project B owes 4 TDM units and wants to create a project worth 8 TDM units, the Project A can buy its 4 TDM units from Project B off of the TDM Credit Exchange. The County could prioritize projects on the exchange based on their co-benefits. The County could put its own TDM projects on the TDM Credit Exchange and sell credits. Perhaps the County would chose to develop its TDM projects in priority areas like infill/ mobility/ EJ areas and serving affordable projects (supporting its policy to allow reduced TDMs for projects in those areas). Perhaps the County would chose to develop its TDM projects in

² As defined by the current Environmental Justice Element, provisions of State law and factors directed by the Board to be considered for inclusion in future EJ Element updates, including DACs identified by the Department of Water Resources (Feb. 10, Item (4)).

partnership with cities within the region. The exchange is just another mechanism to allow the County and applicant to reduce VMT.

5. *Program EIR to Facilitate Housing:* Projects outside VMT efficient areas typically cannot fully mitigate their VMT under the OPR recommended regional threshold and currently require an EIR and Statement of Overriding Considerations, which creates uncertainty on whether they will be approved. A VMT fee based on a regionwide mitigation program would not help because few projects can feasibly pay the fee, even less so if they include affordable units. To create certainty and allow room for such projects to finance affordable housing units, the County can adopt a Program EIR for the threshold and County TDM Ordinance. Like the City of San Diego, it can make a one-time finding that full VMT mitigation is infeasible due to inability to create a program to fully mitigate VMT within a reasonable period of time and social impact, impact on General Plan economic development policies, impact on County affordable housing development policies, impact on special districts (such as water districts) that have already invested in infrastructure needed to build-out the General Plan's density and "other considerations." The County could therefore adopt a Statement of Overriding Consideration (SOC) for significant unmitigated VMT by finding TDMs will reduce overall VMT, but allow development. With its Statement of Overriding Considerations, it creates certainty so projects can price the cost of TDM compliance and develop to that standard with confidence it has satisfied what the Board deems to be an acceptable level of TDM-based VMT reduction. The County will be in good company by certifying this Program EIR because even the City of San Diego could not create a mobility program that could fully mitigate its VMT. The City opted to create a TDM-based ordinance similar to the one described here, adopt SOC's, and enjoyed widespread support from both development and environmental stakeholders.

6. *Streamlining Reduces Uncertainty:* Once the TDM Ordinance is in place, projects can use the TDM Ordinance as mitigation for VMT impacts under CEQA Guideline 15126.4(a)(2). Projects that are consistent with the General Plan can also use CEQA Guideline 15183(f) because the TDM minimum would be established as a "development policy or standard" through the TDM Ordinance. Projects can also use CEQA Guideline 15168 because the project's VMT impacts would be within the scope of the County TDM Ordinance Program EIR, and the TDM requirements would be incorporated into the project.

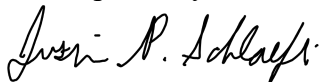
7. *Projects Have Options:* Projects that want to process a Mitigated Negative Declaration (or exemption such as the infill exemption under CEQA section 21159.25) could still opt to fully mitigate its VMT impact, such as through exceeding the minimum required TDMs on- or off-site, or projects may fall below a the VMT Screening Thresholds identified in the OPR VMT Technical Advisory. With regards to the small project threshold, rather than use the 110 ADT threshold that became controversial, convert the 110 ADT threshold into a total average daily VMT threshold by multiplying the total unit count for a project generating 110 ADT by the average number of people per household then by 15% below the average VMT per capita in the region, which would result in a small project screening threshold of below approximately 516 total vehicle miles per day. This would ensure small projects in the unincorporated County do not generate significant VMT regardless of their location – addressing a chief concern of environmental stakeholders have opposed the 110 ADT threshold. Additionally, to ensure

projects are treated fairly despite any unique issues, the TSG should reaffirm that any project remains eligible to bring a project-specific VMT threshold, as permitted by CEQA, or alternative methods to estimate a project's VMT to the County for the Board to adopt, if the project-specific VMT threshold is backed by substantial evidence.

Conclusion

This TDM-based program represents a balanced solution to the serious problem of VMT mitigation for projects in the County, ensuring that projects do their part to implement VMT reductions but that homes, infrastructure and mobility options can be made available in unincorporated County communities, not just in incorporated areas. It ensures projects in the unincorporated County contribute to reducing transportation demand but that homes can still be made available at average or even affordable price, and ensures infrastructure can continue to be provided without excessive cost to unincorporated County communities. We urge you to recommend the Board consider and adopt this approach to best serve all interests of the unincorporated County, including environmental interests and urgent community needs, like affordable housing. For easy reference a summary of the TDM point requirements for each of the four zones is attached at Exhibit B. Finally, a Flow Chart and FAQ explaining the proposed TDM Ordinance are attached as Exhibit C. Thank you for your consideration of these comments.

Respectfully,



Justin P. Schlaefli, PE TE

President

Urban Systems Associates, Inc.

EXHIBIT A

Example Transportation Demand Management Measures (TDMs)

<u>TDM Measure</u>	<u>TDM Point Value</u>
Sidewalks	[assign point value]
Pedestrian Trails	
Pedestrian Intersection Improvements	
Bike Lanes	
E-Bike Share Program	
Transit Access Infrastructure	
Transit Link	
Reserve land for Park and Ride	
Transit Pass Subsidy	
Reserve land for Bus Stop	
Vanpooling	
School pools	
Ride Match	
Telework	
[Insert other options appropriate to project's specific land use mix and location]	

EXHIBIT B

Zone 1: Infill Areas; Affordable Housing Projects; Projects in Environmental Justice/economically disadvantaged communities; solar, wind or other projects where the natural resource dictates the location – Implement 1 point of TDM with project or pay 1 point worth of TDM Opt-In Fee. County can prioritize projects to invest Opt-In Fee program dollars in these areas.

Zone 2: Village Areas Inside the TOA – Implement 2 points of TDM with project or pay 2 points worth of TDM Opt-In Fee. County can prioritize projects to invest Opt-In Fee program dollars in these areas.

Zone 3: Village Areas Outside of the TOA – Implement 3 points of TDM or pay 3 points worth of TDM Opt-In Fee. County may or may not want to invest Opt-In Fee Dollars here.

Zone 4: Everywhere Else – Implement 4 points of TDM with project or pay 4 points worth of TDM Opt-In Fee; County may not want to invest Opt-In Fee Dollars here.

**Zero points for projects that would be screened from VMT analysis under the TSG.*

EXHIBIT C

How an Application is Processed Under Proposed TDM Ordinance

Screening Thresholds* (Revise TSG)

- VMT-Efficient Location: 15% below regional average= 16.15 VMT per capita
- Small projects (less than 516 total VMT)
- 100% affordable infill projects
- Locally serving public facilities/ retail
- Redevelopment projects that reduce total VMT

* Does not preclude project-specific thresholds backed by substantial evidence.

**Screened
& No TDMs
Required**

Less Than
Significant
Impact

**Not Screened
& TDMs
Required**

TDM Zone

Determine “Zone” based on Project location + characteristics for required TDM points

- Zone 1 (1 TDM point): Infill, Affordable, EJ, Renewable/resource-based
- Zone 2 (2 TDM points): Village Areas inside TOAs
- Zone 3 (3 TDM points): Village Areas outside TOAs
- Zone 4 (4 TDM points): All others

OR

Select from TDM Menu

- Implement on-site/off-site TDMs appropriate to project type, land use mix and location:
 - Pedestrian = **V** points
 - Bike/ e-bike = **W** points
 - Car/ Vanpool = **X** points
 - Telework support = **Y** points
 - Other TDM? = **Z** points
- Cost varies depending on TDMs

Opt-in fee

- Applicant pays TDM fee for each point not implemented on-site/off-site. County can use fees to support TDM programs in priority areas:
 - EJ communities
 - Infill areas
 - TOAs
- Exchange program can support

Environmental analysis

- Tier from PEIR for Transportation Impacts (including unmitigated impacts from screening) under 15168
- OR
- GP EIR under 15183(f)

FAQ

1. Why can't projects in the unincorporated County mitigate their own VMT?

According to the County's technical report [County of SD VMT Mitigation Memo 11-15-2021.pdf \(sandiegocounty.gov\)](#), projects in the unincorporated County cannot feasibly mitigate their VMT outside VMT efficient areas. This results in high uncertainty as projects require a statement of overriding considerations for their significant unavoidable VMT impacts, which is in the discretion of the decision-maker. This uncertainty is likely to result in lower investments in project development in the unincorporated County, and result in less overall development, including housing development, even in areas where the County's General Plan encouraged development to occur. Therefore, a full VMT mitigation system conflicts with the General Plan's overall goals and policies.

2. Why can't favored projects simply be screened out or exempted?

"Screening" is a presumption that a project's VMT will be less than significant. The presumption must be supported by substantial evidence. In other words, in order for a "favored" type of project to be "screened out," the County must establish by substantial evidence that the project's VMT will not be significant. For example, OPR recommends 100% affordable housing projects in infill areas may be screened out based on cited evidence that this type of project generates less VMT than other housing development. This requires more than a simple policy choice to allow certain projects to proceed without VMT analysis. It is more defensible to apply a TDM ordinance to all projects that requires more TDM for regular projects and less TDM for "favored" projects. CEQA permits the County to favor certain projects like affordable housing or renewable project, or project in economically disadvantaged areas so long as they are participating in a TDM ordinance covered by a statement of overriding considerations. Exemptions that lack substantial evidence only invite litigation that delays certainty for all applicants attempting to comply a County-approved VMT threshold.

Additionally, screening projects from VMT analysis does not serve the multi-prong intent of SB 743 to more appropriately balance the needs of congestion management with goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

3. Why can't projects in the unincorporated County use the regional fee used in the City of San Diego?

The City's \$1400/ mile fee over regional average is cost-prohibitive for many projects in the City. Projects in the unincorporated County can be expected to have an even greater cost-burden because they are more likely to generate more miles over the threshold. Additionally, the \$1400/ mile fee is based on mitigation projects located in the City, which are more cost-efficient because they can be located in urban areas. Unincorporated County communities receive no benefit from these projects, which do not provide alternative transportation options to these communities. Voting for a regional fee program means voting to send the County's hard-earned VMT mitigation fees to the City, rather than expanding transit-friendly options within the County.

4. How do TDMs reduce VMT in the unincorporated County?

TDMs generally reduce VMT in three ways- reducing vehicle ownership, fewer vehicle trips, and shorter trips, or a combination of these three. (See CAPCOA's 2021 updated GHG Handbook at [www.airquality.org/ClimateChange/Documents/Final Handbook_AB434.pdf](http://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf) p. 66.) CAPCOA provides 30 examples of TDM measures that can achieve VMT reductions in one or more of these ways. Depending on a project's anticipated VMT, size, surroundings, proximity to destinations and transit options, TDM options that could be effective in reducing VMT include sidewalks, pedestrian trails and pedestrian improvements, like safety and connectivity improvements, in areas where destinations may be walkable; bike lanes, traffic calming and subsidized e-bike share programs in areas where transit or other destinations are within biking distance; transit link programs, park and ride locations or new transit stops in areas where transit is relatively close; and carpooling including vanpooling, school pools, ride match programs and telework options to reduce commuter trips in communities that lack local job access. Projects that include destinations, such as master planned communities, may have opportunities to reduce vehicle trips by incorporating destinations and trip alternatives such as shuttles, trails, bike lanes or e-golf cart lanes.

5. What are some examples of TDM ordinances?

As reported by SCAG, [tdm-strategic-plan_scag.pdf](#), in San Francisco, most large new developments are subject to Planning Code Section 169.3 and must submit a TDM plan demonstrating plans to reduce VMT. In conjunction with this rulemaking, the city has a program to assist developers in creating these plans. The program received 86 plans for review as of March 2018.

The City of San Diego adopted its Active Transportation In-Lieu Fee program in November 2020. The program collects a fee of \$1400 per mile needed for projects to mitigate their VMT and invests it into VMT-reducing infrastructures in the areas of the City with the highest density, where the infrastructure will be most cost-efficient.

A County-specific TDM ordinance would adapt these examples to be more appropriate for unincorporated County projects and communities and meet the multi-prong intent of SB 743 to more appropriately balance the needs of congestion management with goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

6. What environmental review is required?

A programmatic CEQA approach would be recommended, using a program-level EIR for adoption of the revised TSG (threshold/screening) and the TDM Ordinance implementing TDM requirements as a development standard. The TDM Ordinance would require projects to contribute TDMs to reduce VMT as appropriate to the project type and location, directly or through an Opt-In Fee. Because all significant VMT cannot feasibly be mitigated, the PEIR would require a statement of overriding considerations, which may be based on considerations including the cost and lack of housing at all income levels within the County. Future projects not otherwise screened from VMT analysis could use CEQA

Guideline 15168 to tier from PEIR with a project-specific analysis of TDM reductions, or 15183 for General Plan consistent projects using TDMs as “development standards” in accordance with subdivision (f).

7. Could the County adopt both a regional VMT fee and a TDM requirement?

A TDM ordinance would not preclude the County from adopting a regional VMT fee, but the risk is that the cost would make most projects infeasible creating a de facto moratorium in the very communities the County wants to lift up out of poverty. It would also remove the benefits of the certainty created by the TDM ordinance. Additionally, a regional VMT fee adopted now would simply direct funds to projects in incorporated areas and would not have co-benefits to unincorporated communities. The only way a regional VMT fee is beneficial to the County is if it is made optional. With an optional regional VMT fee, there could be some applicants that would choose this option to gain access to a CEQA Exemption or Mitigated Negative Declaration, but the majority of projects would not select this option because it is cost-prohibitive.

The proposed TDM ordinance creates a much better way to generate funding for transit priorities and gives the County control over how and where those funds are spent (preferably in economically disadvantaged / environmental justice communities or near affordable housing and future transit opportunity areas called TOAs). It does this by requiring applicants who do not want to implement TDM measures on-site to pay an Opt-in fee to compensate for their lack of TDM.

8. Is full VMT mitigation necessary to achieve our state’s GHG goals?

No. The state has a variety of ways to meet its GHG goals – Cap & Trade, renewable energy mandates, energy and water efficiency mandates, and increased recycling of waste materials. When it comes to GHG emissions from vehicles, VMT reduction is part of the solution, but should not come at the expense of the County’s other goals such as incentivizing affordable housing and creating job opportunities in our economically disadvantaged communities. The real solution to GHG emissions from vehicles is advancement in zero-emission vehicles. More and more states, countries and large auto manufactures have pledge to produce only electric cars. See [6 Automakers and 30 Countries Say They’ll Phase Out Gasoline Car Sales - The New York Times \(nytimes.com\)](#); [Here Are All the Promises Carmakers Have Made about Electric Cars \(caranddriver.com\)](#). California’s Governor has issued Executive Order N-79-20 pledging 100% of new car sales in the state will be zero emission vehicles. [CAP14-20200923101349](#). By approving a TDM ordinance instead of a full VMT mitigation program, the County would be joining the City of San Diego in its commitment to reducing VMT through TDM programs, which accepting the reality that neither the City nor the County can fully mitigate its VMT and still achieve its other equally important societal goals. CEQA does not mandate a lead agency elevate environmental goals over all other public agency and societal goals; it just mandates that the County disclose the impacts and explain why there are other considerations that override full mitigation.

9. How does a full VMT program harm an economically disadvantaged community compared to the proposed TDM ordinance?

With the new threshold, a mitigation fee based on the cost of fully mitigating VMT within the unincorporated County a project in an Environmental Justice community in the unincorporated County could cost a quarter million per unit. For example, a 30-unit project in Sweetwater would require, based on the rate of \$10,000-19,000 per mile estimated in the County's technical report [County of SD VMT Mitigation Memo_11-15-2021.pdf \(sandiegocounty.gov\)](#), between \$4,219,500-8,017,050, or \$140,000-267,235 per unit. Affordable and middle income housing can't absorb this cost; it would be feasible for only the most expensive development, or projects will not get built.

The alternative Regional mitigation program approach leaves unincorporated County communities behind; fees will go to incorporated communities where VMT reductions are more cost-efficient. This leaves unincorporated communities out of mobility options, forcing them to continue driving, and does nothing to improve existing VMT. The TDM approach would distribute mobility improvements more equitably, including in unincorporated County communities. Additionally, the Opt-In fee could be used for TDMs in priority communities, like EJ communities and transit opportunity areas (TOAs), improving mobility options for a lower VMT future.



VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

Board of Directors

Robert A. Polito
President
Enrico P. Ferro
Vice President
VACANT
Director
Daniel E. Holtz
Director
Oliver J. Smith
Director

December 8, 2021

County Proposed VMT Policy and the Valley Center Municipal Water District

The Valley Center Municipal Water District has great concerns over the financial and operational impacts of the proposed VMT.

Over the last eight years, the District has taken on the financial obligation with the State Water Resources Control Board (SWRCB), to expand the treatment capacity of the Woods Valley Ranch Water Reclamation Facility to serve the wastewater needs of the Valley Center's North and South Villages. The Villages were created with the last County General Plan Update and contain land use densities requiring wastewater service. In response, the District planned and designed and ultimately constructed an expansion of the Woods Valley Wastewater Treatment Facility to serve those approved densities; resulting in expansion of the treatment capacity from 75,000 gpd to 275,000 gpd, development of a 16MG seasonal storage facility, and a collection system to connect properties in both the North and South Villages to the treatment plant.

The vast majority of funds needed to construct the project came from an SWRCB Clean Water Revolving Fund Loan and Improvement Bond totaling \$28.8M. Funding to make the \$1.8 million-dollar annual payments on the 20-year loan comes from Assessment District Annual Assessments on the properties based upon the pro-rata share of the plant capacity committed to each property. Annual Assessments, as well as the annual operating and standby fees, are collected via the County Tax Rolls.

At this time, only 110 of the 1247 capacity units available are connected to the plant, 400 are under construction in the Park Circle Project to be connected, leaving 737 units (roughly 60% of the available capacity) unconnected. We have heard from the developers and investors who own the majority of this capacity that they are concerned that if the County adopts the revised VMT Policy, it will be very difficult for them to move forward with their respective developments due to the costs of mitigation. Even though they are financially obligated to continue to pay their assessments for the wastewater system, the District is very concerned that they may not continue to meet those obligations if they cannot develop their respective projects.

If those developers/property owners' default on their annual obligations, the District has a full faith credit obligation to the SWRCB to make the annual loan payments from any funds available, including General Fund water revenues. This would mean the District either must reduce its operations and capital improvement program by roughly \$1,000,000 per year, or shift that additional burden to its water ratepayers, with the potential legal (Prop 218) and political consequences.

The County Board of Supervisors needs to recognize that a local Special District, VCMWD, serving an unincorporated community, in good faith, obligated itself financially to plan, design and construct infrastructure needed to serve properties based upon land use determinations by the County of San Diego. Further, the Board of Supervisors should consider the financial impact on the property owners and ratepayers they represent if there are large-scale defaults by property owners who can no longer benefit from their wastewater capacity.

Given the facts and circumstances, in this case, properties participating in within the Valley Center North and South Villages AD 2012-1 should be exempted from the application of the revised VMT mitigation requirements.



Gary Arant
General Manager
Valley Center Municipal Water District

Ronald Ashman (Representing District 2, Supv. Joel Anderson)
Douglas Barnhart (Representing District 5, Supv. Jim Desmond)
Yolanda Calvo (Representing District 4, Supv. Nathan Fletcher)
Michael Edwards, Chair (Representing District 2, Supv. Joel Anderson)
Ginger Hitzke (Representing District 1, Supv. Nora Vargas)
Tommy Hough (Representing District 3, Supv. Terra Lawson-Remer)
David Pallinger, Vice Chair (Representing District 5, Supv. Jim Desmond)

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
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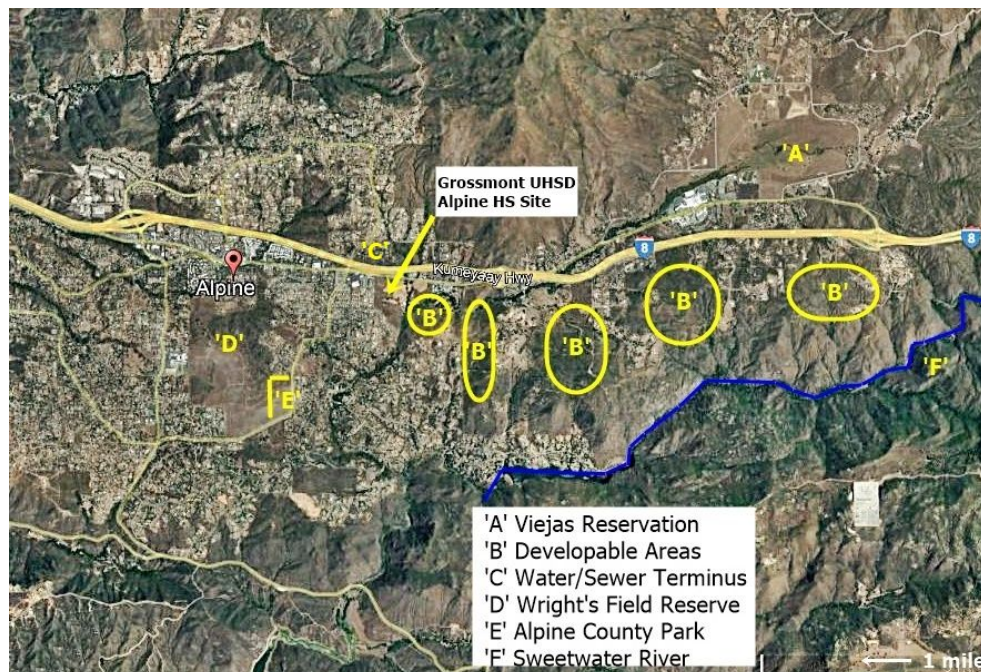
Subject: Vehicle Miles Travelled (VMT) – **A “Village Node” Solution for Unincorporated Alpine**

Dear Commissioners,

Representatives of Planning & Development Services (DPS) recently presented to the Alpine public the proposed County attack on climate change featuring the “Vehicle Miles Travelled” (VMT) concept.

Alpine’s Community Plan is in a final update process. It features managed residential expansion into rather large undeveloped areas deemed former lands of the “Forest Conservation Initiative” (FCI). In total those lands within the Alpine planning area represent 4,000-5,000 acres of potentially developable area. That Plan provides a “Village Node” solution for unincorporated Alpine.

Here is an annotated aerial of Alpine demonstrating the “Village Node” concept; whereby managed growth could produce a sustainable community that itself could satisfy the VMT guidelines. A developed Alpine can support the County’s strategic direction while becoming sustainable and able to contribute its greater financial support to the County while greatly reducing vehicle travel. Alpine can do its part to fight climate change through managed development.



The areas of residential development are shown as 'circles' labelled 'B'. They are adjacent to already semi-developed lands. They are the tops of bluffs over-looking the Sweetwater River. They have minimal environmental value having been highly disturbed environmentally by farming and ranching for near a century. However, their development provides mitigation to purchase and conserve the Sweetwater River and its riparian wetlands through Alpine.

They are within 1-3 miles of the current terminuses of potable and sanitary water infrastructure. Extending such infrastructure to the developable areas is not a major undertaking. Through a successful application to the Local Agency Formation Commission approval, Alpine Fire Protection District has already extended its area of fire protection and emergency medical service operations to include these areas.

These areas lay alongside Alpine Boulevard, the town thoroughfare. They lay between two on-/off ramps to Highway I-8. The 95-acre high school site owned by Grossmont Union High School District lays midway along Alpine Boulevard.

Residential development of these areas would result in a sustainable village of 20,000 to 25,000 maximum population - forevermore bounded by Cleveland National Forest to the east and south, by El Capitan Reservoir and two Indian Reservations to the north (Capitan Grande and Viejas), and bounded by El Cajon's unincorporated areas to the west. The 20,000-25,000 unincorporated town would produce sufficient wealth through property taxation and sales tax revenues to pay for County-provided services. Managed residential growth would support growth in commercial & light industrial businesses thus providing employment. That growth would support Grossmont UHSD's building of a high school on land it already owns.

All that transforms Alpine from a small town currently inordinately dependent on County support into a sustainable town in terms of wealth, and with substantially reduced need for transport "down the hill" westward to El Cajon, La Mesa and to San Diego for employment, schooling, shopping, recreation and employment.

The expanded Alpine very likely would meet the "Vehicle Miles Travelled" guideline being considered by the County as a means of attacking climate change.

May I respectfully request your consideration to guiding Development & Planning Services to consider current growth plans outlined in the Alpine Community Plan Update process? Alpine can support the County's strategic direction while becoming sustainable and able to contribute its greater financial support to the County while greatly reducing vehicle travel. Alpine can do its part to fight climate change through managed development.

Many thanks for taking the time to read this idea.

Very truly yours,

A handwritten signature in black ink that reads "George Barnett". The signature is fluid and cursive, with the first name "George" and last name "Barnett" clearly legible.

George Barnett
2400 Alpine Blvd, SPC 74
Alpine, CA 91901
1-619-655-9650
BigGeorge8888@gmail.com

From: noreply@granicusideas.com
To: [Barnhart, Douglas](#); [Calvo, Yolanda](#); [Edwards, Michael \(LUEG\)](#); [Flannery, Kathleen](#); [Hitzke, Ginger](#); [Hough, Tommy](#); [Jimenez, Ann](#); [Lynch, Dahvia](#); [Nicoletti, Vince](#); [Pallinger, David](#); [Ashman, Ronald](#); [Slovick, Mark](#); [Smith, Ashley](#); [Talleh, Rami](#); [Tessitore, Lynnette](#)
Subject: [External] New eComment for Special Planning Commission Hearing
Date: Friday, January 7, 2022 7:34:58 AM

[SpeakUp](#)

New eComment for Special Planning Commission Hearing

karl higgins submitted a new eComment.

Meeting: Special Planning Commission Hearing

Item: 2. Continued from the December 10, 2021, Planning Commission Hearing Workshop on Vehicle Miles Traveled (VMT) Considering 13 Subjects Related to Implementing VMT During Environmental Review

eComment: Writing in support of Option 7-b Adopt the Small Project Screening Criteria with one suggested edit. The 110 ADT threshold is fine, but 11 homes is not. Our project in Warner Springs is 28 lots on 150acs. Our professionally prepared traffic study shows our ADTs at 94. County staff has the study and agrees with our number. Therefore, please adopt language for Small Project exemptions that states 110 ADTs or 11 homes the word OR being the change.

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Subject: [External] New eComment for Special Planning Commission Hearing
Date: Thursday, January 6, 2022 9:47:22 PM

[SpeakUp](#)

New eComment for Special Planning Commission Hearing

Kevin Smith submitted a new eComment.

Meeting: Special Planning Commission Hearing

Item: 2. Continued from the December 10, 2021, Planning Commission Hearing Workshop on Vehicle Miles Traveled (VMT) Considering 13 Subjects Related to Implementing VMT During Environmental Review

eComment: Please reject efforts to undo the 2020 TSG. Staff said that the OSR guidance "is not legally binding." I am no fan of development in the unincorporated areas, yet adopting these new recommendations will remove almost all options. It forces changes which locals will find completely unacceptable. The General Plan was developed after a decade-long process of regional cooperation. The new proposals clearly are not consistent. Our unincorporated "region" is not inclusive of densely populated cities.

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