



	Comment Letter L1	Response to Comment Letter L1
L1-1	 <p>401 B Street, Suite 800 San Diego, CA 92101-4231 (619) 699-1900 Fax (619) 699-1905 sandag.org</p> <p>May 5, 2017</p> <p>File Number 3300300</p> <p>Ms. Michelle Irace Planning & Development Services County of San Diego 5510 Overland Avenue, Suite 310 San Diego, CA 92123</p> <p>MEMBER AGENCIES Cities of Cathlamet 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 County of San Diego</p> <p>ADVISORY MEMBERS Imperial County California Department of Transportation Metropolitan Transit System North County Transit District United States Department of Defense San Diego Unified Port District San Diego County Water Authority Southern California Tribal Chairmen Association Mexico</p> <p>Dear Ms. Irace:</p> <p>SUBJECT: Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment Draft Supplemental Environmental Impact Report</p> <p>Thank you for the opportunity to comment on the County of San Diego’s Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment Draft Supplemental Environmental Impact Report (SEIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG’s comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.</p> <p>Smart Growth and Transportation Demand Management</p> <p>Please consider developing smart growth concepts and a transportation demand management (TDM) plan for the Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan and SEIR. The SANDAG <i>Smart Growth Toolbox</i> and <i>Smart Growth Design Guidelines</i> provide planning, visualization, and financial tools to show how smart growth principles can be put into practice.</p> <p>A custom TDM plan can help to mitigate traffic congestion and greenhouse gas emissions within and around the Specific Plan area, and could aid in reducing emissions impacts below the County’s screening-level thresholds. Examples of TDM measures to consider include:</p> <ul style="list-style-type: none"> • Provision of enhanced bicycle and pedestrian facilities that connect residents, tenants, and employees to nearby commercial areas, recreation areas, and existing and future transit services. • Encourage employers to offer commuter benefit programs for their employees. Commuter benefit programs offer incentives to employees who use transportation alternatives to driving alone. The SANDAG TDM program, iCommute, can assist employers with developing customized commuter benefit programs and promoting regional commuting services 	<p>San Diego Association of Governments (SANDAG) Seth Litchney, Senior Regional Planner May 5, 2017</p> <p>L1-1 This comment acknowledges SANDAG’s receipt of the Draft SEIR for review and comment, states that review was based on the San Diego Forward: The Region Plan, and briefly summarizes the purpose of policies included in San Diego Forward. This comment does not address the adequacy of the EIR, therefore, no further response is required.</p> <p>L1-2 The Specific Plan Amendment has been modified to include a requirement that Transportation Demand Management (TDM) plans be considered at each Site Plan Review for future development. The requirement for a TDM at Site Plan Review will allow the development-specific TDM to be tailored to the specifics of the actual land use (commercial, business tech, etc.).</p>

<p>L1-2, (cont.)</p> <p>L1-3</p> <p>L1-4</p>	<p>to their employees. This includes the SANDAG Vanpool Program, which offers a subsidy of up to \$400 per month for eligible vans, the Guaranteed Ride Home service, online ridematching and trip planning, support for taking transit, and bike education and encouragement programs. More information on regional TDM programs can be accessed through iCommuteSD.com.</p> <ul style="list-style-type: none"> Given the proximity to the forthcoming South Bay Bus <i>Rapid</i> Transit service, offer subsidized transit passes for residents and employees. Promote transit by offering interactive trip planning kiosks in employment areas that display real-time information about regional transit service and other transportation options. Implement parking management strategies that encourage transportation alternatives and maximize the parking supply, including shared parking among land uses, priced parking and parking cash-out, and designated parking for carpools and vanpools at employment sites. <p>SANDAG has a number of additional resources that can be used for additional information or clarification on smart growth and TDM. These can be found on the SANDAG website at sandag.org/igr:</p> <ul style="list-style-type: none"> SANDAG Regional Parking Management Toolbox Riding to 2050, the San Diego Regional Bike Plan Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities <p>Air Quality</p> <p>There are two minor clarifications relating to air quality within the Draft SEIR:</p> <ul style="list-style-type: none"> On Page 2.1-4, please see the updated text below regarding the San Diego Air Basin’s non-attainment classification for the 2008 ozone standard: <p>“Effective June 3, 2016, the U.S. Environmental Protection Agency (U.S. EPA) determined that 11 areas, including the San Diego air basin, failed to attain the 2008 ozone National Ambient Air Quality Standards (NAAQS) by the applicable attainment date of July 20, 2015, and thus are reclassified by operation of law as “Moderate” for the 2008 ozone NAAQS. States containing any or any portion of these new Moderate areas must submit State Implementation Plan (SIP) revisions that meet the statutory and regulatory requirements that apply to 2008 ozone nonattainment areas classified as Moderate by January 1, 2017. The San Diego Air Pollution Control District submitted an SIP revision addressing Moderate area requirements to the Air Resources Board (ARB). The revised SIP was adopted by ARB on March 23, 2017, and will be submitted to the U.S. EPA.”</p> <ul style="list-style-type: none"> On Page 2.1-9, the Regional Air Quality Strategy was most recently published in 2016. 	<p>L1-3 This revision has been made in the Final SEIR (page 2.1-5) (see Table 8-2 above).</p> <p>L1-4 This date has been corrected in the Final SEIR (page 2.1-9) (see Table 8-2 above).</p>
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<p>When available, please send any additional environmental documents related to this project to:</p> <p>SANDAG Attention: Intergovernmental Review 401 B Street, Suite 800 San Diego, CA 92101</p> <p>We appreciate the opportunity to comment on County of San Diego's Otay 250 - Sunroad East Otay Mesa Business Park Draft SEIR. If you have any questions, please contact me at (619) 699-1943 or via email at seth.litchney@sandag.org.</p> <p>Sincerely,</p>  <p>SETH LITCHNEY Senior Regional Planner</p> <p>SLI/KHE/abar</p> <p>3</p>	
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