

Letter
L4

From: Litchney, Seth
To: CAP
Cc: Henrich, Katie
Subject: Climate Action Plan and General Plan Amendment Supplemental EIR SANDAG Comments.pdf
Date: Friday, September 22, 2017 4:14:42 PM
Attachments: image001.png
Climate Action Plan and General Plan Amendment Supplemental EIR SANDAG Comments.pdf

Dear Ms. Soffel,

Thank you for the opportunity to comment on the County of San Diego's Climate Action Plan Draft SEIR. Please see the attached comment letter from SANDAG.

If you have any questions or concerns, please contact me or Katie Henrich (katie.henrich@sandag.org).

Seth Litchney
Senior Regional Planner

SANDAG
(619) 699-1943
401 B Street, Suite 800, San Diego, CA 92101



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L4-1

Response to Comment Letter L4

San Diego Association of Governments (SANDAG)
Seth Litchney, Senior Regional Planner
September 25, 2017

L4-1 The comment indicates San Diego Association of Government's (SANDAG's) comments are enclosed. No further response is required.



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September 25, 2017

File Number 3300300

Ms. Maggie Soffel
 Planning & Development Services
 County of San Diego
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123

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Dear Ms. Soffel:

SUBJECT: Climate Action Plan and General Plan Amendment Draft Supplemental Environmental Impact Report

Thank you for the opportunity to comment on the County of San Diego's Climate Action Plan (CAP) and General 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 (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.

L4-2

Smart Growth

Please continue to take into consideration consistency with guiding plans for the region. The CAP measures reinforce the vision and goals of the County's General Plan Update of 2011; for example, CAP measures support focusing density in and around existing unincorporated communities to reduce Vehicle Miles Traveled (VMT) and to achieve mixed-use and transit-oriented development. SANDAG supports these goals and measures, as it encourages smart, sustainable growth and reinforces principles set forth in SANDAG's Regional Plan. SANDAG also supports key land use principles that preserve natural resources and limit urban sprawl. SANDAG's *Smart Growth Toolbox* and *Smart Growth Design Guidelines* provide planning, visualization, and financial tools to show how smart growth principles can be put into practice and can be used when the applicable measures within the County's CAP are implemented.

L4-3

Regional Plan References

Throughout the document please replace any reference to the Regional Transportation Plan (RTP) with San Diego Forward: The Regional Plan (Regional Plan) when intending to reference the most recently adopted Regional Plan (adopted October 9, 2015).

L4-4

L4-3

The comment requests the County take into consideration consistency with guiding plans for the region. Section 2.10.4.2 of the Draft SEIR evaluated the CAP's consistency with guiding plans for the region. The County has prepared its CAP to be consistent with the County's 2011 General Plan Update and other regional plans including SANDAG's San Diego Forward: The Regional Plan.

L4-4

The comment requests that references to the Regional Transportation Plan be replaced with San Diego Forward: The Regional Plan. This comment is acknowledged. All references to SANDAG's RTP in the CAP and Draft SEIR are hereby changed to San Diego Forward: The Regional Plan. With regards to the Draft SEIR, SANDAG's most recent Regional Plan was considered in the analysis. Page 2.12-2 of the Draft SEIR is hereby changed as noted below. This change does not alter the conclusions of the Draft SEIR.

- "Regional Transportation Plans and Programs, including 2030 Regional Transportation Plan (RTP) San Diego Forward: The Regional Plan, the 2006 Regional Transportation Improvement Program (RTIP), and the Congestion Management Program (CMP) amendments"

<p>Similarly, SANDAG requests clarification on whether the County's CAP used the Regional Plan as a reference, as opposed to previous SANDAG RTPs. For example, on page 2.12-2 of the Transportation and Traffic chapter, the CAP states that local policy frameworks were referenced, including the "2030 Regional Transportation Plan (RTP)". SANDAG recommends that the County consider only the most recently adopted Regional Plan, as referenced above.</p> <p>Congestion Management Plan</p> <p>Page 2.12-2 of the Transportation and Traffic chapter of the CAP references local frameworks, such as the 2006 Regional Transportation Improvement Plan (RTIP) and the Congestion Management Plan (CMP) as considerations within the development of the CAP. The 2006 RTIP has been superseded five times since adopted; SANDAG has most recently adopted the 2016 RTIP.</p> <p>Similarly, the CMP is no longer a standalone SANDAG document. In October 2009, the San Diego region elected to be exempt from the State CMP. Since this decision, SANDAG has been abiding by 23 Code of Federal Regulations §450.320 to ensure the region's continued compliance with the federal congestion management process.</p> <p>Transportation Demand Management</p> <p>SANDAG appreciates the inclusion of transportation demand management (TDM) and parking management strategies in the County of San Diego's CAP. Please consider extending the implementation of these strategies to new, large residential developments to fulfill the goals of Measure T-2.2 in support of educating residents about ridematching programs and services. Additionally, please continue to encourage County employee participation in regional TDM programs and services, including the SANDAG Vanpool Program, ridematching services, the Guaranteed Ride Home program, and events like Bike to Work Day. More information on these programs can be accessed through iCommuteSD.com.</p> <p>Other Considerations</p> <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/figr:</p> <ul style="list-style-type: none"> • Riding to 2050, the San Diego Regional Bike Plan • 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 • Trip Generation for Smart Growth • Parking Strategies for Smart Growth • Designing for Smart Growth, Creating Great Places in the San Diego Region <p style="text-align: center;">2</p>	<p>L4-5 The comment asks the County to consider transportation demand management (TDM) and parking management strategies included in the CAP for new, large residential developments and continue to encourage County employee participation in regional TDM programs. The comment is noted and will be considered by the County in future CAP updates. The proposed TDM program focuses on non-residential uses to provide more consistent tracking of program implementation. The CAP includes a supporting effort related to educating residents about ride matching programs under Measure T-2.2 as a means to raise awareness and encourage participation from residential users. Additional measures under Strategy T-1 address overall VMT, including from residential uses. The CAP also includes GHG Reduction Measure T-2.3 which requires employees to reduce commute VMT by 20% by increasing reliance on alternative modes of transit, and encouraging participation in vanpools and rideshare services such as those suggest by the commenter.</p> <p>L4-6 The comment offers references to additional documents and concluding remarks. No further response is required.</p>
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When available, please send any additional environmental documents related to this project to:

SANDAG
Attention: Intergovernmental Review
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the County of San Diego's CAP Draft SEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SL/KHE/pro

L4-6
cont