Letter RA-3 – SANDAG

RA-3-1 The comment provides introductory statements and background information about San Diego Forward: The Regional Plan (2015) policies and the perspective from which the comment letter was submitted. The comment does not raise an issue regarding the adequacy of the environmental analysis; therefore, no further response is provided.

RA-3-2 The comment expresses SANDAG’s support for the “attention given to transportation demand management (TDM) strategies in the revised Global Climate Change section of the Draft EIR.” The comment further requests that several additional strategies be considered for inclusion in the proposed Project’s suite of TDM strategies; an assessment of the feasibility and applicability of each strategy follows:

Preferred parking for carpools and vanpools.

The County of San Diego’s Parking Design Manual (February 2013), as authored by the County Department of Planning & Land Use, requires the provision of designated parking for carpools and vanpools. More specifically, page 21 of the Parking Design Manual requires that newly constructed non-residential uses provide designated parking for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles per Section 6792 (Design Standards for Off-Street Parking) of the County’s Zoning Ordinance and in accordance with the California Green Building Standards Code. As the provision of preferred parking is a matter of regulatory compliance, no further action is required.

Please note that the referenced Parking Design Manual is available online at https://www.sandiegocounty.gov/pds/docs/Parking_Design_Manual.pdf and incorporated herein by reference pursuant to CEQA Guidelines Section 15150.

Shared parking among uses within the development that have different peak periods or seasonal parking demands.

As described in SANDAG’s Parking Strategies for Smart Growth (June 2010) report, shared parking can be used between different on-site uses to reduce parking demand. (The referenced report is available online at https://www.sandag.org/uploads/publicationid/publicationid_1499_11603.pdf.)

The County agrees with the comment, that shared parking only is viable where the different land uses have different periods of peak parking demand. The proposed Project’s land use plan does not lend itself to the provision of shared parking because the different land uses in proximity to one another would have similar peak periods for parking demand.

Additional bicycle amenities, such as secure bicycle parking, locker rooms, and bike repair stands.

As part of the site development review process overseen by the County, non-residential and multi-family development will be required to demonstrate that their subject design plans comply with applicable County regulations requiring bicycle amenities, including secured storage, locker rooms, and bicycle repair facilities. Such compliance is a mandatory prerequisite to the issuance of site development permits.

On-site shared mobility services (e.g., carshare, bikeshare, neighborhood electric vehicles) to offer alternatives for travel within the Village and enhance connections to regional transit services, such as South Bay Bus Rapid Transit.
Appendix A, Calculation of GHGs from Vehicles, to Appendix C-2 of the 2019 Recirculation Package contains a technical memorandum, authored by Chen Ryan Associates, regarding the proposed Project’s TDM strategies. This technical memorandum provides that the proposed Project’s resort operator will be required to provide a bike-sharing program at the resort for guests to use throughout the duration of their stay, in order to enhance transportation linkage options between the resort and other on- and off-site land uses. To ensure the implementation of this resort-based TDM strategy, mitigation measure M-GCC-1 has been supplemented as follows in the Final EIR (additions shown in underline):

Prior to issuance of any resort-related building permits, the Project applicant (or its designee) shall demonstrate, to the satisfaction of the San Diego County Planning & Development Services Department, that the Project’s resort operator shall implement a bike-sharing program for resort guests.

The implementation of a bike-sharing program at the resort shall be a mandatory condition of the site development permit required by the County of San Diego and shall be subject to the County’s code enforcement process in the event of a failure to satisfy the permit condition.

RA-3-3 The comment states that SANDAG “appreciates the inclusion of iCommute in the revised Draft EIR and encourages the County to continue to partner with iCommute.” By way of background, mitigation measure M-GCC-1—which sets forth the proposed Project’s required TDM strategies—mandates that the proposed Project provide and promote information regarding SANDAG’s iCommute program in the context of residents, commuters, and on-site businesses. The comment does not raise an issue regarding the adequacy of environmental analysis; therefore, no further response is provided.

RA-3-4 The comment requests that the proposed Project incorporate “robust electric vehicle (EV) charging infrastructure” in order to help mitigate GHG emissions while concurrently supporting SANDAG’s 2015 Regional Plan and the State of California’s goals for EV deployment and uptake. In response, the commenter is referred to mitigation measure M-GCC-6 in Section 2.10, Global Climate Change, of the 2019 Recirculation Package of the Draft EIR. As provided in that mitigation measure, the proposed Project shall provide:

a) For residential uses, a dedicated 208/240 branch circuit in each garage of every residential unit, and one Level 2 EV charging station in the garage in half of all residential units.
b) For non-residential uses, ten (10) Level 2 EV charging stations within on-site parking areas.

As part of the Final EIR, mitigation measure M-GCC-6 has been further refined and expanded to provide for the provision of 20 Level 2 EV charging stations in conjunction with the proposed Project’s non-residential development; please see the subject revision below (additions shown in underline):

“Zero Emission Vehicle Charging Infrastructure

… Prior to the issuance of non-residential building permits, the Project applicant (or its designee) shall submit pertinent building plans and related application materials that demonstrate, to the satisfaction of San Diego County Planning & Development Services Department, the installation of an additional ten (10) Level 2 EV charging stations within the non-residential parking lot areas located on the Project site, as well as an addition ten (10) Level 2 EV charging stations for vehicles utilizing public street parking spaces on street blocks located adjacent to non-residential development areas.”
The proposed Project’s provision of residential and non-residential EV charging opportunities under mitigation measure M-GCC-6 is consistent with the commenter’s request for supporting zero emission vehicles.

**RA-3-5** The comment encourages the County to “utilize resources from the Plug-in San Diego (Plug-in SD) program.” On June 11, 2019, the County reviewed the Plug-in San Diego website ([https://sites.energycenter.org/pluginsd](https://sites.energycenter.org/pluginsd)), which states that Plug-in San Diego is “no longer active.” The County has determined that the proposed Project’s EV charging infrastructure parameters are consistent with the intent of the Plug-in San Diego program as the proposed Project would install Level 2 EV charging stations in residential and non-residential development areas located on the Project site. For more information regarding the parameters of the proposed Project’s EV charging infrastructure, please see Response to Comment RA-3-4 above.

**RA-3-6** The comment cites three resources available on SANDAG’s website, and requests that any additional environmental documents be provided to SANDAG. SANDAG will receive future Project-related notices. The comment does not raise an issue regarding the adequacy of environmental analysis; therefore, no further response is provided.