



County of San Diego

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DAHVIA LYNCH
DIRECTOR

February 15, 2023

TO: Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environment Group

FROM: Dahvia Lynch, Director
Planning & Development Services

CLIMATE ACTION PLAN UPDATE - VEHICLE MILES TRAVELED DATA PATHWAYS

Dear Ms. Aghassi,

In 2018, the Board of Supervisors (Board) adopted the County of San Diego (County) 2018 Climate Action Plan (CAP) and accompanying 2018 Supplemental Environmental Impact Report (SEIR) for the CAP. The CAP is a mitigation measure for greenhouse gas (GHG) emissions associated with new development anticipated to occur in the unincorporated area under the County's 2011 General Plan. The SEIR supplements the 2011 General Plan Final Program Environmental Impact Report, which did not consider the impacts of implementing CAP measures and evaluates alternatives to the CAP that would reduce significant impacts from CAP implementation.

Several petitions were filed challenging the CAP and SEIR approvals. Ultimately, the Appellate Court affirmed the Superior Court's decision that the Final SEIR was out of compliance with the California Environmental Quality Act (CEQA) because it did not adequately account for potential environmental impacts of General Plan Amendment projects, it should have included at least one project alternative focused on substantially reducing vehicle miles traveled (VMT), and it failed to adequately address the cumulative impacts of probable future projects requiring general plan amendments.

In response to the Appellate Court's decision, on September 30, 2020 (4), the Board set aside its approval of the 2018 CAP and related actions and committed to preparing a CAP Update, Guidelines for Determining Significance for Climate Change, and an SEIR that

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identifies and analyzes at least one “smart growth” alternative to reduce VMT and associated GHG impacts.

Since early 2021, the Board has committed to a forward-thinking climate planning policy framework, through the direction of the Climate Action Plan (CAP) Update, which strives to reach net zero emissions by 2035-2045, and the Regional Decarbonization Framework, which seeks to develop science-based pathways to achieve zero carbon in the San Diego region. The discussion below summarizes the progress that has been achieved to date, describes the status of certain remaining tasks, and lays out options for possible means of speeding up completion of the CEQA process, which is required for the CAP Update.

Following the 2018 CAP rescission in late 2020, the County began preparation of the CAP Update in early 2021 and to date has completed the following tasks:

- Acquisition of 2019 baseline GHG emissions inventory data in the following sectors: electricity/natural gas, waste, water/wastewater, offroad transportation (landscaping, construction equipment, etc.), agriculture, and carbon sequestration by landcover type
- Development of draft Smart Growth Alternatives
- Substantial community and industry outreach and engagement
- Development of draft conceptual CAP Measures

Critical path items that are anticipated to be completed within the calendar year of 2023 include:

- Acquisition of 2019 VMT data for on-road transportation
- Completion of baseline GHG emissions inventory, forecasts for GHG emissions in 2030, 2045 and 2050, and emissions reduction targets
- Development of quantified CAP Measures
- Preparation and public review of the Draft CAP and CAP Supplemental Environmental Impact Report (SEIR) that will then go to the Board for adoption in 2024

The project team is currently focused on acquiring VMT data for the unincorporated area and completing the 2019 baseline GHG inventory, GHG emissions projections through 2050, and setting GHG emissions reduction targets in accordance with State laws and Board direction to achieve net zero emissions between 2035-2045. The 2019 baseline GHG inventory serves as the foundation from which future GHG emissions will be forecasted and GHG emissions targets will be set (i.e., 2030 and 2045). Completion of the GHG inventory is critical path to the continued development of the CAP Update. Once the GHG inventory is complete, the project team can move forward from conceptual CAP measures that outline steps the County can take to reduce emissions, to quantified CAP measures that show how effective the measures are at reducing emissions from the GHG inventory and allows for the development of a Draft CAP Update.

Transportation modeling, including VMT data and forecasts, for the entire San Diego region is managed by the San Diego Association of Governments (SANDAG). SANDAG

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models serve as the most reliable transportation pattern forecasts and VMT estimates for all San Diego communities and are necessary data to complete the GHG inventory. The use of SANDAG transportation models for VMT estimates in local planning efforts, including climate action planning, is the best practice to maintain data and forecasting consistency across the region and demonstrate compliance with regional planning efforts at the local level. When requested, SANDAG provides VMT data and forecasts specific to individual jurisdictions or projects that have been vetted by SANDAG modeling staff to ensure accuracy.

As previously described in updates to the Board, updated VMT data for the unincorporated area from SANDAG has been inaccessible due to SANDAG's continued updates to the 2021 Regional Plan and associated transportation modeling forecasts. Acquisition of accurate and reliable VMT data must occur in order to complete the preparation of the 2019 baseline GHG emissions inventory for the CAP Update. County staff began coordinating with SANDAG on VMT data access in May 2021. SANDAG originally projected that custom modeling services would be provided to the County by February 2022; however, SANDAG alerted the County to a new delay in January 2022. Subsequently, the data were to be modeled and provided from SANDAG to the County by September 2022.

In September 2022, the County received a letter from SANDAG stating that they could not provide custom modeling services until late 2023 due to new direction received by the SANDAG Board of Directors to remove from the Regional Transportation Plan a Road User Charge and update the 2021 Regional Plan accordingly. If the County were to wait for SANDAG to complete the Regional Plan Update and provide transportation demand modeling services, CAP Update development would be delayed by at least one year with a large degree of uncertainty from SANDAG regarding that schedule. To avoid this delay, the County offered additional resources to SANDAG to complete custom modeling on behalf of the County concurrently with SANDAG's efforts to update the Regional Plan. However, this approach was determined by SANDAG to be technically infeasible. Therefore, two alternative options that would allow the County to complete VMT modeling and continue work on the CAP Update to stay on track for Board consideration and adoption of the CAP Update in 2024 are presented below. Per Board direction from January 13, 2021 (5) and in response to stakeholder comments received during the SEIR Scoping period in 2021, the CAP Update will use the most up to date data and modeling to develop project components such as the GHG inventory and projections. Both Options would use the most recent Series 14 regional growth forecast produced by SANDAG as part of the Regional Plan development process, are technically sufficient, reflect expert judgment, and meet the CEQA standard for best available data. Series 14 data provides the most recent and up to date growth forecast modeling data.

Option 1 – Use regional data sets prepared by SANDAG during the Regional Plan process.

This would result in the CAP project team using the Activity Based Model (ABM) 2 “Off-the-Shelf” existing data sets for transportation modeling throughout the San Diego region that SANDAG released during the public review period of the 2021 Regional Plan. These

outputs would be scaled by the County's transportation consultant Fehr & Peers to estimate VMT for the unincorporated area from an existing regional data set. This option would result in slightly more transportation emissions in the unincorporated area because it does not include the full build-out of the Regional Plan transportation network. This would likely result in more CAP mitigation through the implementation of CAP measures across emission reduction sectors. This option would not result in a delay in CAP Update preparation.

Option 2 – Have County transportation consultant Fehr & Peers develop a custom transportation model for the unincorporated area. This would result in the County contracting with Fehr & Peers to build a custom version of SANDAG's regional transportation model in an external environment, modeling the same custom land uses that the County would have asked SANDAG to model, and then using those VMT results for the unincorporated area as the foundation for the 2019 baseline GHG inventory. This option would result in a delay of approximately six months in CAP Update preparation in order to build this custom model. Both options provide similar value to waiting for SANDAG's custom modeling services in terms of providing substantial evidence for documenting and modeling reductions in County GHG emissions in the unincorporated area.

The following section outlines the two options with further detail and a staff recommendation to proceed with Option 1 with no further delay in CAP Update preparation.

Option 1 - Use regional data sets prepared by SANDAG during 2021 Regional Plan process

- This option would utilize ABM 2 Series 14 model "Off the Shelf" data which projects growth in the unincorporated area of approximately 20,116 future units through 2050, includes some transportation network infrastructure improvements, updates gas consumption and pricing assumptions, and includes updates to activity-based model considerations similar to the ABM 2+ Series 14 option (Option 2).
- This option would result in a slightly more conservative estimate (i.e., more VMT and therefore more transportation emissions in the unincorporated area) than the custom modeling scenario whether performed by SANDAG or Fehr & Peers because it does not include the full build-out of the Regional Plan transportation network that would develop transportation alternatives that could reduce VMT.
- This option would likely require more CAP mitigation by the County due to the conservative estimate.
- This option would save time because it can be prepared and used now and does not result in additional cost to the County.
- This is a better approach than Option 2 for proceeding within a reasonable timeframe, in that the resulting work product would reflect expert judgment, meet the CEQA standard for best available data, and would be similar to the work product the County would have received from SANDAG if the County were to wait for SANDAG staff to perform the work.

Option 2 - Have County transportation consultant Fehr & Peers develop a custom transportation model for the unincorporated area

- This option would offer the closest VMT data results to what SANDAG was going to provide with custom modeling (ABM 2+ model) because it would use the County's land use data in a similar modeling environment as what SANDAG would offer.
- This option requires more time and costs more than Option 1.
 - Would require Fehr & Peers to obtain all of the data, files, and specifications from SANDAG and build the model in an outside environment at a cost of approximately \$50,000 more than Option 1.
 - This model would take several months to build and orient to the County's data
 - This option could be problematic as the SANDAG model is complex, cumbersome and glitchy, and may be unpredictable which could result in longer timelines than originally anticipated.
 - Anticipated total delay of about 5-6 months which would likely push the CAP Update project completion date from 2024 to 2025 and would result in additional cost to pay for consultant services to build and run the custom model.

The County has received a proposed Scope of Work from Fehr & Peers to undertake the work for Option 1. Fehr & Peers staff are leading experts in transportation planning and engineering. They are considered one of the best transportation and engineering firms in the field. This Scope of Work (attached hereto as Exhibit A) lays out relevant background information on the modeling work required to comply with the Court order and project requirements to prepare a CAP Update, Guidelines for Determining Significance for Climate Change, and an SEIR that identifies and analyzes at least one "smart growth" alternative to reduce VMT and associated GHG impacts, along with the information provided by SANDAG that they are unable to provide the services needed to meet the County's transportation modeling needs within the timeline required to maintain the project schedule. The Scope of Work also details the reliability and sufficiency of the information that will come out of Option 1.

Thank you for your consideration of this matter. If you have any questions, please contact me or Kelly Bray, Chief of Sustainability Planning.

Respectfully,



DAHVIA LYNCH, Director
Planning and Development Services

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cc:

Inga Lintvedt,
Chief Deputy County Counsel

Attachments:

Exhibit A – Fehr & Peers Scope of Work