

4.5 TRANSPORTATION

This section evaluates the transportation impacts of the proposed Amendment.

4.5.1 EXISTING CONDITIONS

The existing conditions included in Section 4.16, *Transportation*, of the approved Plan PEIR are consistent with this evaluation and have not materially changed since the preparation of the approved Plan PEIR.

4.5.2 REGULATORY SETTING

The regulatory setting in Section 4.16.2 of the approved Plan PEIR included relevant federal, State, regional, and local regulations. The regulatory setting included in Section 4.16 of the approved Plan PEIR is consistent with the evaluation included herein and has not materially changed since the preparation of the approved Plan PEIR, with the exception of the adoption of the 2021 Regional Plan.

2021 REGIONAL PLAN

The 2021 Regional Plan is a 30-year plan that serves as both the long-range RTP and SCS for the San Diego region. The 2021 Regional Plan must comply with specific State and federal mandates, including an SCS, per SB 375 (Sustainable Communities and Climate Protection Act of 2008), that achieves greenhouse gas (GHG) emission reduction goals set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process. The SANDAG Board of Directors adopted the Final 2021 Regional Plan on December 10, 2021. The following key policies that address the circulation system are included in the approved Plan:

- **Land Use and Regional Growth.** The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas to preserve the region's open space and support transportation investments by reducing vehicle miles traveled (VMT). SANDAG will consider how land use programs, projects, and policies it supports address social equity in relation to regional access to affordable housing, proximity to jobs and transit, opportunities for residents to live where they work and play, convenient access to multi-modal transportation options, and other opportunities for work, commerce, and recreation.

Land use is the foundation in determining what is built where and how transportation systems connect work, home, and recreation. Ensuring equitable development starts with considering equity in land use decisions and patterns. By coordinating equity, land use, and transportation, we can better understand where historically marginalized communities are located and how to better connect them with opportunities throughout the region, and enable residents to accomplish daily needs without traveling long distances, thereby contributing toward pollution exposure reduction. Because land use authority is reserved to local jurisdictions, SANDAG will leverage partnerships with cities and the county through the Smart Growth Incentive Program and other grants to provide funds for transportation-related improvements and planning efforts that support smart growth in Mobility Hubs to realize this vision.

- **Parking and Curb Management.** Proactively managing parking and curb space enables more people to access places within our communities using alternatives to driving. Effective parking-management policies contribute to the region's ability to meet the SB 375 GHG emissions-reduction target by applying parking pricing and reduced parking supply assumptions, which are included in the travel demand model (see Appendix D of the approved Plan, Sustainable Communities Strategy Documentation and Related Information). In addition, the 2021 Regional Plan addresses curb management by proposing strategies to

help balance competing and changing travel needs at the curb while remaining flexible to resident, employee, business, and visitor needs. While the authority to implement parking and curb policies remains with local jurisdictions, SANDAG plays a unique role of informing these policies by sharing resources and best practices and serving as the regional Mobility Data Clearinghouse.

- **Transportation Demand Management.** Transportation Demand Management (TDM) innovations have the potential to transform the way people travel within and between communities. Managing demands on the existing transportation system is a vital strategy for making the overall system more effective in reducing drive-alone commute trips. SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, and bike education and secure parking services to help reduce commute-related traffic congestion and VMT. Beyond commute trips, TDM programs are expanded to include grants and incentives that make it easier and safer to use active modes for short trips.

SANDAG recognizes that all residents throughout the region deserve convenient, safe, and affordable commute options and will ensure equitable distribution of funding and incentive program assistance. Additionally, SANDAG commuter programs will design options for low-income or unbanked residents while ensuring marketing, outreach, and education efforts reach underrepresented populations in the region.

Greater participation in TDM programs has great potential for pollution exposure reduction by reducing the number of single-occupant vehicle trips.

- **Vision Zero.** Traffic-related fatalities and serious injuries are a critical and preventable public health and equity issue in the region. Vision Zero is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone. In adopting Vision Zero, SANDAG will work towards Zero by collecting and analyzing crash data to identify safety issues and recommend solutions, developing a regional safety policy, continuing to construct the regional bike network, working with local jurisdictions to conduct outreach for and build out their Complete Streets networks, and funding educational programs, including opportunities to collaborate with tribal nations.

Statistics show that low-income communities and communities of color are disproportionately affected by traffic-related injuries and fatalities, which indicates that establishing an equitable and inclusive transportation system is a critical component of achieving Vision Zero. SANDAG will prioritize consideration of and outreach with marginalized communities to make transportation safe and convenient for every person in the region. Pollution exposure reduction can be achieved when people make greater use of facilities that may currently be perceived as—or actually be—dangerous.

- **Fix It First.** The 2021 Regional Plan envisions many improvements to the San Diego transportation system and network to set the region up for success as a world-class transportation system. To optimize investments in the region's transportation infrastructure, the 2021 Regional Plan and the 5 Big Moves focus on improving upon existing roads, rails, and sidewalks.

The Fix It First strategy aims to repair existing roads and create a system for sustained maintenance in the future, creating a safe and efficient transportation network for all users. The Fix It First strategy can help reduce pollution exposure by maintaining infrastructure that facilitates use of efficient routes and does not neglect facilities that could force users to seek inefficient and longer routes. The Fix It First strategy can prioritize funding in disadvantaged communities and places that have not seen investment to maintain older facilities that are in various states of disrepair.

Special attention will be paid to the location of transportation maintenance investments relative to the location of social equity focus populations to ensure that they benefit from the transportation maintenance system. Along with maintenance project location, the frequency, treatment type, and quality will be monitored to ensure an equitable distribution of benefits.

- **Transportation System Management and Operations.** Transportation System Management and Operations (TSMO) employs a series of intelligent transportation system strategies designed to maximize the capacity and efficiency of the existing and future transportation system. TSMO includes the establishment of institutional and governance actions to help advance and facilitate cross-agency collaboration to ensure that existing and proposed transportation systems are not operated or managed as independent systems but as a multi-modal transportation system. These strategies will help SANDAG manage the complete corridor system in a coordinated way across jurisdictions and operators that include capital and technology investments.

As SANDAG prepares for the design and deployment of TSMO, several steps can be undertaken to help address social equity considerations. Initial efforts are generally carried out during the technology planning process to ensure that the designs and identification of technological tools respond to the needs of the entire community (e.g., voice-activated multilingual applications, traveler information kiosks, and mobile apps).

In addition, recognizing that communications infrastructure plays a pivotal role towards the implementation of Next OS, a near-term effort is the completion of a regional communications digital strategy in an effort to address the digital divide. The strategy will set forth a regional roadmap that will focus on identifying communications infrastructure improvements to bring affordable, reliable, and high-speed broadband internet access to underserved and rural populations.

Better trip routing, traffic signal coordination, and overall system efficiency can reduce pollution exposure in disadvantaged communities and throughout the region. Incorporating modernized transportation technology in the region's established and new infrastructure will enable equitable benefits now and in the future.

- **Value Pricing.** The 2021 Regional Plan incorporates a variety of pricing strategies as tools to improve mobility by encouraging changes in travel behaviors while generating revenue to address our aging infrastructure and expand travel options. Specifically, the 2021 Regional Plan explores a network of managed lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by Transportation Network Companies, and further subsidization of transit fares. Pricing strategies such as these are in different phases of planning, design, pilot, and deployment in different regions and are also being explored at the State and federal level.

SANDAG will rely on coordination with the other MPOs in California along with the State Department of Transportation to integrate the selection of technology, collection methods, and account management to ensure a consistent experience for travelers. Meanwhile, other elements of pricing strategies, such as the fee structure and distribution of revenue, should be specifically designed for the San Diego region's unique environment and priorities. Better managing the system can lead to pollution exposure reduction by reducing congestion and generating funds that can benefit other, cleaner travel options.

For all different pricing mechanisms included in the 2021 Regional Plan, SANDAG will develop the fee structure and distribution of revenue strategy to ensure equitable outcomes. The Next OS can provide discounts to low-income, youth, and other vulnerable populations. Meanwhile, revenues can be prioritized to fund improved transportation options for low-income and historically underserved neighborhoods.

Additionally, shifting away from the regressive taxes and fees traditionally used to fund transportation can improve equity outcomes.

As described in Chapter 2, *Project Description*, the policies, programs and projects in the proposed Amendment are identical to those in the approved Plan, with the exception of the regional road usage charge being removed from the proposed Amendment.

4.5.3 SIGNIFICANCE CRITERIA

Appendix G of the CEQA Guidelines provides criteria for determining the significance of a project's environmental impacts in the form of Initial Study checklist questions. Unless otherwise noted, the significance criteria specifically developed for the approved Plan PEIR and used in this SEIR are based on the CEQA Guidelines Appendix G checklist questions. Checklist questions for transportation are provided in Section XVII of CEQA Guidelines Appendix G. In some cases, SANDAG has combined checklist questions, edited their wording, or changed their location in the document to develop significance criteria that reflect the programmatic level of analysis in the approved Plan PEIR and this SEIR, and the unique characteristics of the proposed Amendment. Notably, Appendix G, Section XVII, question (d) regarding whether the approved Plan would result in inadequate emergency access is addressed under HAZ-4 in Section 4.9, *Hazards and Hazardous Materials*, of the approved Plan PEIR.

For purposes of this SEIR, implementation of the proposed Amendment would have a significant transportation impact if it would:

- TRA-1** Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- TRA-2** Conflict or be inconsistent with CEQA Guidelines Section 15064.3 by not achieving the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

The approved Plan PEIR included two additional significance thresholds for transportation (TRA-3 and TRA-4). However, as discussed in Chapter 1, *Introduction*, of this SEIR, it was determined that project modifications associated with the proposed Amendment would not alter the impact conclusions described in the approved Plan PEIR for these thresholds. Therefore, they are not analyzed in this SEIR.

- TRA-3** Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.
- TRA-4** Lead to a lack of parking supply that would cause significant secondary environmental impacts not already analyzed in other resource chapters of this EIR.

4.5.4 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

- TRA-1** **CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES**

ANALYSIS METHODOLOGY

The emphasis of the analysis is on plan inconsistency and conflicts between the proposed Amendment's transportation network improvements and programs, and existing applicable regional programs, plans, ordinances, or policies addressing the circulation system; and on whether any inconsistencies would result in significant environmental effects compared to existing conditions. The proposed Amendment is considered consistent with the provisions of the identified regional plans if it meets the general intent of the applicable plans. Section 4.5.2, *Regulatory Setting*, above provides a brief overview of the relevant regional planning document (the 2021 Regional Plan) and its primary goals. However, the proposed Amendment consistency conclusions are based upon the planning documents as a whole.

Because the proposed Amendment identifies and proposes transportation network improvements at a regional level, plan consistency was reviewed against other regional plans and policies. Given the close relationship among forecasted regional growth, land use change, and planned transportation network improvements and programs on travel behavior, this section analyzes their combined effect, instead of undertaking separate analyses for regional growth and land use change and transportation network improvements and programs.

SB 375 requires RTPs to use "the most recent planning assumptions considering local general plans and other factors." Therefore, it can be assumed the proposed Amendment would generally be consistent with transportation programs, plans, ordinances, and policies of the individual jurisdictions in the region.

This analysis reviews the proposed Amendment against the 2021 Regional Plan, as described in detail in Section 4.5.2 above, to determine if there are any conflicts. As noted in Section 4.5.2, the policies, programs, and projects in the proposed Amendment are identical to the 2021 Regional Plan, with the exception that the regional road usage charge has been removed. Thus, the transportation-related infrastructure proposed in the proposed Amendment is identical to what is included in the 2021 Regional Plan. Therefore, it can be assumed that the proposed Amendment is consistent with all transportation infrastructure-related policies and improvements within the 2021 Regional Plan. Additionally, the consistency analysis with Riding to 2050 performed in Section 4.16.4, *Environmental Impacts and Mitigation Measures*, of the approved Plan PEIR also remains valid.

The removal of the regional road usage charge in the proposed Amendment will reduce the cost to operate a vehicle under future year conditions. This may incentivize some travelers to drive a personal vehicle instead of taking a different form of transportation, resulting in an increase in automobile traffic. Therefore, to determine if the proposed Amendment is consistent with the programs, plans, policies, and ordinances contained in the current regional planning documents, the relative indicators (demand, mode share, and trip length) for each mode of travel (transit, vehicular, pedestrian, and bicycle) were compared to Baseline Year 2016 conditions. This comparison was then used to identify whether, with removal of the regional road usage charge, the proposed Amendment would still be consistent with the policies outlined in the approved Plan's policies.

Please note that the information presented in Tables 4.5-1 through 4.5-3 has also been updated from the approved Plan PEIR to reflect model corrections to the SANDAG updated second generation Activity Based Model¹ (ABM2+).

IMPACT ANALYSIS

As noted in Chapter 2 of this SEIR the transportation network improvements and programs included in the proposed Amendment and the approved Plan are identical, with the only exception being the removal of the regional road usage charge in the proposed Amendment. Thus, this analysis only focuses on the change in transportation-related demand that would be associated with the removal of the regional road usage charge and identifying if the proposed Amendment will still be consistent with the policies contained in the approved Plan.

2025

Transportation Network Improvements and Programs

Table 4.5-1 outlines the transportation network demand, by mode, under proposed Amendment Year 2025 conditions. Additionally, for reference, the approved Plan Year 2025 conditions are provided in the table. Both the proposed Amendment and approved Plan conditions are compared to Baseline Year 2016 conditions to identify how the implementation of each plan would affect transportation demand throughout the San Diego region and identify the changes between the two plans.

¹ The SANDAG Series 14 Regional Growth Forecast is the long-range forecast of population, housing, and employment that was inputted into ABM2+ for the approved Plan. The SCS land use pattern is a subregional allocation of forecasted growth and development (population, housing, and jobs) based on the Series 14 Regional Growth Forecast. Data used to develop the SCS land use pattern are based on the most recent planning assumptions, considering local general plans and other factors, per SB 375 (Sustainable Communities and Climate Protection Act of 2008) (Government Code Section 65080[b][2][B]).

Table 4.5-1
Transportation Demand Analysis – Year 2025

Mode	Category	Baseline Year 2016	Year 2025 Proposed Amendment	Change Between Baseline and Proposed Amendment	Year 2025 Approved Plan	Change Between Baseline and Approved Plan
Transit	Average Daily Transit Trips	258,603	414,594	155,991	416,061	157,458
	Transit Mode Share ¹	1.7%	2.7%	1.0%	2.7%	1.0%
	Average Length of Transit Trip (miles)	9.01	9.51	0.50	9.57	0.56
	Population Within TPAs	764,847	1,457,584	692,737	1,456,876	692,029
	Employment Within TPAs	609,253	968,317	359,064	971,340	362,087
	Service Population Within TPAs	1,374,100	2,425,901	1,051,801	2,428,216	1,054,11
Vehicle	Average Daily Vehicular Trips	12,928,097	13,094,734	166,637	13,074,829	146,732
	HOV Trips	6,643,062	6,870,995	227,933	6,861,984	218,922
	Vehicular Mode Share ¹	87.2%	83.9%	-3.3%	83.9%	-3.3%
	Average Length of Vehicular Trip (miles)	6.90	6.74	-0.16	6.71	-0.19
	VMT per Capita (miles)	18.94	17.81	-1.13	17.66	-1.28
	VMT per Employee (miles)	18.91	17.11	-1.80	16.95	-1.96
	VMT per Service Population (miles)	17.02	16.38	-0.64	16.3	-0.72
Bicycle	Average Daily Bicycle Trips	113,370	169,231	55,861	174,335	60,965
	Bicycle Mode Share ¹	0.8%	1.1%	0.3%	1.1%	0.3%
	Average Length of Bicycle Trip (miles)	2.86	3.38	0.52	3.39	0.53
Walking	Average Daily Walking Trips	1,174,224	1,493,256	319,032	1,494,939	320,715
	Walking Mode Share ¹	7.9%	9.6%	1.7%	9.6%	1.7%
	Average Length of Walking Trip (miles)	0.82	0.81	-0.01	0.81	-0.01

Source: ABM2+

¹Mode share includes all trip types

HOV = high-occupancy vehicle; TPA = Transit Priority Area

As shown in Table 4.5-1, implementation of the proposed Amendment will increase transit ridership as well as the use of active transportation modes such as walking and biking, which is consistent with the effects of the approved Plan. The proposed Amendment will also decrease the vehicular mode share by 3.3 percentage points, which is also consistent with the effects of the approved Plan. The reduction in vehicular mode share will lead to a decrease in the VMT per service population of 0.64 mile, which is also similar to the approved Plan. Finally, the proposed Amendment will increase the total service population (residents and employees) located within a Transit Priority Area (TPA) by more than a million people, which is consistent with the approved Plan. As discussed below, these metrics show that the proposed Amendment is consistent with the circulation system policies outlined in the approved Plan (see Section 4.5.2) and, therefore, will not conflict with them:

- **Land Use and Regional Growth.** The proposed Amendment will increase transit ridership as well as the number of walking and biking trips within the region, showing that it will provide convenient access to multi-modal travel options, as prescribed by the policy. Additionally, the proposed Amendment will increase the total service population within TPAs, thus, increasing the proximity of jobs and residents to transit opportunities, as prescribed by the policy. Therefore, the proposed Amendment is consistent with portions of this policy that relate to the circulation system.
- **Parking and Curb Management.** The proposed Amendment includes the same policy language as well as the parking and curb management strategies that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation Demand Management.** The proposed Amendment includes the same policy language and TDM strategies and programs that are included in the approved Plan. Additionally, as shown in Table 4.5-1 the proposed Amendment will reduce the vehicular mode share within the region by 3.3 percentage points, maintaining one of the intents of this policy by reducing the number of single-occupant vehicle trips within the region. Therefore, the proposed Amendment is consistent with this policy.
- **Vision Zero.** The proposed Amendment includes the same policy language and Vision Zero-based transportation network improvements, strategies, and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Fix It First.** The proposed Amendment includes the same policy language and Fix It First strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation System Management and Operations.** The proposed Amendment includes the same policy language and TSMO strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Value Pricing.** The Value Pricing policy will be maintained in the proposed Amendment; however, the regional road usage charge is removed as one of the multiple pricing strategies identified within the policy. The proposed Amendment will maintain the managed lanes, fees charged to Transportation Network Companies, and transit subsidy programs included within the policy.

The intent of the Value Pricing policy is to assist with the funding of the transportation network improvements and programs included in the plan and incentivize travelers to utilize non-vehicular modes of travel. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-1, the proposed Amendment will decrease the vehicular mode share by 3.3 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the policy as it will be able to both

fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes. Finally, the regional road usage charge was not to be implemented until Year 2035 conditions under the approved Plan; thus, its removal will not affect Year 2025 conditions.

2025 Conclusion

As noted in Chapter 2, *Project Description*, the transportation network improvements and programs included in the proposed Amendment and the approved Plan are identical, with the exception of the removal of the regional road usage charge in the proposed Amendment. Additionally, the policy language in both plans is also the same, with the exception of the Value Pricing policy. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-1, implementation of the proposed Amendment will decrease the vehicular mode share by 3.3 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the Value Pricing policy as it will be able to both fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes. Finally, the regional road usage charge was not envisioned to be implemented until Year 2035 conditions under the approved Plan; thus, its removal will not affect Year 2025 conditions. Therefore, implementation of the proposed Amendment, under Year 2025 conditions, would result in a less-than-significant impact.

2035

Transportation Network Improvements and Programs

Table 4.5-2 outlines the transportation network demand, by mode, under proposed Amendment Year 2035 conditions. Additionally, for reference, the approved Plan Year 2035 conditions are also provided in the table. Both the proposed Amendment and approved Plan conditions are compared to Baseline Year 2016 conditions to identify how the implementation of each plan will affect transportation demand throughout the San Diego region and identify the changes between the two plans.

Table 4.5-2
Transportation System Analysis – Year 2035

Mode	Category	Baseline Year 2016	Year 2035 Proposed Amendment	Change Between Baseline and Proposed Amendment	Year 2035 Approved Plan	Change Between Baseline and Approved Plan
Transit	Average Daily Transit Trips	258,603	779,115	520,512	805,642	547,039
	Transit Mode Share ¹	1.7%	4.8%	3.1%	5.0%	3.3%
	Average Length of Transit Trip (miles)	9.01	9.62	0.61	9.74	0.73
	Population Within TPAs	764,847	1,985,196	1,220,340	1,985,967	1,221,120
	Employment Within TPAs	609,253	1,325,044	715,791	1,323,929	714,676
	Service Population Within TPAs	1,374,100	3,310,240	1,936,140	3,309,896	1,935,796
Vehicle	Average Daily Vehicular Trips	12,928,097	13,031,544	103,447	12,874,363	-53,734
	HOV Trips	6,643,062	6,719,320	76,258	6,653,854	10,792
	Vehicular Mode Share ¹	87.2%	80.0%	-7.2%	79.5%	-7.7%
	Average Length of Vehicular Trip (miles)	6.90	6.76	-0.14	6.63	-0.27
	VMT per Capita (miles)	18.94	17.05	-1.89	16.58	-2.36
	VMT per Employee (miles)	18.91	15.73	-3.18	15.26	-3.65
	VMT per Service Population (miles)	17.02	15.85	-1.17	15.54	-1.48
Bicycle	Average Daily Bicycle Trips	113,370	209,069	95,699	215,216	101,846
	Bicycle Mode Share ¹	0.8%	1.3%	0.5%	1.3%	0.5%
	Average Length of Bicycle Trip (miles)	2.86	3.52	0.66	3.56	0.70
Walking	Average Daily Walking Trips	1,174,224	1,822,530	648,306	1,838,482	664,258
	Walking Mode Share ¹	7.9%	11.2%	3.3%	11.4%	3.5%
	Average Length of Walking Trip (miles)	0.82	0.78	-0.04	0.78	-0.04

Source: ABM2+

¹ Mode share includes all trip types

HOV = high-occupancy vehicle

As shown in Table 4.5-2, implementation of the proposed Amendment will increase transit ridership as well as the use of active transportation modes such as walking and biking, which is consistent with the effects of the approved Plan. The proposed Amendment will also decrease the vehicular mode share by 7.2 percentage points, which is also consistent with the effects of the approved Plan. The reduction in vehicular mode share will lead to a decrease in the VMT per service population of 1.17 miles, which is also similar to the approved Plan. Finally, the proposed Amendment will increase the total service population (residents and employees) located within a TPA by almost two million people, which is consistent with the approved Plan. As discussed below, these metrics show that the proposed Amendment is consistent with the circulation system policies outlined in the approved Plan (see Section 4.5.2) and, therefore, do not conflict with them:

- **Land Use and Regional Growth.** The proposed Amendment will increase transit ridership as well as the number of walking and biking trips within the region, showing that it will provide convenient access to multi-modal travel options, as prescribed by the policy. Additionally, the proposed Amendment will increase the total service population within TPAs, thus, increasing the proximity of jobs and residents to transit opportunities, as prescribed by the policy. Therefore, the proposed Amendment is consistent with portions of this policy that relate to the circulation system.
- **Parking and Curb Management.** The proposed Amendment includes the same policy language as well as the parking and curb management strategies that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation Demand Management.** The proposed Amendment includes the same policy language and TDM strategies and programs that are included in the approved Plan. Additionally, as shown in Table 4.5-2, the proposed Amendment will reduce the vehicular mode share within the region by 7.2 percentage points, maintaining one of the intents of this policy by reducing the number of single-occupant vehicle trips within the region. Therefore, the proposed Amendment is consistent with this policy.
- **Vision Zero.** The proposed Amendment includes the same policy language and Vision Zero-based transportation network improvements, strategies, and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Fix It First.** The proposed Amendment includes the same policy language and Fix It First strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation System Management and Operations.** The proposed Amendment includes the same policy language and TSMO strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Value Pricing.** The Value Pricing policy will be maintained in the proposed Amendment; however, the regional road usage charge is removed as one of the multiple pricing strategies identified within the policy. The proposed Amendment will maintain the managed lanes, fees charged to Transportation Network Companies, and transit subsidy programs included within the policy.

The intent of the Value Pricing policy is to assist with the funding of the transportation network improvements and programs included in the plan and incentivize travelers to utilize non-vehicular modes of travel. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-2, the proposed Amendment will decrease the vehicular mode share by 7.2 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the policy as it will be able to both

fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes.

2035 Conclusion

As noted in Chapter 2, the transportation network improvements and programs included in the proposed Amendment and the approved Plan are identical, with the exception of the removal of the regional road usage charge in the proposed Amendment. Additionally, the policy language in both plans is also the same, with the exception of the Value Pricing policy. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-2, implementation of the proposed Amendment will decrease the vehicular mode share by 7.2 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the Value Pricing policy as it will be able to both fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes. Therefore, implementation of the proposed Amendment, under Year 2035 conditions, would result in a less-than-significant impact.

2050

Transportation Network Improvements and Programs

Table 4.5-3 outlines the transportation network demand, by mode, under proposed Amendment Year 2050 conditions. Additionally, for reference, the approved Plan Year 2050 conditions are also provided in the table. Both the proposed Amendment and approved Plan conditions are compared to Baseline Year 2016 conditions to identify how implementation of each plan will affect transportation demand throughout the San Diego region and identify the changes between the two plans.

**Table 4.5-3
Transportation System Analysis – Year 2050**

Mode	Category	Baseline Year 2016	Year 2050 Proposed Amendment	Change Between Baseline and Proposed Amendment	Year 2050 Approved Plan	Change Between Baseline and Approved Plan
Transit	Average Daily Transit Trips	258,603	903,367	644,764	944,876	686,273
	Transit Mode Share ¹	1.7%	5.3%	3.6%	5.6%	3.9%
	Average Length of Transit Trip (miles)	9.01	9.70	0.69	9.85	0.84
	Population Within TPAs	764,847	2,125,902	1,361,055	1,985,967	1,221,120
	Employment Within TPAs	609,253	1,470,178	860,925	1,323,929	714,676
	Service Population Within TPAs	1,374,100	3,596,080	2,221,980	3,309,896	1,935,796
Vehicle	Average Daily Vehicular Trips	12,928,097	13,128,391	200,294	12,975,633	47,536
	HOV Trips	6,643,062	6,946,033	302,971	6,883,015	239,953
	Vehicular Mode Share ¹	87.2%	77.6%	-9.6%	77.1%	-10.1%
	Average Length of Vehicular Trip (miles)	6.90	6.8	-0.10	6.67	-0.23
	VMT per Capita (miles)	18.94	16.45	-2.49	16.03	-2.91
	VMT per Employee (miles)	18.91	14.74	-4.17	15.26	-3.65
	VMT per Service Population (miles)	17.02	15.53	-1.49	15.54	-1.48
Bicycle	Average Daily Bicycle Trips	113,370	281,517	168,147	289,930	176,560
	Bicycle Mode Share ¹	0.8%	1.7%	0.9%	1.7%	0.9%
	Average Length of Bicycle Trip (miles)	2.86	4.08	1.22	4.10	1.24
Walking	Average Daily Walking Trips	1,174,224	2,103,893	929,669	2,117,553	943,329
	Walking Mode Share ¹	7.9%	12.4%	4.5%	12.6%	4.7%
	Average Length of Walking Trip (miles)	0.82	0.78	-0.04	0.79	-0.03

Source: ABM2+

¹ Mode share includes all trip types

HOV = high-occupancy vehicle

As shown in Table 4.5-3, implementation of the proposed Amendment will increase transit ridership as well as the use of active transportation modes such as walking and biking, which is consistent with the effects of the approved Plan. The proposed Amendment will also decrease the vehicular mode share by 9.6 percentage points, which is also consistent with the effects of the approved Plan. The reduction in vehicular mode share will lead to a decrease in the VMT per service population of 1.49 miles, which is also similar to the approved Plan. Finally, the proposed Amendment will increase the total service population (residents and employees) located within a TPA by over two million people, which is consistent with the approved Plan. As discussed below, these metrics show that the proposed Amendment is consistent with the circulation system policies outlined in the approved Plan (see Section 4.5.2) and, therefore, do not conflict with them:

- **Land Use and Regional Growth.** The proposed Amendment will increase transit ridership as well as the number of walking and biking trips within the region, showing that it will provide convenient access to multi-modal travel options, as prescribed by the policy. Additionally, the proposed Amendment will increase the total service population within TPAs, thus, increasing the proximity of jobs and residents to transit opportunities, as prescribed by the policy. Therefore, the proposed Amendment is consistent with portions of this policy that relate to the circulation system.
- **Parking and Curb Management.** The proposed Amendment includes the same policy language as well as the parking and curb management strategies that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation Demand Management.** The proposed Amendment includes the same policy language and TDM strategies and programs that are included in the approved Plan. Additionally, as shown in Table 4.5-3, the proposed Amendment will reduce the vehicular mode share within the region by 9.6 percentage points, maintaining one of the intents of this policy by reducing the number of single-occupant vehicle trips within the region. Therefore, the proposed Amendment is consistent with this policy.
- **Vision Zero.** The proposed Amendment includes the same policy language and Vision Zero-based transportation network improvements, strategies, and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Fix It First.** The proposed Amendment includes the same policy language and Fix It First strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Transportation System Management and Operations.** The proposed Amendment includes the same policy language and TSMO strategies and programs that are included in the approved Plan. Therefore, the proposed Amendment is consistent with this policy.
- **Value Pricing.** The Value Pricing policy will be maintained in the proposed Amendment; however, the regional road usage charge is removed as one of the multiple pricing strategies identified within the policy. The proposed Amendment will maintain the managed lanes, fees charged to Transportation Network Companies, and transit subsidy programs included within the policy.

The intent of the Value Pricing policy is to assist with the funding of the transportation network improvements and programs included in the plan and incentivize travelers to utilize non-vehicular modes of travel. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-3, the proposed Amendment will decrease the vehicular mode share by 9.6 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the policy as it will be able to both

fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes.

2050 Conclusion

As noted in Chapter 2, the transportation network improvements and programs included in the proposed Amendment and the approved Plan are identical, with the exception of the removal of the regional road usage charge in the proposed Amendment. Additionally, the policy language in both plans is also the same, with the exception of the Value Pricing policy. As outlined in Attachment A of the proposed Amendment, the proposed Amendment will still have the ability to fund the transportation network improvements and programs without the inclusion of the regional road usage charge. Additionally, as shown in Table 4.5-3, implementation of the proposed Amendment will decrease the vehicular mode share by 9.6 percentage points, and increase the walking, biking, and transit mode shares. Therefore, the proposed Amendment will not conflict with the Value Pricing policy as it will be able to both fund the proposed transportation network improvements and programs, and still incentivize travelers to utilize non-vehicular travel modes. Therefore, implementation of the proposed Amendment, under Year 2050 conditions, would result in a less-than-significant impact.

Exacerbation of Climate Change Effects

The proposed Amendment is not expected to exacerbate climate change effects regarding conflicts with an existing program, plan, ordinance, or policy addressing the circulation system, because climate change would not directly cause such conflicts.

Conclusion

No New or Substantially More Severe Significant Impacts in Comparison to the Approved Plan PEIR: The approved Plan PEIR did not identify any significant impacts related to a conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the conclusion for the proposed Amendment during all horizon years (2025, 2035, 2050) would be unchanged from what was identified in the approved Plan PEIR, and would remain less than significant.

TRA-2 CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3 BY NOT ACHIEVING THE SUBSTANTIAL VMT REDUCTIONS NEEDED TO HELP ACHIEVE STATEWIDE GHG REDUCTION GOALS

ANALYSIS METHODOLOGY

Section 15064.3(B) of the CEQA Guidelines criteria for analyzing and determining transportation impacts, states:

(b) Criteria for Analyzing Transportation Impacts.

(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area

compared to existing conditions should be considered to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152.

(3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

(4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

As noted above, VMT is an appropriate measure to identify transportation-related impacts under CEQA. The specific guidelines provided by CEQA Guidelines Section 15064.3(b)(1) and (2) are intended to be applied at the project level; as such, they are not directly applicable to the program-level transportation network improvements and the regional growth from land use changes that are included in the proposed Amendment. However, Section 15064.3(b)(4) does allow for lead agencies to determine the methodology for evaluating VMT, and CEQA Guidelines Section 15064(b) provides lead agencies with discretion to establish a threshold of significance.

In response to the implementation of SB 743 and CEQA Guidelines Section 15064.3(b), the State developed additional guidance on how VMT-related impacts can be evaluated as well as how to establish impact thresholds using the new VMT metric. Key guidance on transportation impacts and VMT is provided by the California Office of Planning and Research (OPR) VMT Technical Advisory (OPR 2018), and CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (CARB 2022). However, neither document provides guidance or thresholds in regard to assessing the significance of VMT impacts for RTPs at the regional level. The recommendations of both documents are discussed below:

OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

The OPR Technical Advisory provides guidance on determining significance thresholds and assessing VMT. The guidance provided within the Technical Advisory is directed to specific projects by project type (i.e., residential, retail, office, etc.) and local plans (i.e., general plans) and includes recommendations for evaluating

transportation impacts. The Technical Advisory utilizes the findings of the 2017 Climate Change Scoping Plan² as substantial evidence to establish a VMT threshold for certain land use development projects, stating that:

In summary, achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals.

The OPR Technical Advisory does somewhat address VMT-related impacts associated with the development and implementation of general plans, noting:

A general plan, area plan, or community plan may have a significant impact on transportation if proposed new residential, office, or retail land uses would in aggregate exceed the respective thresholds recommended above.

However, the Technical Advisory does not provide guidance on the VMT-related impacts that may be associated with regional plans, such as an RTP and SCS, as included in the proposed Amendment.

2022 Scoping Plan for achieving Carbon Neutrality

The *2022 Scoping Plan for Achieving Carbon Neutrality* (CARB 2022) was published after the approved Plan PEIR was adopted by SANDAG's Board (December 2021); therefore, CARB's currently recommended VMT reduction goals were not available for use as part of the Impact TRA-2 methodology in the approved Plan PEIR.³ In November 2022, CARB published an update of CARB 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (CARB 2019). The 2022 Scoping Plan establishes strategies for achieving the AB 1279 goals of an 85 percent reduction in anthropogenic GHG emissions and carbon neutrality by 2045. The 2022 Scoping Plan concludes that the State is not on track to meet the CARB 2017 VMT reduction goals; thus, CARB (2022) recommends that the State reduce VMT per capita generation by 30 percent, from the Year 2019 conditions, by Year 2045 to achieve its climate goals. CARB (2022) also sets an interim VMT per capita reduction goal of 25 percent by Year 2030 conditions compared to 2019. The 2022 Scoping Plan notes that it does not set regulatory limits on VMT and that the authority to reduce VMT largely lies with State, regional, and local transportation, land use, and housing agencies, along with the Legislature and its budgeting choices.

VMT Analysis Approach

This SEIR's VMT analysis was quantitative, consistent with CEQA Guidelines Section 15064.3. The ABM2+ was utilized to derive the VMT metrics analyzed under each analysis scenario. The ABM2+ is a travel demand forecasting model that incorporates census data and travel surveys to inform the algorithms of the model's projections. It uses a simulated population based on existing and projected demographics, to match residents to employment, and forecasts the daily travel on the regional transportation network. In addition, the model tracks the daily travel of individuals in the simulated population, including origins, destinations, travel distances, and mode choices. This allows the ABM2+ to project transportation metrics such as trip generation, trip assignment, and VMT at both a regional and local level.

² In November 2022 CARB published an update to the Scoping Plan that increased the VMT per capita reduction goal from 14.3 percent, from which the OPR's recommended threshold of 15 percent was derived, to 30 percent by Year 2045.

³ The approved Plan PEIR utilized the CARB 2017 VMT per capita reduction goal of 14.3 percent, which has since been superseded by the CARB 2022 VMT per capita reduction goals of 25 percent below Year 2019 levels by Year 2030 and 30 percent below Year 2019 level by Year 2045.

The ABM2+ has four forecast scenarios: Baseline Year 2016, which provides a forecast of the year the model inputs (land uses, mobility network, and socioeconomic data) are based on, the two interim years 2025 and 2035, and a horizon year of 2050. The Year 2025, 2035, and 2050 scenarios are derived based on the planned land uses and mobility improvements within the region, as well as population and employment projections. The different components of the proposed Amendment are projected to be implemented over 30 years with a buildout year projected in approximately 2050.

Because of the close relationship among forecasted regional growth and land use change and planned transportation network improvements and programs on travel behavior, this section analyzes their combined effect on per capita and total VMT, instead of separate analyses for regional growth and land use change and transportation network improvements and programs.

Significance Thresholds

VMT per Capita. The *2022 Scoping Plan for Achieving Carbon Neutrality* (CARB 2022) notes “we also know we are not on track to achieve the VMT reduction called for in the 2017 Scoping Plan and will need to double down to achieve the even more ambitious target called for in the Scoping Plan Scenario.” As a response to this, the 2022 Scoping Plan includes a target to reduce the statewide VMT per capita to 25 percent below 2019 levels by 2030, as well as the overall target to reduce the statewide VMT per capita to 30 percent below 2019 levels by 2045. While these targets are not regulatory requirements, they are intended to inform future planning processes. Therefore, the updated VMT per capita reduction goals included in the 2022 Scoping Plan are used as a guide to determine whether the proposed Amendment would reach the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

CARB stresses that the VMT developed in its estimates “is not household-generated VMT, and the values are not directly comparable to the output from a local or regional travel demand model.” ABM2+ derives VMT estimates based on household-generated VMT; as such, the results of the model may not directly align with the results of the 2022 Scoping Plan. However, ABM2+ is currently the best tool within the San Diego region for estimating baseline and future year VMT metrics, including total VMT and VMT per capita; therefore, the ABM2+ was used in the analysis of the 2022 Scoping Plan’s VMT reduction goals.

ABM2+ does not include scenarios for Year 2019, 2030, and 2045 conditions, which are the timeframes in which the 2022 Scoping Plan’s VMT reductions goals are set. Therefore, to project the VMT analysis metrics under these scenarios, the results from ABM2+ Year 2016, 2025, 2035, and 2050 scenarios were interpolated to derive the VMT metrics for the 2022 Scoping Plan’s target years (Year 2019, 2030, and 2045).

Total VMT. Because there are no State-recommended total VMT significance thresholds for regional plans such as an RTP/SCS, a qualitative threshold is used: *would the proposed Amendment achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals?* If the Regional Plan would cause substantial increases in total VMT, then it would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Interim VMT per Capita Targets (for Informational Purposes). As noted above, the State’s VMT per capita reduction goal is 25 percent below Year 2019 conditions by Year 2030 and 30 percent by Year 2045. The State did not establish any additional interim year targets. However, for informational purposes, and to further evaluate if the proposed Amendment would be on track to meet the State’s VMT reduction goals, interim year VMT reduction goals were estimated for Year 2025 and Year 2035 conditions. The interim year targets were

derived based on a straight line interpretation of the full 25 and 30 percent reductions in VMT per capita that the region has to achieve by Year 2030 and Year 2045, respectively:

- **Year 2025**
 - Year 2030 – Year 2019 = 11 years
 - 25% total reduction / 11 Years = 2.27 percent reduction per year
 - 2.27 percent reduction per year × 6 years (Year 2025 – Year 2019) = 13.64 percent
- **Year 2035**
 - Year 2045 – Year 2030 = 15 years
 - 30% Year 2045 reduction goal – 25% Year 2030 reduction goal = 5% reduction over the 15 years
 - 5% / 15 years = 0.33% reduction per year between Year 2030 and Year 2045
 - 0.33% reduction per year × 5 years (Year 2035 – Year 2030) = 1.65%
 - 1.65% + 25% (Year 2030 target) = 26.65%
- **Year 2050**
 - It is assumed that the ultimate 30% reduction goal would be maintained beyond the target Year 2045.

The qualitative thresholds described above are unique to the proposed Amendment, due to its regional and comprehensive nature. These thresholds are not intended for application to other project types, in particular to individual land use projects for which State-recommended per capita VMT thresholds may be appropriate.

IMPACT ANALYSIS

As noted under the significance thresholds, the 2022 Scoping Plan utilizes Year 2019 conditions as the year in which the VMT reduction goals are measured against. Therefore, TRA-2 utilizes a starting year of 2019 instead of the analysis Base Year of 2016.

2025

Regional Growth and Land Use Change and Transportation Network Improvements and Programs

Table 4.5-4 summarizes the VMT projections and analyses developed under Year 2025 conditions. Total VMT and VMT per capita results are presented and compared between Starting Year – Year 2019 and proposed Amendment Year 2025 conditions to identify VMT-related impacts. The total Home-Based VMT as well as the population for the region are also provided, as they are used to calculate VMT per capita. Finally, to identify if the proposed Amendment will further exacerbate any of the impacts identified in the approved Plan PEIR, the approved Plan Year 2025 conditions are also provided and compared to Starting Year – Year 2019 conditions.

Table 4.5-4
VMT Analysis – Year 2025

Metric	Starting Year 2019	Year 2025 Proposed Amendment	Difference Between Starting Year 2019 and Year 2025 Proposed Amendment	% Change Between Starting Year 2019 and Year 2025 Proposed Amendment	Year 2025 Approved Plan	Difference Between Starting Year 2019 and Year 2025 Approved Plan	% Change Between Starting Year 2019 and Year 2025 Approved Plan
Total VMT (daily) ¹	84,074,414	84,939,833	865,419	1.03%	84,538,406	463,992	0.55%
VMT per Capita (miles) ^{1,2}	18.56	17.81	-0.75	-4.04%	17.66	-0.9	-4.85%
Home-Based VMT ³	61,563,841	60,994,798	-569,043	-0.92%	60,470,401	-1,093,440	-1.78%
Population	3,318,374	3,424,145	105,771	3.19%	3,424,145	105,771	3.19%

Source: ABM2+

Note: Highlighted rows indicate metrics that are used to evaluate VMT-related impacts.

¹ The VMT calculations do not include the off-model VMT reduction in Attachment A of the proposed Amendment because they were not calculated for 2025. Therefore, the VMT figures may be slightly overstated in the analysis. However, the off-model VMT reductions are not anticipated to reduce the impacts to less-than-significant levels.

² VMT per Capita = Home-Based VMT / Population.

³ Home-Based VMT is the total VMT within the region that is generated from trip tours that either start or end at home.

As shown in Table 4.5-4, implementation of the proposed Amendment, under Year 2025 conditions, would result in a 4.04 percent decrease in the region's VMT per capita, as compared to Starting Year – Year 2019 conditions. This is less than the 13.64 percent reduction in VMT per capita that is needed to maintain the pace needed to meet the State's Year 2030 VMT per capita reduction goal of 25 percent. This is generally consistent with the change in VMT per capita between Year 2025 and Year 2019 conditions under the approved Plan (4.85 percent reduction).

Implementation of the proposed Amendment, under Year 2025 conditions, would also result in an increase to the total daily VMT generated by the region of 865,419 (1.03 percent) compared to Starting Year – Year 2019 conditions. The increase is considered substantial because it does not help achieve statewide GHG reduction goals, and is therefore significant. VMT growth in Year 2025 is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and transportation network improvements and programs included in the proposed Amendment would help to reduce VMT growth. The increase in VMT associated with the proposed Amendment Year under 2025 conditions is around 400,000 miles per day (0.48 percent) more than the approved Plan.

Additionally, the proposed Amendment would not make any changes to the roadway network approved as part of the approved Plan. In Year 2025, the number of roadway lane miles within the region would increase by 241 miles. Some of the additional lane miles added to the network would be managed lanes (34 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel. It should be noted that the majority of transportation improvements included within the proposed Amendment, including expansion of transit services, new or expanded bicycle facilities, and pedestrian improvements, would decrease VMT within the region. As noted in OPR's Technical Advisory these types of multi-modal improvements are not anticipated to induce travel (OPR 2018). A detailed discussion of induced travel demand is provided in Appendix D of the approved Plan.

2025 Conclusion

As shown in Table 4.5-4, implementation of the proposed Amendment, under Year 2025 conditions, would result in a decrease in VMT per capita of 4.04 percent below Starting Year – Year 2019 conditions. This is less than the 13.64 percent reduction needed to maintain pace to meet the 25 percent VMT per capita reduction goal under Year 2030 conditions, and is therefore a significant impact. Implementation of the proposed Amendment would also result in an increase of 865,419 daily VMT generated within the San Diego region compared to Starting Year – Year 2019 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is significant in the Year 2025 because the proposed Amendment would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

These significance findings are consistent with those identified in the approved Plan PEIR. The changes under the proposed Amendment would not result in a new significant impact for this significance threshold, and would not result in a substantial increase in the severity of this significant impact.

2030

Regional Growth and Land Use Change and Transportation Network Improvements and Programs

Table 4.5-5 summarizes the VMT projections and analyses developed under Year 2030 conditions. Total VMT and VMT per capita results are presented and compared between Starting Year – Year 2019 and proposed Amendment Year 2030 conditions to identify VMT-related impacts. The total Home-Based VMT as well as the

population for the region are also provided, as they are used to calculate VMT per capita. Year 2030 conditions were not included in the approved Plan PEIR; therefore, a comparison between the two plans cannot be made for this horizon year.

**Table 4.5-5
VMT Analysis – Year 2030**

Metric	Starting Year Year 2019	Year 2030 Proposed Amendment	Difference Between Starting Year Year 2019 and Year 2030 Proposed Amendment	% Change Between Starting Year Year 2019 and Year 2030 Proposed Amendment
Total VMT (daily) ¹	84,074,414	86,035,529	1,961,115	2.33%
VMT per Capita (miles) ^{1,2}	18.56	17.43	-1.13	-6.09%
Home-Based VMT ³	61,563,841	60,962,976	-600,865	-0.98%
Population	3,318,374	3,498,895	180,521	5.44%

Source: ABM2+

Note: Highlighted rows indicate metrics that are used to evaluate VMT-related impacts.

¹ The VMT calculations do not include the off-model VMT reduction in Attachment A of the proposed Amendment because they were not calculated for 2030 conditions. Therefore, the VMT figures may be slightly overstated in the analysis. However, the off-model VMT reductions are not anticipated to reduce the impacts to less-than-significant levels.

² VMT per Capita = Home-Based VMT / Population.

³ Home-Based VMT is the total VMT within the region that is generated from trip tours that either start or end at home.

As shown in Table 4.5-5, implementation of the proposed Amendment, under Year 2030 conditions, would result in a 6.09 percent decrease in the region's VMT per capita, as compared to Starting Year – Year 2019 conditions. This is less than the 25 percent reduction needed to meet the State's Year 2030 VMT per capita reduction goal. Year 2030 conditions were not analyzed in the approved Plan PEIR; thus, a quantitative comparison of the change relative to the proposed Amendment cannot be made.

Implementation of the proposed Amendment, under Year 2030 conditions, would also result in an increase to the total daily VMT generated by the region of 1,961,115 (2.33 percent) compared to Starting Year – Year 2019 conditions. The increase is substantial because it does not help achieve statewide GHG reduction goals, and is therefore significant. VMT growth in Year 2030 is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the transportation network improvements and programs included in the proposed Amendment would help to reduce VMT growth.

2030 Conclusion

As shown in Table 4.5-5, implementation of the proposed Amendment, under Year 2030 conditions, would result in a decrease in VMT per capita of 6.09 percent below Starting Year – Year 2019 conditions. This is less than the 25 percent reduction needed to achieve the State's Year 2030 interim VMT per capita reduction goal, and is therefore a significant impact. Implementation of the proposed Amendment would also result in an increase of 1,961,115 daily VMT generated within the San Diego region compared to Starting Year – Year 2019 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the Year 2030 because the proposed Amendment would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Substantially More Severe Significant Impacts Were Identified in Comparison to the Approved Plan PEIR: Year 2030 conditions were not analyzed in the approved Plan PEIR; however, as the changes under the proposed Amendment were determined to result in a substantial increase in the severity of this significant impact under Horizon Year 2035 conditions, the same should be assumed for Horizon Year 2030 conditions, to be conservative. Thus, a substantial increase in the severity of the significant impact under Horizon Year 2030 conditions is identified under the proposed Amendment.

2035

Regional Growth and Land Use Change and Transportation Network Improvements and Programs

Table 4.5-6 summarizes the VMT projections and analyses developed under Year 2035 conditions. Total VMT and VMT per capita results are presented and compared between Starting Year – Year 2019 and proposed Amendment Year 2035 conditions to identify VMT-related impacts. The total Home-Based VMT as well as the population for the region are also provided, as they are used to calculate VMT per capita. Finally, to identify if the proposed Amendment will further exacerbate any of the impacts identified in the approved Plan PEIR, the approved Plan Year 2035 conditions are also provided and compared to Starting Year – Year 2019 conditions.

Table 4.5-6
VMT Analysis – Year 2035

Metric	Starting Year 2019	Year 2035 Proposed Amendment	Difference Between Starting Year 2019 and Year 2035 Proposed Amendment	% Change Between Starting Year 2019 and Year 2035 Proposed Amendment	Year 2035 Approved Plan	Difference Between Starting Year 2019 and Year 2035 Approved Plan	% Change Between Starting Year 2019 and Year 2035 Approved Plan
Total VMT (daily) ¹	84,074,414	87,131,224	3,056,810	3.64%	85,412,968	1,338,554	1.59%
VMT per Capita (miles) ^{1,2}	18.56	17.05	-1.51	-8.14%	16.58	-1.98	-10.67%
Home-Based VMT ³	61,563,841	60,931,154	-632,687	-1.03%	59,251,034	-2,312,807	-3.76%
Population	3,318,374	3,573,645	255,271	7.69%	3,573,645	255,271	7.69%

Source: ABM2+

Note: Highlighted rows indicate metrics that are used to evaluate VMT-related impacts.

¹ The VMT calculations do not include the off-model VMT reduction strategy reductions totaling 907,217 (1.0% of the Total VMT) in Attachment A of the proposed Amendment. Therefore, the VMT figures may be slightly overstated in the analysis. However, the off-model VMT reductions are not anticipated to reduce the impacts to less-than-significant levels.

² VMT per Capita = Home-Based VMT / Population.

³ Home-Based VMT is the total VMT within the region that is generated from trip tours that either start or end at home.

As shown in Table 4.5-6, implementation of the proposed Amendment, under Year 2035 conditions, would result in an 8.14 percent decrease in the region's VMT per capita, as compared to Starting Year – Year 2019 conditions. This is less than the 26.64 percent reduction in VMT per capita that is needed to maintain the pace required to meet the State's Year 2045 VMT per capita reduction goal of 30 percent. This is slightly less than the change in VMT per capita between Year 2035 and Year 2019 conditions under the approved Plan (10.67 percent reduction). However, neither plan would meet the State's Year 2045 VMT per capita reduction goal.

Implementation of the proposed Amendment, under Year 2035 conditions, would also result in an increase to the total daily VMT generated by the region of 3,056,810 (3.64 percent) compared to Starting Year – Year 2019 conditions. The increase is considered substantial because it does not help achieve statewide GHG reduction goals, and is therefore significant. VMT growth in Year 2035 is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the transportation network improvements and programs included in the proposed Amendment would help to reduce VMT growth. The increase in VMT associated with the proposed Amendment under Year 2035 conditions is around 1.7 million miles per day (2.01 percent) more than the approved Plan.

Additionally, the proposed Amendment would not make any changes to the roadway network approved as part of the approved Plan. In Year 2035, the number of roadway lane miles within the region would increase by 626 miles. Some of the additional lane miles added to the network would be managed lanes (449 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel. It should be noted that the majority of transportation improvements included within the proposed Amendment, including expansion of transit services, new or expanded bicycle facilities, and pedestrian improvements, would decrease VMT within the region. As noted in OPR's Technical Advisory these types of multi-modal improvements are not anticipated to induce travel (OPR 2018). A detailed discussion of induced travel demand is provided in Appendix D of the approved Plan.

2035 Conclusion

As shown in Table 4.5-6, implementation of the proposed Amendment, under Year 2035 conditions, would result in a decrease in VMT per capita of 8.14 percent below Starting Year – Year 2019 conditions. This is less than the 26.65 percent reduction needed to maintain pace to meet the 30 percent VMT per capita reduction goal under Year 2045 conditions, and is therefore a significant impact. Implementation of the proposed Amendment would also result in an increase of 3,056,810 daily VMT generated within the San Diego region compared to Starting Year – Year 2019 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the Year 2035 because the proposed Amendment would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Substantially More Severe Significant Impacts Were Identified in Comparison to the Approved Plan

PEIR: While the proposed Amendment will result in a higher VMT generation than the approved Plan, these significance findings are still consistent with those identified in the approved Plan PEIR. The changes under the proposed Amendment would not result in a new significant impact for this significance threshold. However, the changes under the proposed Amendment would result in a 2 percent increase in the total VMT generated within the region, as compared to the approved Plan. To be conservative, this increase is considered a substantial increase in the severity of this significant impact. Thus, a substantial increase in the severity of the significant impact under Horizon Year 2035 conditions is identified under the proposed Amendment.

2045***Regional Growth and Land Use Change and Transportation Network Improvements and Programs***

Table 4.5-7 summarizes the VMT projections and analyses developed under Year 2045 conditions. Total VMT and VMT per capita results are presented and compared between Starting Year – Year 2019 and proposed Amendment Year 2045 conditions to identify VMT-related impacts. The total Home-Based VMT as well as the population for the region are also provided, as they are used to calculate VMT per capita. Year 2045 conditions were not included in the approved Plan PEIR; therefore, a comparison between the two plans cannot be made.

Table 4.5-7
VMT Analysis – Year 2045

Metric	Starting Year Year 2019	Year 2045 Proposed Amendment	Difference Between Starting Year Year 2019 and Year 2045 Proposed Amendment	% Change Between Starting Year Year 2019 and Year 2045 Proposed Amendment
Total VMT (daily) ¹	84,074,414	88,941,651	4,867,237	5.79%
VMT per Capita (miles) ^{1,2}	18.56	16.65	-1.91	-10.29%
Home-Based VMT ³	61,563,841	60,884,213	-679,628	-1.10%
Population	3,318,374	3,657,464	339,090	10.22%

Source: ABM2+

Note: Highlighted rows indicate metrics that are used to evaluate VMT-related impacts.

¹ The VMT calculations do not include the off-model VMT reduction in Attachment A of the proposed Amendment because they were not calculated for Year 2045 conditions. Therefore, the VMT figures may be slightly overstated in the analysis.

² VMT per Capita = Home-Based VMT / Population.

³ Home-Based VMT is the total VMT within the region that is generated from trip tours that either start or end at home.

As shown in Table 4.5-7, implementation of the proposed Amendment, under Year 2045 conditions, would result in a 10.29 percent decrease in the region's VMT per capita, as compared to Starting Year – Year 2019 conditions. This is less than the 30 percent reduction needed to meet the State's 2045 VMT per capita reduction goal. Year 2045 conditions were not analyzed in the approved Plan PEIR; thus, a quantitative comparison of the change relative to the proposed Amendment cannot be made.

Implementation of the proposed Amendment, under Year 2045 conditions would also result in an increase to the total daily VMT generated by the region of 4,867,237 (5.79 percent) compared to Starting Year – Year 2019 conditions. The increase is considered substantial because it does not help achieve statewide GHG reduction goals, and is therefore significant. VMT growth in Year 2045 is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the transportation network improvements and programs included in the proposed Amendment would help to reduce VMT growth.

2045 Conclusion

As shown in Table 4.5-7, implementation of the proposed Amendment, under Year 2045 conditions, would result in a decrease in VMT per capita of 10.29 percent below Starting Year – Year 2019 conditions. This is less than the 30 percent reduction needed to achieve the State's Year 2045 VMT per capita reduction goal, and is therefore a significant impact. Implementation of the proposed Amendment would also result in an increase of

3,056,810 daily VMT generated within the San Diego region compared to Starting Year – Year 2019 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the Year 2045 because the proposed Amendment would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Substantially More Severe Significant Impacts Were Identified in Comparison to the Approved Plan PEIR: Year 2045 conditions were not analyzed in the approved Plan PEIR; however, because the changes under the proposed Amendment were determined to result in a substantial increase in the severity of this significant impact under Horizon Year 2035 and Horizon Year 2050 conditions, the same is assumed for Horizon Year 2045 conditions. Thus, a substantial increase in the severity of the significant impact under Horizon Year 2045 conditions is identified under the proposed Amendment.

2050

Regional Growth and Land Use Change and Transportation Network Improvements and Programs

Table 4.5-8 summarizes the VMT projections and analyses developed under Year 2050 conditions. Total VMT and VMT per capita results are presented and compared between Starting Year – Year 2019 and proposed Amendment Year 2050 conditions to identify VMT-related impacts. The total Home-Based VMT as well as the population for the region are also provided, as they are used to calculate VMT per capita. Finally, to identify if the proposed Amendment will further exacerbate any of the impacts identified in the approved Plan PEIR, the approved Plan Year 2050 conditions are also provided and compared to Starting Year – Year 2019 conditions.

Table 4.5-8
VMT Analysis – Year 2050

Metric	Starting Year 2019	Year 2050 Proposed Amendment	Difference Between Starting Year 2019 and Year 2050 Proposed Amendment	% Change Between Starting Year 2019 and Year 2050 Proposed Amendment	Year 2050 Approved Plan	Difference Between Starting Year 2019 and Year 2050 Approved Plan	% Change Between Starting Year 2019 and Year 2050 Approved Plan
Total VMT (daily) ¹	84,074,414	89,846,864	5,772,450	6.87%	88,133,934	4,059,520	4.83%
VMT per Capita (miles) ^{1,2}	18.56	16.45	-2.11	-11.37%	16.03	-2.53	-13.63%
Home-Based VMT ³	61,563,841	60,860,743	-703,098	-1.14%	59,300,949	-2,262,892	-3.68%
Population	3,318,374	3,699,373	380,999	11.48%	3,699,373	380,999	11.48%

Source: ABM2+

Note: Highlighted rows indicate metrics that are used to evaluate VMT-related impacts.

¹ The VMT calculations do not include the off-model VMT reduction strategy reductions totaling 993,133 (1.1% of the Total VMT) in Attachment A of the proposed Amendment. Therefore, the VMT figures may be slightly overstated in the analysis.

² VMT per Capita = Home-Based VMT / Population

³ Home-Based VMT is the total VMT within the region that is generated from trip tours that either start or end at home.

As shown in Table 4.5-8, implementation of the proposed Amendment, under Year 2050 conditions, would result in a 11.37 percent decrease in the region's VMT per capita, as compared to Starting Year – Year 2019 conditions. This is less than the 45 percent reduction in VMT per capita required to maintain the State's Year 2045 VMT per capita reduction goal of 30 percent. It is also less than the change in VMT per capita between Year 2050 and Year 2019 conditions under the approved Plan (13.63 percent reduction). However, neither plan would meet or maintain the State's Year 2045 VMT per capita reduction goal.

Implementation of the proposed Amendment, under Year 2050 conditions, would also result in an increase in the total daily VMT generated by the region of 5,772,450 (6.87 percent) compared to Starting Year – Year 2019 conditions. The increase is considered substantial because it does not help achieve statewide GHG reduction goals, and is therefore significant. VMT growth in Year 2050 is predominantly due to the population and employment growth within the region, notwithstanding that the SCS land use pattern and the transportation network improvements and programs included in the proposed Amendment would help to reduce VMT growth. The increase in VMT under Year 2050 conditions is around 1.7 million miles per day (1.94 percent) more than the approved Plan.

Additionally, the proposed Amendment would not make any changes to the roadway network approved as part of the approved Plan. In Year 2050, the number of roadway lane miles within the region would increase by 748 miles. Some of the additional lane miles added to the network would be managed lanes (705 miles); however, these improvements would still increase the overall vehicular capacity of the region's roadway network, resulting in the potential for induced travel. It should be noted that the majority of transportation improvements included within the proposed Amendment, including expansion of transit services, new or expanded bicycle facilities, and pedestrian improvements, would decrease VMT within the region. As noted in OPR's Technical Advisory these types of multi-modal improvements are not anticipated to induce travel (OPR 2018). A detailed discussion of induced travel demand is provided in Appendix D of the approved Plan. These proposed changes to the transportation network are unchanged from the approved Plan.

2050 Conclusion

As shown in Table 4.5-8, implementation of the proposed Amendment, under Year 2050 conditions, would result in a decrease in VMT per capita of 11.37 percent below Starting Year – Year 2019 conditions. This is less than the 30 percent reduction needed to achieve and maintain the State's ultimate VMT per capita reduction goal and is therefore a significant impact. Implementation of the proposed Amendment would also result in an increase of 5,772,450 daily VMT generated within the San Diego region compared to Starting Year – Year 2019 conditions, which is considered a substantial increase. Therefore, this impact (TRA-2) is considered significant in the Year 2050 because the proposed Amendment would not achieve the substantial VMT reductions needed to help achieve statewide GHG reduction goals.

Substantially More Severe Significant Impacts Were Identified in Comparison to the Approved Plan

PEIR: While the proposed Amendment will result in a higher VMT generation than the approved Plan, these significance findings are consistent with those identified in the approved Plan PEIR. The changes under the proposed Amendment would not result in a new significant impact for this significance threshold. However, the changes under the proposed Amendment would result in a 2 percent increase in the total VMT generated within the region, as compared to the approved Plan. To be conservative, this increase is considered a substantial increase in the severity of this significant impact. Thus, a substantial increase in the severity of the significant impact under Horizon Year 2050 conditions is identified under the proposed Amendment.

Exacerbation of Climate Change Effects

The exacerbation of climate change effects analysis included in Section 4.16, *Transportation*, of the approved Plan PEIR is consistent with this evaluation and has not materially changed since the preparation of the approved Plan PEIR.

MITIGATION MEASURES

TRA-2 CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3 BY NOT ACHIEVING THE SUBSTANTIAL VMT REDUCTIONS NEEDED TO HELP ACHIEVE STATEWIDE GHG REDUCTION GOALS

Achieving further reductions in the total and per capita VMT generated within the region depends upon additional State policy actions and funding, as well as local jurisdictions' review and entitlement of individual land use development projects and Regional Arterial System (RAS) transportation projects. In addition, transportation sponsors other than SANDAG, such as Caltrans, must evaluate and potentially mitigate any induced VMT that may be associated with the implementation of enhancements to the freeway and State Highway system.

Therefore, mitigation measure **TRA-2** focuses on project-specific mitigation measures that can and should be implemented to further reduce the region's total VMT and VMT per capita. In addition, region-level alternatives would further reduce VMT (see Chapter 6, *Alternatives Analysis*). Alternative 3 would further reduce VMT through measures such as a more compact land use pattern, and policies to reduce transit fares, increase parking prices, and establish higher road user fees. Alternative 4 would further reduce VMT through measures such as policies to reduce transit fares, increase parking prices, and increase toll prices. Alternative 5 would further reduce VMT through measures such as a more compact land use pattern, and policies to reduce transit fares, increase parking prices, and increase toll prices.

2025, 2030, 2035, 2045, and 2050

The following mitigation measures identified in the approved Plan PEIR would still be applicable to the proposed Amendment as discussed in Section 4.3, *Greenhouse Gas Emissions*, and would further reduce both the total VMT and VMT per capita:

- **GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans**
- **GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide**
- **GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects**

In addition, mitigation measure **TRA-2** for Impact TRA-2 from the approved Plan PEIR has been revised for the proposed Amendment and is still relevant and is still proposed as revised below:

TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects. During the project design and project-level CEQA review phases of transportation network improvements or land use development projects, SANDAG shall, and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement project-level VMT reduction measures in addition to those included in the Regional Plan. VMT reducing measures include, but are not limited to, the following:

- **Require TDM Strategies.** SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should require all transportation network improvements or land use development projects, that are identified to have a significant VMT-related impact, to implement feasible TDM strategies to help offset their impacts. This mitigation measure will further reduce the proposed Amendment's VMT because the potential VMT reductions associated with four⁴ TDM programs, which include pooled rides (private), vanpool, carshare, and the implementation of a regional TDM ordinance, were not incorporated into ABM2+⁵. Strategies such as free shuttles, parking facilities for carshare, and site design features to facilitate walking, biking, and transit can and should be used by land development projects to reduce VMT-related impacts. Additional project-level TDM measures not included in the proposed Amendment can and should also be used, including walking, school bus programs, school pool programs, subsidized transit passes, unbundled parking, preferential parking programs for carpools/vanpools, and bike sharing programs.
- **Reduce Parking Minimums.** The County of San Diego, cities, and other local jurisdictions can and should evaluate the feasibility of reducing their currently required parking minimums. Reducing the parking minimums for different land use types, where appropriate, can decrease project-level VMT by up to 13.7 percent (CAPCOA 2021).
- **Implement Additional Active Transportation Facilities Not Included in the Proposed Amendment.** To further reduce local VMT-related impacts and take advantage of the regional bike network, SANDAG shall and other transportation project sponsors, the County of San Diego, cities, and other local jurisdictions can and should implement additional active transportation facilities that provide connections from the regional bicycle network to local neighborhoods. The proposed Amendment includes funding for Complete Streets investments in Mobility Hub areas including implementation of bicycle and pedestrian facilities that provide local connections throughout Mobility Hub areas; however, the associated VMT reductions from this funding could not be modeled, so this mitigation measure would achieve further VMT reductions. Direct access to bicycle facilities can reduce project-related VMT by 0.8 percent, while incorporating new pedestrian facilities can reduce project VMT by up to 6.4 percent (CAPCOA 2021).
- **Road Diet and Traffic Calming.** The County of San Diego, cities, and other local jurisdictions can and should implement road diets⁶ or other traffic calming measures within their local roadway network, where feasible, to further reduce VMT-related impacts that may be associated with land development projects or local transportation projects. Road diet and traffic calming measures would also be eligible for Complete Streets funding in Mobility Hub areas. The reduction of existing travel lanes in favor of multi-modal facilities or additional public space can help to calm and deter vehicular trips within an area or along a roadway segment. Traffic calming measures can reduce VMT by 0.5 percent (CAPCOA 2010)⁷. It should

⁴ Five total measures are evaluated in the "Off-Model" calculations included in Attachment A of the proposed Amendment. However, EV Programs (Vehicle Incentive and Charger Program) only relates to reductions in GHG and does not help to reduce VMT specifically. See Attachment A of the proposed Amendment.

⁵ These TDM strategies were calculated as part of the off-model strategies (Attachment A of the proposed Amendment). If implemented these strategies could reduce total VMT by 1.0 percent by 2035 and 2.2 percent by 2050 (Attachment A of the proposed Amendment).

⁶ Road Diet = narrowing or eliminating travel lanes and/or shoulders to provide more space for pedestrians, bicyclists, transit, or public spaces.

⁷ Road diet and traffic calming was not included as a VMT reduction measure in CAPCOA 2021. However, reducing the number of travel lanes, decreasing the roadway speed limit, and implementing or enhancing multi-modal facilities, which are common features in road diet and traffic calming projects, discourage the use of automobiles and incentive travelers to use other modes. Therefore, it is still considered to be an effective mitigation measure to reduce VMT within the region.

be noted that the proposed Amendment includes funding, through grants, for local jurisdictions to implement road diets.

SIGNIFICANCE AFTER MITIGATION

2025, 2030, 2035, 2045 and 2050

As outlined in Tables S-19 through S-22 in Attachment A of the proposed Amendment, there are TDM strategies included in the proposed Amendment that could not be incorporated into ABM2+ and were therefore not assumed in the transportation impact analysis. As noted within the appendix, these strategies could further reduce the total VMT generated within the region by a total of 1.1 percent by Year 2050. These reductions were calculated based on their influence on the total VMT generated within the region. As such, it is reasonable to assume that these strategies would have a similar effect on the region's VMT per capita, as the majority of trips within the region are home based. However, as noted in the mitigation section above, TDM strategies generally are required and implemented at the project level, by local agencies, to be most effective. The VMT reductions associated with these project-level TDM measures can vary greatly based on the project type, location, and size; therefore, an overall regionwide reduction cannot be estimated at the program level.

SANDAG cannot require local agencies implementing development projects, or other transportation project sponsors, to adopt the above mitigation measures, and it is ultimately the responsibility of the CEQA lead agency to determine and adopt mitigation. In addition, the State has indicated that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals.

As outlined in Tables 4.5-4 through 4.5-8, the regional VMT per capita is more than 1.1 percent higher than the threshold to meet, or keep pace with, the State's GHG reduction goals under each horizon year. Therefore, the full implementation of the proposed mitigation, under any horizon year, would not reduce the identified impact to a less-than-significant level for any horizon year (2025, 2030, 2035, 2045, or 2050). Additionally, the identified VMT reductions associated with the proposed mitigation measures would not significantly reduce the daily VMT generated within the San Diego region to a point where it would no longer be considered substantial. Therefore, this impact would remain significant and unavoidable under the proposed Amendment.

Conclusion

Substantially More Severe Significant Impacts Were Identified in Comparison to the Approved Plan PEIR: The approved Plan PEIR identified a significant and unavoidable impact as being inconsistent with CEQA Guidelines Section 15064.3 (TRA-2) because even with the incorporation of mitigation measure **TRA-2**, it could not be guaranteed that all future project-level impacts would be mitigated to less-than-significant levels. As discussed above, the changes included in the proposed Amendment will result in a 2 percent increase in the total VMT generated within the region (under Horizon Years 2035 and 2050), which is considered a substantial increase in the severity of previously identified significant effects. Year 2030 and Year 2045 conditions were not analyzed in the approved Plan PEIR; however, because implementation of the proposed Amendment was determined to result in a substantial increase in the severity of this significant impact under Horizon Year 2035 and Horizon Year 2050 conditions, the same should be assumed for Horizon Year 2030 and Horizon Year 2045 conditions. Therefore, the conclusions for the proposed Amendment during Horizon Years 2030, 2035, 2045, and 2050 would substantially increase from what was identified in the approved Plan PEIR.