

Rancho Bernardo Community Planning Board

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July 17, 2025

Draft 2025 Regional Plan Project Manager

SANDAG (regionalplan@sandag.org)

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SUBJECT: Comments on SANDAG's Draft 2025 Regional Plan

Attention: 2025 Regional Plan Project Manager

The Rancho Bernardo Community Planning Board (Planning Board) appreciates the opportunity to review and provide comments on the draft 2025 Regional Plan, which provides an update of SANDAG's proposals for the transportation, infrastructure, land use, housing, and environmental needs of the region. The Planning Board considered and approved the following comments, prepared by our Regional Issues Committee, on July 17, 2025. The primary focus of this comment letter is on the transportation needs of the I-15 corridor between SR-78 and SR-56, an area that receives minimal attention in the draft 2025 Regional Plan. Our specific comments are presented below.

Plan Overview: According to the SANDAG website, "The goal of the 2025 Regional Plan is to make transportation more convenient, equitable, healthy, and safe for everyone in the San Diego region." Although this is a statement that we all hope can be achieved, a review of the draft Regional Plan indicates a plan that emphasizes several specific parts of the region, while providing little discussion of other areas, including the I-15 corridor between I-8 and Escondido. Further, of those proposals that do address transportation needs for this portion of the I-15 corridor, most are proposed for implementation well into the future.

Protection of Environmental Lands: We support the draft regional plan's statements regarding climate change and the protection of the region's conserved lands in accordance with the Multiple Species Conservation Plan. To ensure a resilient future and to adapt to climate change, we agree that the San Diego region must work together to proactively conserve our native habitats and the species those habitats support.

Transportation Planning: The transportation aspects of the draft 2025 Regional Plan are of major importance to our community and we ask that our comments related to stepping up new transit opportunities at the Rancho Bernardo Transit Center be seriously considered.

Bicycle Lanes - A review of the projects proposed for the North County Subregion indicate that in Rancho Bernardo the majority of bike related facilities will be on-street, with only a short distance of off-street bikeway provided in the vicinity of the Rancho Bernardo Community Park. Item number AT073 2035 and AT150 2050 appear to support upgrading existing on-street bikeways to improve safety. We support improving bicycle safety to ensure safe bicycle access, particularly for elementary through high school students. However, due to frequent changes in the terrain and the distances between housing and major employment centers, regional access via bicycle in the Rancho Bernardo area is not realistic for many residents. Therefore, funding in this area would be better spent on local transit connectors between major transit stops and adjacent commercial, employment, and education centers.

Next Gen Mixed Rapid Bus Routes - Currently, the number of express bus routes that serve the Rancho Bernardo Transit Station are limited and do not provide easy access for Rancho Bernardo residents to travel to major employment centers, nor do they easily connect employees of Rancho Bernardo's major employment center to their homes in communities in the southern and northern portions of the County. One only needs to travel on the I-15 corridor during rush hour to see that where people live and where they work are separated by significant distances.

It is encouraging to read of new proposed routes, but disappointing to see that we have to wait at least ten more years before a number of "next gen mixed" rapid bus routes will be added to serve the Rancho Bernardo Transit Center and the northern portion of the City's I-15 corridor. Connections such as those proposed between Rancho Bernardo and UC San Diego via Sorrento Valley and Mira Mesa and Sorrento Valley and Carrol Canyon and the Route 484 Commuter Express providing access from Carlsbad to Kearny Mesa via I-15; Palomar Airport Road, SR 78, and Rancho Bernardo Transit Center would finally connect residents to major employment centers. Earlier introduction of select routes would be an effective way of reducing trips along with reducing greenhouse gas emissions.

Employee Serving Transit Routes - Waiting until 2035 to initiate the Transit: Circulator 675 Rancho Bernardo Business Park Loop is also disappointing, particularly because MTS is currently completing a significantly sized affordable housing project at the Rancho Bernardo Transit Center. This site is likely to provide housing for employees of nearby employment centers, including the Rancho Bernardo industrial park. Unfortunately, transit options for access to this area are limited. The same is true for access to the Palomar College Rancho Bernardo Education Center and nearby commercial areas. Without transit options, most will be forced to drive to their various destinations.

The employees at the industrial and business parks in Rancho Bernardo, Carmel Mountain, and Sabre Springs would benefit from the Flexible Fleet services proposed for the future. The sooner these services are in place, the sooner users will take advantage of existing bus routes, as quick access between transit centers and employment areas will make leaving your car at home much more feasible.

Environmental Justice: Appendix A, Page A-5, states: "California Assembly Bill 805 (Gonzalez Fletcher, 2017) (Chapter 658, Statutes of 2017) requires, among other things, that the Regional Plan identify disadvantaged communities and include transportation strategies to reduce pollution in these communities." Attachment A1 highlights the location of disadvantaged communities and details specific transportation strategies aimed at reducing their exposure to pollution.

As it appears this statute has been in effect since 2017, it is unclear how MTS was permitted to develop affordable housing immediately adjacent to 8+ lanes of I-15 in Rancho Bernardo. The future residents of this development will be subjected to excessive noise and toxic air quality the moment they move into their homes. The housing should have been sited at the western end of the MTS property, where noise and pollutant levels would have been reduced to some extent. Further, based on the information included in the City of San Diego's draft Environmental Justice document, the Rancho Bernardo affordable housing site would upon completion qualify as an Environmental Justice development due to high pollutant levels. The final version of the 2025 Regional Plan should be worded in a manner that would prohibit MTS or any other jurisdiction from developing new affordable housing projects in locations where residents would be exposed to toxic pollutants and excessive noise.

Public Outreach: Although SANDAG states in the draft plan that it conducted extensive public outreach prior to plan preparation, it does not appear that there was any substantive outreach to the various community planning groups in the City and County of San Diego. The plan would likely have benefited from such input.

Appendix F - Regional Growth Forecast: The growth forecasts in this section are based on historical averages from 1991-2020, and do not take into consideration the current population rates or current changes in the distribution of the population within San Diego County. Population distribution will necessarily be affected by where new ADUs and new apartment buildings have and will be constructed within the County. These changes will affect where and how people travel, as well as the total miles traveled between home and work, which will in turn likely require some revisions to the proposed transportation and infrastructure planning for the region.

Use of the 1991-2020 data also does not recognize the potential effects that AI and/or working from home or nearby business centers could have on future transportation needs. According to the Census Bureau, between July 2023 and July 2024, nearly 24,000 people left San Diego, while 24,226 people immigrated into San Diego (KPBS March 17, 2025). Therefore, immigration and emigration into and out of San Diego County currently has little effect on the overall population rate, but could have an effect on transportation needs depending upon the employment needs of those immigrating into the County. The Regional Growth Forecast should be updated to address what appear to be significant changes since 2020. The region would also benefit from an updated analysis of the future needs (e.g., housing, transportation, type of employment) of San Diego County residents based on current population trends and the change in distribution of housing opportunities being provided throughout the County.

Conclusion: The Planning Board generally supports the proposals in the draft Regional Plan, but as stated above, many of the proposals would not be implemented until well into the future. This is disappointing as new housing (most likely not anticipated in the 1991-2020 growth forecasts) is being constructed throughout the County; housing that could be better served if many of the transit proposals addressed in the plan were implemented many years sooner than currently proposed.

Thank you again for the opportunity to provide these comments.

Sincerely,

Robin Kaufman

Robin Kaufman, Chair
Rancho Bernardo Community Planning Board

cc: Councilmember Marni von Wilpert, City of San Diego, District 5