

**RESOLUTION TO REVISE THE
TRANSPORTATION STUDY
GUIDE FOR VEHICLE MILES
TRAVELED TO REMOVE THE INFILL
AREA AND
SMALL PROJECT SCREENING
CRITER**

Meeting Date: January 14, 2026 (06)
Resolution No.: 26-005

**RESOLUTION TO REVISE THE TRANSPORTATION STUDY
GUIDE FOR VEHICLE MILES TRAVELED TO REMOVE THE INFILL AREA AND
SMALL PROJECT SCREENING CRITERIA**

WHEREAS, on September 28, 2022 (6), the Board of Supervisors (Board) approved the Transportation Study Guide (2022 TSG), and

WHEREAS, in November 2022, the Cleveland National Forest Foundation (CNFF) and the Coastal Environmental Rights Foundation (CERF) filed a lawsuit alleging the 2022 TSG violated CEQA because the thresholds regarding infill area and small projects were adopted without substantial evidence, and

WHEREAS, in December 2023, the trial court found the infill area and small project thresholds were supported by substantial evidence and upheld the 2022 TSG. CNFF and CERF appealed, and

WHEREAS, in April 2025, the appellate court disagreed and found the infill area and small project thresholds were not supported by substantial evidence, and

WHEREAS, in October 2025, the trial court ordered the County to vacate the infill area and small project thresholds as specified under the writ of mandate for the following components and sections of the TSG:

- The Infill definition
- The Infill Village Area and Small Residential and Employment Projects Screening Criteria (Table 1 and Section 3.3.1)
- The Infill VMT Threshold of Significance (Section 3.3.2)
- The Infill VMT Analysis Procedure (Section 3.3.3)
- Appendix A Scoping Agreement, Small Project and Infill Screening (Appendix A)
- The Infill Areas within Transit Opportunity Areas maps (Appendix D)
- The Infill Areas and Small Projects Justifications and Thresholds in the Technical Memorandum (Appendix H)

NOW, THEREFORE, IT IS HEREBY RESOLVED, that the Board of Supervisors of the County of San Diego hereby revises the 2022 TSG to remove the infill and small project thresholds specified in the writ of mandate, as shown in the revised TSG included as Attachment A to this resolution.

BE IT FURTHER RESOLVED that the portions of the 2022 TSG not rescinded with these revisions will remain applicable.

BE IT FURTHER RESOLVED that this Resolution shall be effective immediately upon adoption.

APPROVED AS TO FORM AND LEGALITY
DAMON M. BROWN, COUNTY COUNSEL
By: Inga Lintvedt, Chief Deputy County Counsel

ON MOTION of Supervisor Anderson, seconded by Supervisor Aguirre, the above Resolution was passed and adopted by the Board of Supervisors, County of San Diego, State of California, on this 14th day of January 2026, by the following vote:

AYES: Aguirre, Anderson, Lawson-Remer, Montgomery Steppe, Desmond

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STATE OF CALIFORNIA)
County of San Diego) §

I hereby certify that the foregoing is a full, true and correct copy of the Original Resolution entered in the Minutes of the Board of Supervisors.

ANDREW POTTER
Clerk of the Board of Supervisors

By: 
Janelly Valdivia, Deputy



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