



P.O. Box 87588
San Diego, CA 92138
www.movesandiego.org
(619) 702-4266

Chair

Stephen Haase,
Baldwin & Sons

Vice Chair

Keely Halsey,
Oppen and Varco

Secretary

Humberto Peraza,
Counter Point

Treasurer

Sarah Kruer Jager,
Monarch Group

Directors

Aaron Contorer,
Everyone Counts

Marcela Escobar-Eck,
Atlantis Group

Gary London,
The London Group

Of Counsel

John Ponder
Sheppard Mullin
Richter & Hampton, LLP

Executive Director

Elyse W. Lowe
elowe@movesandiego.org

September 19, 2011

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

VIA UPLOAD to <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: CARB Staff Report on the San Diego Association of Governments'
Draft Sustainable Communities Strategy (SCS), and 2050 RTP.

Chairwoman Nichols:

Move San Diego is a 501(c)3 whose mission is to organize and serve a broad collaboration of people and organizations to prioritize, fund, and implement sustainable, healthy, convenient transportation and related land use solutions that get people and goods wherever they are going, on time, throughout the San Diego region.

We have been actively participating as a stakeholder in the SANDAG 2050 Regional Transportation Plan Update and the development of California's first Sustainable Communities Strategy since the CARB target setting process began in 2009. Personally, I was appointed by SANDAG to serve as the City of San Diego representative to the SANDAG RTP stakeholder working group, which met monthly for two years to have in depth discussions about the RTP and SCS. I also serve as a member, appointed by the Mayor and City Council, to the City of San Diego's Climate and Adaptation Mitigation Plan update team.

We applaud SANDAG for providing a plan that meets the targets set for 2020 and 2035. However, we are disturbed that after 2035 emissions and driving per capita increase, as continued job sprawl and highway expansion serve to counteract the beneficial programs SANDAG is investing in to support regional multi-modality efforts.

This "backsliding" of emission reduction long term is particularly troubling, especially when combined with the local air quality problems caused by vehicle emissions. The backsliding is particularly problematic because SANDAG has not fully disclosed *how* its plan meets the targets.

Move San Diego's RTP/SCS comments to SANDAG outline our continued concerns with the lack of transparency in the model and

the plan about how the targets are met SANDAG with the following:

*“SANDAG staff believes Move San Diego’s review of the Draft 2050 RTP is based on several incorrect assumptions and faulty analysis.”*¹ This comment is demonstrative that to the lay person, not enough information is available about how the targets are being met.

SANDAG is the only major MPO in California whose travel model is not fully transparent. Therefore, it is unclear how much different factors (such as transit improvements, highway widening, or economic forecasts) contribute to the projected GHG reductions. SANDAG recently committed to making their model transparent for the next SCS/RTP. We applaud this commitment, but it does not address the “black box” around GHGs in the plan before you today.

One of the greatest obstacles Move San Diego sees in achieving the true intent of SB 375 required greenhouse gas emission reductions is the grandfathering of projects funded before 2008 to proceed without meeting SB 375 requirements. In 2004, voters in San Diego narrowly passed TransNet 2, our region’s 40 year transportation sales tax measure financing \$14 billion in projects, including adding hundreds of miles of freeways expansion and new arterial roads. In the update to the RTP, SANDAG did not revise any of the planned highway projects², and maintains there *“is no evidence that projects included in the TransNet are antithetical to smart growth, GhG reduction, or other state and regional goals.”* Without action from the state to pressure SANDAG into meeting state objectives for climate emissions, TransNet will not likely be reevaluated until the legally required date of 2018. Until then the phasing of transit and highway projects will likely remain unchanged.

Move San Diego echoes the comments by the statewide collaborative Climate Plan, in requesting specific action be taken by CARB for approving the SANDAG SCS:

Transit ridership: Since a robust transit infrastructure is critical to achieving the plan’s ambitious transit ridership assumptions, as well as making those areas that have already committed to smart growth (e.g. City of San Diego) livable at the projected densities, **SANDAG should commit to developing a detailed transit operations funding plan that identifies the actions and additional funding sources needed** (if any) to make the mode shares that are assumed for 2020 and 2035 a reality. This could help serve as the basis for a future funding measure.

Active transportation: To ensure that active transportation increases as quickly as projected, **(1) SANDAG should commit to, and not just “consider,” developing an Early Action Program** with implementation mechanisms and one decade of investments, 2012-2022, for the active transportation (bicycle and pedestrian) investments. If the \$2.6 billion for active transportation is not frontloaded or at least spent evenly over the 40 year life of the plan, the GHG benefits may not materialize. **(2) SANDAG should also commit to, and**

¹ SANDAG RTP/SCS responses, pg. 194 September 2, 2011

² The exception being the recent revisions to the I-5 expansion plan, as required by SB 468 (Kehoe).

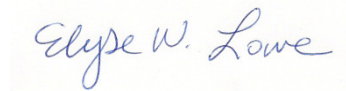
not just “consider,” adopting a Complete Streets Implementation Policy to further the design of Complete Streets across the region, and to echo the sentiments of the State’s Smart Mobility planning.

Land use: Transportation investments drive land use and private investment decisions. SANDAG’s land use scenario assumes an impressive percentage of growth will occur near transit, yet delays many of its transit investments until 20 to 30 years from now. As outlined above, SANDAG should commit to developing more aggressive integrated land use and transportation scenarios in their next RTP/SCS that demonstrate how the transportation investments will support the projected land use changes, and also commit to monitoring the implementation of the land use pattern.

Attorney General Kamala Harris opined on September 16, 2011 the DEIR for the RTP/SCS has significant legal problems. Additionally, she writes *“The intent of SB 375 is to create a long-term downward trajectory for GhG emissions in California through transportation and land use strategies....the RTP/SCS seems to be setting the region on a course that is inconsistent with the State’s climate objectives.”*

We want to see SB 2375 work for all the regions in the state, and believe that the SANDAG SCS can and should be a shining example of how to prepare such a document. We appreciate the efforts of the Board and staff of ARB and SANDAG. Your efforts to implement SB 375 are many, and we commit to helping you as a local stakeholder dedicated to San Diego’s sustainable land use and transportation plans.

Sincerely,

A handwritten signature in blue ink that reads "Elyse W. Lowe". The signature is written in a cursive, flowing style.

Elyse Lowe
Executive Director