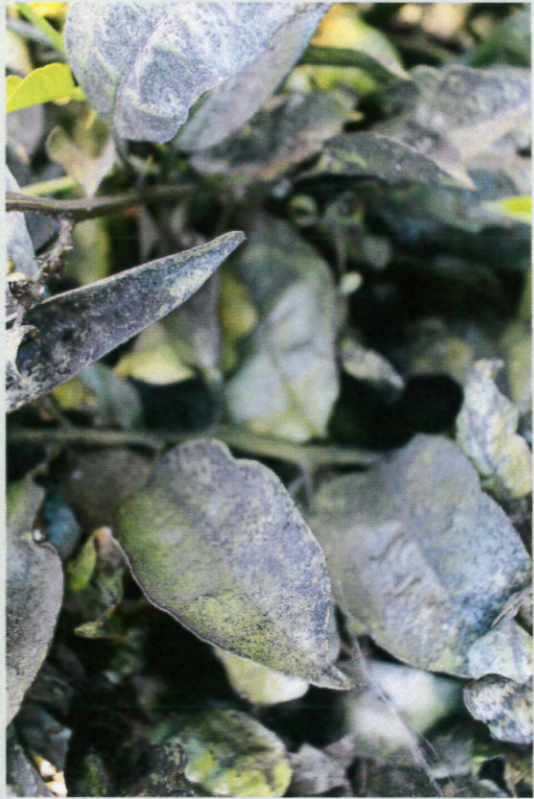
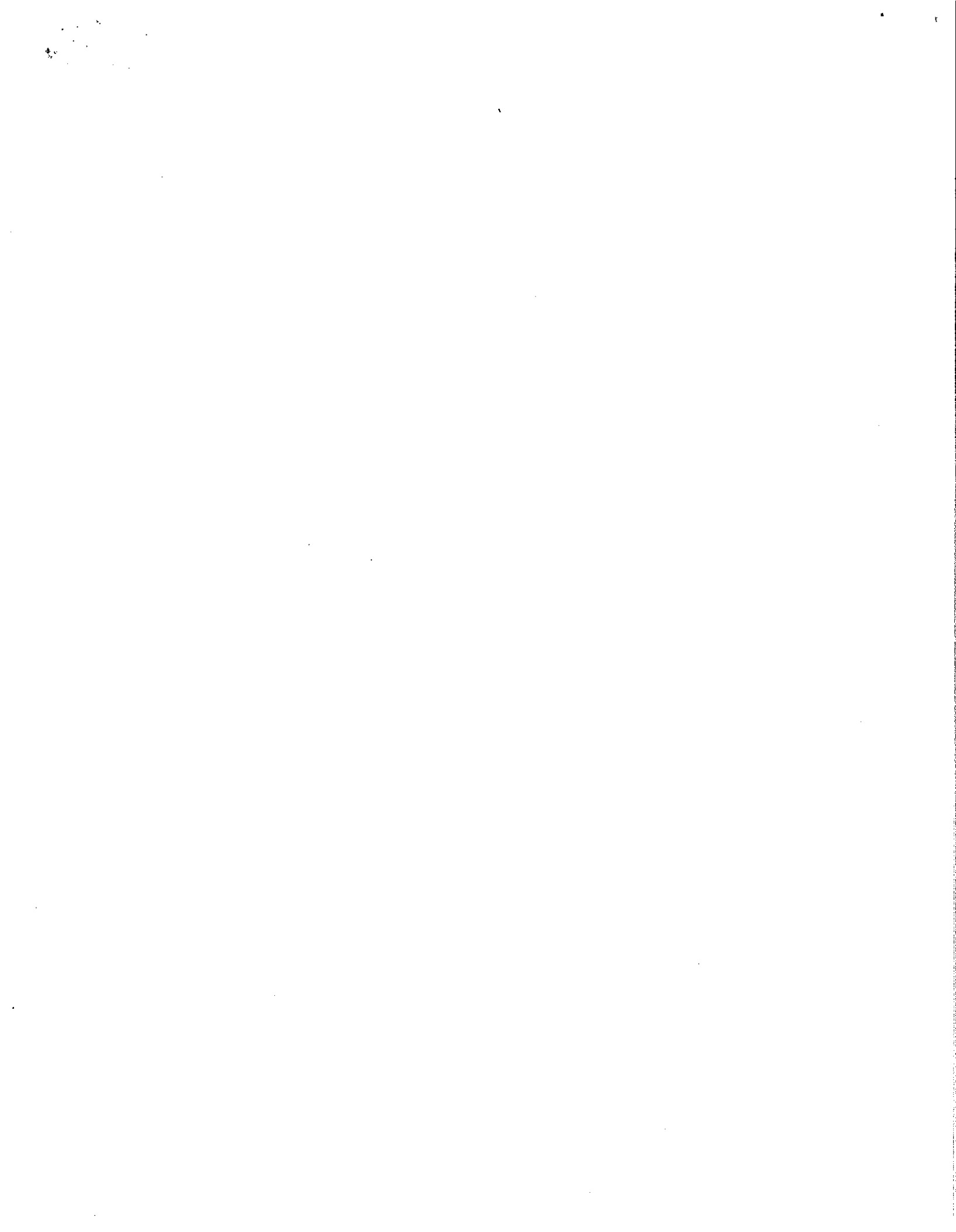


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December 12, 2017

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA

RE: San Diego Region Support for a 25% emission reduction target for the San Diego Association of Governments under SB 375

Dear Chair Nichols and Air Resources Board members:

Thank you for the opportunity to provide comments on the proposed Update to the SB375 Greenhouse Gas (GHG) Emission Reduction Targets. The Environmental Health Coalition (EHC) and the undersigned organizations strongly urge the California Air Resources Board (CARB) to require an emission reduction target of 25% for the San Diego Association of Governments (SANDAG).

SANDAG has long ignored community pleas for a strong transportation system that meets the needs of the most underserved and impacted communities. **The system SANDAG has built is expensive, car centric, increases toxic pollution, and contributes to climate change.** Despite the negative consequences of this inadequate transportation system, SANDAG still refuses to seize the opportunity that SB375 offers to revolutionize their methods and instead chooses to fight for a bare-minimum emission reduction target of 18%. However, even CARB staff's proposed target of 21% does not do enough for a region that must remediate the damage that SANDAG has wrought on the region's transportation planning. San Diego needs a 25% emission reduction target. This target is not only feasible, but also necessary to put San Diego on track for the 21st century.

In comparing San Diego's transportation system to other large cities the injustices become even clearer. **While San Diego is the eighth largest city in the country, its transportation system ranks 33rd of U.S. cities with populations of more than 65,000 for trips per resident¹.** San Diego lags behind most large cities and even communities with populations as small as 70,000. Historically, Los Angeles and San Francisco have dedicated about 65% of their funding to transit -- while SANDAG only

¹ <https://fivethirtyeight.com/features/how-your-citys-public-transit-stacks-up/>

dedicates 45%². According to the United States Census Bureau's 2016 American Community Survey, 75.66% of San Diego workers over the age of 16 drive alone to work while only 2.88% use public transportation. By comparison, in Los Angeles, 73.9% of workers drive alone and 6.02% use public transportation. Los Angeles averages more than twice San Diego's rate of transit commuting with 209% more public transportation ridership than San Diego. Further, Los Angeles plans to revolutionize their transportation system to include electrification of transit and transportation infrastructure expansion. Measure M, a half-cent tax that was widely approved by county voters, allows LA Metro to begin implementing a \$120 billion plan over 40 years for a large array of projects for transit and transportation infrastructure. They will begin by focusing on 28 transportation projects before the year 2028. These projects not only promote greater transit ridership, they also demonstrate what planning for Vehicle Miles Traveled (VMT) reduction looks like. Higher emission reduction targets are possible through ambitious projects like these that prioritize VMT reduction and a shift in mode share.

These discrepancies affect low-income communities of color in critical ways. Unfortunately, the residents who suffer the most from SANDAG's lack of action are those living in low-income communities of color. Residents from disadvantaged communities like Barrio Logan and West National City rank in the top 10% of the most impacted census tracts for pollution in the entire state; due in significant measure to their proximity to freeways. These higher rates of exposure to traffic pollution lead to more asthma attacks and to higher risks of chronic diseases. These residents are both the most impacted by freeway pollution, and the greatest users of public transit. For these regular transit users, an efficient, accessible, and affordable transit system makes it possible to feed their families. According to the Brookings Institution, however, **the average resident in the San Diego region can only reach 29% of jobs within 90 minutes on public transit³.**

SANDAG's transportation planning is largely responsible for a system that advances freeway expansions, causing significant pollution, and then subsequently forgets impacted communities. SANDAGs adamant adherence to an 18% emission reduction target, one that so clearly absolves them of any real changes, should be rejected. Past discrepancies in SANDAG modeling demonstrate

² IBEW Memorandum, To: Assemblymember Lorena Gonzalez Fletcher, RE: SANDAG Structure and Policy Improvement Discussion.

³ Adie Tomer, Elizabeth Kneebone, Robert Puentes, and Alan Berube. 2011. "Missed Opportunity: Transit and Jobs in Metropolitan America." Appendix 5. Brookings Institution.
http://www.brookings.edu/~media/research/files/reports/2011/5/12-jobs-and-transit/0512_jobs_transit.pdf.

that relying primarily on MPO analysis for emission reduction target setting can have grave consequences for San Diego's residents. **In November of 2014, the California Court of Appeal held that SANDAG violated CEQA by approving a defective EIR in connection with its 2011 Regional Transportation Plan.** In a case filed by the Cleveland National Forest Foundation along with other environmental organizations and intervened in by the State Attorney General, the Court of Appeal stated that SANDAG **"misled and misinformed the public"** on five key issues raised by the plaintiffs. SANDAG sought to reverse these rulings, but the Supreme Court allow four of them to stand: the EIR's failure to adequately address the plan's public health effects, failure to consider alternatives to reducing GHGs, failure to mitigate the plan's GHG emissions, and failure to disclose the effects of the plan to regional farmlands. In November 2017, the Court of Appeal reissued its decision on these important points, and ordered the decision published. In light of the Court's sweeping rulings, it would be a mistake to ignore SANDAG's long history of not being forthcoming and refusal to work in earnest when developing effective plans to reduce GHG emissions.

In addition to underfunding transit and active transportation, SANDAG modeling around VMT has also missed the mark. On November 29, 2017, the San Diego Union Tribune revealed that the reports of significant progress by San Diego in reducing VMT as part of the Climate Action Plan were faulty. Specifically, because San Diego's greatest emissions are from transportation, the experts drafting the climate plan focused on VMT reduction estimations as methods for reducing emissions. They based this estimation on economic and demographic forecasting data provided by SANDAG. Based on this data, there appeared to be a steady decrease of VMT. An updated report from SANDAG, however, shows that VMT actually increased significantly since 2010; highlighting a discrepancy between the Climate Plan and SANDAGs current analysis of about 1.3 billion more VMT in 2016. This new information demonstrates that San Diego is much more behind as a region than previously thought.

Voice of San Diego exposed SANDAG for wrongly projecting revenue from tax measures during the last election cycle. On a proposed tax measure in November 2016, SANDAG knowingly misled voters about how much revenue would be realized if Measure A, a proposed half-cent sales tax, were to be approved. According to experts, SANDAGs revenue projections were off by at least \$5 billion. Voice of San Diego found that SANDAG knew about the incorrect projections 11 months before the vote, but continued to use them. Although Measure A failed, it revealed a disturbing fact: **SANDAG is not accountable to the people of San Diego.** The undersigned organizations have worked tirelessly for a transit-focused transportation system for

many years. However when this scandal became known, we turned to the State Legislature for relief. Help came in the form of AB805, a state bill authored by Assemblymember Lorena Gonzalez-Fletcher that reforms SANDAG to make transportation planning more democratic and transit-focused in San Diego. **The passage of AB805 signals a new day for transportation in San Diego. The public is hopeful that a new governance structure will embrace more sustainable and equitable transportation planning that will include more ambitious GHG emission reductions.**

CARB staff has attempted to remediate SANDAG's insufficient actions with a 21% emission reduction target. However, **CARB's plan for a 21% emission reduction target does not make up for the decades of pollution in our communities or the years of inadequacy described above.** If San Diego as a region can focus on reducing VMT and making changes in our mode share, we can reduce GHG emissions by 25%. SANDAG has delayed making these necessary changes in their plans and funding structure for the previous two RTPs even when other MPOs have. Road expansion funding, on the other hand, has remained steady over the last ten years. SANDAG should not be delaying the changes in priority that our communities need.

There are many ways for SANDAG to further reduce emissions. However, as the passage of AB805 clearly demonstrated, at this point we need support and enforcement from CARB. This letter represents a united regional voice represented by the undersigned organizations representing a diversity of communities and issues.

Thank you for your attention to our request for an aspirational and feasible target for the San Diego region that will benefit all communities.

Sincerely,

Ana Reynoso
Transportation Justice Policy Advocate
Environmental Health Coalition



Jack Shu
President
Cleveland National Forest Foundation



Pam Heatherington
Environmental Center of San Diego



Mike McCoy
President
Southwest Wetlands Interpretive Association



David Harris
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