



September 21, 2011

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Review of SANDAG's 2011 RTP / SCS

Dear Chairman Nichols,

Sierra Club California has serious concerns about the San Diego Association of Government's (SANDAG) draft Sustainable Community Strategy (SCS). We request that you reject the California Air Resources Board (CARB) staff's proposal to approve SANDAG's SCS at this time. We ask that you urge SANDAG staff to revise the SCS prior to certification, after which it should come back to this board for your review.¹ The following is a non-exhaustive list of proposed suggestions and concerns:

1. SB 375 calls for transparency and public participation. In order for the public and decision-makers to make an informed decision about the adequacy of the document, sufficient time to review the document is imperative. However, CARB Staff's comment on SANDAG's SCS was released less than one week before this week's expected board vote on the plan. The time allotted is insufficient for board members and members of the public to comment on a document of this magnitude. With SANDAG leading the way as the first metropolitan planning organization (MPO) to submit its SCS, we believe that approving this SCS so hastily would set an unacceptable precedent affecting the 18 MPOs to follow.
2. It is unclear how SANDAG is expecting to achieve the GHG reduction targets. SANDAG is the *only* major MPO whose planning model is not fully transparent. The lack of transparency prohibits the public and decision-makers from fully discerning the source of the claimed GHG reductions. For instance, SANDAG has stated that a significant factor in achieving the 2020 target is the weak economy. In its current state, it is impossible to determine by how much their GHG reductions are dependent on a weak economy. MPOs need to provide the foundational information and research upon which they base their greenhouse gas (GHG) assumptions and emissions projections. A refusal to release the script files (raw data), which embody the agency's fundamental modeling assumptions, would contravene SB 375's mandate to make the modeling information available and

¹ It is important to reiterate CARB's role in the process to "acceptance or rejection of the MPO determination of the strategy (SCS) would, if implemented, achieve the greenhouse gas reduction targets." Cal. Government Code Section 65080(b)(92)(J)(ii).

useable. The legislative history of SB 375 emphasizes the importance of ensuring that regional transportation agencies provide their modeling information directly to the public for purposes of transparency and accountability.²

3. SANDAG's SCS establishes a dangerous and unacceptable precedent of backsliding that undermines the region's and the state's ability to meet future GHG goals. SANDAG's emissions reductions levels actually decrease over time: the RTP/SCS correctly identifies that per capita reduction will drop sharply to nine percent by 2050. This is despite the Regional Target Advisory Committee's findings that it is feasible for emissions reduction levels to increase over time given appropriate planning. CARB must hold MPOs accountable to greater emission reduction levels over time, not less, where it is feasible, as it is in San Diego.
4. The funding allocations for transit and other alternatives to automobile transportation in SANDAG's RTP do not match up with their mode share assumptions. CARB should take a proactive stance and challenge SANDAG to "show their work" by providing the evidence of how the investments back up their mode share assumptions. Furthermore, without a clear breakdown of where SANDAG's accounting for the claimed GHG reductions, we must assume that increases in bicycle trips, walking trips, and transit trips are crucial to meeting their targets. Without these increases, SANDAG may not be able to meet its targets, in which case CARB is legally obligated to reject SANDAG's SCS.
5. CARB should be very concerned about SANDAG's insistence on prioritizing road and highway expansion.³ These projects divert funding from emissions-reducing transportation projects, and are not accurately accounted for in SANDAG's Draft Environmental Impact Report. It is of heightened concern that the current draft of the SCS provides that seventy-two percent of the transit budget is confined to the last two decades – commencing in 2030. Road widening could lead to induced demand and greater GHG emissions.⁴ To reduce vehicle miles traveled (VMT) and GHG emissions, SANDAG's SCS should focus on expanding transit options, other alternative transportation modes, and pedestrian, bicycle, and transit friendly communities.
6. If the board approves SANDAG's SCS, it risks making SB 375 nothing more than a tool for local governments to undercut the California Environmental Quality Act (CEQA). The CEQA streamlining provisions in SB 375 grant developers an opportunity to take advantage of transit projects that may never be built or reach capacity -- it is crucial that

² Section 14522.2 specifies that SANDAG must disseminate the information in a "usable" format. This means that SANDAG must provide to the public all the information used to complete the transportation modeling, with the exception of the TransCAD program itself.

³ The region's existing transportation network is dominated by roads; there are over 1600 miles of highways and arterials and only includes 123 miles of regional transit service. RTP/SCS at 6-2.

⁴ Induced and generated traffic are concepts supported by empirical evidence that clearly demonstrate that widening highways is merely a temporary solution to the complex problems of traffic congestion. A 2011 report from the Victoria Transportation Policy Institute explains that "[r]oad improvements that reduce travel costs attract trips from other routes, times and modes, and encourage longer and more frequent travel." Todd Litman, Generated Traffic and Induced Travel: Implications for Transport Planning (June 8, 2011) <http://www.vtpi.org/gentraf.pdf>.

the MPOs provide fully realized and guaranteed results in return for CEQA streamlining. It is strongly encouraged that CARB staff and board members hold MPOs accountable for the proposed targets, proper planning and actions.

The board should recommend SANDAG make the following commitments to implement the SCS and ensure the 2035 GHG target will be achieved:

1. Make the planning model and raw data available to the public for scrutiny.
2. Develop an early action program and implementation mechanism for active transportation (bicycle and pedestrian) and transit investments.
3. Develop a detailed transit infrastructure and operation-funding plan that identifies the actions needed to make transit assumptions a reality (inclusive of a performance and competitive based system i.e. no less than 15 minute intervals during peak hours).

For the reasons stated above, we strongly urge the Board to reject the proposal before you and provide recommendations to SANDAG on how to improve their SCS before the SANDAG board considers it next month.

Sincerely,



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