



October 24, 2011

Honorable Jerome Stocks, Board Chairman
Honorable members of the SANDAG Board of Directors
SANDAG
401 B St. Ste 800
San Diego, CA 92101

Re: Suggested Improvements to SANDAG's Final 2050 RTP

Chairman Stocks and members of the SANDAG Board:

On occasion of the adoption of California's first SCS/RTP under SB 375, we are writing to commend SANDAG on some important recent improvements to the plan and to re-iterate our recommendations for strengthening this precedent-setting plan.

This RTP takes some important steps in the right direction and has been acknowledged for its market appropriate housing mix, significant increase in funding for active transportation and transit, and its innovative Transportation Demand Management (TDM) programs.

Since the issuance of the draft SCS/RTP this spring, we have been working in good faith to develop a discrete set of suggested improvements to the plan¹. SANDAG has recently adopted amendments to address our concerns and our purpose here is to acknowledge the good work that has been done. We are also concerned, however, that the amendments made to date do not fully address our concerns in a number of important respects.

Below, please find our original six recommendations, SANDAG's responses to date, and our specific policy suggestions as to how the final 2050 SCS/RTP could be enhanced in your final vote this Friday to address these concerns.

1. SANDAG should commit to developing more aggressive integrated land use and transportation scenarios that go beyond adopted general plans (particularly in the North County) that, if implemented, would reverse the "backsliding" in the "out years."

SANDAG's response is to: *Incorporate the concepts and recommended actions of the 2050 RTP into the next update of the RCP, including alternative land use scenarios*².

¹ http://switchboard.nrdc.org/blogs/aeaken/with_carbs_leadership_sandag_s.html

² Chapter 3, page 3-79, Action item 1

Recommended Action: We are pleased to see SANDAG commit to examining alternative land use scenarios in the RCP – an element we believe was noticeably absent from this RTP/SCS process. In your resolution adopting the 2050 RTP/SCS, SANDAG should commit to developing integrated land use and transportation scenarios which preserve and exceed the GHG reductions gained by 2035 all the way through 2050. This “backsliding” was the number one concern raised at the Sept 22 ARB board meeting, and some organizations question whether SANDAG has truly achieved its 2035 GHG targets if this progress is eroded over time. SANDAG needs to commit to developing both alternative land use and transportation investment scenarios which reverse this disturbing trend as part of the next iteration of the Regional Comprehensive Plan. In developing these scenarios, it is essential that SANDAG preserve the flexibility to adjust transportation investment assumptions to complement the alternative land use scenarios.

2. SANDAG must commit to develop, and not just "consider" developing an Early Action Program and implementation mechanism for active transportation investments.

SANDAG’s response is to “*Develop an Active Transportation Early Action Program*”³.”

Recommended Action: Our original hope was that SANDAG would *adopt* an active transportation early action program with concrete projects and investment levels concurrently with the 2050 RTP. We appreciate the commitment in the RTP to *develop* this program, but such a commitment is meaningful only if tied to a date certain. We therefore request that SANDAG bring to the board a proposed Early Action Program for bike and ped projects--as well as for Safe Routes to Transit and Safe Routes to Schools– laying out near-term funding (next 5 years) no later than May 1, 2012.

3. SANDAG should commit to develop a Transit Oriented Development (TOD) Policy to encourage the development of walkable, mixed use neighborhoods in the direct vicinity of transit stations.

SANDAG’s response is to: *Prepare a regional Transit Oriented Development strategy as part of the RCP update*⁴ and to *Pursue joint development opportunities to promote the construction of sustainable housing and mixed-use projects at existing and planned transit stations.* (p. 3-80 17)

Recommended Action: We are pleased to see SANDAG commit to creating a TOD Strategy, and we would like to see more detail. We continue to believe that Resolution 3434 in the Bay Area provides a good model: transit funding to local agencies there is contingent on the adoption of transit-supportive land use patterns in station areas. We request that SANDAG study this policy as a model, and at a minimum adopt a TOD policy that incentivizes local governments to adopt transit-supportive land uses—including carefully evaluating parking policy, and ensuring walkability-- around transit stations.

³ Chapter 6, page 6-79, Item 45.

⁴ Chapter 3, P3-79 2

4. Since a robust transit infrastructure is critical to making those areas that have already committed to smart growth (e.g. City of San Diego) "livable" at the new permitted densities, SANDAG should commit to developing a detailed transit operations funding plan that identifies the actions needed to make assumed mode shares in 2020 and 2035 a reality (i.e. where to get extra funding).

SANDAG's response is to continue to refine the Quality of Life Funding Strategy and determine the appropriate time to seek voter approval⁵.

Recommended Action: Since our understanding is that actual unmet transit need is \$11 billion and the Quality of Life Measure is unlikely to yield the full amount needed, we would like to see SANDAG continue to explore other funding opportunities for transit, including a "re-assessment of the transportation network" as recommended by the Air Resources Board, to determine whether all projects conceptualized prior to the passage of SB 375 – including TransNet projects – meet the region's goal of sustainability and livable communities. Projects that are determined to undermine this goal need to be re-evaluated. In addition, we would like to see SANDAG come to the table to support new legislative proposals that give MPOs new authority to raise local revenue for transportation options. We also commit to work proactively and cooperatively with SANDAG and our partners to seek and support new funding for transit

5. SANDAG should open its travel model to public review and be prepared to disclose the relative contribution of various elements of its SCS (e.g. managed lanes, mode shift to transit, congestion reduction, reduced average trip lengths, telecommuting assumptions) to claimed reductions in 2020 and 2035.

SANDAG Response: Discussions with your staff indicate that SANDAG's new activity based model will be open source, though this is not documented in the RTP.

Recommended Action: We would like to see a written commitment to an open source activity based model. To further increase transparency, SANDAG should include a discussion on project prioritization in its next RTP, and identify how each project is aligned with current goals, including GHG emissions reduction. A discussion of options and constraints in reordering the project delivery schedule, to deliver projects in earlier years to support the growth of transportation efficient communities, could shed light on further opportunities to reduce GHG emissions.

6. SANDAG should commit to adopting a Complete Streets Policy.

SANDAG's response is to: *Develop a regional Complete Streets policy. (Chapter 6, p6-79, Item 54) and: Through the development review process, continue to provide comments to local jurisdictions that encourage development patterns that promote walking, bicycling, and access to public transit in existing and potential smart growth areas and in or near major public*

⁵ Ch 3, P 3-81, Item 28

facilities such as colleges and hospitals, and that encourage reconfiguration of the public right of way to create complete streets. (Chapter 3, Page 3-81, Item 31.)

Recommended Action: We are pleased to see SANDAG make this commitment and look forward to working with your staff to develop this policy. We would like to see a commitment from the Board to a date certain by which staff will bring this policy to the board for adoption. We recommend October 1, 2012.

We appreciate the opportunity to work with SANDAG staff on California's first Sustainable Communities Strategy and Regional Transportation Plan. While we continue to be concerned about the plan's emissions backsliding between 2020 and 2050, we do recognize that staff has worked tirelessly within existing constraints to create this plan. We believe that if SANDAG makes these proposed amendments it will greatly improve the plan and be taking a meaningful step towards regional sustainability. We look forward to working with you to implement these changes.

Sincerely,



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