



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 and California Air Resources Board Members:

On behalf of the undersigned members of ClimatePlan, we thank you for your extensive efforts to implement SB 375, California's Sustainable Communities and Climate Protection Act. This landmark law has moved steadily forward under the leadership of your Board and the hard work of your staff.

We are also grateful to the staff and elected officials who serve on the board of the San Diego Association of Governments (SANDAG). Their draft Sustainable Communities Strategy/Regional Transportation Plan (RTP/SCS) includes some very positive elements including:

- \$53 billion for transit operations and maintenance, which is both more money and a higher percentage of funds for transit than ever before.
- A commitment of \$2.58 billion in long-term funding over 40 years dedicated to Active Transportation, bicycle and pedestrian improvements, with new connections to transit, and including Smart Growth Incentive Planning money, which is a 350 percent increase from the last plan. This is enough funding to implement the newly adopted Regional Bike plan, which will result in increased safety and public health for the region.
- Reallocation of a portion of I-5 project funds to support the smart growth incentive program and the advancement of a key urban rail project.
- A more robust outreach effort to involve more stakeholders in the planning process.

As we applaud SANDAG's commitment to SB 375, we also realize that there is more that they still need to do. As ARB reviews its first SCS, we encourage the Board to set ambitious expectations for all Metropolitan Planning Organizations. We urge the Board to ask SANDAG to make the following additional commitments to ensure achievement of its GHG targets:

I. Give extra scrutiny to draft plans where per capita GHG emissions increase over time

Greenhouse gas reductions from planning decisions and transportation investments should increase over time as walkable, equitable communities with transportation choices are built. As

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ARB's staff report noted, in SANDAG's RTP/SCS, per capita greenhouse gas reductions peak in 2020, then erode over time.

To address this concern, **SANDAG should commit to developing more aggressive integrated land use and transportation scenarios in their upcoming Regional Comprehensive Plan (RCP) that go beyond adopted general plans that, if implemented, would reverse the backsliding in the "out years."** Such scenario planning could also revisit SANDAG's policy of allocating 94% of state and federal discretionary dollars to match TransNet projects, and instead examine alternative transportation investments that support different land use patterns. **In addition, SANDAG should commit to monitoring the implementation of the land use pattern described in its SCS,** with an update on the type and location of developments approved in the region prior to its next RTP/SCS.

II. Ensure that ambitious projections are supported by secure commitments

The RTP/SCS must be an internally consistent document (Government Code Section 65080(b)). The plan's forecasted development pattern and other assumptions need to be supported by complementary transportation investments and policies, or else the projected greenhouse gas reductions may not be achieved. SANDAG's GHG projections rely upon several ambitious assumptions that are not yet backed up by solid policy and funding commitments, without which the ambitious assumptions – and therefore SANDAG's projected GHG reductions – likely will not be realized. Specifically:

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 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.

III. Request a commitment to the ongoing development of co-benefit measures

The land use and transportation improvements in strong RTP / SCSes not only reduce greenhouse gases but also improve air quality and help regions become healthier, more equitable, and more sustainable. The RTAC identified a comprehensive range of co-benefits expected to improve in tandem with GHG, further developed in the RTP guidelines adopted by the California Transportation Commission.

ARB should continue to work with MPOs on projecting and then reporting their progress against a full suite of indicators during the RTP implementation period. In this way, ARB can ensure GHG reductions are measured accurately and achieved via ambitious but achievable strides toward the vision set out by SB 375. Where MPOs currently lack the capability to measure these indicators, they should commit to taking the necessary actions to achieve that capability for the next round. In this instance, as SANDAG upgrades its models, it should commit to developing additional public health, equity, environmental conservation and economic performance indicators for the next SCS/APS.

IV. Review the greenhouse gas compliance of future SCSs earlier in the process

ARB has played an essential role in SB 375 implementation and ensuring an inclusive, public process for monitoring its implementation. For these forums to have greatest benefit, we believe that the ARB Board should have the opportunity to provide input to SCSes earlier in the process, while major revisions are still possible. ARB's analysis of the SANDAG SCS has provided invaluable information, and future SCSes would greatly benefit from having this sort of analysis in earlier stages of the process.

We again express our appreciation and gratitude to the Board and staff of both the ARB and SANDAG. Your efforts to implement SB 375 can help reduce climate change and help ensure that future generations of Californians have cleaner air and water; more active lives and healthier places to live; a stronger and more resilient economy; and greater opportunity for people across the economic spectrum.

Sincerely,

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