

June 23, 2010

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

Re: Comments on SB 375 for CARB Workshop in San Diego

Dear Chairman Nichols,

Save Our Forest and Ranchlands (SOFAR) and the Cleveland National Forest Foundation (CNFF), two organizations dedicated to progressive land use planning and the protection of vital natural resources in San Diego County, submit this letter with regards to target setting for SB 375.

For the last several years, we have diligently participated in the San Diego Association of Governments' (SANDAG) transportation planning processes in an effort to create sustainable regional transportation and land use for the San Diego region. SANDAG's previous regional transportation plan, (the 2030 RTP), was a failure on many levels. SOFAR, along with the Attorney General of California, criticized SANDAG for that Plan's continued emphasis on funding highway capacity at the expense of transit service. Not surprisingly, the environmental impact report (EIR) for the 2030 RTP determined that, if implemented, the Plan would have significant unavoidable and unmitigable impacts in almost every environmental category:

"Significant unavoidable and unmitigable impacts would occur to land use, visual resources, energy, and biological resources and there would be cumulatively significant impacts to land use, visual resources, air quality, noise, energy, global climate change, geology/paleontology, water resources, and biological resources, cultural resources, hazards and hazardous materials." Source: SANDAG Statement of Overriding Considerations for the 2030 RTP.

In 2007, we were party to a settlement agreement with SANDAG regarding the 2030 RTP. This Agreement requires that SANDAG prepare and include in the 2050 RTP environmental impact report an Urban Area Transit Strategy. The purpose of the Urban Area Transit Study is to assess opportunities for making transit time-competitive with the automobile, evaluate parking management strategies that promote transit usage, develop transit mode share goals, and to identify funding strategies for capital and operations for new services.

SANDAG is currently in the process of developing the 2050 RTP. Notwithstanding the requirement to seriously study the Urban Area Transit Strategy and to include a Sustainable Communities Strategy (SCS) in compliance with SB 375, SANDAG appears intent on continuing its business as usual approach to accommodating and encouraging the private automobile. SANDAG is not planning for substantial change with the 2050 RTP; instead, the SANDAG Board of Directors recently voted to use full build-out of the 2030 RTP as a starting point for the new plan. As a result, according to planning experts, in the near future SANDAG will be spending approximately 278% more money on road expansion than on transit expansion. Indeed, under the 2030 RTP, SANDAG proposed 20-40% more roadway and freeway expansion than that expected to be built in Los Angeles, San Francisco and Sacramento.

In a time when nearly every urbanized region appears to be promoting and planning transit-oriented development, SANDAG's antiquated approach to transportation planning is extraordinarily alarming. At the same time, SANDAG should be the leader inasmuch as it is the first Metropolitan Planning Organization ("MPO") to develop a Sustainable Communities Plan pursuant to SB 375. Yet SANDAG is leading us down an entirely unsustainable path while its preliminary modeling paints a deceptively rosy picture. SANDAG's preliminary modeling data shows that the region could achieve relatively high GHG reduction targets when compared to California's other large MPOs. Yet something is very wrong with this picture: how would the 2050 RTP result in substantially reduced GHG emissions when it uses the highway-oriented 2030 RTP as its foundation? It seems the answer is that SANDAG is managing freeway capacity to achieve emissions reductions instead of making any substantial changes to the transportation system such as prioritizing and funding major transit initiatives such as the Urban Area Transit Strategy. The tragedy looming over this process is that SANDAG will potentially get a free pass on a documented unsustainable transportation plan, while using emissions reductions to claim sustainability.

In San Diego, the problem with focusing on GHG emission reductions is that we are treating a symptom of unsustainability, rather than addressing the cause. The environmental analysis of the 2030 RTP suggests that the fundamental cause of climate change and many other regional issues is the region's transportation system.

In sum, we are extremely concerned that the San Diego region will not make the substantial changes to our transportation infrastructure -- prioritizing transit and deemphasizing freeway and roadway projects -- that are necessary to actually meet the challenges of SB 375 and improve the region's quality of life. Unless agencies such as CARB apply pressure to MPOs to adhere to the spirit and intent of SB375, the 2050 RTP will not result in a sustainable region.

For further information, please refer to our website:

[www.transitsandiego.org](http://www.transitsandiego.org)

In addition, you may view comment letters that we have submitted to SANDAG, and an opinion piece that was published in San Diego on this subject here:

[http://www.transitsandiego.org/transitsandiego/pdf/SOFAR\\_Letter\\_5.27.10.pdf](http://www.transitsandiego.org/transitsandiego/pdf/SOFAR_Letter_5.27.10.pdf)

[http://www.transitsandiego.org/transitsandiego/pdf/SOFARCNFF\\_7.16.10\\_Final.pdf](http://www.transitsandiego.org/transitsandiego/pdf/SOFARCNFF_7.16.10_Final.pdf)

<http://www.signonsandiego.com/news/2010/jul/16/long-term-transportation-plan-deeply-misguided/>

Thank you for considering these important matters.

Sincerely,

A handwritten signature in black ink that reads "Duncan McFetridge". The signature is written in a cursive, flowing style.

Duncan McFetridge, Executive Director