



**STAY COOL**

PROTECT OUR GRANDKIDS FROM GLOBAL WARMING

October 31, 2018

Kim Kawada  
Chief Deputy Executive Director  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101

Re: Comments on 2019 Regional Plan - Network Concepts

Dear Ms. Kawada,

We appreciate the opportunity to provide comments to the San Diego Association of Governments (SANDAG) on the 2019 Regional Plan Network Concepts, which were discussed by the SANDAG Board of Directors on October 12, 2018 and have been presented at a series of community meetings during the past month.

*STAY COOL for Grandkids* is a non-profit organization of volunteer grandparents, elders and other citizens in the San Diego region dedicated to preserving a livable climate in the name of those too young to have a voice: our future generations. Along with other organizations in our region, we advocate for meaningful action on climate change and support policies that will have a lasting effect by reducing greenhouse gas emissions and protecting our quality of life. We also educate our youth and our peers on climate science, public policies, and practical actions to reduce greenhouse gas emissions.

STAY COOL believes it is unconscionable for us to leave the burden of mitigating and adapting to dangerous climate change on the shoulders of future generations. By continuing to delay significant reductions in greenhouse gas emissions, we increase the likelihood of severe health impacts, food and water scarcity, irreversible damage to the natural environment, and untold degradation of the quality of life. According to the recent IPCC Study, we're now at a fork in the road: either we cut out fossil fuels completely, or we pass on a dying planet to our children.

In August 2018, the State of California released **California's Fourth Climate Change Assessment**, which includes:

- A **Statewide Assessment**, which includes in-depth analysis of short-term and long-term risks to California that will result from climate change [www.climateassessment.ca.gov/state/index.html](http://www.climateassessment.ca.gov/state/index.html)
- The **San Diego Region Report**, which provides a first-of-its kind detailed assessment of the risks that threaten our own region. [www.climateassessment.ca.gov/regions/docs/20180928-SanDiego.pdf](http://www.climateassessment.ca.gov/regions/docs/20180928-SanDiego.pdf)

While these reports paint a grim future for our state and region in the coming decades, the authors have also put forward suggested actions that can be taken by all levels of government, the private sector, and non-governmental organizations to address these impacts through adaptation and resilience strategies, while at the same time working to reduce GHG emissions to the greatest extent feasible.

To summarize, STAY COOL believes it is essential that SANDAG adopt a 2019 Regional Plan that meets or exceeds the 2035 Greenhouse Gas Emission (GHG) Reduction Target, pursuant to SB 375, while at the same time meeting other important regional goals related to long-term sustainability, including social equity, a healthy natural environment, and economic prosperity.

### **STAY COOL'S ONGOING EFFORTS TO SUPPORT A "CLIMATE-SMART" REGIONAL PLAN**

Over the past several years, STAY COOL has been a strong advocate for "climate-smart" planning at both the regional and local levels. We believe that it is critical for the San Diego Region to have a strong Regional Plan and implementation program that is synchronized with local government General Plans and Climate Action Plans. In March 2018, STAY COOL representatives testified before the California Air Resources Board, recommending that CARB adopt ambitious 2035 GHG reduction targets for the San Diego Region (see Attachment A). In July and August 2018, STAY COOL representatives met with you and other SANDAG senior staff to discuss the 2019 Regional Plan Update. During our second meeting on August 16, we laid out an updated and refined list of recommended GHG reduction measures that had been presented to CARB in March, and we discussed specific ways in which each of them could be incorporated into the 2019 Regional Plan.

### **SANDAG'S REGIONAL PLAN NETWORK CONCEPTS**

As you know, earlier this month SANDAG staff presented a report to its Board of Directors that sets forth three distinct "Regional Plan Network Concepts," and solicited input from the Board on these concepts at a Board Workshop held on October 12. In addition, SANDAG staff held a series of public meetings, including an Open House and six "Community Conversations" to solicit public input on these concepts. Finally, SANDAG ran an on-line survey to solicit further public input on the concepts, and encouraged individuals, public agencies, and stakeholder groups to submit written comments on the concepts during October. STAY COOL has actively participated in this process.

In its Board Agenda Report, SANDAG staff has summarized the three Regional Plan Network Concepts as follows<sup>1</sup>:

**Concept A: Shared Mobility** emphasizes more transit connections through earlier project delivery, increased frequency, and additional services and routes.

**Concept B: Connected Corridors** emphasizes major corridor improvements for highway and transit services within the region's existing regional freeway and highway system and concentrates on completing a connected system of Managed Lanes.

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<sup>1</sup> SANDAG Board of Directors Agenda, October 12, 2018, Item 2, page 1.

**Concept C: Policy Possibilities** emphasizes actively managing the transportation network through new technologies, policies, and programs. Flexible funding is focused on transit with reduced fares and mobility management programs and incentives.

The SANDAG agenda report also includes an analysis of the expected “performance outcomes” for each of the three Network Concepts<sup>2</sup>. With regard to meeting the required 2035 GHG Reduction Target, the report indicates that “only Concept C would meet the 2035 SB 375 greenhouse gas reduction target of 19 percent per capita by achieving 21.3 percent per capita. Concept A and Concept B would achieve a reduction of 14.7 percent and 14.1 percent, respectively.”

Another important performance outcome is the impact of each of the Network Concepts on disadvantaged communities. The report indicates that “Concept A and B would include modest increases in transportation expenditures for low-income persons and modest decreases for minorities and seniors. Concept C would include increases for all populations, most notably for low-income persons, with an additional 16.7 percent increase in income consumed by transportation costs as compared to 5.8 percent increase in income consumed by transportation costs for the non-low-income population.”

## ANALYSIS

STAY COOL believes that the work done by SANDAG staff in preparing and presenting the 2019 Regional Plan Network Concepts has been useful in helping decision-makers, stakeholder groups, and the community-at-large to:

- Gain a better understanding of the various difficult trade-offs that must be addressed in developing the Plan, and
- Provide initial input on these concepts and the associated trade-offs.

Based on our review, we believe that Concept C provides the best overall framework for developing refined scenarios in the next phase of the planning process. Specifically, we agree with the basic approach that was used by SANDAG staff in formulating Concept C, which as we understand it is:

- To start with a transportation network infrastructure concept that allows for significant improvements in transit service and multi-modal access, but which appears to be more cost-effective than Concept A due to greater use of Rapid Bus and other lower-cost fixed route corridor improvements; and
- To strategically incorporate policies, programs, and technological improvements that will further enhance the overall performance of the region’s transportation system, while at the same time meeting the region’s GHG reduction target for 2035.

However, after reviewing the reports and participating in the public meetings, three key points remain:

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<sup>2</sup> SANDAG Board of Directors Agenda, October 12, 2018, Item 2, pp. 39-40.

- We are very concerned that only one of the three Network Concepts meets the 2035 GHG reduction target that was set by CARB in March;
- We are disappointed to see that many of STAY COOL’s recommendations were not included or addressed in any of the Network Concepts;
- We are very concerned that Concept C performs worse than the other two Concepts regarding its impacts on disadvantaged communities.

## RECOMMENDATIONS

STAY COOL strongly recommends that SANDAG give further consideration to the ideas that we presented to CARB during the target-setting process and that we have also discussed with SANDAG staff over the past several months.

### 1. SANDAG staff should further explore the use of “multiple-benefit” plans, projects and programs to obtain GHG reductions in the 2019 Regional Plan.

There are a variety of possible projects and programs that could provide multiple benefits from an environmental, economic and social equity perspective, and would potentially be creditable toward meeting GHG reduction targets for SANDAG. In addition, it should be emphasized that multiple-benefit projects and programs can often qualify for funding from sources other than the traditional transportation-related sources.

A good example of a potential multiple-benefit approach in transportation is the combined use of “Complete Streets” and “Green Streets” design concepts for roadway replacements and extensions. The use of “Complete Streets” that improve multi-modal access and safety is a well-accepted GHG reduction strategy that is being implemented in local communities throughout San Diego region pursuant the *Regional Complete Streets Policy*<sup>3</sup> that was adopted by SANDAG in 2014. “Green Streets” can include the same travel way design as Complete Streets but are also designed to meet specific stormwater pollution reduction requirements and have been approved by the San Diego Regional Water Quality Control Board. Green Streets can also provide significant water conservation benefits, along with other co-benefits. The San Diego County Public Works Department has now incorporated “Green Streets Guidelines” into its adopted *BMP Design Manual*<sup>4</sup>, and other local governments in the San Diego region are following the County’s lead. The use of an integrated “Complete Street / Green Street” concept is thus a cost-effective way for new development and redevelopment projects to help meet their transportation improvement requirements and their stormwater pollution reduction requirements. At the same time, by taking this multiple-benefit approach such projects could qualify for use of transportation funds as well as other State grant programs for water conservation projects, including set-aside funds for disadvantaged communities.

We believe there are many other opportunities to incorporate “climate-smart” strategies and design features into plans, projects and programs. Some examples are:

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<sup>3</sup> [http://www.sandag.org/uploads/publicationid/publicationid\\_1909\\_18570.pdf](http://www.sandag.org/uploads/publicationid/publicationid_1909_18570.pdf) .

<sup>4</sup> [https://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction/BMP\\_Design\\_Manual.html](https://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction/BMP_Design_Manual.html) ; see Appendix K-2, Green Street Guidelines

- Habitat conservation plans and strategies;
- Watershed management plans and strategies;
- Water resource plans and strategies;
- Affordable housing strategies; and
- Coastal access and visitor transport strategies.

In developing this approach, SANDAG and CARB staff should encourage participation by regional and local government agencies, along with key stakeholder groups. In addition, CARB staff should solicit input from affected State agencies such as California Department of Fish and Wildlife, Department of Water Resources, San Diego Regional Water Quality Control Board, Department of Housing and Community Development, California Coastal Commission, Caltrans, and the Governor’s Office of Planning and Research.

- 2. SANDAG should work with CARB and other responsible State agencies to provide clear guidance regarding how GHG reductions from “multi-jurisdictional” plans and projects should be allocated, and the Regional Plan should include an analysis and recommendations regarding regionally significant plans, projects and programs that are being implemented by other regional and local public agencies.**

Such plans and projects would include not only major highway and public transit infrastructure such as “managed lanes” (which can often be financially supported by several different public agencies), but also transportation projects and programs that directly serve major public facilities, such as education facilities, airports, and port transportation projects. Most of the local governments (cities and County) in the San Diego region have either adopted or are in the process of completing and adopting Climate Action Plans. In addition, many public agencies other than local governments have developed and adopted Climate Action Plans. A notable recent example is the *San Diego Unified School District Climate Mitigation and Adaptation Plan* adopted in October 2017. This plan includes a commitment to 100% renewable energy, along with actions related to climate-smart transportation options for students, faculty and staff.

It should be noted here that existing state laws, including the California Environmental Quality Act, allow a public agency to establish a mitigation program to help pay for projects and programs necessitated by new development and redevelopment within its jurisdiction. This principle applies not only to local governments but also to development projects approved by any state, regional or local public agency, such as: educational institutions (e.g., public universities, community colleges, school districts, etc.); public airport facilities, public port facilities, and other public uses that place significant demands on the regional and local transportation systems.

SANDAG should work with CARB to clarify how the strategies contained in locally adopted Climate Action Plans should be credited toward helping SANDAG meet the regional GHG reduction targets related to transportation and built environment, and how multi-jurisdictional projects should be handled.

- 3. SANDAG should work with state, regional and local government agencies to expedite the implementation of SB 743 within the San Diego region.**

In its report to the CARB Board prior to its March hearing on the SB 375 Targets<sup>5</sup>, CARB staff discussed the importance of Senate Bill 743, which was enacted in 2013, toward meeting SB 375 Goals. The report states that SB 743 “creates a process to change the way transportation impacts are analyzed under the California Environmental Quality Act (CEQA). Specifically, SB 743 requires the Governor’s Office of Planning and Research to develop updates to the CEQA Guidelines to guide the analysis of project-level transportation impacts. Once the updated Guidelines go into effect, lead agencies will evaluate vehicle travel associated with new development as part of the project’s environmental review, and, if the impact is significant, mitigate those impacts through vehicle travel-reducing measures, which will support achievement of SB 375 goals.”

We agree that implementation of this law is a critical link in helping the state and the regions meet their GHG reduction targets, and we believe that regional transportation planning agencies like SANDAG will play a crucial role in its implementation. However, there have been serious delays in completing the steps necessary to properly implement SB 743 in the San Diego Region. SANDAG should take a leadership role on this issue, working with CARB, Governor’s Office of Planning and Research (OPR) and Caltrans, along with affected regional and local government agencies and stakeholders, to expedite the implementation of this important law in the San Diego region. SANDAG should make a firm commitment to lead a “SB 743 Implementation Initiative,” including development and adoption of regional guidelines for SB 743 implementation, and modifications to its transportation models as needed to allow SANDAG and other “lead agencies” to comply with the technical aspects of the guidelines in a consistent manner. SANDAG should also identify “pilot projects” where SANDAG and a local or regional “lead agency” would test the use of these guidelines and modified transportation models on regionally significant plans and development projects. At the same time, SANDAG should identify this “SB 743 Implementation Initiative” as one of the key policies, programs, and technological improvements to be included in the 2019 Regional Plan and should work with CARB to determine how this initiative can help SANDAG to meet its 2035 GHG Reduction Target.

4. **In the next phase of the 2019 Regional Plan development process (Draft Network Scenarios) SANDAG should also address the following specific concerns that were expressed earlier in this letter, including:**
  - a. Each of the “Draft Network Scenarios” should be designed to meet the 2035 GHG Reduction Target, or there should be a detailed explanation of why this is not feasible.
  - b. Each of the “Draft Network Scenarios” should also be designed to meet acceptable performance standards regarding their impacts on disadvantaged communities.
5. **In the next phase of the 2019 Regional Plan development process (Draft Network Scenarios) SANDAG staff should include a discussion about how certain issues that will influence the overall outcomes of the final Plan will be addressed, including:**

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[https://www.arb.ca.gov/cc/sb375/sb375\\_target\\_update\\_final\\_staff\\_report\\_feb2018.pdf?ga=2.260916494.2062294739.1541023685-1783935510.1541023685](https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf?ga=2.260916494.2062294739.1541023685-1783935510.1541023685) (See Page 12 for discussion of SB 743).

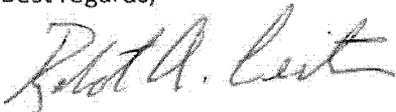
San Diego Association of Governments  
2019 Regional Plan Network Concepts – October 31, 2018

- a. SANDAG should provide an explanation of how the effects of the recently adopted and pending General Plan amendments, including those of the County of San Diego and other local governments, will affect the land use, population and housing growth forecasts being used by SANDAG to conduct its various planning analyses.
- b. Similarly, SANDAG should include a discussion of how pending and future Master Plans being prepared by other public agencies, including but not limited to the San Diego County Regional Airport Authority, San Diego Unified Port District, UC San Diego, and San Diego State University, will be incorporated into the Regional Plan.

We appreciate the opportunity to participate in this very important planning process and hope that SANDAG will carefully consider our comments and recommendations. The stakes are extremely high, especially for future generations.

Please feel free to contact STAY COOL Advisory Council members Bob Leiter at [rlleiter9@cox.net](mailto:rlleiter9@cox.net) or Linda Pratt at [lgpratt@sbcglobal.net](mailto:lgpratt@sbcglobal.net) if you have specific questions regarding the comments contained in this letter.

Best regards,



**Robert A. Leiter, FAICP**  
**STAY COOL for Grandkids - Advisory Council Chair**

cc: Muggs Stoll, Director of Planning, SANDAG

Attachment:

A – Letter to CARB ref SB 375 GHG Reduction Targets, dated March 19, 2018