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via Electronic Mail
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Re: CNFF Comments on San Diego Forward, The Regional Plan
DRAFT Climate Change Mitigation and Adaptation White Paper

We are the Cleveland National Forest Foundation ([CNFF](http://www.cnff.org)), a nonprofit group dedicated to the protection of Southern California Forests, and Save Our Forests and Ranchlands ([SOFAR](http://www.sofar.org)), a membership-based watchdog group committed to defending the San Diego backcountry against urban sprawl. In order to meet the challenge of Climate Change, reduce VMT and build sustainable community we advocate transit based mobility as the real first step forward in transportation and land use policy in the [San Diego region](#).

Introduction:

SANDAG's White Paper on Climate Change begins with this ominous statement: "Climate change is expected to have significant and widespread impacts on California's environment and economy." The stated purpose of the SANDAG Climate Change Mitigation and Adaptation White Paper is "to inform the development of San Diego Forward: the Regional Plan." The SANDAG White Paper includes an inventory of regional GHG emissions, recommendations for a regional approach to address climate change, and a summary of current efforts in the San Diego region.¹ Included in the White Paper is a description of the state and local governing directives to reduce climate change impacts. The paper also informs the public that SANDAG is meeting the short term targets set by the California Air Resources Board (CARB) for the years 2020 and 2035.

CNFF's response:

While this reiteration of policies and short term targets is fine and good on the surface, it tells us nothing new. Furthermore, it leaves the casual reader of the White Paper with the distinct impression that SANDAG -- as the agency responsible for regional climate change oversight and as the dutiful agency possessing full knowledge of the data, the policies and the law -- is in compliance with the law. SANDAG is the responsible public agency so we, the public, assume trust.

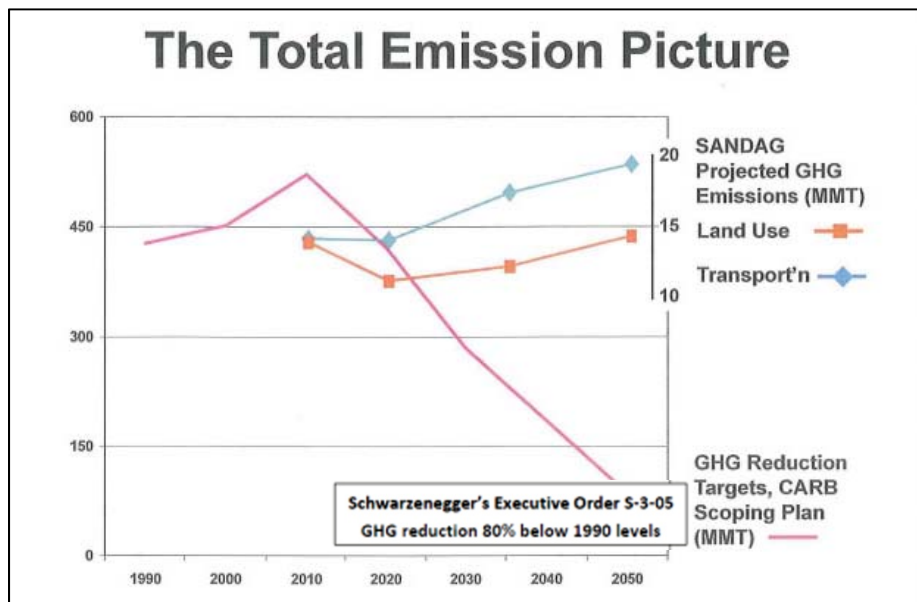
¹ http://sdforward.com/sites/sandag/files/Climate%20Change%20White%20Paper%20-%20Draft_fwe.pdf

There is not the slightest hint in the SANDAG White Paper that things are not as they seem.

The White Paper never discusses, for example, the approach SANDAG elected to use to evaluate the climate change impacts of its 2050 RTP/SCS. SANDAG compared greenhouse gas (GHG) emissions under the Plan in 2020, 2035, and 2050 to a baseline of existing (2010) emissions. By using a baseline of existing conditions rather than those set by Governor Schwarzenegger’s Executive Order S-03-05, SANDAG deliberately masked the magnitude of the Plan’s long-term consequences on climate. This comparison informed readers only that the Plan would allow emissions to increase by 15 percent over current levels by 2050. The EIR’s disclosure of this seemingly modest increase was profoundly misleading. By omitting any information about state policy—or the underlying science—calling for dramatic reductions by 2050, the EIR created the impression that the Plan would actually take a modest step toward helping the state achieve all of its greenhouse reduction goals.²

The inconvenient truth is that if SANDAG had compared the Plan’s GHG emission levels to Executive Order S-03-05, instead of existing conditions, it “would have disclosed the undeniably crucial facts that: (1) the Plan’s 2050 overall emissions would be 600 to 900 percent (not 15 percent!) higher than a trajectory consistent with long-term climate stabilization; and (2) the Plan’s per capita emissions from vehicles would be as much as 2,000 percent higher than that trajectory.

One graphic tells it all – the emissions picture. How can a region reach the 2050 GHG target if it is headed squarely in the opposite direction? The gap between where the region will be and where it ought to be is not 15 percent, it is 600 to 900 percent. We call this the truth gap. The truth is that SANDAG is not telling the public the truth about the facts, the policies and the law governing climate change.



² D063288 Respondents’ Brief and Cross-Appellants’ Opening Brief (pg 33), available at: http://transitsandiego.files.wordpress.com/2014/05/d063288_rbxaob_cleveland-national-forest-foundation-et-al.pdf

Remarkably, it took court action by CNFF, the Attorney General, Sierra Club and Center for Biodiversity³ to reveal this egregious deception. The [Court was remarkably clear](#)⁴, explaining that SANDAG's EIR was, in effect, a nullity in its basic purpose of informing the public and holding officials accountable. Judge Taylor ruled that SANDAG had abused its authority and had merely "kicked the can down the road" for someone else to deal with the grave climate change danger facing not only the San Diego region, but the state and the nation. Seen in this light, the White Paper is thus a repeat of the litany of excuses for SANDAG not doing their job.

Why is a public agency so resistant to truth when it concerns so grave a danger as climate change? The dangers are real, imminent, and documented. Each day we receive calls for new [climate change reduction targets](#)⁵. Each day we receive reports on San Diego's resource vulnerability. Climate change is intimately connected to drought and threats to food production. On a global level, the White House warns of imminent threats as even the military prepares for climate change war⁶.

SANDAG's deception goes further than its unwillingness to tell the truth about the actual long term climate change consequences of the RTP. SANDAG *chose* to ignore CEQA's clear directive to design its transportation plan with the intent of avoiding environmental impacts altogether. The true aim of climate change policy should be climate change avoidance – which can be achieved through alternatives that enable increased transit mode share and transit based infill development.

Ironically SANDAG did develop an urban area transit strategy (UATS) for the region, calling it "the foundation of the 2050 RTP/SCS transit planning process." According to SANDAG, the goals of this transit strategy were twofold: first, maximize transit ridership in the greater urbanized area of the region; and second, test the role of the transit network to reduce vehicle miles traveled and [greenhouse gas emissions](#)⁷. The second goal will help SANDAG comply with Senate Bill 375, which mandates that Metropolitan Planning Organizations develop a [Sustainable Communities Strategy](#)⁸ to align their transportation, housing, and regional land-use plans with the goal of reducing greenhouse gas emissions."

³ <http://transitsandiego.files.wordpress.com/2012/01/cnff-verified-amended-petition.pdf>

⁴ <http://transitsandiego.files.wordpress.com/2012/12/cnff-v-sandag2.pdf>

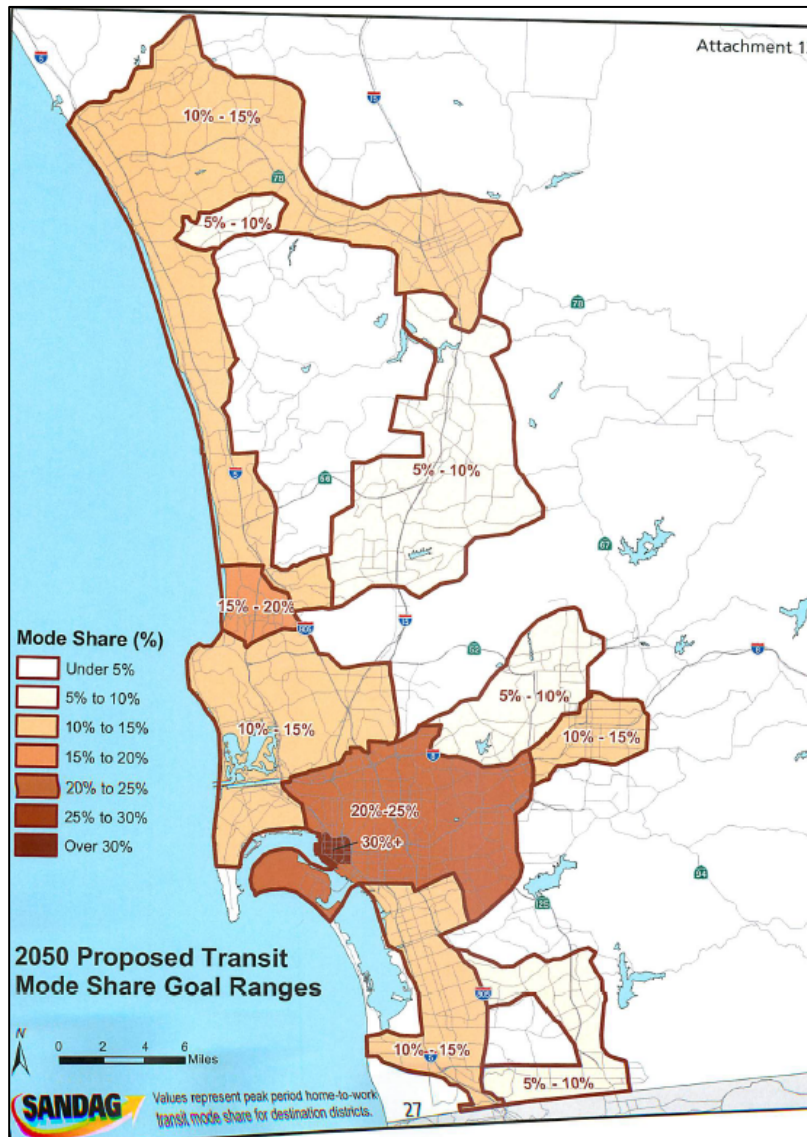
⁵ http://www.ucsus.org/assets/documents/global_warming/Open-Letter-on-Climate-Change-from-CA-Climate-Scientists-and-Economists_May-19-2014.pdf

⁶ http://www.slate.com/articles/technology/future_tense/2014/04/david_titley_climate_change_war_an_interview_with_the_retired_rear_admiral.html?google_editors_picks=true

⁷ <http://www.sandag.org/index.asp?projectid=368&fuseaction=projects.detail>

⁸ <http://www.sandag.org/index.asp?projectid=360&fuseaction=projects.detail>

The UATS identified the following transit mode share goals shown in the graphic below.



Roughly one million residents currently reside or are zoned to reside in the shaded areas of the regional mode share map. These areas encompass the Sprinter corridor, the Coaster corridor, the blue line corridor and the trolley ring urban core corridor. Increases in transit use foster bicycling and walking. By adding bike and walk mode share to the UATS determined transit modes, we roughly calculate a 30% daily non-auto trip mode for one million people. This equates to roughly 300,000 non-auto trips per day in the shaded areas.

Inasmuch as the UATS was the foundation of the RTP/SCS, the RTP should have aimed at achieving these ambitious transit (and bike/walk) mode share goals. Yet, rather than develop a transportation and land use plan

that would have enabled the region to achieve these targeted mode share goals, SANDAG opted for its highway-oriented, business-as-usual approach. Neither SANDAG’s climate change White Paper or its RTP EIR reference the dismal failure of SANDAG to achieve the goals set forth in its own transit plan.

SANDAG even refused to consider publicly suggested alternative transportation plans that would have led the region in a sustainable direction. As a UC Berkeley School of Law Amicus Brief explains, SANDAG deliberately sidestepped its obligation to evaluate alternatives such as [CNFF’s 5010 transit plan](#) that would reduce the Project’s environmental effects, including climate change as required by state law. “Rather, the [RTP] continues to fund and expand highways instead of public transit, and promotes sprawl over infill development near cities through 2050. SANDAG’s failure to reveal, mitigate and propose viable alternatives to the environmental consequences of its chosen RTP/SCS violates the requirements of CEQA.”⁹

SANDAG’s White Paper offers the agency yet another opportunity to confront its failed policies and create innovative policies, programs and plans to address climate change. Yet the document merely offers more of the same. Why, when the alternatives to sprawl land use and freeway dominant transportation, are staring us in the face, is SANDAG is so resistant to change? The people want change, the people want action on climate change, and the people want transit-oriented infill development.

When San Diego citizens were polled in one of the most authoritative local surveys ever conducted in our region by [UCSD and PPIC](#)¹⁰, “building a superior public transit system...” was one of the top categories just under “reducing corruption in government”(pg 17).

**Public Policy Institute Survey 2000
San Diego Solutions Table (Abbreviated Version)**

	All Adults	Likely Voters
Making a big effort to reduce corruption in government	89%	87%
Building a superior public transit system, so that more people have an incentive to use mass transit instead of their cars	85%	82%
Making an all-out effort to build more low-cost housing	77%	72%
Establishing growth boundaries that discourage further development	69%	67%

⁹ CIB_PCL Amicus App and Brief
http://d3n8a8pro7vhmx.cloudfront.net/transitsandiego/pages/15/attachments/original/1396559769/CIB_PCL_Amicus_App_and_Brief.pdf?1396559769

¹⁰ http://www.ppic.org/content/pubs/survey/S_700MBS.pdf

To add insult to injury, the state MPOs, including SANDAG, were recently asked to self-assess their first round of RTP/SCSs. In a report to the Strategic Growth Council, rather than explain why their RTP/SCSs failed to achieve sustainable climate change goals, the MPOs blamed CEQA for their planning failures. They called CEQA “not good for SB 375 or the RTP/SCS process,” and asserted that the looming threat of litigation will “direct more focus and resources toward preparing a legally defensible EIR, rather than toward better planning¹¹.”

With this audacious slap at CEQA, the public’s premier environmental safe guard, SANDAG takes yet another step on the road to Climate Change denial instead of change to meet one of the greatest challenges facing the modern world. In defiance of CEQA, the Superior Court ruling requiring a new EIR, the Attorney General of the State of California, State policies on Climate Change reduction, the Executive order 03-05, scores of authoritative commenters, and lastly in defiance of its own internal directives SANDAG finally completes this strange tale of denial by issuing a white paper that conveys not the slightest hint of their overwhelming resistance to contemplate, model or plan a different course and thereby lead San Diego to a sustainable future.

Instead of blaming the court, CEQA and truth tellers, SANDAG needs to look at itself. In this case, the challenge of meeting the dangers of climate change reside within SANDAG and not without. We suggest that SANDAG either change the name of its RTP to “San Diego Backward” or fulfill its duty to the people and the State by rewriting the white paper in accordance with the truth, the law, and CEQA.

Sincerely,



Duncan McFetridge
Director, CNFF
President, SOFAR

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http://d3n8a8pro7vhmx.cloudfront.net/transitsandiego/pages/15/attachments/original/1400523777/SOFAR_CNFF_Comments_to_SGC_Final.pdf?1400523777