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March 5, 2009

To: Jim Janney, Chair
Regional Planning Committee, SANDAG

Re: March 6, 2009 - Regional Planning Committee Meeting
Agenda Item # 6, Draft - Smart Growth Design Guidelines

This letter is in regard to the Regional Planning Committee's consideration of SANDAG's draft Smart Growth Design Guidelines. As you know, SOFAR has repeatedly urged SANDAG to refine and strengthen its smart growth program in the region. To that end, SANDAG and SOFAR entered into a settlement agreement over the 2030 RTP. Several provisions in the SOFAR/SANDAG settlement specifically addressed SANDAG's approach to smart growth.

The purpose of this letter is to request that SANDAG consider an alternate approach to its draft Smart Growth Design Guidelines that would, if implemented, allow the region to finally turn the corner towards a sustainable future. While SANDAG's draft Design Smart Growth Guidelines consider transit as one of several elements necessary to accomplish smart growth, it is imperative that transit serve as the foundation, or cornerstone, of SANDAG's smart growth program. To that end, the Regional Planning Committee should direct staff to develop Smart Growth Design Guidelines that promote a program resulting in the region's 18 municipalities' becoming *transit-based* city centers, each connected to one another by rail.

It is time for a new approach to transportation in San Diego County. On the heels of California's landmark global-warming legislation, AB 32 and SB 375, the nation has witnessed a historic election based on change, including change in how we approach the challenge of global warming. As President Obama so eloquently explained, we face "a crisis of epic proportions." It is no longer possible to put off "critical debates and difficult decisions" for another day. "The day of reckoning has arrived, and the time to take charge of our future is here."

Even before President Obama made these statements, California Attorney General Jerry Brown had exerted strong leadership in instigating legal and pre-legal settlements with public entities who had flouted climate change warnings. As you are aware, SANDAG was the subject of such pre-litigation discussions with both the Attorney General and SOFAR. At the conclusion of those discussions over the 2030 RTP, SANDAG entered into the settlement agreement with SOFAR for the precise purpose of mitigating the enormous climate change impacts that would

inevitably result from its flawed transportation planning. As the Attorney General and SOFAR pointed out, SANDAG's RTP serves to promote urban sprawl in San Diego County's rural areas and to encourage a transportation system committed to the automobile.

SANDAG's poor transit planning was also the subject of the Independent Transit Planning Review (ITPR), a scathing report by a national team of transit experts, including Robert Cervero. Cervero has written extensively on the need for establishing transit-based communities with measurable transit mode share, in order to achieve sustainable development. Indeed, it was Cervero who first espoused the idea of a "string of pearls," or transit-based city centers connected by rail.

The Attorney General specifically cited the ITPR report in its strong critique of SANDAG's RTP. Furthermore, SANDAG itself has conceded that implementation of the 2030 RTP would have long term unmitigable impacts in every socio-environmental category from global warming and energy consumption to biology and water quality. Yet, remarkably, the agency would purport to justify these impacts for the sake of the "economy."

This casual assumption – that our economy can be based on the long term destruction of our land, air, and water, and that global warming is the price we must pay for our advanced economic lifestyle – is fundamentally wrong. Moreover, it flies in the face of our new president's call for change in the nation's approach to energy and the environment.

The region's persistently flawed approach to sustainability, coupled with our current epic crisis, dictates dramatic action, yet SANDAG has thus far failed to exercise the necessary leadership. By now, it is generally recognized that this agency, which lacks regional land use authority and must work with the conflicting land use plans of 18 separate municipalities, has largely been unable to steer highway-centric growth to transit-based city centers. Inasmuch as land use generally drives transportation plans, SANDAG has been rendered largely ineffective in meeting the threat of climate change-- and has failed to advance public transportation in Southern California in any meaningful way.

SANDAG now attempts to hide this massive structural failure through its promotion of a singularly unambitious "smart growth" program. In fact, randomly tossing 200 so-called "smart growth" centers into a "sea of automobiles" is like "casting pearls before swine." As any urban planner knows, such haphazard planning is exactly the opposite of Cervero's concept of a "string of pearls," or transit-based city centers connected by rail. Importantly, the ITPR points out that San Diego County could easily meet all its growth demands if it built such transit-based centers (p.33). The following factual findings from the 2030 RTP and its environmental impact report confirm that SANDAG's planning efforts in San Diego County are the antithesis of sustainability:

- Instead of encouraging city-centered growth, the SANDAG plan, by its own accounting, promotes excessive growth in rural areas.
- The population in incorporated San Diego County is projected to grow by 55%, and by an average of 42% in three rural communities, over the next 20 years.
- Freeway lane miles will increase by over 800 miles, leading to a 38.8 million increase in vehicle-miles traveled, or VMT
- Gasoline consumption will increase by 31.26%, diesel consumption by 25%.
- Greenhouse gas emissions (GHG) under the RTP will exceed existing levels by about 31%, or 5.3 million tons of CO₂ per year.
- The increase in GHG emissions will contribute to an exacerbation of climate change (an impact the RTP EIR finds to be significant). (EIR at 4.7-34 and 4.7-38.)

While the economic and environmental landscape has changed monumentally over the last few years, SANDAG is marching forward as if we remain in a pre-crisis planning horizon. Given the facts outlined above, it is imperative that the Planning Committee consider a sustainable alternative to the draft Smart Growth Design Guidelines-- one that reasonably satisfies growth demands without sacrificing the environment. The plan we bring before you today is one such alternative (see attached plan). If there is a better alternative than ours - then bring it forward; now is the time for creative thinking and open minds. What you cannot do is "put off difficult decisions for some other day."

Duncan McFetridge, President
Save Our Forest and Ranchlands