



August 2, 2021

SANDAG
401 B Street, Suite 800
San Diego, CA 92101

RE: Climate Action Campaign Comments, SANDAG's Draft 2021 Regional Plan

Climate Action Campaign is a climate and environmental nonprofit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

We thank SANDAG staff and Board for their work on the draft 2021 Regional Plan, and are encouraged by the agency's bold new direction to start the process of transforming the San Diego region's transportation system so it is more sustainable and equitable.

Please see below for our comments to strengthen the draft plan to secure a transportation future that is climate-safe and climate-just:

Putting the Region on the Path to Zero Carbon

The most up to date climate science, including the landmark 2018 UN IPCC Special Report on Global Warming, says that we must eliminate greenhouse gas emissions by mid-century to stave off the most devastating impacts of the climate crisis, such as wildfires, extreme heat, drought, flooding, and more.¹

California's strongest climate goal, Executive Order B-55-18, calls for carbon neutrality as soon as possible, and no later than 2045.² Meanwhile, CARB's mandated emissions reduction target for SANDAG, per SB 375, is a 19% reduction of per capita greenhouse gas emissions from cars and light duty trucks below 2005 levels by 2035. Page 13 of Chapter 1 states that the 2021 Regional Plan will achieve a 20% reduction, exceeding the MPO's state mandate.

Transportation accounts for nearly half of the region's emissions. To remain on track to achieve carbon neutrality, as climate science says is necessary, SANDAG must go further in exceeding CARB's target. We believe a reduction from transportation by at least 30% by 2035 is achievable and needed to ensure a climate-safe Zero Carbon future, and urge SANDAG to map out the strategies needed to achieve that target.

¹<https://www.ipcc.ch/sr15/>

²<https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>

Youth Opportunity Passes: No-Cost Transit for Youth 24 and Under

Page A-51 of Appendix A proposes “subsidies to reduce the fares paid by transit riders.” Appendix A should be amended to include an explicit commitment to Youth Opportunity Passes (YOP)—no-cost transit passes for youth 24 and under—and should be implemented immediately following the adoption of the 2021 Regional Plan. SANDAG should also commit to overseeing YOP in partnership with MTS and NCTD, to ensure successful implementation by the local transit operating agencies.

Community based organizations have been fighting for YOP for nearly a decade, as it is an essential investment in our region’s youth, providing access to education and early career opportunities, while fostering the next generation of sustainable transportation riders.³ We urge you to make YOP a top priority in the 2021 Regional Plan.

Mode Shift Projections in Transit Priority Areas

Attachment 6 of Appendix T (Network Development and Performance), includes the “Performance Measure Results Tables.” Page T6-6 includes mode share projections for the 2021 Regional Plan for the benchmark years 2025, 2035, and 2050 for peak period work trips, all day work trips, and all trips.⁴

We request this same set of projections, but specifically for Transit Priority Areas, to be able to compare Climate Action Plan’s mode shift targets with the mode shift that will be achieved through the buildout of the plan.

For example, the City of San Diego’s Climate Action Plan (CAP) set ambitious targets for the percentage of commuters travelling by bike, walk, and transit in Transit Priority Areas (18% by bike, 7% by walk, and 25% by transit by 2035)⁵, and we want to ensure our regional transportation goals and local transportation targets are meaningfully aligned.

Expedite Transit Leap Timelines, Prioritizing Investments in Communities of Concern

To maximize mode shift away from fossil fuel cars and towards bike, walk, and transit, Transit Leap timelines must be expedited, and prioritized in the early years of the plan over Managed Lanes and Managed Lane Connector, which will yield an increase in vehicle miles travelled.

Investments in commuter rail, light rail, and bus rapid transit infrastructure should be prioritized in Communities of Concern, to increase access to sustainable mobility options and connections to the region’s job centers. The climate crisis and environmental injustice have and will impact Communities of Concern first and worst. Historically underinvested communities are exposed to

³<https://www.midcitycan.org/aboutyop>

⁴https://sdforward.com/docs/default-source/2021-regional-plan/appendix-t---network-development-and-performance.pdf?sfvrsn=6243fd65_2

⁵https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

the region's most dangerously polluted air from cars and trucks, and are left with disconnected transit trips or long, expensive car commutes. As such, we support the inclusion of "Social Equity Early Action Transit Pilots" as a mechanism to streamline immediate investments in the communities on the frontlines of these crises.

Expedite Completion of the Del Mar Tunnel

Page A-26 of Appendix A states that the Del Mar tunnel will be complete by 2035. Currently, the 1.6 mile stretch of LOSSAN tracks in Del Mar is located dangerously close to the edge of the bluffs, and several bluff failures within feet of the tracks have occurred over the past 2 years alone.

With the bluffs eroding at approximately 6 inches per year, and the ever-intensifying threat of sea-level rise due to the climate crisis, these incredibly dangerous bluff failures will only increase in severity and frequency, putting lives seriously at risk.

Moving the tracks off the bluffs is essential to securing a long-term solution for the LOSSAN corridor, while preventing increased air pollution from shipping trucks, and ensuring economic prosperity for the region. To secure a climate-safe transportation system, we urge you to make the Del Mar tunnel a top priority, and urge for completion as soon as possible, no later than 2025-2030.

Conclusion

Thank you for the opportunity to provide comment on this critically important document. The 2021 Regional Plan is a key opportunity for climate action, justice and equity for Communities of Concern, and good union jobs. We look forward to continued engagement with SANDAG on the plan this year.

Sincerely,

Noah Harris
Policy Advocate
Climate Action Campaign