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October 9, 2015

SANDAG Board Members
SANDAG
401 B St. Ste. 800
San Diego, CA 92101

**Re: Environmental Health Coalition's OPPOSITION to the Adoption of the San Diego Forward:
The Regional Plan**

Dear SANDAG Board Members:

Thank you for the opportunity to comment on San Diego Forward: The Regional Plan. Environmental Health Coalition (EHC) advocates for a Regional Plan that ensures Transportation Justice. Transportation Justice requires that overburdened communities have increased access to transportation options, that there are improvements to public health and safety, and that there is equity in transportation planning, policies, and investment.

The San Diego Forward: Regional Plan expands freeways, delays construction of transit and active transportation, and will harm public health. **We urge the SANDAG Board to vote NO.**

The Plan does contain a number of transit and active transportation projects we are supportive of because they will greatly benefit the communities in the South Bay, such as the purple line trolley (Trolley 562), Rapid bus stop in Sherman Heights/Gold Hill communities, and 54th Street Rapid (Rapid 550). The benefits of these projects however are overshadowed by the many freeway projects that will be detrimental to the community's health and will not improve sustainable mobility in the long run. ***We are particularly concerned about increasing car capacity through lane additions on South Bay Freeways (i.e., I-5, I-805, I-15, SR-94) that cut through many environmental justice communities and believe this type of planning and investment will perpetuate significant disparate impacts. As a result, the San Diego Forward: Regional Plan falls short of community needs.***

Residents living in the most impacted communities near the I-5, I-805, I-15, and SR-94 have made hundreds of written and oral comments over the past two years overwhelmingly in support for increasing and advancing public transit and active transportation projects rather than adding capacity to freeways for cars. Yet, the 2015 Regional Plan's freeway lane addition list looks nearly identical to the 2011 plan. The community has clearly called for advancement of a group of transit projects in order to improve local and regional mobility more quickly, especially in communities that are more transit dependent and overburdened by air pollution. There is a lack of evidence to suggest that the rearrangement of selected transit projects on its own will improve mobility and further reduce GHG emissions. Hence, the region needs a dual approach to improving mobility and reducing GHG emissions and air pollution, because an increase in transit mode share requires a reduction of vehicle mode share. By adding more capacity for cars on freeways, as proposed in SANDAG's "managed lanes" approach, vehicle miles traveled would thereby be increased. ***Therefore, we have asked that SANDAG take an alternative "managed lanes" approach that does not add lanes (capacity for more cars) to freeways and highways; but instead, employs innovative corridor***

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strategies that convert existing general purpose lanes to managed lanes to accommodate Rapid routes and carpool (HOV). This approach is not reflected in the proposed Plan.

Developing a pathway for real solutions to improve regional transportation will require transitioning freeway funding to transit and active transportation projects. There is flexibility in state and federal funds that can be transitioned from increasing freeway capacity for cars to transit projects. ***We have urged SANDAG to transition funding from freeway projects to prioritize the development and operation of transit infrastructure and active transportation infrastructure. This approach is not reflected in the proposed Plan.***

There is a solution: Many of the elements in Alternative 5 in the DEIR would help meet community needs and we are in favor of transit projects to be phased within the 35 year planning horizon to make the implementation of transit projects more achievable. However, it is our understanding that it is not financially feasible to build all the transit projects within the first 10 years of the plan. Assuming this is so, it is understood that a phased approach will be required and ***we have stressed our support for the prioritizing building public transit projects that are located within the urban core and communities most overburdened as identified in the CalEnviroScreen tool. This approach is not reflected in the proposed Plan.***

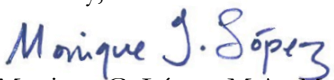
There are many residents in our region that are unable to access the existing transportation network due to cost whose access could help increase future ridership and advance the region economically. Therefore, ***we have recommended the inclusion of no cost transit passes for the youth of families at or below the regional median income level. This is not reflected in the proposed Plan.***

There are many routes to existing transit stops in neighborhoods that lack bike and pedestrian infrastructure for safe routes to these transit stops and deters people from taking transit, biking, and walking options it is estimated that meeting this need regionally would take a commitment of \$500 million while adding two lanes to the SR-94 for approximately two miles is estimated to cost about \$600 million. In order to facilitate and encourage active transportation options ***we have urged SANDAG commit funding to complete all retrofits for safe routes to existing transit stations/stops, and prioritize retrofits in overburdened. This is not reflected in the proposed Plan.***

The Regional Plan falls short of community needs as outlined in this letter. Therefore, we are not able to support the Regional Plan as it stands and urge the SANDAG Board to vote No.

We appreciate your consideration of these comments throughout the process and look forward to working together to further strengthen future Regional Plans.

Sincerely,


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Policy Advocate- Transportation Justice