DOCKET
09-IEP-1N
DATE 7/21/2009
RECD. 8/3/2009

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July 21, 2009

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 09-IEP-1N
1516 Ninth Street
Sacramento, CA 95814-5512

RE: CEC Docket number 09-IEP-1N / 2009 IEPR - Energy and Land Use , Staff Workshop on "Energy and Land Use Issues and Opportunities"

Move San Diego is a California 501(c)3 non-profit corporation with a mission to improve the sustainability of San Diego County's transportation network. MoveSD represents a collaboration of community planners, developers, businesses and environmentalists creating common ground to improve the economic and environmental performance of our regional transportation investments and smart growth policies.
We understand that the San Diego region will be the first region statewide to go through the SB375 Sustainable Communities planning process, including the update of our Regional Transportation Plan (RTP) and Regional Housing Needs Assessment. Therefore we have an urgent need for additional research to inform the process we are beginning. And we would like to make you aware of the barriers we have already identified, and make suggestions on how those barriers can be overcome.

INTEGRATION =
Making the Land Use & Transportation Connections

Since fossil fuel consumption by transportation is known to be the single largest source of California's GHG emissions, accounting for some 41% of emissions, improvement to planning and running our regional transportation networks is critical. While regions are pursuing "smart growth" by adding additional development and redevelopment, the connections between land use planning and transportation performance are lagging behind.

Specifically, our coalition agrees that transit planning performance is the key strategic, economic and environmental investment that is being the most ignored and would like the CEC to become much more aware and involved in further quantification and integration of transit as critical - and required - to achieve the "wealth of benefits" sought by Californians in smart growth and climate change policies.

Research needed to quantify transit contributions to VMT and emissions reductions

In a recent regional study of GHG emissions sources and policies conducted by the Energy Policy Initiatives Center at the University of San Diego <http://www.sandiego.edu/epic>, the policy strategies needed to drive transportation-based GHG emissions downward to achieve State goals were ranked. The top two strategies were changes out of the direct control of the region's governments. However, the third top strategy that the region does have some control over is to reduce VMT (Vehicle Miles Traveled). In turn, having studied the issue over time, we believe the biggest change that allows for the largest number of people to reduce their VMT, other than moving where they live or work which is often unachievable by the vast majority of people, is for drivers to be able to change to transit at least for their work commutes. This would also provide the greatest peak period congestion relief benefits. Furthermore, we believe that having more drivers change to transit will actually be required for us to meet State goals pursuant to Assembly Bill 32 (AB 32), but we have been unable to find any specific quantification of this. We therefore urge the CEC to quantify the benefits of drivers changing to transit and consider the land use, energy and climate change related impacts - and the conditions under which drivers will change to transit.

What will allow a region to reduce VMT?

While our region has adopted a myriad of smart growth policies, and has invested billions in transit projects, ridership has not risen enough to significantly impact either VMT or congestion - distinct from recent peaks in gas prices. Why not? Why don't significant numbers of drivers change to transit?

Market research in the San Diego region has shown that drivers can be divided into six basic market groups, 1/6 will never take transit; 1/6 prefer transit. There are four groups "in the middle" representing 2/3 of drivers who would change to transit, but only if it meets their needs. Those needs can be summed up as: sufficient network connectivity; trip times competitive with driving times; reliable/safe/attractive to use.

What is a key barrier to reducing VMT?
We have identified that a key barrier to reducing VMT is lack of a transit network that meets existing drivers' service needs. Transit projects are not currently being designed based on what market research shows drivers need in order to use transit. They are being shaped by a myriad of planning regimes and funding requirements, and not based on the key factors that would attract significant numbers of riders.

We believe that a market-based approach to transit infrastructure and service planning is *required* to both comply with AB 32's requirement of reducing GHG emissions and achieve smart growth goals - including improving the region's economic competitiveness. Hi-tech and knowledge workers especially hate traffic and are willing to change to transit, but not if it requires significant amounts of additional time.

Objections to policies to reduce VMTs
We have heard some say that improvements in the emissions profiles of cars and trucks will mean we don't have to reduce VMTs. Indeed, the biggest changes out of a region's control are expected to come from manufacturers or through other governmental actions. However, even as emissions profiles of vehicles continue to improve, traffic congestion would still remain as a smart growth challenge and drag on economic performance and quality of life. Therefore, a smart, market-based transit system is a requirement to achieve smart growth.

What would such a system look like?
MoveSD searched worldwide for the global best transit planning practices most applicable to our region's land use and transportation growth pattern. We then hired experts to design a transit network based on the market-service principles determined by the market research.

We believe this market-based approach to transportation network planning has important implications for many urban regions, especially those dealing with sprawl, traffic and dispersed regional job centers.

Our findings determined applying this "FAST Planning" approach (Financially Achievable, Saves Time) could provide significant regional benefits including:

- *better target and serve major regional job zones and housing areas*
- *better support transit-oriented development.*
- *improves the cost-efficiency of transit investments and transit operations.*
- *is affordable to build and operate*
- *increases transit use by attracting significantly more riders*

- flexible enough to adapt to future conditions
- measurably improves congestion
- a more consistent approach to developing infrastructure designed to be more attractive

Investing in mass transit is also a job engine AND real estate investment, unlike other potential policies to reduce energy use such as telecommuting.

We did not study the climate change impacts of drivers changing to transit and we feel this is research that is greatly needed in order to quantify project investments and inform decision-makers as to emissions-related benefits.

Impediment to Smart Growth and Climate Change reductions

We feel the biggest impediment to achieving reductions in VMT and related smart growth goals is the lack of any state requirement to provide a minimum standard for transit services in order to qualify as "smart growth" or a "sustainable community" approach.

Investments in transit that do not meet user market-based service needs or that do not sufficiently improve the network connectivity of regional job centers and housing density, merely result in more congestion and do not offer significant emissions reductions benefits.

Yes, smart growth can offer a wealth of benefits. But it is only as smart as its weakest link. We find, right now, that weakest link, is indeed the design and performance of regional transit networks. Without requiring transit performance improvements, there is a wealth of evidence that we will not achieve the benefits of smart growth; indeed, adding density without having sufficient transit connectivity is exactly what has happened in our region. Additionally, state cuts to transit have reduced transit services to many "Transit Oriented Development" locations. So right now, it becomes a formula for more congestion and more emissions and more parking - the exact opposite of what we need from smart growth.

Note some statistics from the 2030 RTP for San Diego:
- 2006 vehicle miles traveled (VMT) is 74.7 million. Under the 2030 RTP, VMT would be 113.5. (DEIR at 7-3, table 7.0-1). This is a 38.8 million (34%) increase in VMT.

- The total number of freeway lane miles would increase by over 800 from existing conditions. RTP DEIR at 7-12.

- The transportation improvements under the proposed RTP would increase gasoline consumption by approximately 505 million gallons per year or 31.26 percent relative to existing (2006) conditions.

- Total diesel consumption would increase by 48.7 million gallons or 25.00 percent relative to existing conditions. DEIR at 4.7-23.
- Annual greenhouse gas ("GHG") emissions under the 2007 RTP would exceed existing levels by the substantial margin of about 31 percent or 5.3 million tons of CO2 per year in 2030. DEIR at 4.7-34. The document finds that this increase in GHG emissions would contribute to the exacerbation of climate change and concludes this impact to be significant. Id. at 4.7-34 and 4.7-38.

Therefore, we urge you to make the connection in this most strategic location - the performance of our transit networks as necessary to achieve both climate change reduction and indeed all goals related to smart growth and sustainability.

One may view our detailed presentation, "Improving transit performance by applying global best practices" by going to:
http://movesd.org/Downloads/FASTonline%20version%202.4.htm

You may also download a 2-page summary from our Programs page:
http://movesd.org/programs.html

Thank you for the opportunity to comment.

Many thanks,

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