



February 10, 2015

SANDAG  
Rob Rundle  
401 B St. Ste. 800  
San Diego, CA 92101

RE: Alternatives for SANDAG's Environmental Analysis for San Diego Forward: The Regional Plan

Dear Rob:

On behalf of Circulate San Diego and our below-signed partners, I am writing to encourage SANDAG to analyze a robust set of transportation alternatives in the environmental impact report ("EIR") being prepared for San Diego Forward: The Regional Plan.

These alternatives will allow the SANDAG board and the public to better understand the full breadth of options available, and the performance of these options when the final plan is adopted later this year.

The recent California Appellate Court decision found that the EIR for the 2011 RTP was "deficient because it does not discuss an alternative which could significantly reduce total vehicle miles traveled." While SANDAG is currently appealing that decision, it is entirely prudent for SANDAG to craft an EIR that conforms to the standards articulated by the court and analyses a robust alternative scenario.

Furthermore, the alternatives can demonstrate how we begin to move away from auto-centric transportation, and to embrace a vision for a healthier transportation future. The human toll of our car dependent society includes asthma attacks, respiratory illness, obesity, diabetes and heart disease. Increasing the options for the public's mobility can translate directly to improving the public's health, advancing a cleaner environment and improving our region's economy.

We suggest that SANDAG prepare an environmental analysis that includes the following alternatives.

**I. Land Use Models:**

For the EIR, land uses should be assumed to change along with transit investments. One of the limitations of the [Accelerated Alternative Network Analysis](#) ("Accelerated Network") is that it did not model any improvements to current local land uses that are likely to result from the investment in transportation infrastructure. Nor did the analysis assume any societal change in mode choice that might result in an intensive campaign that would accompany the Accelerated Network. This resulted in mode share, ridership numbers, and Vehicle Miles Traveled ("VMT") that do not reflect the actual outcomes from transit investments.

SANDAG can model land use changes based on work they have already completed, such as the three alternative scenarios outlined in the December 6, 2013 SANDAG board report. Those three scenarios are listed below:

- Scenario A: Second Units and Infill Scenario
- Scenario B: Transit Oriented Development
- Scenario C: Multiple Dense Cores Scenario

An accelerated transit scenario should not assume the same land uses as are currently in place. Instead, transit analysis should assume that land uses will follow those investments, as developers and residents move near transit.

This request is consistent with comments from SANDAG board members at the 2015 board retreat, who questioned the utility of the Accelerated Network analysis, for its inability to measure the effects of transit to inspire changes to land uses and private development investment. This request is also consistent with SANDAG's current effort, at the board's direction, to create a TOD plan that will encourage transit oriented development.

## **II. Network Scenario Models:**

### **A. Accelerated Network Scenario:**

SANDAG already ran a network analysis including accelerated transit and active transportation, the "Accelerated Network" Scenario. SANDAG should include that scenario, or a scenario that is as aggressive but is financially feasible to comply with the standards for a reasonable alternative, as a part of the EIR.

SANDAG staff has stated that advancing all transit projects in the Preferred Network to the first 10 years of its timeline will be financially infeasible. SANDAG staff has also stated that the Accelerated Network would build transit infrastructure to locations before there is sufficient land use intensity or population to make use of the transit investments.

SANDAG's obligation is to analyze an accelerated transit scenario that models a set of transit investments that is financially feasible, that builds transit where people want to go, and that reduces vehicle miles traveled and greenhouse gas emissions.

SANDAG could analyze an accelerated scenario that extends the accelerated transit and active transportation projects to a period that is longer than 10 years. Perhaps the projects can be modeled to the first 12 or 15 years of the RTP. If certain transit investments are feasible to advance, and others are not, then the feasible projects should be modeled to occur earlier than other investments.

This alternative is consistent with comments from SANDAG board members at the 2015 board retreat, who asked SANDAG staff to look at alternative methods to advance transit investments in San Diego Forward. Further, such an analysis will help inform the Quality of Life ballot measure being considered.

### **B. Managed Lanes:**

SANDAG should include in the EIR an analysis of converting general purpose lanes into managed lanes to accommodate both Bus Rapid Transit (BRT), High Occupancy Vehicles and solo drivers for a fee. San Mateo County is already studying a similar proposal by Transform, and SANDAG should follow their example.

This proposal could eliminate the need for costly expansions of freeways, expand highway capacity without widening roads, and cut costs to cover expenses.

This request is consistent with comments from SANDAG board members at the 2015 board retreat, who specifically asked SANDAG staff about whether the Accelerated Network examined transitioning general purpose lanes into managed lanes.

**C. Delay Highway Construction:**

The EIR should examine options that include delaying highway construction. Delaying highway construction can free up resources to advance transit infrastructure.

A delay in highway construction does not necessitate a removal of that project from the RTP. SANDAG can still keep the faith of voters who adopted TransNet, by merely pushing out certain highway expansion into the later years of TransNet's decades-long commitments.

**D. Advancing Projects from the Unconstrained Network:**

The EIR can also include analysis of advancing certain transit projects from SANDAG's unconstrained network. If SANDAG is attempting to create a more robust transit scenario, all options should be on the table.

**III. Improving Transit Usage:**

The EIR should model a variety of potential scenarios to improve the share of trips using transit, walking, and biking.

**A. Active Transportation and Safe Routes to Transit:**

The EIR should model funding the entire unconstrained active transportation network, including Safe Routes to Transit. While the model currently includes some active transportation projects and funding for safe routes to new transit stations, the goal should be safe routes to all existing transit as well.

Many people live within walking or biking distance of good public transportation options, but challenges such as dangerous roads and intersections, plus a lack of safe bike parking, understandably deter people from using public transit. Relatively modest investments in Safe Routes to Transit funding can ensure that the significant investments in transit will be enjoyed by as many riders as possible.

The EIR should model a scenario that includes the entire unconstrained Active Transportation network in the first decade of the plan. This is a relatively small amount of funding that can be a catalyst to reducing reliance on cars for commutes and trips.

## **B. Lowering Transit Fares:**

The EIR should gauge the impact of lowering transit fares for riders. San Diego charges more for an ordinary bus trip than Los Angeles or San Jose. An analysis of lowered, or restructured, fees will help test how price changes could affect mode share.

## **C. Stored Value:**

In addition to modeling lowered fees, SANDAG should model whether allowing riders to use stored value payment on the MTS and other systems would increase ridership. Currently, riders must have either a monthly transit pass, or exact change to ride a bus.

For several years, MTS has promised a stored value option for their Compass Card system. Ridership would likely improve if San Diegans who are not regular riders could easily access transit.

If models are available, SANDAG could also gauge the effect of deploying credit card payments, or other payment systems connected to riders' smart phones.

## **D. Extended Service:**

SANDAG should analyze extended service options. Many transit lines that serve nightlife and entertainment destinations provide high frequency service only during commute hours. Transit lines are likely to see more ridership if service is extended to later hours.

## **IV. Performance Metrics:**

The EIR should provide performance metrics along transportation corridors to test the effectiveness of the transportation investment of the Preferred Scenario as well as the alternatives. As previously discussed with SANDAG staff, offering metrics at a regional scale does not provide meaningful information.

## **V. Public Health:**

Alternatives modeled in the EIR should use the Integrated Transportation and Health Impact Model (ITHIM) in conjunction with improved information on mode split from the active transportation inputs to the Activity Based Model.

## **VI. Social Equity:**

A transit and active transportation priority scenario modeled in the EIR should be evaluated using at least the same social equity performance measurements used to analyze SANDAG's Preferred Scenario. The SANDAG board should be given sufficient information to evaluate the social equity impacts of any transportation scenario they eventually adopt.

SANDAG should also adopt a more robust social equity analysis that includes a housing and transportation affordability index analysis and a jobs/housing analysis. If this is not feasible for this analysis, it should be created for future efforts.

**VII. Conclusion:**

Creating a robust and useful environmental impact analysis is a crucial element of SANDAG's adoption of San Diego Forward. An analysis of meaningful alternatives that prioritize transit and active transportation will go a long way to satisfy the recent California Appellate Court's ruling, respond to the requests of ht health, environmental and active transportation communities, and preserve for the SANDAG board meaningful choices for the future of the region's transportation network.

Sincerely,

A handwritten signature in blue ink that reads "Colin Parent". The signature is written in a cursive, flowing style.

Colin Parent  
Policy Counsel, Circulate San Diego

Co-Signers:  
San Diego Housing Federation  
American Lung Association

CC:  
Gary Gallegos, SANDAG  
Muggs Stoll, SANDAG  
Coleen Clementson, SANDAG  
Jessie Bustamante, Executive Director, American Lung Association In California-San Diego Office  
Bruce Reznik, Executive Director, San Diego Housing Federation