July 15, 2015

SANDAG
Board of Directors, Chair Jack Dale
Transportation Committee, Chair Todd Gloria
Regional Planning Committee, Chair Lesa Heebner
401 B St. Ste. 800
San Diego, CA 92101

RE: SANDAG’s Draft 2015 Regional Plan (titled “San Diego Forward: The Regional Plan”)

Honorable Jack Dale and SANDAG Board and Committee members:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide comments to the Draft 2015 Regional Plan (Regional Plan) published by the San Diego Association of Governments (SANDAG).

We are pleased to have this opportunity to provide our input into this process. We believe that SANDAG has an opportunity, and an obligation, to adopt a Regional Plan that reduces greenhouse gasses (GHGs), improves health, and strengthens the economy.

Today, Circulate San Diego is publishing three documents and submitting them to SANDAG.

1. **TransNet Today:** *TransNet Today* is a report in partnership with the nonprofit TransForm which demonstrates that SANDAG has substantial flexibility over how to implement the TransNet Extension Ordinance.

2. **DEIR Comment Letter:** Circulate San Diego’s [DEIR comment letter](#) explains why SANDAG’s environmental analysis for their Regional Plan fails to analyze feasible alternatives that are consistent with SANDAG’s flexibility to implement TransNet, as outlined in *Transnet Today*.

3. **Regional Plan Comment Letter:** Circulate San Diego’s [letter regarding the Regional Plan](#) requests that SANDAG advance transit and active transportation projects, without amending TransNet, as *TransNet Today* explains can be done.

I. **Summary.**

Circulate San Diego is asking the SANDAG Board to make modest, valuable, and achievable changes to the 2015 Draft Regional Plan to improve transportation and land uses in the region. Our request is organized around five main ideas.
1. Circulate San Diego cannot support a Regional Plan that would prevent the region from reaching the GHG reduction goals in Governor’s Executive Order S-3-05.

2. Circulate San Diego is not asking for TransNet to be amended.

3. For San Diego to remain competitive with State and Federal funding, it must accelerate early transit and active transportation projects.

4. SANDAG has a variety of mechanisms available to pay for the advancement of transit and active transportation.

5. Circulate San Diego would support a Regional Plan that advances key projects that benefit the region. SANDAG should shift the below projects to be completed before 2025:
   - Orange Line Trolley Frequency Enhancements
   - Blue Line Trolley Frequency Enhancements
   - Construction of the 562 Trolley line (“The Purple Line”)
   - Rapid 550 Construction
   - Del Mar Fairgrounds Permanent Seasonal Rail Platform
   - Safe Routes to Transit Retrofits at Existing Stations
   - Active Transportation Retrofits at Freeway Interchanges
   - Enhancing the Smart Growth Incentive Program

II. Circulate San Diego cannot support a Regional Plan that would prevent the region from reaching the GHG reduction goals in Governor’s Executive Order S-3-05.

California took an extraordinary step in 2005 when Governor Arnold Schwarzenegger signed Executive Order S-3-05, calling for reductions in GHGs through 2050. That order has been ratified by the legislature several times over, and affirmed by Governor Schwarzenegger’s successor Governor Brown. Governor Brown, through his own Executive Order B-30-15, established interim targets for reductions in GHGs through 2030 including a 50% reduction in petroleum use.

While the 2030 and 2050 emissions targets called for by the Executive Order have not yet been adopted by the California Legislature, there is little doubt that they will be. SANDAG’s Draft 2015 Regional Plan fails to meet these targets, and may permanently set the region’s transportation system in a direction that would prevent San Diego from achieving necessary GHG reductions.

SANDAG must adopt a Regional Plan that advances certain transit and active transportation projects to ensure that the region is prepared to meet the 2030 and 2050 GHG goals. Only by advancing transit and active transportation projects in the Regional Plan will SANDAG avoid locking itself into a transportation system that is overly dependent on cars and less competitive for federal and state transportation dollars.

Similarly, as SANDAG contemplates a Quality of Life revenue measure, it must also draft that measure with an eye to ensure that it funds a mix of projects that help the region achieve the 2050 GHG goals.
III. Circulate San Diego is not asking for TransNet to be amended.

Circulate San Diego is not asking the SANDAG Board to amend TransNet to implement the 2015 Regional Plan. SANDAG can keep faith with the voters that approved TransNet, and simultaneously advance transit projects faster than the Draft 2015 Regional Plan.

Circulate San Diego has published along with this letter a report titled “TransNet Today” on the implementation of TransNet. The report demonstrates that SANDAG has significant flexibility with federal and state funds, as well as within TransNet itself. SANDAG can accomplish substantial acceleration of transit projects within the 2015 Regional Plan without requiring the SANDAG Board to amend the TransNet Ordinance with a two-thirds vote.

IV. For San Diego to remain competitive with State and Federal funding, it must accelerate early transit and active transportation projects.

As explained in our report “Transnet Today,” Federal and State funding is increasingly shifting toward a competitive grant model, and away from formula funding for regions to spend as they wish. The new funding reality rewards regions that invest in transit and active transportation.

This changing terrain for transportation funding requires a corresponding change by SANDAG. For the San Diego region to remain competitive when applying for state and federal grants, SANDAG must shift the region’s investments toward transit and active transportation. If SANDAG fails to modernize the region’s transportation plans, not only will the region have a mediocre transportation network, but we will lose out on future funding opportunities.

V. SANDAG has a variety of mechanisms available to pay for the advancement of transit and active transportation.

There are a variety of ways SANDAG can fund the advancement of transit programs within the 2015 Regional Plan, without amending TransNet.

a. Circulate San Diego has outlined SANDAG’s broad flexibility for using its funds, including TransNet.

As the Circulate San Diego report TransNet Today identifies, SANDAG controls a wide variety of funding sources, most of which are very flexible. Even TransNet itself is more flexible than is often recognized. While TransNet does require a certain set of projects to be included in SANDAG’s Regional Plan, TransNet provides great flexibility as to when those projects are built.

SANDAG can free up substantial funding to advance transit projects, by rebalancing TransNet projects to later periods in the Regional Plan. Rebalancing projects will free up early State and Federal funds that were planned for TransNet projects, which can be used to support transit projects earlier in the Regional Plan timeline.

b. Circulate San Diego is not asking for any particular projects to be eliminated.

Circulate San Diego is agnostic as to how the SANDAG Board effectively funds the advancement of transit in the 2015 Regional Plan. We are sensitive to the difficult policy and political choices that the SANDAG staff and Board must navigate to accomplish what Circulate is asking for.
To accomplish the requests from Circulate San Diego, the SANDAG Board could rely on the following options:

1. Rebalancing the timing of TransNet highway or managed lane construction later in the 2015 Regional Plan.
2. Removing or changing the scale of highway construction plans in the Regional Plan that perform poorly by SANDAG’s own measurements.
3. Assuming higher revenue from a Quality of Life measure either by advancing it to 2016, or by assuming more than a quarter cent of revenue dedicated to transit capital and operations.
   
   c. SANDAG is planning to spend more than $12 Billion on highway expansion projects before 2035, funds that could instead be used for transit and active transportation.

The Draft 2015 Regional Plan assumes that SANDAG will spend about $12.722 Billion on highway and managed lane construction between 2015 and 2035.

**Funds that can be shifted for accelerating Transit, Safe-Routes, and Incentive programs (in thousands of dollars):**

<table>
<thead>
<tr>
<th>FY 2014-2035 - Highway Costs</th>
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<tbody>
<tr>
<td>Highways</td>
<td>$530</td>
</tr>
<tr>
<td>Freeway Connectors</td>
<td>$1,097</td>
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<tr>
<td><strong>Subtotal</strong></td>
<td><strong>$1,627</strong></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>FY 2014-2035 - Managed Lane Costs</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Managed Lanes</td>
<td>$11,820</td>
</tr>
<tr>
<td>Managed Lanes Connectors</td>
<td>$902</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>$12,722</strong></td>
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</tbody>
</table>

SANDAG would not have to eliminate these projects to pay for accelerated transit and active transportation. Instead, SANDAG can and should push back some of those projects to later years in the plan (between 2035 and 2050), freeing up early-year funds to invest in transit and active transportation. SANDAG would still maintain faith with the voters that approved TransNet, and the Board members that hope to see more highway construction by keeping those projects in the Regional Plan, just somewhat later than they are currently programmed.

**VI. Circulate San Diego would support a Regional Plan that advances key projects that benefit the region.**

Circulate San Diego has identified a variety of projects that SANDAG can advance earlier in the Regional Plan. By moving these projects to be completed before 2025, SANDAG can adopt a Regional Plan that reduces greenhouse gases, improves health, and strengthens the economy.
Moving projects like these forward will help the region prepare to meet the GHG goals the Governor’s Executive Order establishes through 2050.

Circulate San Diego recommends that SANDAG advance the following projects. A more detailed list with phase and costs is attached to this letter.

- Orange Line Trolley Frequency Enhancements - $402 million
- Blue Line Trolley Frequency Enhancements - $741 million
- Construction of the 562 Trolley line (“The Purple Line”) - $5.4 billion
- Rapid 550 Construction - $59 million
- Del Mar Fairgrounds Permanent Seasonal Rail Platform - $72 million
- Safe Routes to Transit Retrofits at Existing Stations - $500 million
- Active Transportation Retrofits at Freeway Interchanges - $56 million
- Enhancing the Smart Growth Incentive Program - $70 million

These projects are projected to cost approximately $7.3 billion. This is far less than the $12 billion SANDAG plans to spend on highway construction through the 2035 period in its Draft 2015 Regional Plan. SANDAG can fund all of these projects before 2025 by shifting only some of its highway construction into later plan years.

VII. Conclusion.

SANDAG has the power to make modest, valuable, and achievable changes to the Draft Regional Plan to improve transportation and land uses in the region.

To achieve the GHG reduction goals that the region must eventually meet, SANDAG must take action today. Circulate San Diego has outlined a clear and actionable plan for SANDAG to implement. TransNet is not a barrier, and the competitiveness of the region for future funding opportunities is at stake.

For Circulate San Diego to support SANDAG’s plan, it must successfully advance key transportation projects that will truly help move San Diego forward.

Sincerely,

Colin Parent
Policy Counsel, Circulate San Diego

Cc: Phil Trom, Regional Plan Project Manager San Diego Association of Governments, via email to ptrom@sandag.org.
### Attachment A – List of Projects to Advance in the 2015 Regional Plan:

<table>
<thead>
<tr>
<th>Service</th>
<th>Line</th>
<th>Description</th>
<th>Current Phasing</th>
<th>Cost</th>
<th>Serving</th>
<th>Notes and Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trolley</td>
<td>520</td>
<td>Orange Line Frequency Enhancements and four rail grade separations at Euclid Ave, Broadway/Lemon Grove Ave, Allison Ave/University Ave, Severin Dr</td>
<td>2035</td>
<td>$402 million</td>
<td>La Mesa, Lemon Grove, El Cajon, Logan Heights, Downtown San Diego</td>
<td>Would mitigate interaction between Trolley and pedestrian and car traffic, improve jobs-housing access between El Cajon and downtown, as well as improve connections for numerous cities.</td>
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<tr>
<td>Trolley</td>
<td>510</td>
<td>Blue Line/Mid-Coast Frequency Enhancements and rail grade separations at 28th St, 32nd St, E St, H St, Palomar St, at Taylor St and Ash St, and Blue/Orange Track Connection at 12th/Imperial</td>
<td>2050</td>
<td>$741 million</td>
<td>San Ysidro, Chula Vista, National City, Downtown San Diego, UCSD</td>
<td>Would mitigate interaction between Trolley and pedestrian and car traffic, improve jobs-housing access between the San Ysidro border crossing, downtown, UCSD, as well as improve connections for numerous cities.</td>
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<tr>
<td>Trolley</td>
<td>562</td>
<td>San Ysidro to Carmel Valley via National City/Chula Vista via Highland Ave/ 4th Ave, Southeast San Diego, Mid-City, Mission Valley, and Kearny Mesa</td>
<td>2035</td>
<td>$5,471 million</td>
<td>San Ysidro, Carmel Valley, National City/Chula Vista via Highland Ave/ 4th Ave, Southeast San Diego, Mid-City, Mission Valley, and Kearny Mesa</td>
<td>This is a major planned trolley system expansion that would serve a variety of communities, links low income communities with higher paying jobs, and relieve congestion in some of the most impacted traffic areas in the region.</td>
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<tr>
<td>Rapid</td>
<td>550</td>
<td>SDSU to Palomar Station via East San Diego, Southeast San Diego, National City</td>
<td>2035</td>
<td>$59 million</td>
<td>City of San Diego, SDSU, National City</td>
<td>Low-cost BRT expansion serving SDSU and two jurisdictions.</td>
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<tr>
<td>Safe Routes to Transit at Existing Stations</td>
<td>N/A</td>
<td>Fully fund the region’s Safe Routes to Transit retrofits at existing stations, to maximize the access and usage of</td>
<td>Not in 2015 Draft Regional Plan – in only the</td>
<td>$500 million</td>
<td>Every jurisdiction in the region</td>
<td>Maximize use and access to existing transportation infrastructure. Facilitate transit usage and</td>
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Figures are from Draft 2015 Regional Plan Appendix A unless otherwise stated.
<table>
<thead>
<tr>
<th>Service</th>
<th>Line</th>
<th>Description</th>
<th>Current Phasing</th>
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<th>Notes and Rationale</th>
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<tr>
<td></td>
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<td>transit investments.</td>
<td>Unconstrained Network</td>
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<td>traffic mitigation around new planned development in Mission Valley, including Chargers Stadium site, promote infill development, and maximize existing transit investments.</td>
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<td>Fully fund the region’s Active Transportation retrofits around freeways to minimize the impact of freeways on bicycling and pedestrian activity.</td>
<td>Not in 2015 Draft Regional Plan – in only the Unconstrained Network</td>
<td>$56 million</td>
<td>Every jurisdiction in the region</td>
<td>Facilitate bicycling and walking by mitigating the barriers to those transportation modes caused by the region’s freeways.</td>
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<td>Adopt a meaningful TOD Policy that enhances the Smart Growth incentive Program by:</td>
<td>Not in plan.</td>
<td>$70 million</td>
<td>Every jurisdiction in the region</td>
<td>Expand transit oriented development opportunities, promote affordable homes and anti-displacement policies, maximize the return on public investments in transit.</td>
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<td>(1) Doubling funding for Smart Growth grant funding for 10 years</td>
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<td>(2) Incorporate TOD readiness criteria for scoring grant applications.</td>
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<td>(3) Incorporate affordable housing criteria as a subset of TOD readiness (see Attachment B)</td>
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<td>(4) Fund studies for how MTS and NCTD can make land available for affordable homes</td>
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<td>(5) Contribute to a blended investment fund for affordable homes</td>
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<td>Total Costs:</td>
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<td>$7,371 million</td>
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Attachment B - Proposed Readiness Criteria for SANDAG’s Transit Readiness Policy:

The below criteria could be inserted in the readiness criteria proposed in the SANDAG white paper:  

**C. Affordable Homes.** Proximity to transit is a crucial need for low income San Diegans. Transit investments tend to add market value to surrounding land. As land values rise, it becomes increasingly more difficult for developers of affordable homes to successfully bid against market-rate developers for land. However, different market conditions and available resources caution against a one-size-fits all solution. It is proposed that SANDAG include a readiness measurement that gauges how the district plans to mitigate the effect of transit investment on affordable home development.

4 = Plan includes a robust mechanism for ensuring affordable homes are built within the district. Options can include:

- mandatory affordable housing set-asides,
- land value recapture that finances affordable homes within the district,
- housing overlay zone or density bonus program that trades density for inclusionary affordable homes within the district (above and beyond the state density bonus program),
- public land in the district dedicated for affordable homes,
- substantial philanthropic donations of either land or capital costs for affordable homes in the district.

3 = Plan includes a significant mechanism for ensuring affordable homes are built within the district. Options can include:

- the district will generate tax increment through an infrastructure finance district that will be dedicated to affordable homes within the district,
- the district can access a locally administered transit oriented development blended fund.

2 = Plan includes a modest mechanism to develop affordable homes within the district, but may not generate new resources. Options include:

- dedicating an amount of preexisting local funds for affordable homes to be used in the district (HOME, CDBG, Redevelopment, Impact Fee revenue), within the district,
- affordable developments can receive expedited reviews, fee reductions, parking reductions,
- the district includes substantial amounts of multi-family zoned land in areas that would be competitive for nine percent Low Income Housing Tax Credits.

1 = Plan does not include a mechanism to ensure affordable homes are included, including for districts without any residential opportunities.