



January 16, 2015

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

RE: San Diego Forward: Accelerated Alternative Transportation Network Analysis

Honorable Todd Gloria and SANDAG Board and Committee members:

On behalf of Circulate San Diego, I am pleased to submit these comments regarding the Accelerated Alternative Transportation Network Analysis ("Accelerated Network") released by SANDAG staff earlier this week.

Circulate San Diego, along with a coalition of other nonprofits, requested that SANDAG produce a third Regional Transportation Plan scenario, which we called the "Healthy People and Economy" Scenario.

On September 12, 2014, the SANDAG Board of Directors requested that staff evaluate the performance and estimate the cost of a third accelerated transportation scenario that would complete the public transit and active transportation projects in the preferred scenario within 10 years instead of the planned 35-year period. [That analysis](#) is scheduled for presentation to the SANDAG Transportation Committee on January 16, 2015.

**I. The Accelerated Network shows that Transit First is the right approach for San Diego.**

The Accelerated Network analysis shows clear advantages to the Preferred Network. From SANDAG's own report:

"For 2025, in comparison to the existing conditions and the Preferred Network, the Accelerated Network shows a reduction in transit travel times, greater use of public transit, an increase in the amount of employment within ½ mile of a high frequency transit stop, and increases the amount of time people are engaged in transportation-related physical activity."

The Accelerated Network has notably higher transit accessibility to low income San Diegans, communities of color, and employment opportunities. This scenario outlines a vision for a San Diego that chooses to prioritize transit, and to make a modern and effective transportation network.

## **II. The analysis of the Accelerated Network contains some fundamental flaws.**

Circulate San Diego appreciates the time and resources SANDAG dedicated to preparing the Accelerated Network. However, the network analysis is deficient in some key ways, which understate the value of a transit-first approach. The SANDAG Board should take the analysis, especially with regard to cost, with a grain of salt for the following reasons:

1. The SANDAG Board should discount the cost estimates from the Accelerated Network. While SANDAG included revenue from a future “Quality of Life” initiative in their modeling of their “Preferred Network,” that revenue is absent from the cost estimates from the Accelerated Network. The result is a report that does not present an accurate comparison cost for a transit-first approach.
2. The Accelerated Network report includes a list of potential revenue sources, creating an implication that a transit-first approach would somehow require new taxes. The reality is that SANDAG’s Preferred Network already assumes a transportation sales tax in the form of a Quality of Life initiative. The Accelerated Network does not include new or different projects from the Preferred Network, only a reordering of their construction. Previously unconsidered revenue sources are not required.
3. The Accelerated Network actually understates the potential benefits of a transit-first approach. The analysis fails to examine individually the corridors where the transit investments are being made. Instead, the impact is watered down by measuring only region-wide performance.
4. The Accelerated Network further understates the benefits of a transit-first approach by failing to model land use changes that would result from earlier transit investments. The analysis only looks at effects as far as 2035, and it does not model more intensive land uses than under existing plans. It is therefore incapable of analyzing adequately new jobs and housing that will result from land use changes that may take longer to catch up to the transit investments. This will lead to foreseeable higher utilization of the transit network.

## **III. The inability of the Accelerated Network to model land use changes that result from transit investment show the importance of SANDAG’s pending Transit Oriented Development policies.**

At the urging of Circulate San Diego’s predecessor organizations, the SANDAG Board in 2011 committed to implementing an action to develop a regional transit-oriented development policy (TOD) in the 2050 RTP Sustainable Communities Strategy to promote and incentivize sustainable development.

The Accelerated Network’s inability to project more effective land uses that result from transit investment help show the continuing need for SANDAG to adopt useful TOD policies. Metropolitan Planning Organizations can and should play an important role in helping constituent governments implement local housing and land use policies.

Examples of land use strategies can be found in the December 2014 report from Transportation for America, titled “The Innovative MPO,” available at <http://t4america.org/maps-tools/the-innovative-mpo/>. SANDAG can follow the example of MPOs in other regions, like the OneBayArea Grant Program, and adopt funding priorities that tie transit investments to cities’ willingness to adopt effective land uses.

Circulate San Diego is committed to engaging in SANDAG's ongoing TOD policy planning. We look forward to engaging in a productive dialogue over how SANDAG can both innovate, and adopt policies that have proven to work in other regions.

**IV. The benefits of the Accelerated Network demonstrate why it needs to be included as an alternative in SANDAG's environmental impact report.**

The Accelerated Network results in substantial reductions in greenhouse gas emissions. From the Accelerated Network A and B Performance Summary:

“Network A shows total on-road GHG emissions reduced from 2012 levels of 39,341 tons per day to 32,308 in 2025 and 32,706 in 2035. Network B shows slightly more total GHG emissions reductions from 2012 with 32,097 tons per day in 2025, and 32,624 tons per day in 2035.”

SANDAG should include the Accelerated Network as an alternative in its Environmental Impact Report for the Regional Transportation Plan. The recent appellate court ruling faulted SANDAG for failing to analyze accelerated transit alternatives in their prior environmental impact report. Including such an alternative in this forthcoming environmental analysis will be a prudent response to the court ruling, even while SANDAG simultaneously pursues its appeal.

Thank you again for taking an earnest look at a transit first scenario in the form of the Accelerated Network. While there are some limitations to the model created, it shows conclusively the benefits transit investments provide for San Diego. We look forward to working with staff to provide input to SANDAG's environmental documents, and to help identify other useful alternatives and refinements to SANDAG's developing RTP.

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