October 25, 2017

San Diego Association of Governments
Board of Directors, Chair Ron Roberts
401 B St. Ste. 800
San Diego, CA 92101

RE: Development of Revenue Constrained Network Scenarios and Network Performance Measures

Honorable Ron Roberts 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 with comments on the development of the 2019 Regional Plan.

Circulate supports SANDAG staff’s recommendation to move forward with the unconstrained transportation network developed in 2015 for the previous Regional Plan and not update it for 2019. Instead, Circulate recommends the development of a revenue-constrained transit-advancing network scenario (Constrained Transit Scenario) and Network Performance Measures that include an analysis of compliance with adopted Climate Action Plans across the region.

1. **Preparation of the Regional Plan must include development of a transit-advancing network scenario that is financially constrained and does not require an amendment of the 2004 TransNet Ordinance.**

The Regional Plan must contain one or more network scenarios that prioritize and advance transit projects significantly more than any other network scenarios, a Constrained Transit Scenario. Such a scenario should advance as much transit and active transportation as possible, subject to the following constraints:

Constraint 1: It must cost approximately the same as other constrained network scenarios, paying for the acceleration of transit through the delay or removal of highway expenditures; and

Constraint 2: It must not delay or remove so much highway expenditures as to violate the text of the 2004 TransNet Extension Ordinance.

Any Constrained Transit Scenarios must also be analyzed as an alternative in the EIR.
a. In 2015, transit-advancing scenarios were analyzed too late in the process and were financially or politically unviable.

In 2015, the analysis of transit-advancing alternatives occurred as an alternative in the EIR after the preferred network scenario was chosen and not as a network scenario in the Regional Plan. Circulate San Diego wrote a letter to SANDAG in 2015 commenting on the failure to perform a reasonable alternatives analysis for the agency’s Draft 2015 Regional Plan EIR. A Transit Constrained Scenario must be developed alongside all other scenarios for the Regional Plan, not only as an EIR alternative.

b. Including one or more Transit Constrained Scenarios does not preclude SANDAG from analyzing even more ambitious alternatives.

Circulate San Diego would support SANDAG if it chose to analyze alternatives in the network-selection stage, and in the EIR that assume ambitious federal funding, or optimistic views about the willingness of the SANDAG Board to amend TransNet to prioritize transit. However, alternative scenarios that would rely on contingences that are unlikely to occur are not sufficient and do not replace the need to provide a Transit Constrained Scenario in the Regional Plan.

c. Any Transit Constrained Scenario should advance only as much transit as is financially viable through the delay or removal of highway projects.

SANDAG should provide the Board with a network scenario that provides the option to select a Transit Constrained Scenario that is both financially and politically viable. Any Transit Constrained Scenario should cost roughly the same as SANDAG’s preferred scenario. This will allow the SANDAG Board and the public to make a fair comparison between maintenance of SANDAG’s current status quo plans, and a network scenario that changes those plans to prioritize transit. The Board was not presented with that option in 2015.

Delaying highway spending will free up near-term resources that SANDAG can dedicate to front-load transit projects. A Transit Constrained Scenario should only accelerate as much transit as can be accomplished by freeing up funding through the delay or removal of highway expenditures.

As we stated in 2015, a viable Transit Constrained Scenario likely could not accelerate all of SANDAG’s transit projects into the first ten years of the plan. Accelerating all such transit projects would likely make any Regional Plan financially infeasible. Instead, SANDAG should prepare at least one Transit Constrained Scenario that accelerates as much transit as can be financially feasible, given the flexibility the agency has to delay or remove highway projects, as described below.

d. **A Transit Constrained Scenario should be consistent with the requirements of the 2004 TransNet Extension Ordinance.**

When determining how much of SANDAG’s highway projects to delay or remove to free up resources to accelerate transit in a Transit Constrained Scenario, SANDAG should limit changes to highway plans to be consistent with the text of the 2004 TransNet Extension Ordinance.

In 2015, Circulate San Diego and TransForm California published *TransNet Today*, which explains the substantial flexibility SANDAG has over how to implement the 2004 TransNet Extension Ordinance.

While TransNet does require SANDAG to build certain highway projects, it allows substantial flexibility as to when those projects must be built. SANDAG has itself chosen the order and phasing of TransNet projects, an ordering they can elect to rebalance at their discretion. Such a rebalancing would require only a majority vote by the SANDAG Board, and would be consistent with both the text and the intent of the 2004 TransNet Extension Ordinance approved by the voters.

As explained by *TransNet Today*, if SANDAG were to delay or remove highway projects from its Regional Plan, it could free up other near-term resources planned to be spent on highways, like the State Transportation Improvement Program funds, and instead repurpose them to transit.

Any Transit Constrained Scenario should only delay highway projects required by TransNet in a manner that would still allow SANDAG to complete them within the 40-year time horizon required by the text of the 2004 TransNet Extension Ordinance. For highway projects that are not required by the 2004 TransNet Extension Ordinance, they could be delayed or removed entirely as needed in a Transit Constrained Scenario, to free up resources to accelerate transit.

While the TransNet Extension Ordinance is legally capable of amendment with a two thirds vote of the SANDAG Board, that would be politically very difficult. One or more Transit Constrained Scenarios should be presented to the SANDAG Board that simultaneously advances transit, and preserves the text of TransNet, so that the SANDAG Board can make a real choice within the bounds of the politically possible.

e. **A Transit Constrained Scenario should present a reasonable alternative for the SANDAG Board to consider, even if it does not solve all of the region’s transit challenges in one stroke.**

A Transit Constrained Scenario that is required to be financially and politically viable may not allow SANDAG to accelerate all of its planned transit projects into early periods. Such a plan may be deemed insufficient to many advocates for transit and active transportation.

However, for the SANDAG Board to reasonably consider a change of direction from the status quo, they must be presented with an option that meets Board members’ legal, financial, and political obligations to their constituencies.

If the SANDAG Board were to adopt a Transit Constrained Scenario, even with the constraints outlined in this letter, it could present meaningful improvements to the region’s transit future. The SANDAG Board can only implement such a change if an option is presented to them in the form of a Transit Constrained Scenario, consistent with the text of the 2004 TransNet Extension Ordinance.

Transit advocates, including Circulate San Diego, would likely desire even greater progress on transit that this limited Transit Constrained Scenario could achieve. If SANDAG did adopt such a Scenario in 2019, that would not preclude transit supporters from seeking still further improvements to transit through a future ballot measure, or changes to state or federal law.

2. **Preparation of the Regional Plan must include development of a transit-advancing network scenario that is financially constrained and allows for a TransNet amendment.**

While amending TransNet may be difficult, it is not impossible. The text of TransNet itself requires that SANDAG periodically examine and potentially alter its list of required projects. As SANDAG prepares network scenarios for the 2019 Regional Plan, it should also develop at least one scenario that advances transit through amendments to TransNet to remove or delay projects. With the advent of autonomous vehicle technology, SANDAG’s own modeling may show that some expansions to highway capacity will not be necessary, and those can and should be removed or delayed in the Regional Plan, even if they were envisioned by TransNet.

3. **The Regional Plan should include network performance measures that analyze whether the Scenarios do or do not meet the mode-share goals for local jurisdictions with Climate Action Plans.**

Many jurisdictions in the region have Climate Action Plans (CAPs) that adopt greenhouse gas reduction targets, as well as mode-share goals for transit, walking, and bicycling.

In 2015, Circulate San Diego and the Climate Action Campaign published a report titled *New Climate for Transportation.* That report detailed how SANDAG’s own data predicted that the 2015 Regional Plan would not result in the mode-share outcomes called for by the City of San Diego’s CAP.

The 2019 Regional Plan should include a network performance measure that analyzes to what extent network scenarios meet individual jurisdictions’ CAP mode-share goals where such goals exist. This will help inform the SANDAG Board and the public about whether SANDAG’s efforts are sufficient to help cities meet their own climate goals.

In addition, cities with CAPs and advocates like Circulate San Diego will likely be seeking this data. SANDAG can help a variety of stakeholders in the region by preemptively sharing this information in the draft Regional Plan.

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4. **Conclusion.**

Circulate San Diego looks forward to working with the SANDAG staff and Board as they develop the 2019 Regional Plan, so that San Diego can enjoy the robust transportation network it deserves.

Sincerely,

Maya Rosas  
Advocacy Manager  
Circulate San Diego