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December 16, 2010

Via Electronic Mail

Vice Chair Jerome Stocks and
Members of the Board of Directors
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

**Re: 2050 Regional Transportation Plan: Preferred Revenue Constrained
Transportation Network Scenario**

Dear Board Members:

Save Our Forest and Ranchlands (“SOFAR”) and the Cleveland National Forest Foundation (“CNFF”) submit this letter to comment on the Board of Directors’ deliberations on the preferred alternative for the 2050 Regional Transportation Plan (“2050 RTP”). While the Transportation Committee is recommending that the Board of Directors accept the Hybrid Scenario as the preferred Revenue Constrained Transportation Network Scenario, we are concerned that this Scenario, if implemented, would continue to place an unacceptable emphasis on regional highway capacity. Although the Hybrid Scenario is certainly a step in the right direction because it includes about \$24 billion in transit investment, the Scenario also includes about \$21 billion for highway expansion. Increasing highway capacity at the same time as the region is trying to grow its transit mode share is an inherently flawed approach to regional transportation mobility. Moreover, such an ill-fated approach will sabotage the potential to create a truly sustainable land use for the San Diego region.

SOFAR and CNFF respectfully request that the Board defer further consideration of the Hybrid Scenario and instead direct SANDAG staff to evaluate the merits of a 50-10 Plan. The 50-10 Plan, which envisions 50 years of transit within a 10-year period, would include the

following components: (1) transit infrastructure and operational service improvements fully built-out prior to any consideration of highway capacity projects; (2) a comprehensively designed and fully integrated transit network; (3) an initial emphasis on the *urban core* and the Sprinter and Coaster lines.¹

1. Background

For much of the last decade, SOFAR has participated in SANDAG's regional transportation planning processes, advocating that SANDAG pursue a comprehensive transit network for the San Diego region. To this end, SOFAR participated in the 2003 RTP (referred to as 2030 RTP) and the 2007 RTP planning processes. With each iteration of the RTP, SOFAR has consistently advocated that SANDAG allocate the vast majority of the region's transportation funding to expanding transit infrastructure and operational service instead of highway infrastructure.

Notwithstanding these requests, SANDAG directed the lion's share of revenue in the 2007 RTP to expanding the region's highway network while directing a relatively minor portion toward public transportation. Indeed, the 2007 RTP called for adding more than 800 total-lane miles to the region's highways which, when constructed, would result in a 52 percent increase in daily system-wide vehicle miles traveled ("VMT") compared to 2007 conditions. DEIR at 7-3 and 7-12. SANDAG's environmental impact report ("EIR") for the 2007 RTP confirmed the RTP's alarming implications for global climate change -- the Plan was projected to cause a cumulatively considerable contribution to the worldwide increase in greenhouse gas (AGHG@) emissions, adding 5.3 million tons of GHG emissions to the atmosphere *every year*. DEIR at 4.7-34 and 4.7-38. SANDAG's highway-centric approach to regional transportation in the 2007 RTP also prompted a sharp response from the California Attorney General who criticized SANDAG because it had not analyzed an RTP alternative that would greatly reduce the extent (and cost) of freeway lane expansion projects, and therefore allow investing more funds in urban core transit, walking and biking improvements that would reduce VMT.

SOFAR's participation in the 2007 RTP process culminated in a settlement agreement with SANDAG.² The 2008 SOFAR/SANDAG Settlement Agreement required SANDAG to "develop a regional long-range transit plan, and five-year and ten-year transit action plans, with emphasis given to the urban core." 2008 Agreement at 3. According to the Settlement Agreement, the purpose of the "transit plan with urban core emphasis" was intended to investigate "regional, corridor, local, and neighborhood transit services (e.g., transit capital improvements; operational changes; fare restructuring; design of intermodal transfer facilities) *that would make transit time competitive with the private car*. *Id.* (emphasis added). SOFAR and CNFF agree with this purpose. It is important to note, however, that SOFAR also intended that the purpose of the *urban core* plan was to design a transit program that allocated the vast majority of the region's transportation resources to transit *and* that these resources be allocated

¹ The "urban core" is the geographic sub-area that includes the downtown San Diego Trolley Ring and National City.

² SOFAR's participation in the 2003 RTP also culminated in a Settlement Agreement with SANDAG.

primarily to projects within the *urban core*. SOFAR's vision of the *urban core* plan thus never included funding for the expansion of highways. Thus far, SANDAG has not developed or studied an *urban core* alternative as envisioned by SOFAR.

2. SANDAG's Hybrid Scenario Would Not Result in a Sustainable Region.

With this iteration of the RTP, we are pleased that SANDAG recognizes the importance of transit as a viable component in the region's transportation network. Yet, the Hybrid Scenario contains serious flaws which would result in a failure to advance the region's *smart growth* goals. First, the Hybrid Scenario would continue to fund massive increases in highway infrastructure concurrently with the expansion of the region's transit network. Funding both highway expansion and transit is an ill-fated approach that will not allow the region to achieve its sustainability goals.

Investing in highways will undermine the region's attempt to promote infill development within the region's urban communities. Continued emphasis on facilitating highway travel also perpetuates development patterns that are inherently unsuited to alternative modes. Investing in transit capital and operational improvements, on the other hand, creates transit certainty which in turn is a critical factor for supporting the growth of compact communities. Moreover, as discussed below, substantial increases in highway capacity perpetuate auto-oriented development and significantly impact transit patronage, since the presence of congestion is an incentive to transit usage.

In addition, while the Hybrid Scenario contemplates investing about \$24 billion in public transportation, certain of the transit projects are proposed in locations, or along relatively low-density development corridors, that would not achieve optimal ridership. By funding transit projects over such a dispersed geographical area, the effectiveness, and therefore benefits, of transit become diluted. Without a concentrated and integrated transit system, the region will never achieve optimal transit mode share goals. Transit investment *must* be targeted for areas that either already have relatively intense land use or which have planned intensified land uses. In other words, *it is not just the amount of transit, but the location of that transit that will ultimately affect land use that will, in turn, lead to major changes in travel habits.*

As discussed above, SOFAR has repeatedly emphasized the importance of implementing a comprehensive transit system in the region's *urban core*. See e.g., the alternative SOFAR provided to SANDAG in the context of the 2007 RTP, February 16, 2007. The infrastructure in the *urban core*, coupled with this community's demographics, suggest that this location has tremendous potential for increased transit mode share. Roadways within the *urban core* were developed on a grid system which inherently supports the efficient movement of transit vehicles. In fact, some of the heaviest traveled bus routes in the trolley ring area were once served by streetcars. It is important to note that, in addition to concentrating transit in the *urban core*, SOFAR and CNFF wholeheartedly endorse SANDAG's proposals to double track the Sprinter and the Coaster lines.

In sum, SANDAG's proposed Hybrid Scenario would not ensure that the region meets its sustainability, transportation or environmental goals. SANDAG should follow the precedent being set by urban regions around the world by: (a) committing to a future of *smart growth*, and (b) funding a transportation network that will support the mobility needs of this *smart growth*. Alternative transportation approaches to the Hybrid Scenario are available and should be examined. Set forth below is a sketch of an approach – referred to as the 50-10 Plan -- that would achieve this important goal. We respectfully request that SANDAG work with this sketch to formulate a revised alternative for the 2050 RTP.

3. The 50-10 Plan Would Result in Considerable Benefits Compared to SANDAG's Hybrid Scenario.

SANDAG should develop a 50-10 Plan for the San Diego region. A 50-10 Plan, which envisions 50 years of transit implemented within a 10-year period, would include the following components: (a) full buildout of the region's public transportation network prior to funding any additional highway expansion; (b) the regional transit network would be a comprehensive, well-integrated system; and (c) an initial focus on the *urban core*, the Sprinter and the Coaster. In developing this 50-10 Plan, we encourage SANDAG to look to the plans prepared by two cities: Bordeaux and Los Angeles.

In just six years, Bordeaux completed a transit revolution, changing the car-dominated nature of the city center, by building 3 tram lines with total length of 27 miles and 88 stations. Sustainable transportation mode share is expected to increase to 17% city-wide by 2010 (37% for the city centre), compared to 9% in 1998. These transit investments have supported housing revitalization, walk-ability and business activity in downtown Bordeaux. The average time gain on every transit trip with the tram network was estimated to be eight minutes. This significant improvement was accompanied by an urban revitalization of an unequalled magnitude in France, transforming a much neglected downtown area.³

Los Angeles is also undertaking what appears to be an equally ambitious approach to fund a comprehensive transit program. The 30/10 Initiative would use the City's 30-year sales tax revenue (which allocates ½ cent to transit projects) to leverage federal funding and complete a robust transit plan in ten years. According to the Los Angeles County Metropolitan Transportation Authority, the 30/10 Initiative will:

- Create 160,000 new jobs
- Result in 77 million more transit boardings
- Generate 521,000 fewer pounds of mobile source pollution emissions
- Use 10.3 million fewer gallons of gasoline
- Result in 191 million fewer vehicle miles traveled

³ The Downtown Complete Community Mobility Plan is available at http://www.ccdc.com/images/stories/downloads/planning/advance-planning-studies/complete_mobility_transit_study.pdf. The Bordeaux case study begins on page 116.

See Los Angeles County Metropolitan Transportation Authority (www.metro.net), available at <http://www.metro.net/projects/30-10/>.

Set forth below is a summary of the components, and overall goals, of a 50-10 Plan.

A. The 50-10 Plan Would Implement Transit Projects Prior to Highway Capacity Projects.

If transit is to succeed in the region, *it must now be the region's highest priority*. SANDAG must build out its public transportation network before funding any additional highway projects. Highway expansion is not unlike a treadmill. Decades of highway expansion projects have encouraged decentralized development patterns supported by easy highway access. In turn this decentralized development has encouraged massive traffic growth, leading to congestion, and the demand for further highway expansion. Consequently, for at least the last 30 years, San Diego's legacy has been a devotion to the automobile. The sprawling pattern of land development and the extensive highways have contributed to a region that is almost entirely automobile dependent. Not surprisingly, vehicle miles traveled ("VMT") has grown exponentially. Moreover, the San Diego region has more than its fair share of freeways. According to the Texas Transportation Institute Urban Mobility Study, the San Diego region ranks as having the most per capita freeway lane miles of the country's fifteen largest regions.

A confluence of factors is contributing to a dramatic shift in our development patterns: the economy, an aging population, global climate change, and concern about our dependence on foreign oil are contributing to an escalating shift in residential market demand. The public is now seeking smaller homes, shorter commutes and more urbanized living. Developers and jurisdictions are reacting to this demand by intensifying land uses in our urban areas. This shift in development patterns results in a corresponding shift in transportation needs. Residents of more compact development – such as that in the *urban core* – have much less need for automobiles compared to their suburban counterparts. SANDAG must acknowledge this fundamental land use shift and plan its future transportation network accordingly. The region no longer needs wider highways to the suburbs. Instead, the region's highest priority must be enhanced mobility for urban residents.

There are two additional reasons why the 50-10 Plan should not include any highway widening projects. First, increases in highway infrastructure undercut transit ridership. Traffic congestion provides a significant incentive to seek alternative modes of transportation. High quality public transportation tends to attract travelers who might otherwise drive. Once highways are widened, however, traffic congestion eases, travel speeds increase (at least for some period of time), and travelers again begin to drive. Thus, a comprehensive transit program would be essentially guaranteed to fail if a massive increase in highway capacity were to accompany the Plan's public transit investments. Second, as discussed further below, intensive land use tends to follow transit development. Improving transit thus provides further incentive for the growth of compact communities. Funding highways, on the other hand, would only contribute further toward decentralized, low density development patterns.

Now is the time to shift directions in transportation mobility and this simply cannot be accomplished in a half-hearted manner. Instead of committing \$21 billion toward highway expansion projects, as the Hybrid Scenario contemplates, SANDAG must commit this funding to transit. In any event, SANDAG must not fund increases in highway capacity at the same time as it proposes a substantial commitment to transit. Put simply, a comprehensive transit system must be *fully implemented* prior to considering any further increases in highway capacity.

B. The 50-10 Plan Would Be Based on a Compact Development, High Density Land Use Plan.

The foundation of the 50-10 Plan must be the development of a preferred regional land use plan – a *smart growth* land use plan -- and the development of a transportation mobility network that supports the needs of this *smart growth* plan. This is a vitally important point. The region's historical land use patterns must change in order to ensure a sustainable future. This shift is already underway. SANDAG must be at the forefront of this change and lead the region in this new direction. The fact that the San Diego region has traditionally experienced a low-density, decentralized development pattern should not be an excuse for a continuation of unsustainable land use practices.

San Diego, like many urban regions around the country, is undergoing a fundamental shift in residential development patterns toward more compact, infill, multi-modal development. Not surprisingly, residents of these urban areas are seeking transit-oriented homes. As one study shows, in the San Francisco Bay Area, about 600,000 households are located within a half-mile of an existing rail transit or bus station. Over the next 25 years, an estimated additional 250,000 households will be seeking transit-oriented homes, an increase of 40 percent. *See* Transit Oriented Development, New Places, New Choices in the San Francisco Bay Area, November 2006, available at: http://www.mtc.ca.gov/planning/smart_growth/tod/TOD_Book.pdf.

At the same time, this compact, infill development has the potential to make public transportation more efficient. People living or working close to high-quality transit use it with much greater frequency than people farther from transit. One study found that California transit station area residents are about five times more likely to commute by transit as the average worker in the same city. *See* Land Use Impacts on Transportation, Todd Litman, Victoria Transport Policy Institute, (citing Lund, Cervero and Willson (2004)), December 7, 2010 at 24. These higher levels of transit use can improve the cost-effectiveness of transit investments, bolster the financial stability of transit systems and support higher-quality transit. In turn, proximity to higher quality public-transit infrastructure such as rail, trolley or bus lines and stations tends to further encourage compact, mixed, multi-modal development. *See* Evaluating Transportation Land Use Impacts, Todd Litman, Victoria Transport Policy Institute, at 16.

The planning principles of transit oriented development or communities are not new – indeed they represent a return to the development patterns common to older cities throughout the world. Siting homes, jobs, shops and services within walking distance of mass transit hubs was the typical pattern of development as American cities expanded along railroad corridors and

streetcar lines in the 19th and early-20th centuries. *See* Transit Oriented Development, New Places, New Choices in the San Francisco Bay Area at 3. Indeed, in the 1970s, San Diego led the nation by being the first to build a low-cost rail line. Dozens of other cities have since followed, using rail transit as the foundation for their transit systems. Unfortunately, over the last 40 years, San Diego seems to have lost its way.

Despite the San Diego region's unsustainable past, ample opportunity exists to develop compact, infill, multi-modal development within the County's urbanized areas. SOFAR and CNFF recently commissioned an analysis of the infill development potential within the County's 18 cities. *See* Infill Scenario Study, prepared by GreenInfo Network (submitted previously). Using SANDAG's 2030 Employment and Residential Land Inventory ("SANDAG Inventory"), the Infill Study determined that the County can more than meet its need for new housing over the next several decades by concentrating development in existing cities. The SANDAG inventory projects that the County will require 230,000 new housing units by 2030. Using this figure as a starting point, the Infill Scenario Study concluded that, based on the incorporated cities' *existing General Plans and zoning*, there is ample development capacity to accommodate approximately 400,000 new homes in the incorporated cities of San Diego County. Thus, *all* of the region's projected housing needs for 2030 could take place as infill development (within the incorporated cities of San Diego). Moreover, the cities would still have 170,000 additional units available for development beyond 2030.

The implications of this Infill Study are profound. Beyond the obvious benefits to transportation (such as reduced commute trip lengths, reduced VMT and increased potential for a viable public transportation system), focusing development in the County's urbanized areas or cities and developing in a compact manner would reduce unnecessary land consumption and allow for the preservation of the back-country's environmentally sensitive lands. A land use plan such as that described in the Infill Study would reduce the waste of natural resources including energy and water, as well as the impacts of development on air and water quality. According to the draft EIR for the San Diego County General Plan Update, the proposed General Plan would result in 22 significant and unavoidable environmental impacts including impacts to aesthetics, agriculture, air quality, biological resources, hazards, hydrology/water quality, minerals, noise, public services, traffic, and utilities. Many of these environmental impacts could be reduced or avoided altogether if the County directed the vast majority of its projected residential development to the County's 18 cities.

C. The 50-10 Plan Would Fund a Comprehensive, Integrated Transit System that Focuses Initially on the Urban Core.

SANDAG's proposal to commit \$24 billion to transit, while ambitious, is unlikely to result in a substantial increase in transit mode share. The problem with the Hybrid Scenario's approach extend beyond the ill-fated proposal to commit \$21 billion in highway expansion while also funding transit. The second fundamental flaw is that the transit projects that are contemplated by the Hybrid Scenario are simply spread over too large a geographical area and planned for inappropriate transportation corridors.

The SANDAG urban region is enormous, comprising about 800 square miles. The Hybrid Scenario proposes transit investment over an area that is roughly 200 square miles. In contrast, the *urban core* area is about 40 to 60 square miles. In order to be successful, the region's transit system must be initially focused in a discrete geographical location that allows for the development of a comprehensive and well-integrated system. We strongly encourage SANDAG to initially build-out transit in the *urban core* (along with double-tracking the Coaster and Sprinter). The goal of such a transit system is that it would allow mobility within the geographical limits of the *Urban Core* without an automobile; efficient transitions between various public transit modes (e.g., light rail, trolley and bus service); and connections to other modes (e.g., pedestrians and bicyclists should have safe, accessible routes to transit stops. Indeed, the work that SANDAG did conduct on the Urban Area Transit Study shows that there is tremendous potential to increase transit mode share within the *urban core*.

Once the *urban core* public transit system is fully built out, as well as the Coaster and Sprinter, the second phase of the 50-10 Plan would be designed, working outward from the urban core.

4. Conclusion

SOFAR and CNFF are encouraged by SANDAG's willingness to allocate \$24 billion of the region's relatively scarce transportation resources to public transportation. Yet SANDAG should not commit this funding to a transit plan while concurrently increasing the capacity of the region's highways. In addition, SANDAG should design a geographically focused and well-integrated transit program beginning with the *urban core*, the Sprinter and the Coaster. SANDAG owes it to the residents of the region to plan for the future, and not just perpetuate the unsustainable transportation policies of the past. We urge the Board to direct SANDAG staff to design and study the 50-10 Plan.

Sincerely,

Duncan McFetridge

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