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July 14, 2010

San Diego Association of Governments
Transportation Committee
401 B Street, Suite 800
San Diego, CA 92101

Re: 2050 Regional Transportation Plan: Draft Unconstrained Transportation Network

Dear Honorable Members of the Transportation Committee:

Save Our Forest and Ranchlands ("SOFAR") and the Cleveland National Forest Foundation ("CNFF"), two organizations dedicated to progressive land use planning and the protection of vital natural resources, are submitting comments on the Draft Unconstrained Transportation Network ("Unconstrained Network") for the 2050 Regional Transportation Plan ("RTP"). After reviewing the Draft Unconstrained Network, we believe that it lacks the necessary policies and investments to ensure sustainability for the region's long-term future. In addition, the 2050 RTP model unrealistically inflates transit mode share projections that would occur with implementation of the 2050 RTP. Unless and until SANDAG prioritizes transit and deemphasizes freeway and roadway projects, we must conclude that the region will never achieve SANDAG's purported goal of creating a "world class" transit system.

Modeling Errors

On June 23, 2010, transportation and planning experts submitted a letter to the California Air Resources Board ("CARB"), which included an analysis of SANDAG's proposed hybrid scenario for reducing greenhouse gas ("GHG") emissions for purposes of complying with Senate Bill 375 ("SB 375").[1]

The CARB letter notes,

[1] This letter, otherwise referred to as the "CARB letter" is attached for reference.

"The ambitious transit results (of the hybrid scenario) are laudable and should be supported by appropriate policies and investments. However based on the information presented we are concerned that these transit goals may not be supported."

The letter goes on to state,

"The problems noted here (within the letter) tend to overestimate auto travel and VMT, and paradoxically may overestimate the shift to transit use. If fixed or adjusted, SANDAG would gain confidence in its estimated GHG savings for the hybrid scenario, and better understanding of effects of policy and investment choices on travel behavior. SANDAG could then verify its GHG reductions, and learn more about effectiveness of current and more ambitious strategies."

These experts make clear that deficiencies in SANDAG's 2050 RTP modeling efforts cast doubt on the reliability of the modeling results. Given this analysis, CNFF and SOFAR question the validity of SANDAG's modeling of transit mode share, cost predictions, and other results of the 2050 RTP Unconstrained Network.

Land Use

On June 3, 2010, SOFAR and CNFF submitted a letter to SANDAG regarding the Urban Area Transit Strategy. This letter described the importance of using appropriate land use and transportation assumptions in order to capture the dynamic relationship between these factors. Our letter explained that increasing densities in the urban core would change the amount and destination of transit trips which would reduce vehicle miles traveled and further support higher density land uses. We expressed the concern that by using the 2050 Regional Forecast as a constant in modeling land use for the Urban Area Transit Study, SANDAG is ignoring important market shifts and demand changes that will rely on transit infrastructure to properly function.

The CARB letter verifies this concern by questioning SANDAG's 4-Step Model. The CARB letter explains that the 4-Step Model, "cannot assess very well, or at all, policy questions of today." Included within the criticism of SANDAG's 4-Step Model, the experts noted that it cannot answer vital questions such as, "What do local land use details, particularly mixed uses, mean to travel behavior?"

Due to the fact that land use assumptions for the 2050 RTP cannot be properly modeled with the 4-Step Model, we can conclude that SANDAG must change its model and modeling assumptions to ensure that the land use and transportation factors are properly considered and that the modeling accurately reflects the performance of the 2050 Unconstrained Network.

Furthermore, the CARB letter noted,

"For SANDAG, a fully ambitious land use would enhance its Urban and Town Center growth strategy…to support the transit strategies discussed below and make them more realistic."

CNFF and SOFAR concur with this conclusion, and have found that SANDAG should model more intensive land use scenarios to enhance transit mode share. On July 13, 2010, CNFF released the "Alternative Development Scenario for San Diego County" ("Infill Study"), which concluded that with existing zoning there is sufficient development capacity to accommodate approximately 400,000 new

homes in the incorporated areas of San Diego County. The conclusions of the Infill Study are profound: all of the region's projected housing needs for 2030 could take place as infill development (within the incorporated cities of San Diego), and the cities would still have 170,000 additional units available for development beyond 2030.[2] The Infill Study's conclusions are supported by current national trends in the market demand for urban style housing in walkable neighborhoods.

If SANDAG were to use more intensive land use assumptions in its RTP modeling, the model results would likely demonstrate increased transit use. Without increasing confidence in its modeling -- either by using a different and up-to-date model, changing land use assumptions, or both --, key questions about 2050 travel patterns will remain unanswered. In this regard, the CARB letter stated,

"If the shift (to transit) is overstated, SANDAG will need to concentrate more on its Urban Area Transit Strategy **in its next RTP,** including redirecting or increasing revenues to expand its system."

We cannot afford to wait for the next iteration of the RTP to fix these critical issues and make transit a reality for the San Diego region. Given the magnitude of the financial investment and the scarcity of funding, it is imperative that decisions pertaining to transportation infrastructure be based on sound science. We must be accurately informed so that we can change course to ensure a more sustainable future.

Baseline

In recent comment letters to SANDAG, SOFAR and CNFF have repeatedly noted that the "world class" transit system proposed for the 2050 RTP will not be possible given SANDAG's baseline (buildout of the 2030 RTP). Transportation and planning experts have criticized SANDAG's extensive highway system, explaining that HOV and Managed Lanes are highway "solutions" to mobility, and that highway expansion is known to have a direct negative impact on transit.

The CARB letter reinforces these assertions:

"SANDAG's hybrid/ambitious scenario makes no changes to rein in suburban and interregional highway expansion. A fully ambitious scenario would **retract or scale back highway projects** in outlying areas, particularly those designed to serve interregional commuting, in favor of interior road, transit, or walk and bicycle projects to improve accessibility to or within Urban and Town Centers." (Emphasis added).

Despite these conclusions, SANDAG's staff report on the Unconstrained Network notes,

"It is important to note that the 2030 RTP Unconstrained highway network includes an extensive Managed Lanes system that provides tremendous flexibility in serving transit and HOVs by maximizing the available rights-of-way in several of the region's major highway corridors. The goal in reviewing the highway network is to build upon this existing plan by integrating the revised transit network into it, thereby creating the most efficient and balanced transportation system."

[2] The full report is available here: http://www.transitsandiego.org/transitsandiego/pdf/Infill_Study.pdf

Although the staff report states that SANDAG may modify the 2030 RTP Unconstrained Highway Network to reduce certain proposed freeway lane expansions, these changes are insufficient to ensure that transit and transit oriented development will not be compromised by highway expansion, including Managed Lanes projects. Indeed, the staff report finds that the Draft 2050 Unconstrained Transit Network proposes an increase in 240 miles for the region's Bus Rapid Transit (BRT) system, an increase in 250 miles for Rapid Bus, yet only 78 and 100 miles for Commuter Rail/Highspeed Rail and Light Rail Transit, respectively.

The Independent Transit Planning Review ("ITPR") panel that reviewed the 2030 RTP noted,

"Smart Growth efforts will likely be weakened by managed lanes' alleviation of congestion and its encouragement of auto-oriented growth away from transit corridors."

The CARB letter echoed this concern,

"Some of the suburban highway expansions would provide too much capacity to support more low density, single use suburban development than SANDAG intends to be built, and might not be needed if more of that growth were directed into Urban and Town Centers. The Route 241 toll road extension into Orange County plus HOT lanes (Managed Lanes) on I-5 & I-15 to the north county line would promote more interregional commuting and in no way fit with the spirit of SB 375."

It is interesting to note that comments made by the ITPR panel nearly four years ago with regards to the previous RTP are remarkably similar to recent transportation planning experts' comments regarding the 2050 RTP. This demonstrates that regardless of changes that have occurred between the previous RTP and now, the 2050 RTP currently contains many of the flaws and issues as did the previous RTP. While the environmental review has not yet been completed for the 2050 RTP, it is likely that given its current state, it will follow the same footsteps as the previous RTP and generate significant, unavoidable, and unmitigable impacts in almost every environmental and social category. Despite the 2050 RTP's many flaws, it is not too late to amend the plan and its model, and help ensure a sustainable future for the San Diego region.

Sincerely,

Duncan McFetridge