



SAVE OUR FOREST AND RANCLANDS

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May 27, 2010

San Diego Association of Governments
Board of Directors
401 B Street, Suite 800
San Diego, CA 92101

**Re: Item 14, 2050 Regional Transportation Plan: Draft Evaluation Criteria
for Highway Corridors, Connectors, Transit Services, and Freight Projects**

Dear Board of Directors,

Save Our Forests and Ranchlands (“SOFAR”), an Specifically, we are concerned that the methodology used in developing the evaluation criteria and in selecting networks for the 2050 RTP is fatally flawed. We believe that in essence, the San Diego Association of Governments (“SANDAG”) is putting the cart (selection criteria) before the horse (performance measures), and using arbitrary criteria to build the cart. A fundamental error at this level of developing a regional transportation system will in turn undermine the efforts to achieve sustainable growth for our region. Therefore, we are requesting that SANDAG, in light of the evidence explained below, table its discussion of selection criteria, and first focus on the performance measures and the goals for overall functionality of the 2050 transportation system. After this process is complete, it would be appropriate to review and amend the selection criteria in accordance with the comments detailed below.

Background:

On May 12, 2010 SOFAR submitted a letter to the SANDAG Board of Directors, which outlined a preliminary list of concerns that SOFAR had with the selection criteria for the 2050 RTP. On May 18, 2010 SOFAR received a response letter from SANDAG staff, which attempted to address the issues raised by SOFAR.¹ Yet, SANDAG's correspondence overlooks several critical issues that must be taken into account in order to achieve SANDAG's stated goals in the 2050 RTP and the Regional Comprehensive Plan ("RCP"):

- Compliance with Senate Bill 375 ("SB 375").
- Achieving SANDAG's Urban Area Transit Strategy, which, if developed and implemented appropriately, would create a "world class" transit system for the region.
- Changes in our economic state due to the ongoing recession.
- Changes in the cost, availability, and reliability of natural resources.
- Changes in the real estate market.
- Demographic shifts.²

We live in a world that has experienced radically changed circumstances since the previous iteration of the RTP. As such, SANDAG must shift course, and reverse its decades-long -- and entirely unsustainable -- approach to urban transportation planning. If the San Diego region is going to surmount these changed circumstances, we cannot afford to plan the wrong way. From across the nation there is overwhelming evidence that cities are meeting the challenges of a changed world. Recent articles in the Los Angeles Times, the AARP Newsletter, and The Atlantic demonstrate this fact:

"Thanks to overbuilding, demographic changes and shifts in preferences, by 2030 there could be 25 million more suburban homes on large lots than are needed, said Arthur C. Nelson of the University of Utah. Nelson believes that as baby boomers age and as younger generations buy real estate, the population will abandon remote McMansions for smaller homes closer to shops, jobs and the other necessities of life."³

"Urban-style housing in walkable neighborhoods -- including those in the inner suburbs -- is what's in demand today. And for a variety of reasons, that demand will intensify in the coming years. Only by serving it can the country kick-start growth in an enormous and essential part of the economy."⁴

¹ Both of these letters are enclosed for reference.

² *The San Diego Region 2009 Employment and Residential Land Inventory and Market Analysis*, which was prepared by SANDAG in September of 2009, notes that of the 130,016 units currently in the development pipeline, 107,253, or roughly 80% are within the incorporated cities of San Diego County.

³ <http://www.latimes.com/business/la-fi-hemet30-2010mar30,0,7301923.story>

⁴ <http://www.theatlantic.com/magazine/archive/2010/06/here-comes-the-neighborhood/8093/2/>

“Supporters say that streetcars cost less in the long run and pollute less than other forms of transportation while injecting new life into neighborhoods. Simply put, they help create communities where residents have alternatives to cars for getting around.”⁵

These quotes represent a brief sampling of a tidal wave of change in land use and transportation patterns that is sweeping the country. Despite this fact, the 2050 RTP process, including the development of the selection criteria and the selection criteria themselves are entirely based on the previous RTP (2030). One has to question the legitimacy of basing the 2050 RTP on the 2030 RTP, which had significant and unavoidable impacts on almost every environmental resource, and resulted in intense criticism from the environmental community and the California Attorney General, resulting in a settlement agreement that required a comprehensive urban core transit plan to address these unmitigable impacts. Consequently, the 2050 RTP has to start on new ground in order to achieve new goals and respond to the overwhelming changes in environmental, social, and economic circumstances.

Issues with the 2050 RTP Process

Due to the planning horizon of the 2050 RTP, and the fact that it will determine transportation networks in the San Diego region for the next forty years, we cannot afford to pursue an antiquated approach and put infrastructure in the wrong place. As such, it is critical that the RTP process itself is set-up properly. As it is currently set, the 2050 RTP process has two critical flaws: it relies on bottom-up rather than top-down planning, and arbitrarily separates evaluation of transit projects and highway projects. To address these issues, SOFAR recommends that after approval and finalization of performance measures and network parameters that SANDAG continue its discussion on selection criteria, and directly compare transportation projects, specifically transit vs. highway projects.

1. Top-Down vs. Bottom-Up Planning

SANDAG’s letter to SOFAR regarding the selection criteria for the 2050 RTP noted,

“Projects are ranked relative to other projects within the same category which allows for identification of the strongest projects within each category...The lists of ranked projects will serve as a tool to aid in the development of the multimodal transportation network alternatives.”

SOFAR disagrees with this methodology because it will lead to a haphazard approach to planning for the 2050 RTP. The Independent Transit Planning Review (ITPR) Panel concurs with this top-down approach,

“The transit planning approach should be a top-down effort, starting with creating a good system plan and then bringing the process to the corridor level. Ensuring that a strong network is in place to meet modal share is critical.”

⁵ http://bulletin.aarp.org/yourworld/gettingaround/articles/streetcar_revival.html

The main problem with this bottom-up planning is that it is project-based, and does not allow for the creation of new whole networks of transit infrastructure. The current highway and road system throughout San Diego County is extensive, and can be considered a comprehensive system in that it is possible to travel almost anywhere throughout the County in a car. The transit system in contrast, is not a comprehensive system, and there are many places throughout even the urban core of San Diego that one cannot travel by transit. The bottom-up process of the 2050 RTP is prejudice for failure of transit, which will continue to underperform if it is analyzed on a project-by-project basis. In order for transit to work, it needs to be viewed and evaluated as an entire system, because individual transit projects are not functional if they are not a part of an overall transit system. Due to the fact that the performance measures have not yet been evaluated by the SANDAG Board of Directors, one must wonder: how can the Board evaluate individual project criteria when they have not yet determined performance measures for the overall system? This question must be addressed in order to move forward with the 2050 RTP process.

2. Category Separations and Multimodal Transportation Networks

As discussed above, SANDAG intends to separately rank projects of different categories in order to create various multimodal transportation networks. SOFAR disagrees with this methodology, and questions the rationale for segregating transit and highway projects in the criteria ranking system.

There is a strong relationship between transit mode share and projects that accommodate the automobile. The peer panel that recently evaluated the Urban Area Transit Strategy stated the following with regards to this topic:

“Locations that have limited parking and freeway expansions, and have simultaneously added an array (of) transit services, have increased the overall performance of their transit systems and have increased transit mode share.”

Similarly, the ITPR panel stated:

“The panel understands the need for a balanced, multi-modal RTP that reduces the growth in congestion and provides greater modal choices, but contends that the extent of managed lanes in the RTP will reduce the transit mode share of regional trips.”

Given the inverse relationship between transit and highway projects, and the fact that increasing transit mode share (in part) depends on decreasing vehicle mode share, there is no sound reason to evaluate highway and transit projects separately. SANDAG must immediately correct this egregious error in order to accommodate the region’s growth in a sustainable manner.

Issues with Selection Criteria:

After development of performance measures and network goals, SANDAG should incorporate the following suggestions into the selection criteria for the 2050 RTP. This approach is essential to developing an RTP that will address critical issues currently facing San Diego.

1. Cost-Effectiveness

As SOFAR explained in its May 12, 2010 letter, the connection made in the selection criteria between cost and congestion relief for highway corridor projects is erroneous. This cost-effectiveness parameter is misleading, and does not capture the true cost of highway projects.

“Congestion relief” is an antiquated goal and should be stricken from the selection criteria altogether. That said, if SANDAG intends to connect congestion relief, an alleged benefit of highway projects, with capital and operating costs (direct economic costs), then it also must link other “external” costs to the highway projects as well. To start, SANDAG must include in its modeling the cost of gasoline, as it is well known that the actual societal cost of gasoline consumption is much higher than the three to four dollar per gallon price that is paid by consumers at the pump.⁶ In addition, the “external” costs (outside of direct economic costs) borne by highway building and increasing vehicle miles traveled (VMT) are overwhelming. Emissions from vehicles themselves, as well as land use patterns (sprawl development) that occur as a result of automobile-based infrastructure are known to have significant impacts on climate change, air and water pollution, habitat, public health and safety, and many other quality of life issues. All of society must pay for these costs, either in taxes to mitigate for damages, or in personal expenditures. The societal costs caused by automobile-based infrastructure were clearly identified in the Statement of Overriding Considerations (“SOC”) for the 2030 RTP, which stated:

“Significant unavoidable and unmitigable impacts would occur to land use, visual resources, energy, and biological resources and there would be cumulatively significant impacts to land use, visual resources, air quality, noise, energy, global climate change, geology/paleontology, water resources, and biological resources, cultural resources, hazards and hazardous materials.”

Despite the long list of SIGNIFICANT UNAVOIDABLE and UNMITIGABLE impacts that would occur due to the 2030 RTP, the SOC went on to say:

“...SANDAG has determined that the following legal, economic, social, and environmental benefits of the Project (2030 RTP) **outweigh** the potential unavoidable adverse impacts and **render those potential adverse environmental impacts acceptable...**” (emphasis added).

The selection criteria for the 2050 RTP, by only measuring the direct economic costs that will result from highway corridor projects, will result in the same outcome: unmitigable impacts in almost every possible category, which are deemed “acceptable” because of

⁶International Center for Technology Assessment. 1998. *The Real Price of Gasoline*. Available at: <http://www.icta.org/doc/Real%20Price%20of%20Gasoline.pdf>

socioeconomic benefits. If San Diego wants to move forward and have a sustainable future, as is called for under the 2050 RTP, SANDAG must end this archaic way of thinking. SANDAG must evaluate projects for more than their direct economic costs, and refuse to accept that society will take on extreme environmental, social, and economic costs for the sake of “congestion relief.”

2. Mobility vs. Congestion Relief

As discussed above, SOFAR’s prior letter to SANDAG expressed concern with the excessive reliance on congestion relief in the selection criteria. SANDAG’s response to this concern, in part was: “within the highway corridor project category, it is important to understand the **functionality** of these corridors” (emphasis added). The use of congestion relief in this sense is connected to mobility, which the SANDAG response elaborated on by stating, “projects that are capacity-related such as HOV lanes and Managed Lane systems provide for improved quality of travel and livability and sustainability, in line with the 2050 RTP goals and policy objectives.”

As urban planners and transportation engineering experts now clearly recognize, congestion relief is synonymous with highway capacity increases, which is the antithesis of sustainability. The ITPR panel determined:

“[M]anaged lanes are primarily a highway solution to mobility, not a “transit first” approach. The dramatic increase in freeway capacity that managed lanes provide will perpetuate auto-oriented development and reduce transit’s competitiveness.”

“The SANDAG Board appears to agree that livability, not just mobility, is a key goal of all SANDAG plans. The ITPR panel suggests that the RTP should facilitate the RCP vision of a balance between transportation and land use leading to improved livability throughout the region.”⁷

As such, HOV and Managed Lanes, as the ITPR panel explains, are a **highway solution to mobility**, which perpetuate auto-oriented development and gravely threaten the viability of transit in the region. Therefore, although SANDAG identifies these types of projects as “transit” because they facilitate auto-dependent land uses, they are anything but sustainable.

VMT reduction, which greatly favors transit projects and transit-oriented development, must be one of the 2050 RTP criteria if SANDAG intends to promote sustainability. Relying on congestion relief and emphasizing HOV and Managed Lanes will lead the 2050 RTP down the same path as the 2030 RTP, which was extremely transit deficient, and resulted in many significant unavoidable and unmitigable environmental impacts.

3. Greenhouse Gas Considerations

⁷ http://www.sandag.org/uploads/publicationid/publicationid_1274_6239.pdf

SOFAR's previous comment letter noted that for considerations of greenhouse gas ("GHG") emissions, SANDAG only takes CO₂ emissions into account, and that GHG emissions should be measured in terms of VMT reduction. SANDAG noted that VMT was taken into account in an indirect way, because CO₂ emissions (which are calculated in part by looking at VMT) are analyzed with and without project improvements. This response by SANDAG is missing the greater picture of analyzing projects for their impact on VMT. VMT is not just a means of calculating CO₂ emissions, as described by SANDAG, but can also have significant indirect effect on CO₂ and other GHG emissions reductions. VMT is an indicator of the number of vehicles on the road and how far each of these vehicles travels. As such, this parameter is intrinsically linked to land use, because land use determines the origin and destination of trips. In order to truly reduce GHG emissions in San Diego, we must reduce VMT. Accordingly, SANDAG must evaluate each project's contribution to VMT both in a direct sense (how the project relates to land use) and in an indirect manner to determine emissions, both GHG and otherwise.

4. Smart Growth Areas and Land Use Considerations

In SOFAR's previous comment letter, we explained that the selection criteria for the 2050 RTP make a false connection between highways and Smart Growth Areas. SANDAG responded that under the current selection criteria, both highway corridor and transit services projects receive points "based upon place types served as listed within the RCP Smart Growth Area Classifications." Therefore, points are awarded to projects that serve various smart growth place types, which are delineated on the Smart Growth Concept Map. This approach is flawed, because it focuses too heavily on the Smart Growth Areas rather than looking at smart growth on a community-wide basis, and accepts highway projects as a viable means of transportation for Smart Growth Areas.

While some Smart Growth Areas are properly identified by SANDAG as candidates for increased density and transit infrastructure, focusing transit investments on specific Smart Growth Areas alone will not necessarily lead to region-wide smart growth. This is because the Smart Growth Areas do not comprise a community, but rather are pockets of areas that have densities and other characteristics that could potentially support transit infrastructure. The Smart Growth Areas need to be expanded such that they are viewed and analyzed on a system or community-wide scale. Viewing the Smart Growth Areas on a larger scale is the only way that SANDAG will be able to model transit investments that best serve community-level land uses and lead to the development of sustainable, transit-oriented communities. The proposed Transit Propensity network is an example of a transit system that was designed to make transit work within a community.

Additionally, relying on Managed and HOV lanes as "transit" to serve Smart Growth Areas is erroneous, and will impede the development of true transit-oriented smart growth communities. The ITPR noted this fact when they stated:

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

In order for transit to work and function as a system, it is imperative that land use is supportive of transit, and vice versa. The only major land use connection made within the selection criteria for the 2050 RTP is between transportation (of all modes) and smart growth areas, which as SOFAR, the ITPR panel, and the Attorney General, have made clear, are not necessarily conducive to smart growth. As such, the selection criteria must be amended such that priority is given to transit (not highway) networks that serve community-wide areas with actual or proposed land use densities and zoning (mixed use, etc.) that are most supportive of transit infrastructure. In this regard, the unprecedented market and demographic shift that was noted by SANDAG in the 2009 Employment and Residential Land Inventory and Market Analysis, is testimony to why SANDAG should be focusing transit infrastructure to meet these changes in demand. Building infrastructure to serve infill demand constitutes a crucial building block for San Diego's recovery from the depressed economy. This is why, as we have noted, we cannot afford to make an infrastructure mistake.

5. Parking

Transportation planning criteria and parameters often include parking considerations, because parking availability is a critical component of both transportation and land use. The provision of parking is, by definition, a way to accommodate the automobile, and the presence of parking often depresses transit ridership and other non-automobile uses. Put simply, when parking is available, people drive. This idea was further espoused by the ITPR panel, who noted: "Behavioral changes, supportive land uses, and parking policy are often greater determinants of transit system ridership than transportation infrastructure." Despite the importance of parking availability and policies, the selection criteria for the 2050 RTP make no mention of parking, nor do they link transportation projects to parking. This is an extreme flaw within the selection criteria, which must be immediately resolved to move forward with the 2050 RTP.

Conclusion

SANDAG must depart its archaic approach to transportation planning that finds its basis in past and inherently flawed planning efforts. To this end, SANDAG must be able to answer the following question: given that we live in a changed world, a world of changed resources, changed economic structures, and changes in demand, do the selection criteria address these changes and aim at improving the San Diego region's critical problems? The requirements of SB 375, drastic environmental and economic issues with oil and water consumption, as well as market trends shifting towards infill development necessitate change. Ideally the 2050 RTP and the transportation networks put forth in this plan will assist San Diego in addressing change and moving forward towards a sustainable future. It is up to the SANDAG Board of Directors to make this a reality, and it is the responsibility of you, the elected officials to provide the leadership that San Diego needs.

Sincerely,

Duncan Mc Schicfe