



SAVE OUR FOREST
AND RANCLANDS



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San Diego Association of Governments
Regional Planning and Transportation Committees
401 B Street, Suite 800
San Diego, CA 92101

Re: Item C, Urban Area Transit Strategy: Mode Share Goals; Performance of Alternative Networks: Initial Recommendations for a Revised Transit Network; and Discussion of Complementary Highway Network Concepts for the 2050 Regional Transportation Plan

Dear Honorable Committee Members,

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 Urban Area Transit Strategy (“UATS”). Specifically, we are concerned that the baseline, land use assumptions, and regional basis for the UATS will not lead to the development of a functional transit network that is desperately needed in San Diego.

SOFAR, as one of the parties in the settlement agreement that was the impetus behind creating the UATS, has been involved in the process of creating this plan for many years. As such, SOFAR and CNFF believe that the UATS represents a great opportunity to make headway in meeting today’s challenges and leading San Diego down a path of sustainability and greatly improved quality of life. True sustainability and a future of change for San Diego will require a structural change in our transportation system. We need to move away from the unsustainable costs and unmitigable consequences of the automobile and sprawl-based system that we have created and move forward towards a future based in transit and transit oriented development. Unfortunately the UATS, in its current state, has some major flaws that will impede the

development of a transit network that is comprehensive, based in the urban core, and supportive of sustainable land uses.

Baseline

The UATS, in its attempt to create a “world-class transit system” for San Diego would represent a drastic change from the auto-based transportation system that has been in the making for decades. Given that the UATS represents such a dramatic structural change for transportation planning in San Diego, one must wonder why the baseline for modeling transit networks for the UATS is the complete buildout of the 2030 Regional Transportation Plan “RTP.” The 2030 RTP has been repeatedly criticized by SOFAR, the Attorney General, the Independent Transit Planning Review (“ITPR”) panel, and others for its lack of transit and emphasis on expanding highway capacity. As such, from a modeling standpoint, it is clear that superimposing a world class transit network over a highway-based transportation system could not possibly produce positive results. This is exactly what SANDAG modeling produced, as the Transit Propensity network did not model well. And how could it? In order for SANDAG to test, design, and build a world-class transit system for San Diego, they must move away from modeling efforts based in the past, and instead look forward to developing and creating a community-based transit system, which meets the needs of sustainable, livable communities.

In addition, arbitrarily using the 2030 RTP as a baseline for the UATS is questionable, because it assumes full build-out of the 2030 RTP, which includes completion of major highway projects that have not yet begun and may never be built. Planning and transportation experts have repeatedly noted that highway expansion directly competes with transit by diverting funds and serving unsustainable sprawl land uses that are not conducive to promoting transit. As such, SANDAG is setting up a planning contradiction because a radically changed transit system will only be possible if we curtail and ultimately stop expanding our freeway system. SANDAG, if it wishes to create a new model for the future of San Diego, must strive to create change, and use a new transportation and land use baseline.

Land Use Assumptions

Land use assumptions for the UATS are based on those in the 2050 Regional Growth Forecast, which, as the staff report states were held constant “in order to isolate the performance of transit in each alternative.” This approach is also questionable when considering that land use and transportation have a direct relationship, and that transportation drastically impacts decisions and patterns of land use. A more visionary approach would be to capture this dynamic relationship between land use and transit infrastructure, and model changes in both. For example, land use changes in the urban core have the potential to change the amount and destination of transit trips, which would reduce vehicle miles traveled, and further support higher density land uses.

In addition, it is clear that in a world of changing conditions, land use decisions are also changing. This fact was recognized by Matthew Adams, Vice President of Government Affairs for the Building Industry Association, who stated the following at a SANDAG Board of Director’s Meeting on February 26, 2010: “we are shifting into more of a mixed-use market.” In relation to this statement, the San Diego Region 2009 Employment and Residential Land Inventory and Market Analysis, which was prepared by SANDAG in September of 2009, noted 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. Together, these statements make it clear that San Diego is experiencing a drastic market shift towards mixed-use and infill development. Making infill, mixed-use, and higher density development work is only possible with transit infrastructure. By using the 2050 Regional Growth Forecast as a constant in modeling land use for the UATS, SANDAG is not responding to important market shifts and demand changes that will rely on transit infrastructure to properly function.

Regional Basis

At its outset, the UATS was called the Urban Core Transit Strategy, and had an emphasis on the urban core of San Diego. All three currently proposed transit networks as well as the proposed revised transit network go far beyond the original urban core emphasis, and instead aim at creating a transit system for the entire urban area of San Diego. While this is a good long-term strategy, it is not appropriate to begin transit planning at this high of a level. Instead, it would be much more realistic and achievable to focus transit planning on a smaller scale, namely in downtown San Diego and the urban core where current and near-future demand is high, and there are dense land uses to support transit. Making transit work and function in the urban core will ultimately have a regional effect, as stated by the ITPR panel:

“Downtown San Diego is a key to the success of the regional transportation system. It is the major regional center and should be supported with an efficient, seamless and convenient transit system.”

San Diego’s current transit system in the urban core does not constitute a comprehensive transit network, but rather is composed of various lines and routes that aim at addressing transit where it is needed most. In order to provide strength and support for transit, SANDAG needs to create a comprehensive transit network for the urban core that will allow transit to function at a system-wide level. Focusing transit on the urban core will also support regional transit by serving as a catalyst, demonstrating what transit can do not just for mobility, but also for community building, economic development, and true sustainability.

On this topic, the Peer Review Panel that recently reviewed the UATS, stated the following:

“...the plan’s (the 2050 Regional Transportation Plan’s “RTP”) ultimate success will be grounded in the implementation of near-term demonstration or “catalyst” projects that showcase elements of the transit vision, particularly the integration of transit into smart growth areas.”

The UATS, with its baseline in the past, constant land use assumptions, and regional application, undermines the very possibility of beginning to create a functional urban core transit system, and instead is set up to support existing transportation and land use patterns. Ideally the UATS would answer the question: if there is going to be a fundamental transit shift in San Diego, where would it begin? The current UATS does not answer this question, and as such is at risk for failure.

Conclusion

The UATS represents more than just a visionary change for transit, it represents the future. It represents how San Diego will meet regulations set forth in AB 32 and SB 375, will increase

affordable housing, will reduce dependence on fossil fuels, will reduce air pollution, and will move forward into a sustainable future. The ultimate strategy of focusing on “developing a strong link between transit and transit-supportive land use patterns” is an excellent way to move forward. However, caution must always be applied, because, the UATS also risks moving backwards by accepting highway expansion for BRT as a viable transit option. The bigger picture of transit is not simply to move cars more easily and efficiently, but to move people within and between communities, and to make these communities function sustainably.

Sincerely,

A handwritten signature in cursive script that reads "Duncan McFetridge". The signature is written in black ink and is positioned below the word "Sincerely,".

Duncan McFetridge