



SAVE OUR FOREST  
AND RANCLANDS

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June 11, 2010

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

**Re: 2050 Regional Transportation Plan Overview, Vision and Goals, Urban Area Transit Strategy, Initial Unconstrained Transportation Network, and the Draft Evaluation Criteria**

Dear Board of Directors,

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 2050 Regional Transportation Plan (“RTP”). This comment is a follow-up to two previously submitted comment letters; the first was submitted by SOFAR to the SANDAG Board of Directors on May 27, 2010, and the second was submitted by both SOFAR and CNFF to the Transportation and Regional Planning Committees on June 4, 2010.

Overall, SOFAR and CNFF are concerned with the fact that the 2050 RTP is based on the 2030 RTP, a transit-deficient and freeway-heavy plan that was found to have significant unavoidable and unmitigable impacts in almost every category. As such, the 2030 RTP represents a plan of the past, a plan that will lead the San Diego region in the same freeway-dominated, sprawl-inducing direction that it has been heading for many years. The 2030 RTP’s approach is especially problematic when one considers the changed situations in which we currently live. Overwhelming evidence -- from the oil spill in the Gulf of Mexico to the wars in Iraq and Afghanistan to global climate change-- demonstrates that we need to curb our nation’s addiction to fossil fuel. Similarly, persistent water shortages and increases in water pollution

throughout our region demonstrate the urgent need to change the way we use and impact water resources.

At the same time, on a social level we need to respond to changing economic times and address the fact that we are in a multi-year recession that is not expected to end in the near future. In addition, we need to respond to dramatic demographic changes in the San Diego region, to reflect the reality that many people are choosing to live in more urbanized (infill) areas, rejecting the suburban subdivision model that prevailed in the past. Given these fundamental changes, which have taken place since the creation of the 2030 RTP, SOFAR and CNFF urge SANDAG to reject an approach that would establish goals and would plan future infrastructure based on that outdated document. SOFAR and CNFF are particularly concerned with the 2030 RTP baseline as it relates to the Urban Area Transit Strategy (“UATS”). The UATS has the potential to create a visionary plan for the future of San Diego, as the Strategy was specifically conceived to establish a world-class transit system for the region. It is undisputed that functional and community-based transit is desperately needed in San Diego, not just for mobility purposes, but to enhance our quality of life and address the changed circumstances listed above. Yet, despite the potential of the UATS, SANDAG again appears to have used the outdated 2030 RTP as the basis for this Strategy. For example, the UATS posits as a baseline the *full build-out of the 2030 RTP*. The 2030 RTP, in turn, assumes massive highway expansion, including the proposed widening of the I-5 freeway. SANDAG appears to condone such a scenario even though the UTAS peer review panel expressly warned that this sort of highway infrastructure will undercut the success of transit in our region:

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

In short, SOFAR and CNFF urge SANDAG to reconsider its approach, so that it may take advantage of the significant planning opportunities presented by the UATS and the 2050 RTP. Without making a fundamental change in the structural basis of the 2050 RTP, in comparison to the 2030 RTP, there is no chance that the transit vision of the UATS will be realized.

A visionary RTP, one that has goals to achieve sustainability, meet greenhouse gas regulations, and improve quality of life, must contain transit as an integral component. While the UATS strives to include transit into the vision of the 2050 RTP, this is proposed to be done in conjunction with freeway expansion. As the peer review panel recognized, these two goals cannot be completed simultaneously, as expanding the freeway system will only continue to undermine transit, both in terms of funding and in supporting sprawl land use patterns.

Finally, SOFAR and CNFF must address the critical subject of funding, which is a necessary component of any effort to build a world-class transit system in San Diego. We are concerned not only about the lack of adequate funding for the UATS, but also about the general imbalance of transportation funding in San Diego, where highway and road projects routinely take priority over transit projects. *TransNet*, for example, is legally required to dedicate 1/3 funding to highways, 1/3 to transit, and 1/3 to local roads. However, it has been estimated that approximately 40% of the money that is required to be dedicated to transit projects is actually

used to fund highway expansion projects, such as HOV and Managed Lanes. Any responsible citizen must ask, why are we taking dedicated transit funds and spending those funds on freeways? And, similarly, how will this region ever reach our future transit goals if we continue to allow highway expansion projects to be done in the name of transit? These questions must be addressed in order to move forward with the 2050 RTP and the UATS and create a new vision for transit in San Diego.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Duncan McFetridge". The signature is written in a cursive, flowing style.

Duncan McFetridge