

March 11, 2016

Via E-Mail

Brad Richter, Vice President - Planning
Civic San Diego
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Email: richter@civicsd.com

Re: Draft Downtown San Diego Mobility Plan and Draft Supplemental Environmental Impact Report

Dear Mr. Richter:

We appreciate the opportunity to submit comments on behalf of the Cleveland National Forest Foundation (“CNFF”) on the revised draft Downtown San Diego Mobility Plan (“Mobility Plan”) and the associated draft supplemental environmental impact report (“DSEIR”). We are pleased that the draft Mobility Plan establishes goals and policies to encourage and provide active transportation options for residents, workers, and visitors to Downtown San Diego. We are equally pleased that the draft Plan emphasizes active transportation at the expense of roadways as the Plan calls for reductions in vehicular travel lanes to facilitate enhanced bicycle and pedestrian facilities. Unfortunately, however, the Plan lacks *any* commitment to increasing public transit in downtown San Diego. Public transit is critical to the downtown transportation system and is essential to the economy, environment, and the quality of life of the City’s residents and visitors.

The Mobility Plan is a requirement of the Settlement Agreement between Save Our Forest and Ranchlands and the Redevelopment Agency of the City, the Centre City Development Corporation (“CCDC”) and the San Diego City Council over litigation in connection with San Diego’s Downtown Community Plan. The Settlement Agreement calls for, among other things, the preparation of a transit-oriented alternative study, which would identify opportunities to: (a) more efficiently manage downtown San Diego’s transportation system, (b) investigate funding options for specific transit improvements,

and (c) reduce significant transportation and parking impacts of the Downtown Community Plan.

Quoting SANDAG's Independent Transit Planning Review Services report, the Settlement Agreement states: "The Downtown region is a key to the success of the regional transportation center. It is the major regional center and should be supported with an efficient, seamless and convenient transit system." Settlement Agreement at 3. The Settlement Agreement then explicitly states that the Mobility Plan would consider a public transit program with the goal of increasing transit mode share by 2020. The Mobility Study was required to analyze actions including maximization of the Coaster Service, numerous enhancements to the Trolley service, several improvements to bus service, implementation of a cross-town shuttle service, and the enactment of an ordinance to collect impact fees for transit operations and streetscape improvements.

The first draft of the Mobility Plan, released almost six years ago, proposed comparatively specific strategies and projects to improve transit mode share. Transportation improvements included in the prior Mobility Plan included, for example, potential extensions of the light rail system (San Diego trolley) to serve San Diego International Airport, extending the light rail system into the northern part of the City and double-tracking of the COASTER commuter rail from downtown San Diego to Oceanside.

CCDC received several comments on the prior Mobility Plan from entities such as CNFF, SANDAG and the California Department of Fish and Wildlife requesting substantive additions to the Plan. SOFAR, for example, specifically requested that the Plan consider a rail alternative that includes the following:

- Modernization of the 35-year old trolley system to reflect all the changes that leading rail systems have introduced since San Diego pioneered the way. Capacity should be increased by adding new lines (and thus relieving the existing lines, as well as increasing rail coverage).
- New operating concepts to enhance rail operations. The network should be expanded into other major corridors, eventually providing coverage to much of the urban core. This is the core concept to increasing transit's mode share, and reforming land use and travel patterns.
- The commute rail system should be double-tracked, as currently proposed and also extended southwards, to increase service coverage, and take some of the load of Santa Fe Station. Trains should not turn back at the peak

load point, and there should be multiple interfaces with the trolley and bus systems. *See* letter from D. McFetridge to B. Richter, submitted under separate cover.

Caltrans also clearly expected more from the initial Plan as evidenced by the following statement: “SANDAG’s on-going Urban Area Transit Study is the basis for a new more robust program of transit improvements being developed for the 2050 RTP. Preliminary findings indicated that downtown modal shares for transit, walking and bicycling can be significantly increased through investments in capital projects and transit service operations.” *See* Letter from J. Armstrong to B. Richter, October 18, 2010 at 1, attached under separate cover. To this end, Caltrans recommended that CCDC consider the implementation of a fee program for downtown mobility improvements. *See* Letter from J. Armstrong to B. Richter, October 18, 2010 at 1, submitted under separate cover.

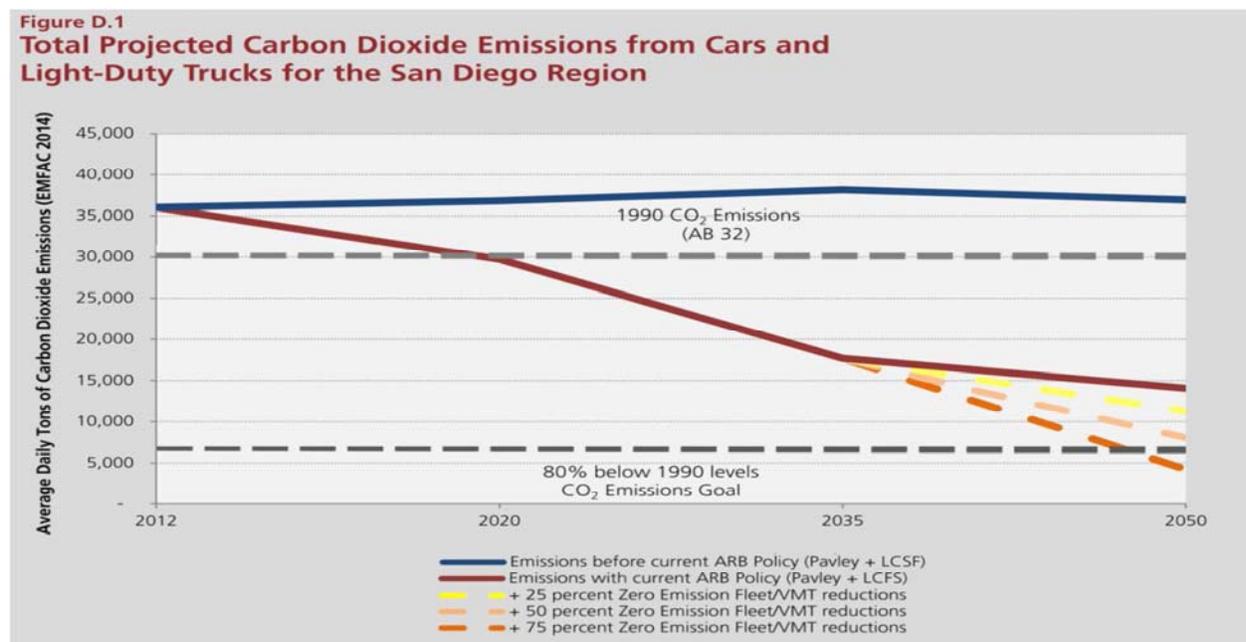
It has taken about six years to prepare a revised Mobility Plan. Yet, rather than take heed of these substantive comments and suggestions, and diligently work to improve its Plan, CCDC’s current draft Mobility Plan includes *even less* specificity regarding projects that would maximize multi-modal travel choices than the prior Plan. Indeed, the section of the draft Plan that identifies CCDC’s recommendations for transit is only two paragraphs and does not identify any specific transit projects. Instead, it includes a map that shows “transitways” along the City streets, but this map shows nothing more than colored lines along certain downtown streets. The Mobility Plan includes a general reference to a “planned public transit network identified in the 2050 RTP” but there is no discussion of the specific transit projects other than a general overview of certain RTP improvements (*see* page 57).

We understand that CCDC does not have the authority to operate transit, yet this is no excuse for not thoroughly planning the specific transit projects that are needed to achieve a flexible, fast, frequent, and safe transit system for downtown San Diego. Indeed, a detailed transit plan should be the *key component* of this Mobility Plan, since, as discussed above, the purpose of the Mobility Plan was to develop a transit alternative to implement the Settlement Agreement.

Moreover, the stakes have changed considerably over the last six years since the prior Plan was released. It is now even more clear that reducing greenhouse gas emissions (“GHG”) is one of the most urgent challenges of our time. Governor Schwarzenegger’s Executive Order S-3-05, signed in 2005, established a long-term goal of reducing California’s emissions to 80 percent below 1990 levels by 2050. The order

also directed several state agencies (collectively known as the “Climate Action Team”) to carry its goal forward. The following year, the Legislature enacted the Global Warming Solutions Act of 2006 (“AB 32”), codified at Health and Safety Code § 38500, *et seq.* By these authorities, California has committed to reducing emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. In 2015, Governor Brown took further action to meet this challenge by issuing Executive Order B-30-15, which sets an interim target of 40 percent below 1990 levels by the year 2030.

Unfortunately, as the following figure clearly shows, there is a tremendous gap between the San Diego region’s forecasted GHG emission levels and the California emissions target.



Source: 2015 RTP/SCS Appendix D: 2012 Greenhouse Gas Inventory for San Diego County and Projections, pg. 39

San Diego, like every other major city in California, is at a critical juncture. The current Mobility Plan provides a key opportunity to set forth detailed transit strategies to ensure that the City *leads* the region in a sustainable direction. The City’s climate Action Plan establishes an ambitious goal to cut GHG emissions in half by 2035, in part by getting people who live near high-quality transit stations to walk, bike or take

transit to work.¹ The only way that the City can achieve its transit and active transportation goals is by adopting a Mobility Plan that goes considerably further than the half-hearted references to transit in the draft Mobility Plan.

In 2011, CNFF proposed the 50-10 Transit Plan: A World Class Transit System for the San Diego Region which would, if implemented, initiate a transformation in the region's transportation system and land use patterns. The premise of the 50-10 Plan is quite simple: fifty years of transit improvements would be implemented over the next decade. This comprehensive, integrated transit system initially would be constructed within the region's urban core, while also including the Sprinter and the Coaster. As the attached reports show, the benefits of the 50-10 Transit Plan include: shorter automobile trips on average, reduction in transportation costs and traffic congestion, more housing and transportation choices, many more walk and bicycle trips, and improved public health and overall quality of life. See, *The 50-10 Plan – A World Class Transit System For the San Diego Region* and *The 50-10 Plan – Quantifying the Benefits*, prepared by Smart Mobility, Inc., attached.

CCDC's Mobility Plan sets forth a lofty goal: to establish a master plan of policies, programs, and *projects* which would improve overall mobility throughout the study area and provide multi-modal connections to surrounding communities and the region's transportation network. While CCDC may choose to not adopt the 50-10 Transit Plan outright, it must identify a specific transit plan capable of achieving the Mobility Plan's goal. To this end, in addition to identifying specific transit projects, CCDC must identify the funding for these projects; it must prioritize projects in federal, state, and local transportation programs; and it must demonstrate commitment by key city agencies to implement the recommended projects and strategies. Without these key components, this Mobility Plan will be destined to languish on the shelf like so many plans before it.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Laurel L. Impett, AICP, Urban Planner

¹ See "New Climate For Transportation: How the City of San Diego and SANDAG Must Improve Transportation to Meet Climate Goals," Climate Action Committee."

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Attachments:

The 50-10 Plan – A World Class Transit System For the San Diego Region
The 50-10 Plan – Quantifying the Benefits

cc: Duncan McFetridge, Cleveland National Forest Foundation

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