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SANDAG

BOARD OF DIRECTORS
AGENDA

Friday, June 10, 2011
10 a.m. to 12 noon
SANDAG Board Room
401 B Street, 7th Floor
San Diego

AGENDA HIGHLIGHTS

• PUBLIC HEARING: DRAFT 2050 REGIONAL TRANSPORTATION PLAN, ITS SUSTAINABLE COMMUNITIES STRATEGY, AND DRAFT ENVIRONMENTAL IMPACT REPORT

PLEASE TURN OFF CELL PHONES DURING THE MEETING

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Welcome to SANDAG. Members of the public may speak to the Board of Directors on any item at the time the Board is considering the item. Please complete a Speaker’s Slip, which is located in the rear of the room, and then present the slip to the Clerk of the Board seated at the front table. Members of the public may address the Board on any issue under the agenda item entitled Public Comments/Communications/Member Comments. Public speakers are limited to three minutes or less per person. The Board of Directors may take action on any item appearing on the agenda.

This agenda and related staff reports can be accessed at www.sandag.org under Meetings. Public comments regarding the agenda can be forwarded to SANDAG via the e-mail comment form available on the Web site. E-mail comments should be received no later than 12 noon, two working days prior to the Board of Directors meeting. Any handouts, presentations, or other materials from the public intended for distribution at the Board of Directors meeting should be received by the Clerk of the Board no later than 12 noon, two working days prior to the meeting.

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BOARD OF DIRECTORS AGENDA
Friday, June 10, 2011

ITEM #

1. PUBLIC COMMENTS/COMMUNICATIONS/MEMBER COMMENTS

Public comments under this agenda item will be limited to five public speakers. Members of the public shall have the opportunity to address the Board on any issue within the jurisdiction of SANDAG that is not on this agenda. Other public comments will be heard during the items under the heading “Reports.” Anyone desiring to speak shall reserve time by completing a “Request to Speak” form and giving it to the Clerk of the Board prior to speaking. Public speakers should notify the Clerk of the Board if they have a handout for distribution to Board members. Public speakers are limited to three minutes or less per person. Board members also may provide information and announcements under this agenda item.

REPORTS (2)

2. PUBLIC HEARING: DRAFT 2050 REGIONAL TRANSPORTATION PLAN, ITS SUSTAINABLE COMMUNITIES STRATEGY, AND DRAFT ENVIRONMENTAL IMPACT REPORT (First Vice Chair Jack Dale, Transportation Committee Chair; Heather Adamson)

The SANDAG Board of Directors is asked to accept public testimony on the Draft 2050 Regional Transportation Plan (2050 RTP), its Sustainable Communities Strategy (SCS), and Draft Environmental Impact Report (EIR) for the 2050 RTP. The public comment period for the Draft 2050 RTP/SCS and the Draft EIR will close on June 30 and August 1, 2011, respectively.

3. CONTINUED PUBLIC COMMENTS

If the five speaker limit for public comments was exceeded at the beginning of this agenda, other public comments will be taken at this time. Subjects of previous agenda items may not again be addressed under public comment.

4. UPCOMING MEETINGS

The next Board Business meeting is scheduled for Friday, June 24, 2011, at 9 a.m. The next Board Policy meeting is scheduled for Friday, July 8, 2011, at 10 a.m.

5. ADJOURNMENT

+ next to an agenda item indicates an attachment
PUBLIC HEARING: DRAFT 2050 REGIONAL TRANSPORTATION PLAN, ITS SUSTAINABLE COMMUNITIES STRATEGY, AND DRAFT ENVIRONMENTAL IMPACT REPORT

Introduction

The Draft 2050 Regional Transportation Plan (2050 RTP or the Plan) is the blueprint for a regional transportation system that further enhances our quality of life, promotes sustainability, and offers more mobility options for people and goods. The Plan is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system so it meets the diverse needs of our changing region through 2050.

On April 22, 2011, the SANDAG Board of Directors accepted the Draft 2050 RTP and its Sustainable Communities Strategy (SCS) for public distribution and comment. On June 7, the Draft Environmental Impact Report (EIR) is scheduled to be released for distribution and comment. Five subregional public workshops and public hearings are being held between June 7 and June 16, 2011, to facilitate public comment on the Draft 2050 RTP and its SCS, EIR, Draft Air Quality Conformity Determination (AQCD), and the draft Regional Housing Needs Assessment Methodology and Allocation. In addition, another public hearing will be held at the Regional Planning Stakeholders Working Group meeting on June 21, 2011. A flyer with dates, times, and locations of the public workshops and public hearings is attached (Attachment 1).


Discussion

Draft 2050 RTP

The Draft 2050 RTP contains a robust transportation network, with a diversity of projects that will provide residents and visitors with a variety of travel choices. The regional transportation network, in conjunction with how local jurisdictions develop land, will provide additional opportunities for walking, biking, getting to work, going to school, shopping, and playing.

The Draft 2050 RTP and its SCS seek to guide the San Diego region toward a more sustainable future by integrating how we use land, develop housing, and plan transportation. The goal is to create communities that are more sustainable, walkable, transit-oriented, and compact. The strategy for the San Diego region is to use existing and reasonably expected funding to achieve our region’s transportation and housing needs, also while respecting, and enhancing our natural resources.
The path toward living more sustainably is clear: focus housing and job growth in urbanized areas where there is existing transportation infrastructure, protect sensitive habitat and open space, invest in a transportation network that provides residents and workers with transportation options that reduce greenhouse gas emissions, and implement the Plan through incentives and collaboration.

The building blocks of the SCS have formed the foundation of transportation planning in the San Diego region for many years. This planning effort is now focused more sharply on promoting sustainability as our region strives to meet new requirements mandated by Senate Bill 375 (Steinberg, 2008).

**Draft EIR**

Prepared in accordance with the California Environmental Quality Act (CEQA), the Draft EIR evaluates the impacts of the Draft 2050 RTP/SCS (the project) on the physical environment at the program level. The Draft Program EIR analyzes a range of impacts resulting from future development consistent with the regional growth projections and improvements to the regional transportation network. It provides the framework for subsequent environmental analysis on specific projects, in which individual project impacts will be evaluated separately as project alignments and features are defined. Seventeen issue areas are analyzed in the document, as well as the cumulative impacts of the project and other projects, project alternatives, and other analyses required by CEQA.

The Draft EIR evaluates several alternate transportation networks to the project. The alternatives include the No Project, a modified phasing alternative, a modified expenditure alternative, and a conceptual slow growth alternative. In addition, the alternatives analysis evaluates the impacts of these modified transportation networks overlaid on an intensified land use distribution pattern, as well as the forecasted growth that was developed as part of the 2050 Regional Growth Forecast.

**Draft 2050 RTP/SCS/EIR Distribution**

To obtain public input on the development of the 2050 RTP and its SCS, a broad range of media and communication avenues are being utilized to provide information, solicit participation and input, and allow for ongoing feedback and updates. A major goal of this public involvement effort is to reach out to both nontraditional and traditional audiences, to include them in the transportation planning process. Display ads and public notices were published in area newspapers announcing the June public workshops and public hearings.

The Draft 2050 RTP was circulated to local jurisdictions, Board advisory members, and the Regional Planning Stakeholders Working Group. All SANDAG working groups and other interested parties received a notice of the availability of the Draft 2050 RTP.

The Draft EIR is anticipated to be released on June 7, 2011, and will be distributed to individuals, agencies, and organizations interested in the 2050 RTP and to all individuals who provided comments on the Notice of Preparation of the EIR that was published on April 19, 2010. A Notice of Availability of the Draft EIR will be published in area newspapers and sent to interested individuals, agencies, and organizations generated from SANDAG mailing lists.
Next Steps

Anticipated milestones for the 2050 RTP, its SCS, and the EIR are summarized below:

- **June 7, 2011:** Release of the Draft EIR
- **June 7 - 21, 2011:** Public hearings and subregional workshops on Draft 2050 RTP/SCS/EIR
- **June 30, 2011:** Close of public comment period for Draft 2050 RTP and its SCS
- **August 1, 2011:** Close of public comment period for Draft EIR
- **September 2011:** Transportation Committee and Board of Directors review RTP comments and proposed changes to the RTP
- **October 28, 2011:** Presentation to SANDAG Board of Directors of the Final EIR for certification, finding of air quality conformity, and adoption of the Final 2050 RTP and its SCS

GARY L. GALLEGOS
Executive Director

Attachment: 1. 2050 RTP Public Workshops and Public Hearings Flyer

Key Staff Contact: Heather Adamson, (619) 699-6967, had@sandag.org
Help shape our region’s future.

Join SANDAG at a public workshop/public hearing to provide input into the $196 billion plan that will serve as the blueprint for the development of the San Diego region’s transportation system during the next 40 years. We invite you to comment on the Draft 2050 Regional Transportation Plan (RTP), its Sustainable Communities Strategy (SCS), the Draft Regional Housing Needs Assessment (RHNA), and the Draft Environmental Impact Report.

The Draft 2050 RTP is designed to maximize transit enhancements, provide express lanes, integrate biking and walking, and promote programs to manage demand and increase efficiency. The SCS seeks to guide how we use land, develop housing, and plan transportation. The RHNA considers housing needs for the fifth housing element cycle for a range of income segments.

For more information, visit www.sandag.org/2050rtp, e-mail 2050rtp@sandag.org, or call toll-free 1-877-277-5736.

All Public Workshops & Public Hearings are from 4 to 7 p.m.
Public Workshops held 4 to 6 p.m.; Public Hearings begin at 6 p.m.

Tue, June 7   Encinitas Community & Senior Center
1140 Oakcrest Park Dr., Encinitas, 92024

Wed, June 8   The Joe & Vi Jacobs Center
404 Euclid Ave., San Diego, 92114

Thu, June 9   Sonrise Community Church
8805 North Magnolia Ave., Santee, 92071

Mon, June 13  Martin Luther King Jr. Center
140 East 12th St., National City, 91950

Thu, June 16  San Marcos City Council Chambers
1 Civic Center Dr., San Marcos, 92069

Public Hearings
Public hearings will be held as part of these regularly scheduled meetings:

Fri, June 10   SANDAG Board of Directors Meeting
10 a.m. 401 B St., San Diego, 92101

Tue, June 21  Regional Planning Stakeholders Working Group (SWG) Meeting
4 to 6 p.m. Caltrans, 4050 Taylor St., San Diego, 92110

In compliance with the Americans with Disabilities Act (ADA), SANDAG will accommodate persons who require assistance in order to participate in the Public Workshops/Hearings listed above. If such assistance is required, please contact SANDAG at (619) 699-1900 at least 72 hours in advance of the meeting. To request the materials in an alternate format, please call (619) 699-1900, (619) 699-1904 (TTY), or fax (619) 699-1905.
¡Lo invitamos!
Ayude a darle forma al futuro de nuestra región.

Únase a SANDAG en los talleres públicos/audiencias públicas para ofrecer retroalimentación al plan de $196 mil millones que sirve como un plan de ruta para el desarrollo del sistema de transporte de la región en los próximos 40 años. Le invitamos a hacer comentarios al Borrador del Plan Regional de Transporte 2050 (RTP, por sus siglas en inglés), su Estrategia de Comunidades Sustentables (SCS, por sus siglas en inglés), el Borrador de la Evaluación de Necesidades Regionales de Vivienda (RHNA, por sus siglas en inglés), y el Borrador del Reporte de Impacto Ambiental.

El Borrador del RTP 2050 está diseñado para maximizar mejoras al transporte público, ofrecer carriles expresa, integrar el ciclismo y caminar, y promover programas para administrar la demanda e incrementar la eficiencia. La estrategia SCS busca guiar cómo usamos el suelo, desarrollamos vivienda y planeamos el transporte. RHNA considera las necesidades de vivienda para el quinto ciclo del elemento de vivienda para una variedad de segmentos de ingresos.

Para más información, visite www.sandag.org/2050rtp, correo electrónico 2050rtp@sandag.org, o llame gratis al 1-877-277-5736.

Todos los Talleres Públicos y Audiencias Públicas son de 4 a 7 p.m.
Los Talleres Públicos son de 4 a 6 p.m.; las Audiencias Públicas comienzan a las 6 p.m.

Mar., Junio 7  Encinitas Community & Senior Center
1140 Oakcrest Park Dr., Encinitas, 92024

Miér., Junio 8  The Joe & Vi Jacobs Center
404 Euclid Ave., San Diego, 92114

Jue., Junio 9  Sunrise Community Church
8805 North Magnolia Ave., Santee, 92071

Lun., Junio 13  Martin Luther King Jr. Center
140 East 12th St., National City, 91950

Jue., Junio 16  San Marcos City Council Chambers
1 Civic Center Dr., San Marcos, 92069

Audiencias Públicas
Las audiencias públicas se llevarán a cabo como parte de estas reuniones programadas regularmente:

Vie., Junio 10  SANDAG Board of Directors Meeting
10 a.m. 401 B St., San Diego, 92101

Mar., Junio 21  Reunión del Grupo de Trabajo de Partes Interesadas en Planeación Regional (SWG, por sus siglas en inglés)
4 a 6 p.m.
Caltrans, 4050 Taylor St., San Diego, 92110

En cumplimiento de la ley Americans with Disabilities Act (ADA), SANDAG asistirá a las personas que requieren ayuda para participar en los Talleres Públicos/Audiencias Públicas enlistados arriba. Si requiere tal asistencia, por favor comuníquese con SANDAG al (619) 699-1900 con al menos 72 horas de anticipación de la reunión. Para solicitar los materiales en un formato alterno, por favor llame al (619) 699-1900, (619) 699-1904 (TTY), o fax (619) 699-1905.
I-15 Express Lanes Closed June 18-26:

- I-15 Express Lanes from SR 56/Ted Williams Parkway to SR 163 will be closed 9 days from June 18 - June 26
- Significant delays are expected in all lanes
- Please adjust your commuting schedule and visit keepsandiegomoving.com and twitter.com/SDCaltrans to get up-to-date info
- At completion, four Express Lanes, double the current number, will be open
- The SR 163 northbound entrance to Express Lanes will reopen June 27

Express Lanes Closure:
Saturday, June 18 - Sunday, June 26
I-15 Express Lanes from SR163 to SR 56/Ted Williams Pkwy

Extended Closure:
After June 27 the entrance & exit of I-15 Express Lanes to & from the I-15 main lanes will be temporarily closed and relocated at this location for three months. Detours will be signed.
Southern I-15 Express Lanes Entrance/Exit Closed Beginning June 27:

- The temporary closure of the I-15 Express Lanes northbound entrance and southbound exit will start June 27.
- Closure to last approximately 3 months.
- The SR 163 northbound entrance to Express Lanes will reopen June 27.
- The exit from the Express Lanes to SR 163 will not be affected.
- Delays are expected, please visit keepsandiegomoving.com and twitter.com/SOCaltrans to get up-to-date info.

**Southbound I-15 Detour:**
Southbound I-15 travelers must exit the Express Lanes just north of Miramar Way to continue on I-15.

**Northbound I-15 Detour:**
Northbound I-15 travelers must use new Express Lanes entrances located south of Miramar Way (shown on map) or north of Miramar/Pomerado Road (not shown).

**Closure Location:**
Ramp to and from I-15 main lanes and Express Lanes will be temporarily closed.

**Legend:**
- Intermediate Access Point
- Closed Express Lanes Entrance/Exit
- Express Lanes Southbound Detour
- Express Lanes Northbound Detour
- Open Express Lanes
Interstate 15 Express Lanes Nine-Day Closure
Lanes Closed From State Route 56 to State Route 163

Frequently Asked Questions

What will be closed?
Eight miles of I-15 Express Lanes between State Route 56 (SR 56)/Ted Williams Parkway and State Route 163 (SR 163) will be closed.

When will this closure begin?
The closure will last nine days starting Saturday, June 18, through Sunday, June 26. The Express Lanes will reopen by Monday, June 27, for the morning commute.

What are the expected impacts?
Between Monday, June 20, and Friday, June 24, heavy traffic congestion is expected on I-15 in both the northbound and southbound directions during peak commuting hours.

What recommendations do you have for commuters?
All motorists on I-15 will experience delays as a result of this work. Motorists are encouraged to leave earlier or later than usual to avoid major congestion. It may be beneficial to talk with your employer about adjusting your work schedule during this week.

Will the Express Lanes be closed for the entire nine days?
Yes, the Express Lanes will be closed around the clock until the morning commute on Monday, June 27.

What happens when the closure ends?
Once the work is completed, the Express Lanes will reopen. The good news is that travellers will have two additional Express Lanes. The Express Lane facility will have four lanes operating twenty-four hours a day, seven days a week. Also beginning Monday, June 27, an extended closure of the entrance and exit between I-15 and the Express Lanes near the I-15/SR 163 split will begin and last approximately three months. The entrance and exit will be relocated and detour signs will be posted to direct motorists to new Express Lane access points.

Why is this closure necessary?
This closure is necessary for crews to be able to work around the clock to install the new moveable barrier and complete important paving, electrical and other important tie-in work near SR 56 and SR 163.

Will the Express Lanes north of SR 56 remain open?
Yes, the Express Lanes north of SR 56 will remain open during this work. Motorists who regularly use the Express Lanes to travel south in the morning will be routed out of the Express Lanes to the main lanes at State Route 56.

Are there any detours?
Unfortunately, there are no recommended detours as I-15 is major thoroughfare for inland San Diego County community members, local businesses, commercial trucking and other goods movements. Motorists are strongly encouraged to adjust their schedules during this work.

I ride the bus. Will this impact me?
Yes, all MTS Commuter Express Bus routes that use I-15 will have to travel in the I-15 main lanes between SR 56 and SR 163. Bus patrons will also experience delays as a result of this work.

When will the I-15 Express Lanes be totally complete?
The South Segment from SR 56/Ted Williams Parkway to SR 163 is expected to be completed by late 2011, almost one year ahead of schedule. The North Segment, from State Route 78 to Centre City Parkway in Escondido is scheduled to also be completed by late 2011, right on schedule.

For more information, log-on to:
www.keepsandiegonmoving.com
For questions, call: Caltrans Public Affairs: 858-688-3368
Commuters Advised of Nine-Day I-15 Express Lanes Closure

Facility Closed from State Route 56 to State Route 163

Beginning Saturday, June 18, the Interstate 15 (I-15) 15 Express Lanes will be closed for nine consecutive days from State Route 56 (SR 56) to State Route 163 (SR 163). Motorists are encouraged to avoid peak commuting hours or adjust their schedules as traffic congestion is expected on I-15 during weekday commuting hours from Monday, June 20, through Friday, June 24.

When the Express Lanes reopen on June 27 there will be two additional Express Lanes in the median of the freeway that will allow Express Lanes users to travel in both directions twenty-four hours a day, seven days a week. Additionally, beginning June 27, there will be an extended closure and relocation of the Express Lanes entrance and exit to/from I-15 near the I-15/SR 163 split for approximately three months. Detour signs will be posted to direct motorists to new Express Lane access points. This closure is necessary for crews to complete the critical, final work to fully open eight miles of expanded Express Lanes.

How to Stay Informed

Save yourself time and frustration. Call or visit us online to learn about your travel options and plan your commute during these closures.

- Project Hotline
  (866) 890-1397

- I-15 Public Information Office
  (858) 668-3368

- Web site
  keepsandiegomoving.com

Overview

The I-15 Express Lanes Project is being constructed in three segments: North, Middle and South. Construction in the South Segment began in 2008 and is expected to be completed by late 2011/early 2012, approximately one year ahead of schedule.

**Closure Map**

**Full Express Lanes Closure:**
Saturday, June 18 - Sunday, June 26
I-15 Express Lanes from SR 163 to SR 56/Ted Williams Pkwy

**Miramar**

**Extended Closure:**
After June 27 the entrance & exit of I-15 Express Lanes to & from the I-15 main lanes will be closed and relocated at this location for three months.
June 10, 2011

Heather Adamson, Senior Regional Planner
SANDAG
401 B Street
San Diego, CA

*Hand Delivered and Sent via Email (had@sandag.org)*

Dear Ms. Adamson:

On behalf of the Sierra Club San Diego ("SCSD"), this letter is to request a time extension for the public comment and review period of the draft 2050 Regional Transportation Plan and related Sustainable Community Strategy ("RTP/SCS") until the date of August 1, 2011, to correspond with the public comment period for the related Draft Environmental Impact Report ("DEIR"). We respectfully submit that an extension is necessary to comply with the intent and spirit of SB 375 and the California Environmental Quality Act ("CEQA").

Currently, the deadline for commenting on the RTP/SCS is set for June 30th, 2011, and the deadline for commenting on the Draft EIR is August 1, 2011. This means that only twenty-four days have been provided to review and compare the two voluminous documents. The RTP/SCS provides the regional blueprint while the Draft EIR provides the context and explanation of the Plan’s associated environmental impacts. It follows that meaningful review of the RTP/SCS requires a meaningful opportunity to examine, analyze and assess the plan for environmental consequences and feasible alternatives as set forth in the Draft EIR.

In addition to the interrelated nature of the two documents, factors such as the length of the documents, their technical complexity, long-ranging environmental consequences for land use, and the enormous scope of the project also support this request for additional time. The RTP/SCS encompasses the health and trajectory of regional planning and design for the entire region over the next half-century. Public participation is essential to the CEQA process; members of the public and various stakeholders in the region must have an adequate time to read, review, digest, and effectively comment on a DEIR.¹ The legislative requirements providing for mandatory public comment and review are intended to enhance decision making processes concerning California’s vital natural resources by ensuring that those that will be

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¹ California Code Regulations, Title 14, Division 6, chapters 3, section 1501.
affected by a project or have particular knowledge may provide the decision-making body with the benefit of that knowledge before a decision is made.

The Sierra Club of San Diego respectfully requests an extension of the RTP/SCS deadline to coincide with that of the Draft EIR. In doing so, SANDAG - the first metropolitan planning organization to draft an RTP subject to the provisions of SB 375 – will be better positioned to achieve exemplary standards which will have a correlative effect on the State’s future ability to achieve sustainable development and compliance with SB 375.

Thank you sincerely for your time and consideration of this request.

Respectfully Submitted,

[Signature]

Pamela N. Epstein, Esq., LL.M
Staff Attorney & Legal Program Manager
Sierra Club, San Diego Chapter
pepstein@sierraclubsd.org
8304 Clairemont Mesa Blvd., Ste 101
San Diego, CA 92111

The San Diego Chapter of the Sierra Club is San Diego’s oldest and largest grassroots environmental organization, founded in 1948. Encompassing San Diego and Imperial Counties, the San Diego Chapter seeks to preserve the special nature of the San Diego and Imperial Valley area through education, activism, and advocacy. The Chapter has over 14,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.
June 10, 2011

SANDAG Board of Directors
401 B St. Suite 700
San Diego, CA 92101

RE: Item 2 - 2050 RTP draft, June 10, 2011 SANDAG Board meeting

Hon. Chair Stocks and members of the SANDAG Board:

Move San Diego is submitting these comments today in response to SANDAG’s 2050 regional transportation plan. While we have been supportive of pieces of the RTP in the past two years of development, as currently drafted, Move San Diego sees major deficiencies within the document including but not limited to:

- Shortfall in significantly reduced vehicle miles traveled;
- Lack of short term programs identified to guarantee Early Action for spending active transportation funding;
- The need to improve transit project phasing in order to balance transit and road investments;
- The need to improve transit frequency near term; and
- Lack of a map that illustrates how transit serves smart growth opportunity areas.

While we applaud the great strides SANDAG has taken from the 2030 RTP in terms of planning for transportation alternatives, we certainly believe the region would benefit from improvements to the plan. We applaud the significant planned increases to funding for transit and Active Transportation, and remain steadfast supporters of these overall investments toward diversifying the region’s mobility options. However, the draft 2050 RTP is failing to meet the strict standards established by SB 375 for better coordinating land use and transportation, and Move San Diego believes that SANDAG can exceed these standards.

The following pages are comments, questions, and concerns submitted by Move San Diego and its affiliates and partners in response to the 2050 Regional Transportation Plan.
Move San Diego’s comments on the draft 2050 Regional Transportation Plan June 10, 2011

Thank you for considering our comments. Please do not hesitate to contact me with questions. I look forward to continuing our work with you on this very important project that is setting a precedent for land use and transportation planning in the entire state.

I can be reached by phone at (619) 702-4266 or by email at elowe@movesandiego.org.

Sincerely,

[Signature]

Elyse Lowe
Executive Director

Enclosures:
1. Move San Diego’s comments on the draft 2050 Regional Transportation Plan
2. Overview of 2050 RTP Move San Diego Recommendations
3. Additional RTP questions
2050 RTP- Sustainable Communities Strategy

The provisions set forth by SB 375 are designed to directly assist in reducing GHG emissions with smarter land use, but to also improve the quality of life for future generations of San Diegans in the years to come. According to CARB, the purpose of SB 375 is to “integrate development patterns and the transportation network in a way that achieves the reduction of greenhouse gas emissions while meeting housing needs and other regional planning objectives.”

SANDAG did not reconsider whether any TransNet projects actually got us further from our regional goals and SB 375 targets, based on the date the TransNet measure was passed (2004). This means that forty years of planned highway expansions, new local roads and arterials are not being reconsidered for long term climate impacts as part of the SB 375 planning process.

This is evident in the following:
- SANDAG does not propose eliminating any road or highway projects, or even portions thereof, from the 2030 RTP.
- Highway expansion is used as a climate emissions reduction strategy (completely contrary to what SB 375’s goal of reducing Vehicle Miles Traveled).
- After 2035 emissions and driving per capita increase as continued job sprawl and excessive highway expansion counteract some of the beneficial programs SANDAG is investing in.

SANDAG’s use of highway expansion as a means of reducing emissions does not provide an effective or sustainable long term emissions reduction strategy if the long term goal is to reduce vehicular emissions by creating transportation options and livable communities.

Many transportation research studies have concluded that vehicle travel is generated and induced by roadway expansion:
- Cervero (2003): a 10% increase in speed increases Vehicle Miles Traveled 6.4% and 80% of added road capacity is filled with additional peak period traffic.¹

- Noland (2001): Half of increased roadway capacity is filled with added travel in approximately five years, and 80% of increased capacity eventually fills.²
- Hansen and Huang (1997): 60–90% of increased road capacity is filled with new traffic within five years; each 1% increase in highway lane-miles increased VMT approximately 0.65%.³

**Recommendation:** TransNet projects that work **against** SCS objectives should be identified and evaluated as such, and scheduled later in the TransNet period – from 2035 to 2048 – so they are not built prematurely. Currently, 72% (2050 $) of the transit budget is in the last two decades of the RTP (2030-2050), and the first two decades of the forty year plan sees the full build out of the 2030 highway network. This will require the board to make a significant policy shift in its long term priorities in order to meet its own goals set for sustainability, which includes healthy environment, prosperous economy, and equity. Specifically, we recommend changes to the project phasing to ensure a balanced investment among highways, transit, and walk and bicycle projects during each time period 2010-2020, 2020-2035, and 2035-2050.

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**Alternate Recommendation:** If no changes to the phasing are made, we ask for the Board to consider adopting a policy to ensure that highway expansion projects scheduled in the RTP for beyond the SCS milestone year of 2035 cannot leapfrog into the Regional TIP unless authorized via formal RTP amendment.

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**GHG Targets**

We are pleased to see the GHG reductions presented in the SCS either meet or exceed the standards set forth by CARB from 2020 to 2035. Yet, how the targets were achieved is troubling. Our region has not gone far enough in making smart growth smarter and creating jobs/housing fit to produce a long term strategy needed to meet the goals of SB 375 in order to help the region’s individual jurisdictions. According to the USD EPIC’s review on the targets, our GHG reductions are largely based on new fuel standards, carpools, expanding the number of highway lanes, vanpools, telecommuting, some parking pricing, and HOT pricing.

Most significantly, it is not clear why the targets for 2035 and 2050 drop significantly once the 14% target for 2020 is reached. This concept is contradictory to what SB 375 aims to produce: more compact, sustainable communities that rely less on fossil fuels in order to reduce GHG emissions across the state. Regional population will increase by 1.3 million in

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2050, but as SANDAG plans for more efficient transit in addition to significantly more compact land use, why don’t the GHG reductions either *increase* or remain consistent? It is counterintuitive to expect a decrease in the reduction rate of GHG emissions while increasing land use density and improving transit.

To meet the long-term goal of reducing emissions to 80 percent below 1990 levels by 2050 that is laid out in Executive Order S-3-05, SANDAG needs to pursue GHG reduction strategies that compound rather than diminish in effectiveness over time. Moreover, a 14% decrease in emissions *per capita* multiplied by a 30% increase in population results in a 14% *increase* in emissions in total. That depressing result is not the whole picture, however. The plan needs to provide more transparency on how the targets are actually being achieved.

We request SANDAG publish a table showing where percentage emissions reductions are achieved by type, for the target dates.

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<th>2020</th>
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**VMT**

Another cause for concern is the fact that VMT per capita in 2050 is barely reduced (-1%) in comparison with 2008 levels (25.66 v. 25.34). Reducing overall VMT is important to improving quality of life in the region. Even if in 2050 everyone drove an electric car, powered by photovoltaics (EV/PV), we would all be sitting in traffic!

Conventional wisdom implies that lower rates of VMT per capita should decrease on a similar scale as that of GHG emission reduction targets. How are emissions to be reduced by 9% overall, while VMT is only reduced by 1%? Please explain.
The current RTP anticipates an increase in overall VMT of 50% (800 additional miles of freeway lanes and 38.8 million additional VMT annually) for the period between 2000 and 2030. Please provide these numbers for 2050.

The purpose of the SCS is to promote more compact, mixed land uses which prevent residents from having to depend on the use of a personal automobile for short trips within their community. While the new focus on regional growth will be accomplished mainly through multi-family attached homes in transit priority areas, the resulting action should be compounded GHG reductions.

Reduction of VMT per capita and GHG emissions should go hand in hand as we aim to achieve a more sustainable region; however, current VMT per capita projections are inconsistent with GHG emission reduction rate over the next 40 years, and this fact needs to be examined more closely.

A 10% VMT reduction would be possible in 2020 (equivalent to 1.4 MMT CO2e) using a range of measures (including mass transit with a commuter mode share of 16%, a telecommute policy with 20% of the total labor force telecommuting. (Anders, USD EPIC 2010). While this greatly exceeds the projected transit commute share for 2050 (1.9%) it demonstrates that with a shift in funding priorities, we can accomplish multiple goals set in the RTP by the board:

- "To create the kind of public transit infrastructure and services offered by "world-class" transit systems."
- "The transportation system should promote environmental sustainability, and foster efficient development patterns that optimize travel, housing, and employment choices."

Land Use
The compact growth envisioned in the SCS will be realized by developing almost 200,000 units of attached multi-family residential in Transit Priority Projects (TPPs). Transit Oriented Developments (TODs) are a great example of compact, mixed-use developments as housing, employment, and commercial centers are combined with transit. contributing to a more sustainable way of life for the users and greatly reducing one's carbon footprint. Although the SCS makes frequent reference to these types of developments, it fails to demonstrate a land use pattern showing where TODs will be situated within each city and the County. In addition, since SB 375 provides special incentives to TPPs, it would be more helpful if the SCS revealed the specific fiscal and regulatory incentives that would be provided in order to encourage TPPs within the region. (Krout, 2011)

Request: We request that a map be added to the RTP/SCS appendices that overlays the Smart Growth Concept map (2030) with planned transit uses for 2030. When the SGCM is updated for 2050, we ask that a new map be created, overlaying the projected 2050 transit system. This map will provide the general public, elected officials and others the ability to see how the transit system interfaces with the areas planned for mixed use and higher densities. This is the type of information
needed to show demonstratively how we are supporting infill development with transit infrastructure.

The RTP forecast from 2010-2050 indicates a dramatic shift in housing types, representing a striking departure from past trends. Under the 2050 RTP the incremental growth in attached housing grows from 46% in the previous decade to 76%. In order to achieve the goal of 84% of new housing in transit priority areas, TODs supplied through redevelopment and infill would comprise a significant proportion of the new housing supply. As we move forward, we must re-analyze our performance measures. If over 70% of commuters have ½ mile access to transit with a frequency of every 15 minutes, but only 6% of commuters use the service, there must be other factors involved, such as length of trip times.

Luckily, as we progress through the 21st century, both Millennials and Baby Boomers are more inclined to desire compact, walkable communities. According to a 2007 study by the National Association of Realtors and Smart Growth America, approximately nine out of ten Americans feel that new communities should be built to promote more walking and less driving while also improving the efficiency of public transportation. Therefore, the SCS needs to not only remain aligned with SB 375 requirements, but also follow the real estate trends of the region in the next 40 years. (Krout, 2011)

The dilemma facing our region is that very little land is available within the Transit Priority Areas to accommodate either housing or employment without redevelopment, but a vast land supply remains for detached housing. The SCS has the opportunity to create incentives for enabling the type of growth that is in SANDAG’s scenarios. However, the need to make Smart Growth “Smarter” still exists, as the adopted smart growth map displays 198 smart growth centers for the region.

Our policy recommendations for the Board to make Smart Growth “Smarter” within the SCS are to:

1. **Support implementation of compact mixed-use land uses and supportive infrastructure by prioritizing Urban and Town Smart Growth Centers for multimodal transportation investments in the next two decades**;

2. **Prioritize Active Transportation investments in Urban and Town Smart Growth Centers as a regional interest and SCS policy**.

The SCS inappropriately emphasizes employment trips even though non-employment trips make up approximately 90% of the region’s total trips. For example, the SCS states that "neighborhood-level growth forecasts considered a neighborhood’s proximity to existing job centers (along with travel time estimates and information on local commuting choices), as well as historical development patterns." (SCS 3-7.) Projections for neighborhood-level growth should also take into account a neighborhood’s proximity to transit, schools, parks, commercial centers, and other resources that are draws to residents. Otherwise the SCS may overemphasize neighborhood growth in the County’s business park and employment centers and de-emphasize growth near transit. Such an inaccurate assumption could lead to reduced funding for transit in the RTP.
The SCS estimates that inter-regional commuting "will be minimal, driven only by the proximity of neighboring regions to some job centers, and personal choices." (SCS 3-37.) Although we recognize that SANDAG did perform an analysis to reach this conclusion, we feel that it does not utilize current planning assumptions that growth will continue in lower-price areas such as Southwest Riverside County, Western Imperial County, and Northern Baja California. Proximity to job centers and personal choices are not the only drivers of out-of-county growth. SANDAG’s analysis disregards that the primary driver is high housing prices in San Diego County. Although the SCS carefully accounts for housing units for low income persons, it does not provide realistic estimates of the housing choices of moderate income persons. The assumption that inter-regional commuting "will be minimal" has the effect of grossly underestimating future VMT. In order to accurately plan for the region’s transit infrastructure, it is vital to have an accurate account of future VMT.

Because the SCS assumes there will be changes in local policies and plans to make communities more walkable and sustainable, SANDAG needs to focus investments, programs and policies towards supporting these efforts. We recommend SANDAG develop a Transit-Oriented Development Policy as part of the upcoming dialogue on strategies to support transit. TOD policy can save taxpayers money and improve the efficiency of the transportation system by more closely linking transit investment with supportive land use policies. Examples include:

- Phoenix, limits auto-oriented land uses from being built within walking distance of light rail stations.
- MTC in the Bay Area only commits regional funding to a transit corridor once the communities along the project have plans for supportive land use near the stations.

SANDAG will soon be considering a broad range of parking and land use strategies to support transit, and this dialogue should include the development of a regional TOD policy that will accommodate to meet our region’s needs.

Active Transportation

Further connecting land use and transportation together is imperative for active transportation in the San Diego region. Utilizing the smart growth opportunity areas for people to live, work, and shop all within an area conducive to walking and bicycling will result in a decrease in dependence on the automobile.

Recommendation: Create a “Safe Routes to Transit” program for smart growth areas, and provide each small jurisdiction with $1 million and each large jurisdiction with $2-5 million to implement this program as Early Action in the next 10 years.

This action will provide additional climate benefits, and further produce high yields of user friendly neighborhoods. The implementation of the Regional Bike Master Plan along with education on active transportation and its multiple benefits is a great start. The safe routes program must be carried over in the implementation of the bike plan,
with the elimination of class 3 or bike routes on every road segment but rural and local collectors.

**Complete Streets**

Implementing region wide design guidelines for Complete Streets would result in streamlining roads together and create an interconnected feel. **Complete Streets language should appear throughout the RTP, not only one time in an RTP appendix.** Taking a serious approach to Complete Streets will not only make it easier to comply with AB 1358, but also bring access to pedestrian and bicycle commuters all over the region. The initiatives to implement the design of streets and its relation to Complete Streets should be emphasized in the RTP. The recent interest in Active Design Guidelines would be a positive addition to the Complete Streets explanation and how it relates to bicycle and pedestrian activity. This would help the Complete Streets portion relate more to the Active Transportation part of the plan.

**Transit**

We applaud the marked increase in transit ridership projected for commute trips (123%), but feel the increase in overall transit ridership is not adequate for the length of time covered by this plan. Around the world, regions have done innovative transit planning that has yielded higher results in just 5-10 years then what SANDAG is planning for forty years!

Transit frequencies planned for every 10 minutes in key corridors are an exciting new part of the RTP. Yet it is very disconcerting to hear that the ten minute frequencies are not planned until 2040. Transit must be fast, frequent and appealing to attract new riders. **We recommend improving the higher frequency to the near term decade.**

Please add the following specific goals in the SCS description (SCS at 3-63) of how to make public transit more appealing:

- Apply global best practices
- Apply market research findings to transit
- Increase network connectivity
- Provide trip times competitive with the car
- Provide a secure customer experience

While Move SD supported the preferred scenario for the RTP (hybrid) over the other choices due to its strong emphasis for funding transit capital projects, it is important to continue the dialogue about why certain transit projects were removed from the final scenario, and at what impacts.

- The UTC Coaster Tunnel project was removed, at the expense of a downtown transit tunnel which will allow trolleys to move more quickly (Trolley Express).

- The Kearny Mesa Transit bus guideway was downgraded from a grade separated transit only project, to an at grade “transit priority lane” type project.
Conversations should continue publicly about how these changes in our “choices” impact the region.

**Ideas for more Effective Transit (to boost ridership):**

*We recommend the Board set transit ridership goals by decade, in addition to by corridor.* Currently, the goals set in the RTP in the Urban Area Transit Strategy are NOT being met. Key areas where the goals are not projected to be met include the urban core of the City of San Diego, downtown, and San Marcos. We request the highway and transit project phasing in the RTP be reconsidered so that the plan provides a scenario where all corridor ridership goals are met by 2050.

Ten BRT projects have been added to the 2050 RTP, and four major light rail lines added (Pacific Beach, Kearny Mesa, Mira Mesa and SDSU). To get the most transit ridership possible and get the most for the taxpayer investment in this service, we recommend:

- **Putting BRT/Rapid Bus into service before 2020** where LRT expansion is proposed in the RTP.
- **Adding new LRT lines only by converting BRT/Rapid Bus lines where high ridership warrants, funded from $1.5 billion for BRT-to-LRT conversion reserve beyond 2035.**
- **Linking streetcar lines to compact, mixed use, high density Town Centers** where development can pay for and support that investment.

Move San Diego is pleased to have had the resources to hire an independent transportation planning consultant to develop an alternate transit strategy for the region, also known as the FAST plan. This plan has been developed with choice riders in mind and can significantly increase transit ridership by taking the “rapid” bus approach to create a more local rapid connection while building upon the existing transit system. The FAST plan has been presented to SANDAG in the past, and parts of the FAST plan were adopted into the 2030 RTP, and portions are included in the 2050 Draft RTP.

**We request the full FAST plan be analyzed for improving transit route efficiency in the 2050 RTP in order to dramatically increase ridership, and meet the ridership goals.** The overview of the plan is available on our website, [www.movesandiego.org](http://www.movesandiego.org) and the full plan will be delivered on CD for SANDAG staff review, and for the public record. Anyone may request a copy of the FAST plan on CD by contacting Move San Diego directly.

**Highways**

California transportation expert Pete Hathway has opined the toll lanes to Orange County and Riverside are:

- Not in TransNet
- Sprawl inducing
Move San Diego's comments on the draft 2050 Regional Transportation Plan June 10, 2011

- Anti SB 375
- Should be removed from the RTP

The huge highway investment reduces the chance to maximize transit investment. In other words, transit return on investment is inhibited by the draft 2050 RTP freeway investment. With a shift in investment priority to a transit first strategy, it is likely the region will not need additional highway widening on Route 52, 15, 76, 94. Ideas to consider here include:

1. On I-805 creating 2 HOV lanes, and consider converting 2 existing lanes plus the 2 HOV lanes to managed lanes;
2. Forego expansion of SR76 east of I-15, I-8 east of El Cajon, and SR94 east of Jamacha, to avoid opening up access for rural development;
3. Omit expansion of I-5 through National City, SR15 through SE San Diego, SR94 east of I-805, and SR52 from I-5 to I-805, and shift this funding to BRT, walk and bicycle projects.

Most sources of state and federal funding cannot be “flexed” from capital to operations. And because of federal requirements that RTPs are “financially constrained” it is not possible to simply assume more transit projects are built without a reasonable chance of being able to operate them. Thus, SANDAG can only go so far in bringing transit projects forward without a reasonable financial plan which is based on the political will to make such a shift. The 2050 RTP outlines $7-11 billion in transit funding that is unidentified local funding. The San Diego region will need to be creative to locate the revenue needed to transform the transit system into the “world class” network it envisions.

**Conclusion**

Thank you again for considering our comments on the draft 2050 RTP. Move San Diego believes that together we can greatly increase transit ridership in the region with the right type of infrastructure, appropriate funding and the political will to shift the region’s priorities for mobility options. This is imperative so that we maximize the value of our transit system for all of the taxpayers. The co-benefits to a climate plan in our regional transportation plan are endless.; cleaner air, less pollution, increased public health, reduced health costs, increased productivity and economic prosperity for all, and better overall quality of life we believe that with changes to the RTP, VMT can be reduced, more people will choose options like biking and transit when they are made safer, faster and more convenient.

Whether you ride transit daily, infrequently or never, by reducing traffic congestion, transit affects you.

Thank you,
Move San Diego
Move SD 2050 RTP Recommendations
Overview

TransNet projects that work against SCS objectives should be identified and evaluated as such, and scheduled later in the TransNet period -- from 2035 to 2048 -- so they are not built prematurely.

Changes to the project phasing should ensure a balanced investment among highways, transit, and walk and bicycle projects during each time period 2010-2020, 2020-2035, and 2035-2050.

Adopt a policy to ensure that highway expansion projects scheduled in the RTP for beyond the SCS milestone year of 2035 cannot leapfrog into the Regional TIP unless authorized via formal RTP amendment.

We request SANDAG publish a table showing where percentage emissions reductions are achieved by type, for the target dates.

Smart Growth “smarter” within the SCS by:
  1. Prioritizing Urban and Town Smart Growth Centers for multi-modal transportation investments in the next two decades;
  2. Prioritize Active Transportation investments in Urban and Town Smart Growth Centers as a regional interest and SCS policy;

The SCS should demonstrate a land use pattern showing where TODs will be situated within each city and the County. It should make a point to reveal the specific fiscal and regulatory incentives that would be provided in order to encourage TPPs within the region.

Land use maps should overlay the Smart Growth Concept map (2030), with planned transit uses for 2030. When the SGCM is updated for 2050, overlay it with the projected 2050 transit system.

Create a “Safe Routes to Transit” program in the RTP for smart growth areas, and provide each small jurisdiction with $1 million and each large jurisdiction with $2-5 million to implement this program as Early Action in the next 10 years.
Complete Streets language should appear throughout the RTP, not only one time in an RTP appendix.

Set transit ridership goals by decade, in addition to by corridor in order to monitor performance of the goals set.

Highway and transit project phasing in the RTP be reconsidered so that the plan provides a scenario where all corridor ridership goals are met by 2050.

Analyze the Move SD FAST plan for improving transit route efficiency in the 2050 RTP in order to dramatically increase ridership, and meet the ridership goals.

Set policy linking streetcar lines to compact, mixed use, high density Town Centers where development can pay for and support that investment.

To get the most transit ridership possible and get the most for the taxpayer investment in this service, we recommend:

- Putting BRT/Rapid Bus into service before 2020 where LRT expansion is proposed in the RTP.

- Adding new LRT lines only by converting BRT/Rapid Bus lines where high ridership warrants, funded from $1.5 billion for BRT-to-LRT conversion reserve beyond 2035.

We recommend SANDAG develop a Transit-Oriented Development Policy as part of the upcoming dialogue on strategies to support transit. TOD policy can save taxpayers money and improve the efficiency of the transportation system by more closely linking transit investment with supportive land use policies.

The Board should adopt a TOD policy which limits the use of discretionary funds to projects which can demonstrate qualification for CEQA exemption criteria for Transit Priority Projects.

The Board should adopt a TOD policy prioritizing the use of discretionary funds to projects which facilitate increased affordable / mixed-income housing within Transit Priority Areas.
Additional Questions:

Chapter 2
Table 2.2:
Why would the carpool mph be the same as the no-build situation? One of the major changes in the RTP is the construction of HOV lanes where carpools would travel at free flow speeds. If this is to be the case, why not convert an existing general purpose lane to an additional HOV lane?

Clarify units in 2030 RTP vs Draft RTP 2050 (CO2 tons per year or lbs per year?). If the units are the same in the 2030RTP and the 2050 Draft RTP, explain why the smog forming pollutants have apparently increased from 2006 to 2008 four times while the VMT in peak, all day and daily delay per capita have decreased from 2006 to 2008. Are such model results tested empirically? If so, provide results. How can the smog forming pollutants increase this much and yet conform to the air pollution attainment limits?

Clarify whether if the unit is weekday average or daily average for CO2 per capita. Is it foreseen that while the SB 375 target is to be 7% per capita less than in 2005 in 2020 (or 24.18 lbs/capita weekday average) and 13% less than 2005 (22.62 lbs/capita weekday average) in 2035, this per capita decrease would be overtaken by a large amount by 2050?

Chapter 3
- Does the modeling of the smog-forming pollutants take into account the effect of increasing temperatures due to climate change?
- Does the model account for induced demand?
- Provide amounts spent from the Transnet Smart Growth Incentive Program compared with availability of funds since start of program.
- Provide amount spent and acres acquired, managed or monitored under the TransNet Environmental Mitigation Program. How much additional is expected to be mitigated for the RTP 2050 projects and where will this come from, at what cost?
- How is the RCP Performance Monitoring connected to the regional performance measures of the RTP 2050?
- Provide an estimate of the GHG reduction amounts from the various SCS measures outlined.
- Provide metrics to monitor implementation of SCS measures to reduce energy use.
- Monitor the energy efficiency of the various modes of transportation (eg MJ per capita per km BRT at different capacities, same for train, passenger vehicle etc) and establish targets to improve them.
Additional Questions, Continued

Chapter 4
In regards to table 4.4:
   Why is there no difference in the average travel time per person trip between the
   No Build and the 2050 RC scenario despite all the planned changes?

Chapter 5
If maintenance and operations should be given priority over new construction,
why are the state highways still in poor shape in parts?
June 4, 2011

Honorable Jerome Stocks, Chair
SANDAG Board of Directors
401 B Street, Suite 800
San Diego, CA 92101

Re: Comments on the draft RTP update pertaining to the planning review area of the Carmel Valley Community Planning Board

Dear Mayor Stocks:

The Carmel Valley Community Planning Board (CVCPB) is the City of San Diego's recognized planning group for the communities of Carmel Valley and Pacific Highlands Ranch. The CVCPB also reviews planning matters within the communities of Fairbanks Ranch Country Club, Via de la Valle and North City Future Urbanizing Area Sub Area II along the City's northern boundary, which lack an established planning group. The CVCPB also works closely with the San Dieguito River Park JPA. At its regular meeting on 26 May 2011, the CVCPB voted unanimously to submit comments on the draft RTP update and to request that our City Council representative, Sherri S. Lightner, create a SR-56 corridor transportation task force so affected communities may better work with SANDAG and Caltrans on shared mobility interests.

Transit Service

We appreciate the addition of Rapid Bus Route #473 in the Revenue Constrained Plan scenario in response to our request for additional transit services. However, we believe that Route #473 should be completed well before 2030.

As you know, we had requested a rapid bus route within the SR-56 corridor to provide a high frequency transit link between inland and coastal centers connected by this key transportation corridor. At a minimum, we had sought to have such a route in the Unconstrained Needs scenario and still do make this request. We do note the inclusion of local bus service within the SR-56 corridor in the Revenue Constrained Plan scenario to be completed by 2020 and appreciate the inclusion of this route as complementary to the desired future rapid bus route within the same general corridor. We also appreciate the addition of a local bus route along El Camino Real/High Bluff Drive, with a terminus at Del Mar Heights Road, in the Revenue Constrained Plan scenario, also proposed for completion by 2020.
Honorable Jerome Stocks
June 4, 2011
Pg 2

SR-56 Freeway Improvements

We are very concerned that the widening of SR-56 to six lanes is now proposed to be completed by 2040, which is a significant delay from the existing plan to complete it by 2020 and a quadrupling of cost in 2010 dollars; the quadrupling in cost is puzzling and must be reviewed for accuracy since there is no known change to the project. We learned much during our outreach work on the 2010 Proposition C campaign about the importance of the SR-56 corridor to commuters and are dismayed that improvements continue to be delayed. This project should be completed much sooner. Please note that significant development impact fees are projected to be available to fund part of the improvements to the freeway, especially now that voter approval of Proposition C enables continuing development of Pacific Highlands Ranch with the imminent removal of its development timing restriction.

Because the SR-56/I-5 freeway connectors are now proposed to be completed by 2030 instead of 2020, this suggests that there is more time to work on a solution to the connectors that meets both regional transportation needs and is sensitive to community impacts. Adjacent communities continue to be concerned about the impact that the connectors with I-5 will have on community character.

We question the 2008 modeled level of service for SR-56 eastbound between I-5 and Carmel Valley Road. We experience a failing level of service today along that segment during the PM peak period. The 2008 modeled level of service underestimates the level of congestion along that segment during that period.

We question the utility of a combination of additional conventional lanes, managed lanes and HOV freeway connectors along SR-56 in the Unconstrained Needs scenario. Please explain why this combination is proposed.

I-5 North Coast Corridor

We continue to have concerns about how the proposed improvements to the North I-5 Corridor will impact community character, as stated in earlier correspondence and in ongoing work by the Torrey Pines Community Planning Board.

El Camino Real Arterial Improvements

Please note that the CVCPB has been actively working with the City of San Diego on a design for the El Camino Real project (Arterial Project SD34) for many years. The CVCPB has consistently sought a design that is sensitive to the natural environment and community character in the area it traverses and we have supported roundabouts at intersections within the project area. Please confirm that the RTP update has incorporated these community preferences.
Honorable Jerome Stocks  
June 4, 2011  
Pg 3

Request for Creation of a SR-56 Corridor Transportation Task Force

The CVCPB is also requesting that Councilmember Lightner consider establishing an SR-56 corridor task force to coordinate with SANDAG and Caltrans on transportation interests along the corridor by the affected community planning groups within the current Council District 1 (Torrey Pines, Carmel Valley, Torrey Hills, Del Mar Mesa and Rancho Peñasquitos planning groups).

Thank you and please feel free to contact me at white@wwarch.com or 619-542-1188 for follow up and questions. The CVCPB looks forward to your responses and changes to the RTP.

Sincerely,
Carmel Valley Community Planning Board

Frisco White, AIA
Chair

cc: Hon. Sherri S. Lightner, District 1, San Diego & SANDAG Board Alternate
    Hon. Jerry Sanders, San Diego Mayor, SANDAG Board Member
    Hon. Anthony Young, San Diego Council President, SANDAG Board Member
    Gary Gallegos, Executive Director, SANDAG
    Heather Adamson, Senior Regional Planner, SANDAG
    Mel Millstein, Council Representative, District 1, San Diego
    Sachiko Kohatsu, Representative, Supervisor Pam Slater-Price, County of San Diego
    Deanna Spehn, Policy Director for State Senator Christine Kehoe
    Dennis Kidz, Chair, Torrey Pines Community Planning Board
    Allen Kashani, Secretary, CVCPB
Recommendations for Improving SANDAG’s 2050 RTP and for Post-RTP Actions

Stuart Cohen,
Executive Director, TransForm
Member, SB 375 Regional Targets Advisory Committee

May 23, 2011

As SANDAG nears the end of their comment period on California’s first Sustainable Communities Strategy under SB 375, which is part of the SANDAG’s 2050 RTP, there is a strong feeling that more must be done to improve it. This analysis briefly outlines what many see as the most fundamental problem, the continued focus on freeway and arterial expansions in the RTP, and what ideally would take place instead of those expansions.

It then discusses practical constraints and considerations for changing the RTP, especially given the time frame. It concludes with nine recommendations that are divided into three sections:

I. Recommendations for improving SANDAG’s 2050 RTP
II. Commitments to develop new policies once the RTP is adopted
III. Commitments for additional analyses once the RTP is adopted

There are two primary causes of concern that are worth noting from the outset. First, the SCS barely reduces VMT per capita by 2050 compared with 2008 levels (25.66 vs. 25.34), just over a one percent reduction, yet the plan claims to reduce GHG per capita 9% in this time frame. This plan needs to be carefully examined to determine where the reductions in GHG per capita are coming from, if not reductions in VMT, and whether these are lasting changes.

Second, while SANDAG exceeds their target for 2020, the reductions in GHG per capita then begin to decline, so that by 2050, the RTP investments only achieves a 9% reduction as compared with a 14% reduction in 2020. This is contrary to the conventional wisdom about transportation and land use planning as well as every conversation about the subject during the Regional Targets Advisory Committee process; that land use and transportation changes accrue over time to give much more substantial reductions in the 2035 and 2050 time horizons. It is of great concern if SANDAG’s SCS only achieves short term GHG reductions that are eroded over time.
What is the problem with planning for so many roads?

1. San Diego already has an extensive arterial and highway system. As in other regions throughout the US, the primary problem is not that there is not enough road space, but that so many people want to use it at the exact same moment -- primarily weekdays at 8 am and again at 5 pm.

2. Building more roads is incredibly expensive. Highway projects and connectors would consume over $22 billion (2010 dollars – RTP page 5-13) through 2050, and would require about $10 billion more for maintenance and rehabilitation.

3. Building roads subsidizes and supports a more auto-oriented development pattern and generally suppresses a shift towards development the meets the growing demand for compact, walkable transit-oriented development.

4. Building all of these roads, and especially the $6 billion worth of projects programmed over the next decade FY 2010-2020 (pg 5-11, in escalated dollars) also translates into less funding for transit, walk, bike and other modes.

5. Such auto-oriented development places a large financial burden on residents; TransForm’s Windfall for All showed that if all San Diego residents had the same level of public transit access as the quintile (20%) with the best transit access, San Diegans would be saving $3,515 per household annually or $2.8 billion as a region, and emitting 30% fewer greenhouse gases from cars and light trucks.

What would ideally happen?

While advocates for sustainability and social equity may have differing priorities, it is generally agreed that we would have fewer (and some want no) highway and arterial expansions and, to the extent road expansions are funded, to backload them later in the plan. Some select plans, like the current plan for I-5, that call for an extraordinary expansion to 14 lanes in some sections, are especially critical to scale back or stop.

Yet intense traffic congestion generates additional CO2 and leads to popular demand for more highway expansions. So given the growing population, it is imperative to reduce demand and improve operations on roads and highways in order to avoid dramatic gridlock.

Currently, SANDAG’s projected mode shift away from single occupancy vehicles is based on a future where carpools, vanpools and transit vehicles can flow freely on the RTP’s proposed HOV/carpool lanes and on a great number of new “managed lanes” that allow solo drivers into those lanes for a fee. Any plan for improving access with fewer physical road expansions would have to account for the fact that San Diego’s road system has so few carpool and managed lanes at this time.

Instead of physical expansion and new lanes, it would be ideal to move vehicles more efficiently with a combination of:

1. Implementation of a more ambitious Transportation Demand Management (TDM) program. From telecommute to flex-time to transit incentives; more can always be done with TDM. Though without HOV or managed lanes the list of effective TDMs is somewhat constrained, e.g. carpool promotions and vanpooling incentives would clearly not work as well.
2. Acceleration of the Transportation Systems Management programs, including comprehensive ramp metering.

3. Acceleration of transit, bicycle and pedestrian infrastructure targeted towards the most congested commute corridors, as well as smart growth areas that are actively zoning for and attracting new walkable development.

4. Optimizing use of the existing infrastructure by:
   a. Analyzing and potentially supporting the conversion of at least one mixed flow lane in each direction, at least on highways that currently have at least 8 lanes, into a managed lane. SANDAG was a pioneer with I-15 and this is the next generation of out-of-the-box ways to improve efficiency and save taxpayers money. This would allow many of the same vanpooling and other strategies to work without new lanes. It would still cost money to implement and faces a host of obstacles, but so did I-15 when it was conceived.
   b. Scaling back on some of the proposed expansions -- for example corridors where 4 managed lanes are proposed -- considering whether that can be reduced to two new lanes by further reducing demand.
   c. Analyzing innovative new practices, such as in Minnesota where buses are allowed to use existing shoulders to bypass congestion.
   d. Including an equity analysis of any conversions, including provisions for funding benefits such as reduced or free transit fares, to ensure there is overall benefit to low-income commuters.

Needless to say, if efficiencies can be found in this area, funding saved by reducing the number or scope of freeway expansions could be used for TDM programs or to speed implementation of the transit, bicycle, and pedestrian improvements included in the RTP.

**What are some practical constraints and considerations?**

Realistic recommendations for achieving an ideal transportation system that maximizes environmental and social benefits while reducing costs for taxpayers requires an understanding of the constraints SANDAG faces, and the underlying statutes governing RTPs.

At a most basic level, some major constraints and considerations include:

1. **TransNet** – TransNet is probably the biggest constraint in the entire RTP. TransNet projects, both highway and transit, dominate the RTP’s committed project list. While SANDAG can revisit and change many of these projects with a 2/3 vote of the board, the measure does not call for a comprehensive program review until 2019. However, SANDAG’s board can change the phasing of projects in the TransNet expenditure plan in order to prioritize those that improve sustainable transportation options and support priority growth areas.

2. **Need for transit operating funds** – Most sources of state and federal funding cannot be “flexed” from capital to operations. And because of federal requirements that RTPs are “financially constrained” it is not possible to simply
assume more transit projects are built without a reasonable chance of being able to operate them. Thus, SANDAG can only go so far in bringing transit projects forward without a reasonable financial plan.

3. **Already assuming some new funding in the plan** -- The passage of a new source of operating funds *is already assumed as part of the constrained revenue scenario* (federal requirements allow such assumptions, as long as they are reasonable). In other words, even to get to the service levels outlined in this RTP there will need to be strong collaboration and likely additional commitment from the voters. A significant reason cited for not changing the TransNet projects at this time is that SANDAG needs to show voters that they follow through on commitments, especially since SANDAG is bringing together diverse interests around a “quality-of-life” initiative. This effort may lead to a funding measure that would likely include some portion of transit operating funds, and potentially funding for parks, water quality and a host of other uses.

4. **Land use projections must also be realistic.** Federal guidelines require RTPs to use realistic land use assumptions that consider existing general plans and codes, though federal agencies and the state RTP guidelines explicitly allow for MPOs to deviate from local land use plans in order to account for economic trends, regional plans, or likely shifts in state and federal policy. While SB 375 does not give SANDAG any power over local land use, but creates incentives for smarter land use and a more sensible, integrated planning framework (see excerpt at bottom for how clearly this is stated in SB 375).

Given all of these realities, and the imminent adoption of the RTP, the following recommendations are divided into three sections

- Recommendations for improving SANDAG’s 2050 RTP
- Commitments to develop new policies once the RTP is adopted
- Commitments for additional analyses once the RTP is adopted

**Recommendations for improving SANDAG’s 2050 RTP**

1. **Identify Specific Programs and Near-Term Funding for Active Transportation.** The proposed $2.58 billion expenditure on Active Transportation is an excellent addition to this RTP, but a significant commitment of funding should be made early in the plan (in the next 2-10 years) to maximize its long-term benefit. This commitment should be for a “pro-rata” share of funds for the RTP as a whole.

TransForm applauds the development of a Regional Safe Routes to School Strategy (pg 6-52). There should also be a firm commitment to implement the recently discussed “Safe Routes to Transit” program, which promotes bicycling and walking to transit stations by making important bike/pedestrian feeder trips easier, faster, and safer. Either a new grant program should be initiated that focuses on Safe Routes to Transit, or criteria developed that further prioritizes existing smart growth or bicycle and
pedestrian programs to improve access to transit. Any grant criteria should also ensure low-income communities get improved access.

2. Clarify and commit to improve transit frequency where densities and ridership warrant.
Local bus transit service is, and will remain, the workhorse of the transit system, including connecting people to regional transit. A map identifying SANDAG’s “key corridors” i.e. where local transit will have headways of 15 minutes by 2020 and 10 minutes by 2035, should be included in the final RTP.

In addition, SANDAG should review whether additional routes that have 10-minute headways assumed for 2035 could be advanced to 2020, where densities and potential ridership may justify that frequency. These headways can then be included in the unconstrained revenue scenario, and considered as part of any new funding measure. Expediting the delivery of transit projects will incentivize transit-oriented walkable development patterns which deliver per capita VMT and GHG reductions and will help SANDAG to meet its target. Waiting to fund these projects in the outer years of the SCS may mean that a greater share of development will be auto-oriented and detract from SANDAG’s efforts to achieve its land use goals and meet the GHG targets.

3. Improve Project Phasing by funding key commute routes earlier
While operating funds are constrained, SANDAG could identify where Bus Rapid Transit (BRT) and “Rapid” routes in key urban corridors could be advanced earlier. As with recommendation #2 above, SANDAG should specify the incremental amount of funding needed to bring it forward. Include these projects in the constrained revenue scenario if feasible. Specific suggestions include:

-- Move BRT 640 from 2020 to before 2018 (I-5 - San Ysidro to Downtown and Kearny Mesa via I-5 shoulder lanes/HOV lanes, Downtown, Hillcrest/Mission Valley Guideway);

-- Move Rapid Route 30 from 2030 to 2020 (Old Town to Sorrento Mesa via Pacific Beach, La Jolla, UTC)

-- Move Rapid Route 11 forward from 2035 to 2020 (Spring Valley to SDSU via SE San Diego, Downtown, Hillcrest, Mid-City)

4. The Sustainable Communities Strategy should include a map and narrative detailing how existing and planned transit serve “Smart Growth” Opportunity Areas. SANDAG should clarify how its plan is internally consistent. Its assumptions about percentage of new development in multi-family configurations near transit are impressive and appropriate for its Sustainable Communities Strategy. It should clarify
how its transportation investments will support the implementation of this land use pattern.

**Commitments to develop new policies once the RTP is adopted**

5. Develop a Transit-Oriented Development Policy as part of the upcoming dialogue on strategies to support transit.

Regions and jurisdictions across the country have developed policies that save taxpayers money and improve the efficiency of the transportation system by more closely linking transit investment with supportive land use policies. Phoenix, for example, limits auto-oriented land uses from being built within walking distance of light rail stations. The Bay Area’s Metropolitan Transportation Commission only commits regional funding to a transit corridor once the communities along the project have plans for supportive land use near the stations.

SANDAG will soon be considering a broad range of parking and land use strategies to support transit, and this dialogue should include the development of a regional TOD policy that is fashioned to meet San Diego’s particular needs.

6. **Commit to implementing parking policies, including funding innovative programs.**

SANDAG deferred consideration of transit-supportive parking policies and programs until after the current RTP is adopted. Since research has shown that more supportive parking policies are critical to transit’s success, SANDAG should set out a specific timeline for this review, and commit to funding innovative parking programs (out of smart growth incentive or other funding streams). The most effective and innovative programs could then be brought to scale as part of the 2015 RTP.

**Commitment for additional analyses once the RTP is adopted**

7. **Identify and model a maximum TDM/TSM/Transit alternative as part of SANDAG’s upcoming discussion on strategies to support transit.**

SANDAG has committed to considering a wide range of transit-supportive strategies once the SCS is adopted. To understand the potential synergistic benefits of maximizing these demand management strategies with other system management and pricing strategies, SANDAG should conduct an exercise that starts with the existing system as a base, and see what mix of projects and programs can have the biggest impact.

This may include concepts that are not widely supported at this time – such as converting certain mixed-flow lanes, especially where at least 8 exist on a corridor, into
managed lanes. (This would be consistent with RTP page 6-66 “Consider congestion pricing as an alternative whenever new highway capacity is added – responsible parties: SANDAG and Caltrans”.) This exercise could create a huge payoff as we try to find low-cost, effective ways to increase access and mobility.

SANDAG should include an analysis of arterials in these scenarios, seeking to maximize TDM and TSM strategies as a way to limit the demand for physical arterial expansions. This analysis could involve the two SANDAG working groups that currently focus on local roads and arterials. Findings should be presented to the cities and county (as they are the ones that generate plans for arterials) and tied to funding and grant programs.

8. Improve Performance Targets, Project Performance Measures and Assessment Tools

SANDAG did more than ever with this RTP to set a broad range of environmental, health and social equity goals. There was also a methodology created for ranking highway and transit projects. While laudable, there were various weaknesses; including not creating quantifiable targets for public benefits such as health and open space. Ideally each transportation project would be evaluated for its potential to either achieve or detract from these targets as MTC is currently doing. Such analysis can provide critical information to decision-makers and the public as they decide not just on projects to include in plans, but in what order they are funded.

SANDAG should commit to revisiting their methodology, reviewing what other regions have done, and having a more transparent method for developing and illustrating project performance assessment, and show how these projects link to regional goals.

9. Use Scenario Planning to Identify Impacts of Major Land Use Trends

As SANDAG undertakes an update of its Regional Comprehensive Plan (that outlines future projected land uses) it should undertake some analysis and scenario planning for areas that are generating excessive vehicle trips. While much of the SB 375 focus is on integrating planning for housing, it seems that the design and locations of future job centers, primarily in North County, are part of the reason the GHG reductions degrade over time. Employment growth, as well as residential locations, should be an important part of this analysis.

Additional information including a short SB 375 fact sheet could be found at www.transformca.org

For suggested changes please contact Stuart at stuart@transformca.org
Review of Chapter 3 of the San Diego Regional Transportation Plan (SCS)

The current effort as described in the SCS is a reaction to a variety of carrots and sticks at the state and federal level. It focuses on compliance with mandates and will result in a fragmented plan for sustainability. What are the end products of a sustainable region? What would such a region look like? These should be the starting questions for a discussion of Sustainable Community Strategy (SCS).

1. How does TOD fit into the SCS picture?

TODs would generally extend to a radius of up to ½ mile from a major transit stop—representing the maximum comfortable walking range in a compact, mixed-use setting. TODs could become the cores of transit villages that use a shuttle system or similar eco-friendly alternative to the automobile to get people out of their cars within up to a one-mile radius from the transit station. Using these basic building blocks, a mix of employment districts, mixed-use commercial centers and housing nodes connected by rapid transit could form long “sustainable community corridors” ranging from ¼ to 1 mile wide and functioning as extended or linear downtowns. Under SB 375, a desirable growth pattern for California would be archipelagos of TODs and transit villages connected by rapid transit corridors. This was not evident or clear in the SCS how this particular type of development would occur in specific areas within the both cities and the County.

2. What types of new growth and related land development projects will get the highest priority under SCS?

SB 375 encourages three types of new growth that can be broadly described as (1) infill, (2) compact, mixed-use development, and (3) TODs. All share characteristics, including the fact that VMT reduction results from inherent trip-elimination, trip-internalization, and access to multiple modes of travel.

People who live and work in the same general area are more likely to take transit, walk, or bicycle to work. It is interesting to note that home-to-work trips constitute only about 16% of total trips and about 20% of total VMT on average. That leaves 84% of total trips that either start or end at home or connect non-residential land uses. So even without rapid transit access, compact, mixed-use development can reduce VMT related to the 80% of trip generation that is not commute-related.

With compact mixed-use development, automobile trips can be reduced by 20-40% (based on 23 studies). National studies of infill, mixed-use, and TOD development indicate that TODs generate the largest trip generation reduction (44%), followed by infill (36%) and mixed-use development (35%). When commute-related VMT is considered, TODs can produce half the VMT associated with typical suburban development. More specifically, according to studies by Fehr & Peers, a transportation-consulting firm, VMT is reduced by 42% for households within ½ mile of transit, and 21% for households between ½ and 1 mile from transit. As a result, the most desirable form of development under the SCS will be TODs.

This is made clear in SB 375 since it gives special incentives to “Transit Priority Projects” (TPPs), i.e., TOD projects that are consistent with a strategy adopted by the region that would, if implemented, achieve the regional targets set by CARB. TPPs must be residential or mixed-use residential, have an average density of at least 20 homes per acre, and be within ½ mile of an existing or funded major transit stop or high-quality transit corridor with fixed-route transit service intervals no longer than 15 minutes during peak commute hours. Recognizing this, it would be helpful if the SCS was more specific in the particular incentives (fiscal and regulatory) that will be provided on a local level to further encourage TPPs within the San Diego region.

3. The SCS encourages compact growth patterns with emphasis on infill and transit-oriented mixed-use. How will this align with the projected marketplace for residential?
The marketplace for California’s suburban sprawl was driven by demographic trends. A large population wave of people started families at the same time that the country was becoming a mass production engine following World War II. Relatively cheap land and an expanding freeway system funded by the federal government increased personal mobility and enabled people to pursue their version of the American dream—a new home in the suburbs. But attitudes change over time and extrapolating consumer needs and buying trends from previous decades will not accurately project needs and trends over future decades.

Take, for example, trends in family formations, where a number of significant demographic changes are at work:

- The average US household size is now 2.03 people per home, a 40% decrease from 3.27 five decades ago
- In the 1960s, 48% of households had at least one child—today only about 1/3 of households have school-age children at home
- By 2025, the number of households with children will decrease another 20%, to about 25% (Preparing for the Next Building Boom)

In addition, twenty-somethings and their 50-plus parents are already pushing the next pattern of growth towards forms of “downtown” living. The first wave of about 85 million Baby Boomers are both downsizing and moving to areas where they can walk to restaurants, stores, theaters and museums. Gen-Xers, some 50 million strong, are looking for smaller homes in diverse communities, often reflecting their dissatisfaction with vanilla suburbs. Generation Yers, with 76 million members just entering the workforce, say they want walkable lifestyles, and homes close to friends, family and work. It follows that well-heeled empty-nesters, middle-income households and cash-strapped first-time homebuyers will all want walkable, mixed-use environments, even if they can’t afford the same homes.

SB 375’s emphasis on compact, walkable neighborhoods, with or without transit, is responsive to these changing demographics and lifestyles. In fact, according to a 2007 study by the National Association of Realtors and Smart Growth America, nearly 9 in 10 of Americans believe that new communities should be built so people can walk more and drive less, and that public transportation should be improved and made more available. Surveys by American Lives, a market research firm, placed a “walkable town center” second only to open space as the most desired quality of a master planned community. Other research estimates that more than 40% of American adults today want to live in a “walkable urbane place”. Because these and other trends, the SCS needs to be in alignment of the California’s real estate marketplace will generally be in alignment with SB 375’s preference for compact, mixed-use growth patterns. Additional detail and/or studies should be provided to address this issue.

4. Increasing transit system infrastructure is central to achieving reduced greenhouse gas emissions under the SCS. Can transit system expansion keep up with San Diego’s projected growth needs?

Existing rail transit stations offer TOD development opportunities pending new transit system expansion—but the limited number of existing rail-related TOD opportunities will not be able to keep up with projected needs. This is especially true since transit improvements and in particular rail transit, can be very expensive and take decades to implement. While heavy- and light-rail transit systems will get a lot of attention and lip-service under SB 375, implementation of new routes will continue to be very slow. What is needed is a systematic shift towards alternative transit system concepts such as Bus Rapid Transit (BRT).

BRT should become the transit of choice for most communities attempting to grow in compliance with SB 375. Basically rail-like transit service on rubber tires, it is the cost-effective solution for timely expansion of rapid transit networks, with relatively low capital and operational costs that put BRT systems in reach of most cities. In fact, financing is rarely an obstacle to implementing a successful BRT project according to the 2007 CalTrans Planning Guide.

While relatively new, BRT has been deemed the best transit strategy to reduce transportation-related carbon dioxide emissions, according to the Journal of Public Transportation. Further, BRT is the first, and so far the only, mass transit technology certified under the Kyoto Protocol.
In addition to its relative cost efficiency, BRT has the capability to move us beyond “transit-oriented development” to what I call “development-oriented transit.” Transit-oriented development currently relates to growth around a regional pattern of rail transit stations—a transit node is fixed and the development pattern must conform around it. Conversely, development-oriented transit relates to the growth of compact, mixed-use development nodes where appropriate—the community’s major land use nodes are generally predetermined and it is the transit alignment that must conform. For example, an area of existing compact, mixed use development within a community could become an instant TOD by extending a BRT route, using existing arterials, to the site—creating a transit corridor for more new TODs along the way. In this way, BRT enables communities to have flexibility in deploying high-quality transit service, and accelerating their ability to open opportunities for sustainable growth and economic development that otherwise might not be available for many years or even decades.

If you look at the arterial master plan of existing communities, the ability of BRT to create and shape TODs in suburban locations seems quite clear. Like historic boulevards and main streets (and unlike heavy-rail transit), the bus lanes and stations do not form barriers within communities. BRT stops can unify a place by creating a focus and a common destination.

To work best, BRT needs a minimum average density of 9 homes/acre and a minimum 1.0 FAR for non-residential within 1/2 mile of a BRT stop. But one of the beauties of BRT is that BRT stop spacing is shorter than stop spacing limitations for rail systems, allowing desired density/intensity characteristics to be achieved by linking adjacent areas of residential or non-residential concentrations to form a sort of elongated TOD or transit village. Once a suitable BRT corridor is identified, local government and the development community can focus energy and resources on new infill redevelopment opportunities that bolster density/intensity characteristics and, thereby, transit system cost-effectiveness along the route.

A TOD or transit village using BRT can have economic benefits similar to those resulting from rail transit. Based on a survey of developers, proximity to BRT can increase property value by 3-5% as compared to similar properties without BRT. The higher land values correlate to a richer variety of land uses and features. It follows that, over time, a successful BRT program should substantially increase local tax revenues and pay for itself. Again, recognizing these trends, greater emphasis and detail should be given to BRT within the SCS as a strategy to address existing infrastructure.

5. Lack of detail for a streamlined path for CEQA clearance

Regional growth under SB 375 will continue to be subject to CEQA—and protections provided by CEQA could create new legal battlegrounds for developers endeavoring to comply with SB 375. Well-situated, new development that is compact, mixed-use and transit-oriented is favored by SB 375—but not necessarily protected. The evolving definition of “significant impact” as it applies to Climate Change under CEQA will likely influence the course of future litigation on development projects. As currently described the SCS provided limited CEQA waivers only to projects that are at least half affordable housing and meet other narrow criteria—a very limited option for most private-sector projects. The lack of regulatory relief for dealing with local impacts of the majority of new, denser development, such as increased traffic in infill locations, could delay or even defeat projects.