October 1, 2015

The Honorable Jack Dale  
Chair, SANDAG Board of Directors  
401 B Street  
San Diego, CA 92101

Re: San Diego Forward: The Regional Plan

Dear Chair Dale:

An efficient, connected, and affordable transit network can improve quality of life and make San Diego a world-class region that can retain and attract a workforce to make San Diego economically competitive and allow for upward economic mobility.

I am aware of the need and desire for a robust public transit network and increased investment in infrastructure that will make biking and walking safer in overburdened communities. I am also aware of public health and environmental concerns regarding the Regional Plan’s strategy of adding freeway lanes to increase car capacity, particularly through overburdened communities in the urban core (i.e., SR- 94, I-15, I-5, I-805).

Despite much of the public comments SANDAG has received in support of public transit and opposition to adding capacity for cars on freeways, there has been little to no movement in reprioritizing money from freeway lane additions to transit and active transportation projects. Freeway lane addition projects in the 2015 Regional Plan are very similar to the freeway project list from the Regional Transportation Plan passed in 2011. State, Federal, and local funding for transportation may be more flexible than SANDAG is allowing it to be in its allocation to each mode-share (i.e., freeway, transit, active transportation).

I support the analysis of flexible federal, state, and local funds that could be transitioned from freeway projects to public transit and active transportation projects. I ask that this conversation continue at the SANDAG Transportation Committee and Board and that there is a commitment to complete such an analysis by an independent local and statewide panel of funding experts and local transportation advocates.

Most importantly, an implementation plan for the transition of funds must occur. What SANDAG can do in the interim to improve mobility for overburdened communities and further reduce greenhouse gasses are prioritize in the following Regional Plan:
• Complete all retrofits for safe routes to existing transit and complete all Active Transportation Retrofits for Bicycle/Pedestrian Improvements at Freeway Interchanges by 2025, prioritizing overburdened communities first.

• Implement 10-minute all-day frequencies for Urban Core local bus routes, expand bus service for early morning and late night commuters, and increase frequency of transit services on routes where ridership was at or near capacity of the vehicles by 2025.

• Eliminate the proposed Plan’s investments in highways that add general purpose lanes and managed lanes; instead, consider converting existing general purpose lanes to managed lanes to accommodate Rapid routes and HOV that would operate in new Managed Lanes under the proposed Plan (as is currently being studied in the SR-94 Corridor DEIR).

I stand with my constituents who have asked me to support a regional plan that is more aligned with a movement towards the reduction of greenhouse gas emissions and towards ensuring transportation options. I strongly urge you to continue the conversation at the SANDAG Transportation Committee and reconsider an efficient, connected, and affordable public transit network that can improve the quality of life in our overburdened communities.

Sincerely,

SHIRLEY N. WEBER, Ph.D.
Assemblymember, 79th District
October 5, 2015

SANDAG
Board of Directors, Chair Jack Dale
Transportation Committee, Chair Todd Gloria
Regional Planning Committee, Chair Lesa Heebner
401 B St. Ste. 800
San Diego, CA 92101

RE: Final Comments for SANDAG’s Draft 2015 Regional Plan (titled “San Diego Forward: The Regional Plan”)

Honorable Jack Dale and SANDAG Board and Committee members:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide final comments to the Draft 2015 Regional Plan.

Transit and active transportation projects are crucial to economic development, reducing greenhouse gas emissions, and providing safe, affordable connections between where people live and where they work and play.

Circulate San Diego appreciates the work over the years by the SANDAG Board and staff to develop transportation choices through its Draft 2015 Regional Plan, titled “San Diego Forward.” There are many aspects to the Regional Plan that have great merit.

Unfortunately, we must recommend that SANDAG Board members vote against adoption of the plan in its current form because it does not adequately advance transit and active transportation projects.

Despite these differences, Circulate San Diego believes that the SANDAG Board can and should move forward with a region-wide Quality of Life revenue measure in 2016 that includes provisions and funding to advance transit and active transportation projects.

SANDAG’s Draft 2015 Regional Plan assumes a Quality of Life measure that generates a 1/4 cent sales tax over a 30 year period. Yet, SANDAG is currently contemplating a 1/2 cent sales tax over a 40 year period—more than twice the Quality of Life revenue contemplated by the Draft 2015 Regional Plan.
With additional resources, SANDAG will have substantially more funding flexibility to advance transit and active transportation projects into earlier periods of the region’s transportation plan. If the Regional Plan represents what SANDAG is willing to do today, Quality of Life should represent our aspirations for tomorrow.

SANDAG should draft the Quality of Life measure to advance some or all of the transit and active transportation projects that advocates have asked to be accelerated in the Regional Plan. Those projects will provide meaningful contributions to the region’s transportation plans, and are already priorities for organizations that can be helpful and active in supporting a Quality of Life measure with voters. The projects SANDAG should advance have already been articulated by Circulate San Diego through previous correspondence, and are listed here below:

- Orange Line Trolley Frequency Enhancements
- Blue Line Trolley Frequency Enhancements
- Construction of the 562 Trolley line (“The Purple Line”)
- Rapid 550 Construction
- Del Mar Fairgrounds Permanent Seasonal Rail Platform
- Safe Routes to Transit Retrofits at Existing Stations
- Active Transportation Retrofits at Freeway Interchanges
- Enhancing the Smart Growth Incentive Program

Competitive funding programs such as California’s cap-and-trade system, the Active Transportation Program, TIGER, New Starts, and numerous others, are expected to continue to grow both in overall numbers and in the proportion of funding available to SANDAG for transportation investment. These programs favor regions that focus on smart growth principles. Visionary planning that prioritizes transit and active transportation is critical for maintaining the San Diego region’s competitiveness for securing new funding.

The Regional Plan that SANDAG adopts in 2015 will be a living document, subject to amendment and update. It is a continuation, not the end of San Diego’s transportation plans. A Quality of Life measure can instill SANDAG’s regional plans with new energy—and new funding—to improve our region’s transportation network into the future.

If SANDAG moves forward with a Quality of Life measure that includes both provisions and funding to advance transit and active transportation, Circulate San Diego will be eager and active in our support.
We look forward to continuing to work with SANDAG to promote transportation choices in the region.

Sincerely,

Colin Parent  
Policy Counsel, Circulate San Diego
New Climate for Transportation
How the City of San Diego and SANDAG must improve transportation to meet climate goals.
Acknowledgements

Colin Parent  
Lead Author – Policy Counsel, Circulate San Diego  
Colin Parent is Policy Counsel at Circulate San Diego. He is responsible for advocating for affordable transit, safe walkable neighborhoods, and effective land use policy.

Colin served on the Jerry Brown for Governor 2010 campaign, and was appointed by Governor Brown as the Director of External Affairs for the California Department of Housing and Community Development. Prior to working for Governor Brown, Colin practiced law for three years as a commercial litigator at DLA Piper US LLP. During 2013 and 2014, Colin served as the Director of Policy at the San Diego Housing Commission.

Nicole Capretz  
Co-Author – Executive Director, Climate Action Campaign  
Nicole is an environmental attorney with over 15 years of experience working as a legal and policy advisor for local government and the nonprofit sector in San Diego. Nicole Capretz was one of the primary authors of the City of San Diego’s draft Climate Action Plan, and served as the Chair of the City’s Economic and Environmental Sustainability Task Force for three years while she was the Associate Director for Green Energy/Green Jobs at Environmental Health Coalition. As Climate Action Campaign’s Executive Director, Nicole’s duties include overall strategic and operational responsibility for the organization's staff, programs, expansion, and execution of its mission.

Special Thanks:
Thanks to Circulate San Diego staff members Kathleen Ferrier and Maya Rosas for substantive edits, Terra King and Brian Gaze for design work, and to Circulate San Diego Executive Director Jim Stone. Special thanks to Dennis Larson with Nexus Planning for technical advice.
Executive Summary

The City of San Diego’s proposed Climate Action Plan (CAP) commits the City to change the way people get to work. Not only is transportation important for economic development, lifestyle, and social equity, it is a crucial component to reducing the risks from climate change.

The purpose of the CAP is to reduce greenhouse gas emissions (GHGs) in the City of San Diego and to protect our quality of life.

One of five key strategies in the CAP is to reduce GHGs from car trips by encouraging more commuters in San Diego to rely on transit, walking, and bicycling in the future. In order for the City of San Diego to meet its climate goals, the City Council and Mayor must:

(1) Implement a variety of policies, infrastructure projects, and programs at the city level to make non-car transportation choices both safe and easy to use, and

(2) Ensure that the San Diego Association of Governments (SANDAG), implements a Regional Plan that provides sufficient resources for transit, walking, and bicycling to meet the City of San Diego’s climate goals.

Some of the mobility strategies outlined in the CAP must be implemented at the regional level by SANDAG—not by the City alone. However, San Diego Forward: The Regional Plan, SANDAG’s long range transportation plan, projects transit, walking, and bicycling levels far smaller in the City of San Diego than what is called for by the CAP.

The City of San Diego’s climate goals call for 50 percent of commuters living near transit to bicycle, walk, or take transit to work. However, according to SANDAG’s own data, their plans will result in less than 15 percent for those same areas in the City of San Diego.

It is mathematically impossible for the City of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.

SANDAG’s own projections show that it is mathematically impossible for the City of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.

The City of San Diego must use the influence of its SANDAG Board members to ensure the region prioritizes sufficient funding to meet the transit and active transportation goals of the CAP.

<table>
<thead>
<tr>
<th>Commute mode-share projections for San Diego Transit Priority Areas</th>
<th>2012</th>
<th>2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source</td>
<td>SANDAG Data</td>
<td>SANDAG Projection</td>
</tr>
<tr>
<td>Transit</td>
<td>5.1%</td>
<td>8.6%</td>
</tr>
<tr>
<td>Walk</td>
<td>4.2%</td>
<td>4.1%</td>
</tr>
<tr>
<td>Bicycle</td>
<td>1.9%</td>
<td>2.1%</td>
</tr>
</tbody>
</table>
Introduction

The City of San Diego’s proposed Climate Action Plan (CAP) offers a roadmap with specific policy recommendations to address climate change and reduce greenhouse gas emissions (GHGs) citywide.

The Climate Action Plan’s Relationship with the City’s General Plan

The City of San Diego’s General Plan Conservation Element sets forth broad policies intended to reduce GHG emissions. The CAP takes these policies one step further by outlining strategies and enforceable actions that will achieve GHG reduction targets by certain time frames. Enforceable actions are necessary not only to reduce the GHG emissions of future development under the General Plan, but to also meet the City’s obligations under the California Environmental Quality Act to mitigate cumulatively considerable impacts of activities covered by the General Plan.

The CAP also provides specific strategies the City must implement to reduce GHG emissions.

Similar to a General Plan, the CAP provides broad goals for addressing GHG impacts. The CAP also provides specific strategies the City must implement to reduce GHG emissions. The CAP can be considered an “instruction manual” for the City to identify and implement GHG reduction measures over a period of time. Subsequent to adoption of the CAP, implementation of the strategies will occur through:

1. Adopted resolutions (voluntary actions or City programs),
2. Ordinances (mandatory actions that carry the force of law in the City of San Diego),
3. Community plan updates, and
4. Other similar regulatory updates to the City’s Zoning and Building Codes.

The Climate Action Plan and Transportation Choices

The CAP identifies five core strategies to reduce GHGs, including:

1. Energy and Water Efficient Buildings,
2. Clean and Renewable Energy,
3. Bicycling, Walking, Transit, and Land Use,
4. Zero Waste, and
5. Climate Resiliency.

One of the five core strategies outlined in the CAP focuses on “Bicycling, Walking, Transit, and Land Use.” This strategy outlines a broad range of activities that aim to reduce vehicle miles traveled (VMT) and improve transportation choices as mechanisms to reduce GHGs. Relevant CAP implementation measures focus on promoting alternative modes of travel to the automobile, locating new development near transit to reduce car commuting, revising parking standards, and managing parking supply over large areas rather than building by building.

The CAP’s goals are not to change commuting practices for all San Diegans, but instead are targeted toward commuters living in Transit Priority Areas.

The CAP commits to expanded multi-modal transportation choices like walking, bicycling, and transit use through the following strategies:
Transit: Implement the City’s General Plan Mobility Element and the City of Villages Strategy to increase use of transit and achieve mass transit mode-share of 12 percent by 2020 and 25 percent by 2035.

Walking: Implement the City’s Pedestrian Master Plan to increase commuter-walking opportunities in Transit Priority Areas and achieve walking commuter mode-share of 3 percent by 2020 and 7 percent by 2035.

Bicycling: Implement the City’s Bicycle Master Plan to increase commuter bicycling opportunities in Transit Priority Areas and achieve bicycle commuter mode-share of 6 percent by 2020 and 18 percent by 2035.

By 2035, when the CAP's multi-modal transportation targets are to be met, 50 percent of San Diego residents living in Transit Priority Areas will commute using transit, walking, and bicycling.

<table>
<thead>
<tr>
<th>Climate Action Plan mode-share goals for commuting</th>
<th>2020</th>
<th>2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transit</td>
<td>12 %</td>
<td>25 %</td>
</tr>
<tr>
<td>Walking</td>
<td>3 %</td>
<td>7 %</td>
</tr>
<tr>
<td>Biking</td>
<td>6 %</td>
<td>18 %</td>
</tr>
</tbody>
</table>

The Climate Action Plan Supports Existing and Future City Policies

The CAP’s strategies leverage existing City policies and efforts. For example, the CAP supports the following policies and mobility concepts:

- Bicycle and Pedestrian Infrastructure: Achieving the CAP goals will require funding pedestrian and bicycle infrastructure already identified in the City’s Bicycle and Pedestrian Master Plans.

- Complete Streets: The CAP calls for incorporating pedestrian and bicycle facilities in street planning, instead of focusing primarily on cars. This is required by state law as of 2008.

- Infill Development: The CAP contemplates new infill development opportunities as community plans are updated. California has made similar efforts to encourage infill with SB 375 and SB 743.

- Transit-Oriented Development: The CAP strategies support implementation of transit-oriented development to promote effective land use that will reduce average commute distance.

- Parking Reform: The CAP supports development of a “Parking Plan” to include measures such as “unbundled parking” for nonresidential and residential sectors in urban areas.
The City of San Diego’s Climate Action Plan and SANDAG

The CAP was drafted to be consistent with SANDAG’s Sustainable Communities Strategy (SCS). As a Metropolitan Planning Organization, SANDAG is required by the State of California to prepare an SCS as part of its Regional Transportation Plan, in order to meet certain GHG reduction targets.

The goals of the CAP and SCS are similar—to reduce GHG emissions. The SCS is responsible for demonstrating how regional GHG reduction targets will be met through reductions in VMT from cars and light trucks.

However, SANDAG cannot implement either its SCS or Regional Transportation Plan in a vacuum. SANDAG’s SCS must be consistent with the land use and transportation planning of its constituent governments.

The Climate Action Plan and SANDAG’s Transportation Planning

For the CAP to be successful, the City of San Diego must take a two-pronged approach:

1. Implement actions and measures over which it has direct control (e.g., implement the City of San Diego’s Pedestrian Master Plan and Bicycle Master Plan), and

2. Ensure that SANDAG implements a Regional Plan that provides sufficient resources for transit, walking, and bicycling to meet the City of San Diego’s climate goals.

Some of the mobility strategies outlined in the CAP are to be implemented at the regional level by SANDAG—not by the City. Many of the strategies are also dependent on the City and SANDAG cooperating, communicating, and leveraging resources to effectively implement projects that meet both of their climate reduction requirements. The City of San Diego can and should ensure that SANDAG prioritizes and dedicates sufficient resources to transit and active transportation by using its voting power at the SANDAG Board when updating San Diego’s Regional Transportation Plan.

SANDAG’s Plans are Insufficient

SANDAG’s current transportation planning is a barrier to the City of San Diego achieving the mode-share goals of the CAP. SANDAG is currently updating its 2011 Regional Transportation Plan with a 2015 Regional Plan, titled “San Diego Forward.” The Regional Plan outlines a variety of transportation projects for the region, and the cost and phasing of their construction.

While the CAP calls for transit, bicycling, and walking to represent 50 percent of commuting trips in 2035 for Transit Priority Areas in the City of San Diego, SANDAG’s transportation plan projects much smaller improvements for transit, bicycling, and walking mode-share.

Based on the Draft 2015 Regional Plan, SANDAG prepared a transportation model that analyzed projected mode-shares for walking, bicycling, and transit ridership on a region-wide basis. Through a public records request, Circulate San Diego received more specific projections on mode-share for walking, bicycling, and transit ridership expected by SANDAG to occur within the City of San Diego’s Transit Priority Areas. That data shows SANDAG’s transportation plans are expected to produce improvements to mode-share that are far smaller than the goals of the CAP.
In the table below, the stark contrast is evident between necessary changes in transit and active transportation to reach the City’s GHG goals, versus what SANDAG expects to be the outcome from its transportation plans for the same Transit Priority Areas.

The City of San Diego’s climate goals call for 50 percent of commuters living near transit in 2035 to bicycle, walk, or take transit to work. However, SANDAG’s plans will result in less than 15 percent. Even as soon as 2020, the Climate Action Plan requires the City to meet 12 percent transit ridership, while SANDAG is projected to result in only 6.8 percent.

SANDAG is planning for a transportation network that will result in extremely small increases for transit, walking, and bicycling by 2035. Yet for the CAP to be successful, those travel modes must increase by about 500 percent from their current state. SANDAG’s own projections show that it is mathematically impossible for the City of San Diego to achieve its mode-share goals with the transportation network SANDAG is planning.

The City of San Diego must lead at SANDAG

In order for the City of San Diego to achieve its mode-share goals from the CAP, SANDAG must build a transportation network to facilitate more transit, walking, and bicycling.

SANDAG’s transportation plans can be improved, and can help the City of San Diego to achieve its CAP goals by advancing transit, walking, and bicycling projects into earlier periods.

SANDAG’s complicated voting system awards the City of San Diego 40 out of 100 weighted votes, and two individual representatives—traditionally the Mayor and a councilmember—to sit on SANDAG’s Board of Directors. Only the County of San Diego has as many individual votes, but no jurisdiction—including the County—has as much of a weighted vote as the City of San Diego.

The City of San Diego is the most influential force at SANDAG, and has the power to shift priorities for the region.

While that voting power alone is not enough to dictate SANDAG’s actions, the City of San Diego has the largest say of any jurisdiction in the region for what transportation plans SANDAG adopts. The City of San Diego is the most influential force at SANDAG, and has the power to shift priorities for the region.

Recently, Circulate San Diego and TransForm released a report titled “TransNet Today,” which identifies a variety of options for how SANDAG can advance funding for transit, bicycling, and walking, with SANDAG’s current authority and available funding. The City of San Diego should work with SANDAG Board members and staff to ensure that SANDAG adopts and implements a transportation plan that can help the City of San Diego achieve its climate goals.

The City of San Diego will have multiple opportunities to influence SANDAG to adopt a more successful transportation plan. SANDAG updates its regional transportation plans every four years, meaning another update is due in 2019. SANDAG is currently contemplating a regional revenue measure to fund transportation, habitat, and infrastructure. The City of San Diego can ensure that sufficient funds are included in such a measure to achieve the mode-share goals of the Climate Action Plan.

### Mode-shares for commute trips in City of San Diego Transit Priority Areas

<table>
<thead>
<tr>
<th></th>
<th>2012</th>
<th>2020</th>
<th>Climate Action Plan Goals</th>
<th>2035</th>
<th>Climate Action Plan Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transit</td>
<td>5.1%</td>
<td>6.8%</td>
<td>12.0%</td>
<td>8.6%</td>
<td>25.0%</td>
</tr>
<tr>
<td>Walk</td>
<td>4.2%</td>
<td>4.3%</td>
<td>3.0%</td>
<td>4.1%</td>
<td>7.0%</td>
</tr>
<tr>
<td>Bicycle</td>
<td>1.9%</td>
<td>2.0%</td>
<td>6.0%</td>
<td>2.1%</td>
<td>18.0%</td>
</tr>
</tbody>
</table>
Conclusion

The climate goals for the City of San Diego in its Climate Action Plan are ambitious, but achievable. City leaders must take action today to reduce greenhouse gas emissions and secure our City’s future.

Not only must the City of San Diego adopt a variety of policies at the City level and invest the necessary resources into infrastructure improvements, but the City’s current representatives to SANDAG, Mayor Kevin Faulconer and Council Member Todd Gloria, must ensure that the region dedicates sufficient funding for transit, bicycling, and walking. Future SANDAG representatives from the City of San Diego must also stay vigilant, to ensure that the Climate Action Plan goals are met.

While the City of San Diego can and should implement policies to improve transportation using its own authorities, SANDAG must also play a part. SANDAG must meet the City of San Diego half way.

For the CAP to succeed, the City of San Diego must show leadership at SANDAG, and ensure that our region’s transportation efforts are up to the task of addressing climate change in San Diego.

For the CAP to succeed, the City of San Diego must show leadership at SANDAG.
Appendix 1:

SANDAG Data on Transportation Mode Share from the Draft 2015 Regional Plan

Below is data from SANDAG on its projections for mode-share within Transit Priority Areas (TPAs), from their 2015 Draft Regional Plan. TPAs represent locations in the City of San Diego within one-half mile of a rail station stop or a high-quality transit corridor, where the City is committing to improving mode-share for bicycling, walking, and transit ridership.

Figures for SANDAG mode-share projections within TPAs were developed by SANDAG as a part of the transportation modeling for their Draft 2015 Regional Plan. Those figures were provided to Circulate San Diego through a public records request.

The data from SANDAG shows that the Climate Action Plan’s mode-share goals cannot be achieved with SANDAG’s current transportation plans.

2012 Peak Period Home-Work (Commute) Mode-Shares

<table>
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<tr>
<th>Row Labels</th>
<th>AM Peak</th>
<th>PM Peak</th>
<th>Grand Total</th>
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</thead>
<tbody>
<tr>
<td>Active</td>
<td>5.21%</td>
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</tr>
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<td>1.75%</td>
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<tr>
<td>Walk</td>
<td>3.46%</td>
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<tr>
<td>Drive Alone</td>
<td>63.02%</td>
<td>58.29%</td>
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</tr>
<tr>
<td>Auto SOV (Non-Toll)</td>
<td>62.16%</td>
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<td>Auto SOV (Toll)</td>
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<td>0.81%</td>
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<tr>
<td>HOV</td>
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<tr>
<td>Auto 2 Person (Non-Toll, HOV)</td>
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<td>7.34%</td>
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</tr>
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<td>Auto 2 Person (Non-Toll, Non-HOV)</td>
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<td>0.01%</td>
<td>0.01%</td>
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<td>3.54%</td>
<td>4.99%</td>
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<td>0.01%</td>
<td>0.01%</td>
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<tr>
<td>Transit</td>
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<td>KNR-Express Bus</td>
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</tr>
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<td>Grand Total</td>
<td>100.00%</td>
<td>100.00%</td>
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### Appendix 1, continued:

2020 Peak Period Home-Work (Commute) Mode-Shares

<table>
<thead>
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<th>Row Labels</th>
<th>AM Peak</th>
<th>PM Peak</th>
<th>Grand Total</th>
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<tbody>
<tr>
<td><strong>Active</strong></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Bike</td>
<td>1.87%</td>
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<tr>
<td>Walk</td>
<td>3.22%</td>
<td>10.25%</td>
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<td><strong>Drive Alone</strong></td>
<td>60.80%</td>
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### Appendix 1, continued:

2035 Peak Period Home-Work (Commute) Mode-Shares

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Appendix 2:

This map displays the Transit Priority Areas used in the City of San Diego’s Climate Action Plan. They represent locations within one-half mile of a rail station stop or a high-quality transit corridor, where the City is committing to improve mode-share for bicycling, walking, and transit ridership.


According to data in Appendix 1, SANDAG projects that the Climate Action Plan’s mode-share goals within Transit Priority Areas cannot be achieved with SANDAG’s current transportation plans.
Endnotes


2 These numbers represent Peak HOME-WORK mode shares (Commute Trips) in City of San Diego Transit Priority Areas. The figures for 2012 baseline mode shares and SANDAG mode share projections were developed by SANDAG as a part of the transportation modeling for their Draft 2015 Regional Plan. Those figures were provided to Circulate San Diego through a public records request. The SANDAG data is attached as Appendix 1 and hosted online with this report on the Circulate San Diego website at http://circulatesd.nationbuilder.com/new_climate_for_transportation. Figures for the Climate Action Plan mode share goals are available from City of San Diego, Draft Climate Action Plan (July 2015), http://www.sandiego.gov/planning/genplan/cap/pdf/draft_cap_july_2015.pdf.


6 AB 1358 (2008), the “California Complete Streets Act.”

7 Figures for 2012 baseline mode shares and SANDAG mode share projections were developed by SANDAG as a part of the transportation modeling for their Draft 2015 Regional Plan. Those figures were provided to Circulate San Diego through a public records request. The SANDAG data is attached as Appendix 1 and hosted online with this report on the Circulate San Diego website at http://circulatesd.nationbuilder.com/new_climate_for_transportation. Figures for the Climate Action Plan mode share goals are available from City of San Diego, Draft Climate Action Plan (July 2015), http://www.sandiego.gov/planning/genplan/cap/pdf/draft_cap_july_2015.pdf.

8 The mode-share projections for walking in the CAP for 2025 are less than the 2012 mode-share estimates from SANDAG. This is a result of the CAP being based in part on the mode-share figures in the SANDAG 2011 Regional Transportation Plan, which estimated base-line walking rates at lower percentages than SANDAG’s current mode-share estimates for walking. See SANDAG, 2011 Regional Transportation Plan Technical Appendix 3 (2011), http://www.sandag.org/uploads/2050RTP/F2050RTPTA3.pdf.

October 9, 2015

SANDAG Board Members
SANDAG
401 B St. Ste. 800
San Diego, CA 92101

Re: SANDAG Item No. 15-10-2, October, 9 2015, San Diego Forward: The Regional Plan

Dear SANDAG Board Members:

There continues to be a need for a regional plan that prioritizes transit before highway expansion, increases active transportation and connects transit to the northern areas of San Diego. I brought forward the Transit First Resolution (R-306886) passed by the San Diego City Council in 2011 (see attached) which stated that the Regional Transportation Plan should prioritize mass transit infrastructure and sustainable transportation projects over highway expansion.

For decades, our region has over-invested in highways while under-investing in transit. Consequently, the region has an extensive highway system but a limited transit network that does not serve all San Diego residents. As the representative for District 1, I respectfully request that SANDAG include more transit connectivity to northern communities such as Carmel Valley and Torrey Pines Mesa and more East/West connectivity in the SR-56 corridor in the Regional Plan. Additionally, SANDAG should commit to funding retrofits for safe routes to existing transit stations.

This item is scheduled to be heard before the City has adopted its new Climate Action Plan (CAP). The City is moving forward with the adoption of the CAP and at a minimum, we expect, as the largest city in the region, to see our CAP transportation goals incorporated into the Regional Plan. I am concerned that without adequate resources from SANDAG, the City will not be able to achieve the CAP goal of 12% transit mode share by 2020. Given the short timeline to 2020, I respectfully request the SANDAG Board allow for a timely amendment to the proposed Regional Plan to support the implementation of the City’s Climate Action Plan, which is scheduled to be heard by the City Council in late 2015. The CAP’s implementation should not be stalled because SANDAG’s Regional Plan does not include the resources needed to achieve the City’s near term transportation goals.

A priority of the Plan should be to assure implementation of the various climate action plans within SANDAG’s jurisdiction. As CAPs are adopted, the Plan should be modified to reflect the goals and timelines of each, and infrastructure funding should, as much as possible, be prioritized for timely implementation of the various CAPs throughout our region.
Please let me know if my office or I can be of any assistance in incorporating the CAP goals into the regional plan.

Sincerely,

[Signature]

Sherri S. Lightner
Council President, District One
City of San Diego
RESOLUTION NUMBER R-306886
DATE OF FINAL PASSAGE JUL 15 2011

WHEREAS, on May 25, 2011 the San Diego Association of Governments (SANDAG) presented its Draft 2050 Regional Transportation Plan (RTP) to the City’s Land Use and Housing (LU&H) Committee; and

WHEREAS, at that meeting, the LU&H Committee voted to form an Ad Hoc Committee consisting of Councilmembers Lightner and Alvarez to return with a draft comments to the June 22, 2011 LU&H Committee meeting; and

WHEREAS, on June 22, 2011, the LU&H Committee considered the draft comments, Committee member comments and comments from the public and voted to forward the draft comments with certain amendments to the City Council; and

WHEREAS, Councilmembers Lightner and Alvarez have received the following correspondence regarding the Draft RTP: “Position Paper on SANDAG 2050 Regional Transportation Plan,” submitted by Torrey Pines Community Planning Board, May 25, 2011; “Comments on the draft RTP update pertaining to the planning review area of the Carmel Valley Community Planning Board,” submitted by Carmel Valley Community Planning Board, June 4, 2011; “2050 Regional Transportation Plan Update,” submitted by the City of San Diego Economic and Environmental Sustainability Task Force letter, May 24, 2011; “Recommendations for Improving SANDAG’s 2050 RTP and for Post-RTP Actions,” submitted by TransForm, May 23, 2011; “Item 2 – 2050 RTP draft, June 10, 2011 SANDAG Board meeting,” submitted by MoveSD, June 10, 2011; “California Air Resources Board (CARB) Greenhouse Gas (GHG) Reduction Targets, Issued to SANDAG, in Accordance with SB 375, for the Year 2035,” submitted by Mike Bullock, April 20, 2011; “Comments on the Draft 2050

WHEREAS, the City Council wishes to communicate the priorities and recommendations of the LU&H Committee and the City Council regarding SANDAG’s Draft 2050 RTP; and

WHEREAS, the City Council looks forward to a response from SANDAG on the priorities and recommendations; NOW, THEREFORE,

BE IT RESOLVED, that the City Council believes that that the following priorities should guide the regional transportation infrastructure planning outlined in the Draft 2050 RTP:

1. That the regional transportation policy and projects planned for the City of San Diego should align with principles outlined in the General Plan's City of Villages growth strategy and should adequately meet the infrastructure demands resulting from the City's projected density growth. The City's long-term transportation infrastructure policy and priorities are reflected in the General Plan's Guiding Principles, including Guiding Principle No. 3. “Compact and walkable mixed-use villages of different scales within communities” and Guiding Principle No. 5. “An integrated regional transportation network of walkways, bikeways, transit,
roadways, and freeways that efficiently link communities and villages to each other and to employment centers”.

2. That the RTP should prioritize mass transit infrastructure and sustainable transportation projects over highway expansion in order to reduce vehicle miles traveled.

3. That the RTP should accelerate the timeline of funding projects supporting active transportation, increasing transit ridership, and transit frequency.

4. That transit infrastructure should be expanded in smart growth centers, and project priorities should support smart growth.

5. That the RTP projects should strive to meet the needs of the City’s older adult population and should aim to improve the link between riders and labor market opportunities.

BE IT FURTHER RESOLVED, that the City Council project-specific priorities include:

1. The Carmel Valley Community Planning Board (CVCPB) notes that a rapid bus route along SR-56 remains a high priority, widening of SR-56 should be completed earlier, and concerns exist regarding proposed projects in the I-5 North Coast Corridor.

2. CVCPB has requested the creation of a SR-56 corridor transportation task force to coordinate SANDAG, CalTrans, and community interests.

3. For Project SD102A “Otay Truck Route Widening,” revise project description to a more general overview of the project, deleting specific street names.

4. The streetcar projects in San Diego’s Mid-City communities should be accelerated.

5. The completion of the CenterLine Mid-City BRT (Bus Rapid Transit) and I-15 bicycle lane facilities should be accelerated.
BE IT FURTHER RESOLVED, that the City Council provides the following recommendations on the Draft 2050 RTP:

1. That the RTP prioritize public transportation and mass transit projects and minimize the expansion of single-vehicle general purpose highway lanes.

2. That the RTP advance the timeline of funding for key commute routes, improving transit frequency, and active transportation projects.

3. That the RTP provide greater clarity about how greenhouse gas emissions reduction targets are being met in the long term, specifically how the aims of SB 375 will be met through the life of the Plan out to 2050.

4. That the Sustainable Communities Strategy consider implementing concepts such as the “Safe Routes to Transit” program, prioritizing a “Transit First” system of projects, and ensuring that a Transit-Oriented Development strategy is developed to link mass transit with affordable housing development.

APPROVED: JAN I. GOLDSMITH, City Attorney

By Elisa A. Cusato
Chief Deputy City Attorney
I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of JUN 27 2011.

ELIZABETH S. MALAND
City Clerk

By
Deputy City Clerk

Approved: ________________  
(date)  

JERRY SANDERS, Mayor

Vetoed: ________________  
(date)  

JERRY SANDERS, Mayor

Please note the Mayor did not sign this resolution within the specified time limit. See San Diego City Charter Section 280(c)(4).
October 1, 2015

Via E-Mail and FedEx

Chair Jack Dale and Members of the Board of Directors
SANDAG
401B Street, Suite 800
San Diego, CA 92101

Re: Comments on San Diego Forward: The Regional Plan and Environmental Impact Report

Dear Chair Jack Dale and Members of the Board:

We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF") to provide comments on the draft 2015 Regional Transportation Plan/Sustainable Communities Strategy ("2015 RTP/SCS" or "Plan") and the accompanying environmental impact report ("EIR"). As SANDAG is well aware, CNFF commented extensively on the prior plan – the 2050 RTP/SCS – because the organization had grave concerns that the Plan’s auto-centric approach to transportation would set the region on a course that is inconsistent with the State’s climate change goals. Instead of reducing automobile travel, that Plan would have increased vehicle miles traveled ("VMT") by 50 percent between 2010 and 2050. Because the 2050 RTP did not prioritize transit over highways, it was incapable of reducing greenhouse gas ("GHG") emissions over the life of the Plan. These concerns were echoed by numerous other environmental organizations, the California Attorney General and ultimately by California courts.¹

¹ SANDAG’s RTP/SCS was challenged in a lawsuit brought by state and local environmental groups and the state Attorney General. Cleveland National Forest Foundation et al. v. San Diego Association of Governments, California Supreme Court, Case No. S223603. Plaintiffs allege that SANDAG violated CEQA by failing, among other things, to disclose that the RTP/SCS’s upwards emissions trajectory is inconsistent
Rather than take heed of these valid criticisms, and diligently work to improve its Plan, SANDAG’s current draft Plan proposes to keep every single roadway project that was included in the 2050 RTP/SCS. Making matters worse, the draft 2015 Plan includes even less funding for transit than the prior RTP. Not surprisingly, if implemented, the proposed 2015 RTP/SCS would once again result in VMT that is far too high to be compatible with California’s climate change goals.

Recognizing the magnitude of change the region must undertake to achieve the state’s climate change goals, the 2015 RTP/SCS EIR includes alternatives that would significantly reduce VMT and GHG emissions. Yet rather than seriously consider even one of these environmentally superior alternatives, the EIR finds that each one is infeasible. We cannot help but conclude that SANDAG continues to view SB 375 as a mere bureaucratic hurdle and has very little interest in making the changes necessary to stave off dangerous climate change.

Adoption of the RTP/SCS and certification of the EIR would not just constitute bad planning; it would violate state law. The EIR for the 2015 RTP/SCS does correct several deficiencies contained in the EIR for the 2050 RTP/SCS, as requested in CNFF’s lawsuit against the prior EIR and as required by the Court of Appeal. However, our review of the EIR reveals serious new violations of the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 et seq., and CEQA Guidelines (“Guidelines”), California Code of Regulations, title 14 section 15000 et seq. For the reasons set forth below and in the attached report prepared by Smart Mobility Inc., we request that SANDAG substantively revise its RTP/SCS and prepare an EIR that complies with CEQA and the CEQA Guidelines.

I. The 2015 RTP/SCS Takes the Region in a Dangerous Direction Environmentally.

Metropolitan planning organizations (“MPO”) around the state are using SB 375 and their RTP/SCSs to explore a variety of transportation scenarios that will, together with land use strategies, enable their regions to achieve their GHG reduction goals. Southern California Association of Governments (“SCAG’s”) approach to its forthcoming RTP/SCS, for example, is to define the region’s transportation needs, evaluate transportation funding trade-offs, and then assess how various transportation

with the state’s targets for reducing greenhouse gases. SANDAG disputes this contention, and the matter is now before the California Supreme Court.

2 SCAG 2016/2040 RTP SCS Development Process, attached as Exhibit 1.
network scenarios achieve performance targets. Based on stakeholder and public input, SCAG will then adopt a preferred transportation scenario. The Metropolitan Transportation Commission (“MTC”) is also planning substantive changes for transportation in the Bay Area. It has set a goal of increasing non-auto mode share by 10 percent and decreasing automobile VMT per capita by 10 percent. See Plan Bay Area 2040 – Project Update, Call for Projects and Needs Assessment Guidance – Performance Targets, April 29, 2015, attached as Exhibit 2.

In marked contrast to these thoughtful approaches to regional transportation – approaches specifically contemplated by SB 375 – SANDAG has proposed the identical roadway network that it has endorsed since at least 2007. This “business as usual” approach to meeting the region’s transportation needs makes a mockery of SB 375 and takes the region in a dangerous direction. By not making every effort to explore transportation scenarios that dramatically reduce VMT, SANDAG’s Plan will dig an even deeper GHG emissions hole, making compliance with state GHG goals nothing more than an illusory promise. As the following figure clearly shows, there is a tremendous gap between the RTP’s forecasted GHG emission levels and the California emissions target.

![Figure D.1 Total Projected Carbon Dioxide Emissions from Cars and Light-Duty Trucks for the San Diego Region](source)


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3 According to the Smart Mobility Report, both the 2007 and 2011 RTPs contain identical roadway projects as the proposed 2015 RTP. Smart Mobility Report at 1.
The San Diego region, like every other region in California, is at a critical juncture. Local jurisdictions are looking to SANDAG to lead the region in a sustainable direction and certainly not to be an obstacle to their progress. The City of San Diego, for example, has set an ambitious goal in its climate action plan to cut GHG emissions in half by 2035, in part by getting people who live near high-quality transit stations to walk, bike or take transit to work. See “New Climate For Transportation: How the City of San Diego and SANDAG Must Improve Transportation to Meet Climate Goals,” Climate Action Committee” attached as Exhibit 3. Yet, according to the Climate Action Campaign, “[i]t is mathematically impossible for the city of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning.” Indeed, “[t]he RTP/SCS projects transit, walking and bicycling levels far smaller in the city of San Diego than what is called for in the City’s climate action plan.” Id. See also, “City’s Bold Action Plan Could Be Nullified Before it Even Passes,” A. Keatts, Voice of San Diego, September 23, 2015, attached as Exhibit 4.

San Diego County has also committed to substantially reduce GHG emissions consistent with the Executive Order S-3-05 trajectory. See Sierra Club v. County of San Diego (2014) 231 Cal.App.4th 1152. Thus, the only way that the City and County of San Diego, along with many other local jurisdictions, will be able to achieve their goals is if SANDAG focuses the vast majority of the region’s funding on transit and active transportation.4

A. A Plan that Expands Highway Capacity Has No Place in the Region’s Future.

Numerous factors have combined over the last decade to eliminate the need for additional highway capacity. First, the region’s jurisdictions have changed their land use plans significantly, resulting in development patterns that concentrate future growth in urbanized areas, reduce sprawl, and preserve more land for open space and natural habitats. As the RTP/SCS explains, “our region has made great strides in planning for more compact, higher density, and walkable developments situated near transit and in the incorporated areas of the region.” RTP at 34. We have entered an era when Americans simply prefer to drive less. Baby boomers are getting older and driving less; millennials are less interested in driving; and there is a trend toward living near urban areas. See

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4 Because the draft RTP/SCS is not on a trajectory to meet 2050 GHG goals, it is inconsistent with the City’s Climate Action Plan and the County’s General Plan. These inconsistencies constitute significant impacts under CEQA. CEQA Guidelines Appendix G (X)(b).
“Five Reasons Why Peak Driving is Here to Stay,” August 25, 2014, Irvin Dawid, Planetizen, attached as Exhibit 5. Largely as a result of these changed land use and travel patterns, regional VMT has leveled off. As the Smart Mobility Report explains, in the eight years since SANDAG published its 2007 RTP, VMT has decreased in most of the United States including the San Diego region. See Smart Mobility’s Comments on RTP/SCS and EIR (“Smart Mobility Report”) at 2, attached as Exhibit 6.

Looking forward, changes in vehicle technology will further reduce the need for additional highway capacity. As the RTP/SCS itself acknowledges, “by 2025, driverless cars are expected to begin replacing conventional cars. Autonomous vehicle technologies will transform public transit as well, increasing efficiency and accessibility while reducing congestion.” 2015 RTP/SCS at 68. According to Smart Mobility, it is estimated that driverless cars – together with the crash avoidance systems and vehicle-to-vehicle communication that will accompany such cars – will increase roadway capacity by 273 percent. Smart Mobility Report at 7.

We can find no logical explanation as to why SANDAG stubbornly refuses to abandon its mid-twentieth century approach to transportation. Even agencies that have traditionally been auto-centric are moving toward multi-modal forms of transportation. Caltrans recently drafted a new mission and vision statement, along with goals and objectives, that take into account per capita VMT and multimodal system integration. Consistent with its new vision, Caltrans has endorsed livable, multimodal street design that supports bicycles and pedestrians as well as automobiles. See “A Follow-Up to The California Department of Transportation: State Smart Transportation Initiative (“SSTI”) Assessment and Recommendations,” SSTI, December 2014, at 3, 4, attached as Exhibit 7.

Similarly, Los Angeles is making every attempt to become America’s next great mass-transit city. Thanks to a visionary mayor, Los Angeles has chosen a bold path to invest in the kind of infrastructure that supports continued population growth, and to transform the built environment to match the new infrastructure. See “L.A.’s Transit Revolution”, Matthew Yglesias, Slate, September 17, 2012, attached as Exhibit 8. Mr. Yglesias explains,

Los Angeles continues, like almost all American cities, to be primarily automobile oriented. But the policy shift is having a real impact on the ground. The most recent American Community Survey showed a 10.7 percent increase in the share of the metro area’s population that relies on mass transit to get to work, matched with a 3.6 percent increase in driving.
And that’s before several of the key Metro projects have been completed or the waning of the recession can drive new transit-oriented development. *Id.*

The actions that Caltrans and Los Angeles are taking demonstrate that it is long past time to change the way we travel in California. Notably, it took a scathing report on Caltrans to move that agency in a sustainable direction. In 2014, the SSTI wrote,

> Caltrans today is significantly out of step with best practice in the transportation field and with the state of California’s policy expectations. It is in need of modernization—both in the way it sees its job and how it approaches that job—and of a culture change that will foster needed adaptation and innovation. Caltrans is in need of both modernization and organizational culture change. *See Exhibit 7 at iv* [SSTI Report].

Unfortunately, this same criticism could describe SANDAG’s current approach to transportation. Ironically, while Caltrans is making significant strides to meet California’s policy around sustainable goals, SANDAG has yet to markedly change its auto-centric attitude. SANDAG is in need of both modernization and organizational culture change.

Perhaps one of the best examples of SANDAG’s failure to embrace a sustainable transportation future is “Destination Lindbergh.” Included in the 2050 RTP/SCS, Destination Lindbergh was a comprehensive planning process designed to improve intermodal access to the Airport. *See 2050 RTP Destination Lindbergh, SANDAG attached as Exhibit 9.* *See also,* Destination Lindbergh Power Point, attached as Exhibit 10.

Destination Lindbergh began in 2008, when SANDAG along with the City of San Diego and the Airport Authority undertook an exhaustive two year study to determine local and long-distance intermodal transit needs and specifically evaluated the feasibility of the Airport serving as a regional transportation hub. Destination Lindbergh at 1. The study determined that up to 20 percent transit mode share could serve passengers to the Airport. Destination Lindbergh Power Point at 4. The study was included as an appendix to the 2050 RTP yet inexplicably none of the transit-related projects are included in the current RTP’s constrained project list. Instead, while SANDAG has failed to capitalize on this critical transit opportunity, the Airport
Authority has begun construction of a 1,700-space parking garage which SANDAG is serving with freeway and road access.

It is abundantly clear that implementation of Destination Lindbergh would have advanced the goals of both the Urban Area Transit Strategy (“UATS”) and the City of San Diego’s climate action plan and therefore should have been included as an essential part of the 2015 RTP/SCS.

B. There Continues To Be a Disturbing Disconnect Between SANDAG’s Words and Its Actions.

A cursory review of SANDAG’s 2015 RTP/SCS suggests the optimistic conclusion that the agency is on the right track. Initially, the Plan’s EIR explains that the RTP’s transit investments were guided by its UATS. DEIR at 2-14. According to SANDAG, “the overarching goal of the UATS was to create a world-class transit system for the San Diego region in 2050, with the aim of significantly increasing the attractiveness of transit, walking, and biking in the most urbanized areas of the region.” See 2015 RTP/SCS Technical Appendix U-17. The 2015 RTP/SCS also reports good news as regards land use. As discussed previously, the document now clearly acknowledges that local jurisdictions are concentrating growth in urbanized areas, reducing sprawl, and preserving open space and natural habitat. RTP/SCS at 30. The RTP/SCS explains,

These were seismic shifts in thinking about how to grow, and with them came new perspectives about how our region should invest in public transit, roads and highways, and other transportation infrastructure. It was becoming clear that people needed more options for getting around than just the car. Id.

The reality of the 2015 RTP/SCS paints a decidedly less rosy picture. Regional transit mode share is projected to be a mere 3.7 percent in 2050. See DEIR at 4.15-30, Table 4.15-13. The fact that less than four percent of the region’s residents will be travelling by transit in 2050 is a far cry from a “seismic shift.” A Plan that is expected to cost $200 billion of the taxpayer dollars to achieve a nominal increase in transit does a great disservice to the region’s residents.
II. There Are Feasible Transit-First Options for the Region.

SANDAG is correct in one respect: people need more options for getting around than just a car. In order to achieve the region’s climate change goals, SANDAG must immediately shift all planned roadway spending to other travel modes, and especially to transit investments. For many years, the region has over-invested in highways while under-investing in transit. Consequently, the region has an extensive highway system but a poor transit network, one that fails to serve many of its residents at all and under-serves the rest.

The only way that SANDAG can reach its overarching goal of creating a “world-class transit system” is to begin forthwith to build a transit system with better coverage and better service region-wide. This is a large undertaking that will take years to complete, but the longer SANDAG delays in taking the first steps, the more it sets the region behind. Delay now makes progress increasingly difficult to achieve in the future. CNFF’s 50-10 Plan includes the following key components:

- A comprehensive, integrated transit system that would be constructed in phases. While San Diego ultimately needs a comprehensive regional transit system throughout the region, the 50-10 Plan would begin by building out a complete transit network within the urban core (including the Sprinter, Coaster and Blue Line corridors), where existing and future higher density land uses would best complement the expanded transit services.

- A “transit system” that is well integrated. Random, fragmented transit routes that are scattered haphazardly throughout the region are ineffective. Without a comprehensive, well-integrated transit system, public transportation will never be able to become a truly viable alternative to the automobile in meeting the region’s transportation mobility needs.

- Halt to any further increase in road capacity. SANDAG must focus all investments in the first decade on transit in the region’s core.

• Modification of the TransNet program to re-prioritize transit over highway projects.

III. The RTP/SCS EIR Is Legally Inadequate.

CNFF appreciates the strides that SANDAG has made with respect to analyzing the environmental impacts that would be expected to result from the 2015 RTP/SCS. SANDAG has corrected numerous errors identified by the Court of Appeal in connection with the EIR for the prior RTP, the 2050 RTP/SCS. For example, the EIR now analyzes impacts to all agricultural parcels, regardless of parcel size. Further, in response to CNFF’s prior claims and the Court’s holding that SANDAG’s prior EIR failed to provide adequate information regarding air quality impacts, the 2015 RTP/SCS EIR now provides baseline data regarding existing air quality conditions, health risks and location of sensitive receptors. It also conducts a health risk assessment using EMFAC modeling and analyzes cancer and non-cancer risks due to toxic air contaminants near the freeways, providing a more complete analysis and mapping as requested in CNFF’s lawsuit.

With respect to GHGs, in response to CNFF’s litigation, the 2015 RTP/SCS EIR now analyzes the consistency of the Plan’s long-term GHG emissions trajectory with the emissions trajectory set forth in Executive Order S-3-05. It also includes an analysis of the Plan’s consistency with Executive Order B-30-15.

The 2015 RTP EIR also contains a more robust discussion of mitigation for GHG and air quality impacts, including many measures suggested by the Court of Appeal (e.g., encouraging parking management measures and coordinating low-carbon transportation with smart growth). The new EIR likewise recommends adoption of more mitigation, and with more defined standards, than the prior EIR. Finally, in response to the CNFF litigation, the new EIR analyzes a wider range of alternatives, including a variety of alternatives that are designed to reduce VMT by implementing more transit early in the Plan’s deployment, not constructing all of the freeway and road projects, and locating even more dense development in urban, transit-friendly areas. SANDAG also takes an important step by describing the ways in which the region might meet the 2050 GHG emissions reductions goal. Although the EIR’s analysis is based on implementation of current GHG regulations, policies, and programs, the document includes an “alternative scenario.” DEIR at 4.8-38. This scenario identifies strategies such as moving toward 100 percent renewable electricity, 100 percent zero emission vehicle passenger fleet, and 90 percent landfill waste diversion. According to the EIR, with implementation of these strategies, regional emissions would be reduced to 77
percent below 1990 emissions, but would still fall short of the 80 percent below 1990 emissions reference point based on EO-S-3-05. *Id.*

Unfortunately, the EIR’s analysis still violates CEQA because it provides no evidence to support its rejection of the environmentally superior alternative and fails to provide an adequate analysis of the various alternatives.

A. The EIR Lacks the Evidentiary Basis To Reject the Environmentally Superior Alternative.

The EIR identifies several “Type 5” alternatives that contain no additional roadway capacity and that would result in lower VMT and GHG emissions than the proposed Plan. The EIR identifies Alternative 5D as the environmentally superior alternative. Alternative 5D would complete all public transit projects, including all revenue unconstrained transit projects by 2025; eliminate the Plan’s investments in highways and managed lanes; convert existing general purpose lanes to managed lanes to accommodate “Rapid” routes; complete all active transportation projects by 2025; substantially increase land use densities; implement a policy change to substantially increase the cost of operating an automobile; and double parking prices at those locations that currently charge for parking. DEIR at 6-19 – 6-26. This alternative would increase VMT by about 7.2 million miles per year, or 9 percent, by 2050, compared to an increase of about 15.7 million miles per year, or 20 percent, by 2050 under the proposed Plan. *Id.* at 6-27.

The EIR lists several reasons why this alternative—and all of the other Type 5 alternatives—is infeasible. Yet, the EIR provides no facts or substantive analysis to support its claims. As explained below, there is ample evidence that these alternatives, or variations on these alternatives, are feasible.

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6 *Rapid* transit services refer to both bus rapid transit (BRT) that operates on Managed Lanes and *Rapid* bus that provides higher-speed alternatives to local bus services in high-volume arterial corridors and utilizes a range of lower-capital cost signal priority treatments, transit-only lanes, and limited station stops to achieve faster travel times. DEIR at 2-5.
1. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Would Require Road Pricing Policy or Legislative Changes.

The EIR asserts that Alternative 5D is infeasible because it would require road pricing policy changes to be implemented by the State of California (VMT or fuel fee or tax), or require a major change in State legislation to allow implementation by regional or local agencies such as SANDAG, cities, or the County. DEIR at 6-26. Even if this alternative would require legislative changes, such changes do not render the alternative per se infeasible. “[T]he mere fact that an alternative may require a legislative enactment does not necessarily justify its exclusion from the EIR . . . it may not be appropriate, for example, to disregard an otherwise reasonable alternative which requires some form of implementing legislation.” Citizens of Goleta Valley v. Bd. of Supervisors (1990) 52 Cal.3d 553, 573. Rather than reject this alternative because it may involve legislative and/or policy changes, the EIR should have described the specific action that SANDAG could take to facilitate such changes. For example, SANDAG could certainly lobby the State legislature to allow MPOs to implement more extensive road pricing policies.

SANDAG could also commit to working with the state to set up a road pricing pilot program. There is precedent for such an approach. To develop a new way to fund Oregon's roads and highways, the Oregon Legislature convened an independent body of state legislators, transportation commissioners, local government officials and citizens to establish a road pricing program. See “User Fee Task Force,” Oregon.GOV, attached as Exhibit 13. The Oregon task force examined the challenges and benefits of a mileage-based road user charge system and conducted two pilot projects to gather driver feedback on different options. With input from the task force, the 2013 Oregon Legislature approved the Road Usage Charge Program to be operational July 1, 2015. Id. Similar to the efforts in Oregon, SANDAG could work with the state of California to implement a demonstration pilot program to explore the opportunities and constraints associated with a user based mileage fee.

In conclusion, it is debatable that Alternative 5D, or any other “Type 5” alternative would require extensive policy or legislative changes. And, even if they would, this is not a sufficient reason to reject an alternative.

The EIR then states that Alternative 5D is infeasible because it would require major changes in land use policies, parking policies, and transit funding and that state and federal budgets and priorities would have to change. DEIR at 6-26. Here too, the EIR provides no detail about the specific land use and parking policies that would have to change or why such changes would be infeasible. Far from being infeasible, as discussed below, many local jurisdictions are well on their way to increasing land use densities. It has also become quite common for cities to increase parking costs, or otherwise manage parking to reduce vehicular travel. See “Parking Management: Strategies, Evaluation and Planning,” Victoria Transport Policy Institute, attached as Exhibit 14. We can find no logical explanation for SANDAG to suggest that changes to land use and parking policies are infeasible, especially since it is about to adopt a Transit Oriented Districts Program that addresses the importance of, and provides strategies for, increasing land use densities and parking management. See Transit Oriented Districts Strategy for the San Diego Region, September 2015, attached as Exhibit 15. Moreover, the RTP/SCS EIR itself identifies parking strategies as a method for reducing VMT (at 4.15-25) and SANDAG has adopted a Parking Management Toolbox which provides local jurisdictions a framework for evaluating, implementing, managing, and maintaining parking management strategies. See SANDAG’s Regional Parking Management Toolbox attached as Exhibit 16.

Far from being infeasible, promoting compact development patterns and managing parking are now routine standard strategies for reducing VMT and GHG emissions. If SANDAG sees revisions to land use and parking policies as tools to achieve objectives such as supporting economic vitality, increasing safety, increasing accessibility and mobility, and promoting environmental protection, it should lead the region in this direction.

Nor can SANDAG suggest that the state and federal government are somehow holding SANDAG back from adopting Alternative 5D. California continues to lead the nation on climate change policy. California’s governors have issued Executive Orders such as S-3-05 and B-30-15. The State Legislature has passed numerous climate change laws including AB 32 and SB 375. The State has published ample material on climate change and makes available a Climate Change Portal which is a virtual research and information website for climate change mitigation and adaptation resources. See
Climate Change Portal webpage, attached as Exhibit 17. In addition, the 2015-16 budget would allocate $1 billion from Cap-and-Trade revenues for programs including transit and sustainable communities’ implementation. See “Cap-and-Trade,” League of California Cities, attached as Exhibit 18. It is for this reason that the program has expanded public transit, clean vehicle technology, the development of clean and fast high-speed rail, and responsible growth policies to encourage housing Californians near transit and job centers.

Nor can SANDAG look to the federal government’s priorities to suggest that Alternative 5D is infeasible. President Obama’s Executive Order 13693 demonstrates the Federal government’s commitment to curbing GHG emissions. E-O-13693 calls for cutting Federal GHG emissions by 40 percent over the next decade from 2008 levels. See “Executive Order—Planning for Federal Sustainability in the Next Decade,” attached as Exhibit 19. Furthermore, President Obama’s 2016 budget proposal places sustainable transportation infrastructure front and center. See “Transportation and infrastructure take center stage in President Obama’s 2016 budget proposal,” A. Dodds, Smart Growth America, February 3, 2015, attached as Exhibit 20. While the proposed budget reauthorization includes funding for highway spending, it would increase transit funding by 75 percent to $18.2 billion, including $10.2 million for the transit oriented development planning grant program. The budget proposal would establish a rail account and a multimodal account within the Highway Trust Fund, and allocate $4.7 billion and $1.25 billion to each, respectively. It would provide $2.45 billion to maintain passenger rail assets, and would create a multimodal freight program funded at $1 billion. Id.

In conclusion, there is ample support from local jurisdictions as well as the state and federal government for transit first alternatives such as Alternative 5D. SANDAG lacks the evidentiary basis to reject such alternatives.

3. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Is Not Fiscally Constrained.

The EIR also asserts that Alternative 5D is infeasible because it includes transit projects that are not fiscally constrained. We understand that federal laws require RTPs to be fiscally constrained. Yet, there is no reason that SANDAG could not have crafted this alternative in a manner that eliminates the specific transit projects that are considered to be in the fiscally unconstrained category.

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Another approach, however, is to seek additional funding sources so that the transit projects that are currently in the unconstrained category could be implemented. While the RTP discusses the constraints to augmenting revenue sources for transportation, it only gives lip service to additional funding options such as mileage-based user fees, toll pricing, an increase to the fuel tax, an increase to vehicle weight fees, an increase to other vehicle-related fees, and opportunities for more public-private partnerships. RTP/SCS at 115. SANDAG should delve into each of these potential revenue sources and identify a role that it could play in helping to bring these funding sources to fruition. For example, as discussed above, SANDAG could take a proactive role in promoting a user based mileage fee that would replace or supplement the current gas tax.

Another obvious source of funding for transit and active transportation is TransNet. The SANDAG Board has the authority to change the TransNet expenditure plan by a 2/3 vote, which could shift funding more dramatically from highways to transit. SANDAG should consider adopting an alternative that allocates all of the TransNet funding to the region’s unconstrained transit projects. Such an alternative would educate the public and decision-makers as to whether sufficient funding exists within the TransNet pool of monies to fund the constrained and the unconstrained transit projects.

There are numerous sources of funding that SANDAG could tap to fund unconstrained transit projects. Consequently, SANDAG lacks the evidentiary support that Alternative 5D is infeasible because it includes transit projects that are not fiscally constrained.

4. The EIR Incorrectly Concludes that Alternative 5D Is Infeasible Because It Would Not Be Consistent With Local General Plans or SB 375.

The EIR states that Alternative 5D is infeasible because it would not be consistent with current local general plans and would conflict with SB 375. We do not dispute that SB 375 requires that the land use patterns included in an RTP/SCS be based on current planning assumptions, but as SANDAG itself recognizes, the region is already directing growth toward the more urbanized areas in west County. Its own Transit

Oriented Districts Strategy states that, “During the last decade, more than half of local jurisdictions have updated their land use plans and zoning ordinances, collectively moving the region’s vision of the future toward compact development near transit and greater open space preservation. Focusing housing and job opportunities in existing urbanized areas has replaced previous assumptions of more dispersed development patterns…” See Exhibit 15 [SANDAG’s Draft Transit Oriented Districts Strategy].

There is every reason to believe that local jurisdictions will continue to promote compact land use patterns. It is logical that a long term planning document such an RTP must do some amount of extrapolation from local jurisdictions general plans. The next iteration of general plans, i.e., those that will have a planning horizon more in line with the 2015 RTP/SCS (2035 to 2050) will almost certainly call for even more compact land development patterns than exist today.

The City of Encinitas, for example, is putting together a plan that will increase density and intensity in order to comply with state law that requires affordable housing. To this end, city leaders are targeting 95 sites to be developed as high density transit villages. Until the city approves its plan, it is unable to apply for grant funding from SANDAG and is also on precarious legal grounds and vulnerable to lawsuits from developers and affordable housing advocates. See Encinitas Hopes to Comply with State Housing Law by 2016, M. Srikrishman, Voice of San Diego, September 4, 2015, attached as Exhibit 21.

Nor can SANDAG suggest that SB 375 somehow prevents the agency from approving an alternative that calls for increased land use densities. It is not the intent of SB 375 to have regional planning agencies simply compile local land use plans. Instead, SB 375 envisioned that regional agencies would design alternative land use scenarios that would show local jurisdictions how growth might be redistributed, the role that transportation systems play with regard to growth patterns, and the effect that the transportation/land use interaction has on travel patterns and GHG emissions. Clearly, SANDAG understands its obligation to do some amount of land use forecasting. Its own Urban Area Transit Strategy (“UATS”) states that 80 percent of all homes in 2050 are projected to be located within the UATS study boundary. See 2015 RTP/SCS Technical Appendix U-17. Consequently, SANDAG cannot reject Alternative 5D because it would not be consistent with local plans. At a minimum, SANDAG should be working with local agencies during their general plan update processes to identify and promote growth opportunities, particularly in transit priority areas.

Inasmuch as SANDAG clearly understands the role that increased land use densities play in reducing VMT and GHG emissions, it must take action to lead local
governments in this direction. SANDAG could certainly adopt an alternative that includes a land use scenario that calls for substantial increases in intensity and density in those jurisdictions that are already advocating for compact development patterns, e.g., the cities of San Diego and Encinitas.

5. The EIR Incorrectly Concludes that Alternative 5D and the Other “Type 5” Alternatives Are Infeasible Because They Would Have To Be Constructed by 2025.

Finally, the EIR states that Alternative 5D and the rest of the Type 5 alternatives are infeasible because the revenue constrained and unconstrained transit projects would have to be constructed by 2025. This 10-year time period appears to have been influenced by CNFF’s 50-10 Transit Plan. But, as discussed previously, the 50-10 Transit Plan does not propose to construct all transit over a ten-year period. Instead, it calls for focusing all investment over the next ten years on transit in the region’s urban core, while also including the Sprinter, Coaster and Blue Line corridors.

Not surprisingly, the EIR rejects all of the Type 5 alternatives, claiming it would be too expensive to implement and operate the accelerated capital program of these alternatives. For example, for Alternative 5A, the EIR states that this alternative would require $42 billion by 2025:

This would require approximately $38 billion in new capital funds within a 10-year period, approximately eight times more than the anticipated $4.8 billion in available revenue (see Chapter 3 of the proposed Plan for discussion of available revenues). The cost to operate the transit facilities would expand from approximately $350 million annually in Fiscal Year 2015, to nearly $1.25 billion annually in Fiscal Year 2025. Total operating costs over the 35 year period (by 2050) would be nearly $59 billion, more than $24 billion more than anticipated available revenues of $34 billion for operations over that timeframe. DEIR at 6-20.

SANDAG cannot identify alternatives that call for an unrealistic amount of transit over a short period of time and then claim that such alternatives are infeasible because they are too expensive.

Moreover, SANDAG’s assertion that the expense of Alternative A renders it infeasible is incorrect. As the Smart Mobility Report explains, Alternative 5A clearly is less expensive than the proposed RTP/SCS. The draft Plan includes roadway expenditures of $22 billion in 2014 dollars. The lane conversion component of
Alternative 5A might cost 10 percent of that, so about $20 billion would be available to fund the unconstrained transit projects. This is more than enough to construct the unconstrained transit projects which are projected to cost about $13 billion (2014 dollars). See Smart Mobility Report at 12.

The Type 5 alternatives are clearly feasible; SANDAG should adopt the alternative that provides the greatest VMT and GHG emission reductions.

**B. The EIR Does Not Adequately Analyze the Project’s Alternatives.**

A fundamental flaw in the EIR’s alternatives analysis is its failure to accurately describe existing transit conditions in the region. As a result, the EIR does not accurately evaluate the potential for any of the Type 5 alternatives to increase transit mode share in the region or to reduce VMT or GHG emissions.

First, the EIR underestimates current transit use in the region. The RTP/SCS identifies the regional transit mode share in 2012 as 1.8 percent. See RTP/SCS, Appendix N, Table N.1 at 3. Yet, as the Smart Mobility Report explains, according to the California Household Travel Survey for 2012 (“2012 Survey”), the actual transit mode share for San Diego County residents is 4.4 percent, i.e., over twice as high. Smart Mobility Report at 7. The rate for home-based-work trips is even higher, 6.5 percent. Id.

Second, the RTP, and therefore the EIR, substantially downplays how poorly the region’s transit system currently operates. The RTP/SCS identifies an average transit travel time to work of 50 minutes. Yet, it currently takes much, much longer than this to travel to work on transit in the region. The 2012 Survey identifies a mean door-to-door travel time reported for work commuting trips with at least one transit segment as 81 minutes. Smart Mobility Report at 7. Therefore, the RTP and EIR appear to be missing the mark by 31 minutes. By underestimating transit travel times today, SANDAG is likely substantially underestimating the ridership gains that could be achieved by improving transit service.

On a related note, the EIR substantially underestimates the amount of time it currently takes an individual to get to a job or to school via transit. The EIR states that “approximately 86 percent of the population was within 30 minutes of jobs and higher education enrollment using transit as of 2012.” Smart Mobility Report at 8. This statistic does not appear to be accurate. For transit trips to be 30 minutes or less on a door-to-door basis generally requires short walks on both ends, a “one-seat ride” without transfers and frequent service. Such optimal transit situations are uncommon today in the San
Diego region. *Id.* Furthermore, this statistic appears immediately above a table showing that only 77 percent of the population is within 0.5 miles of a transit stop. How can 86 percent of the population be within 30 minutes by transit to jobs if only 77 percent have any reasonable transit access? The EIR’s failure to include accurate statistics regarding existing conditions, e.g., proximity to transit service and transit travel-time data undermines the entire alternatives analysis.

A third critical flaw is that the EIR concludes that Alternatives 2 and 3 would result in identical performance metrics implying that the sequencing of transit and roadway projects makes no difference. Smart Mobility Report at 10. Specifically, the EIR determines that total VMT, GHG emissions and air pollution would be equivalent in 2050 whether all transit and highway projects are assumed to be constructed in 2016 or 2049. *See DEIR at 6-42, 6-43, 6-54, 6-67.* This makes no sense. Investing in highways, especially adding capacity in suburban and rural locations, perpetuates decentralized low density development patterns. Sprawl development is highly auto-dependent and trip lengths are considerably longer than commutes in urban environments. Increasing roadway capacity also induces additional travel, which undermines attempts to increase transit ridership. Moreover, making transit investments in urbanized areas sooner will attract developers, employers, retailers and residents to those areas. Consequently, there can be no debate that the RTP’s highway projects would result in increased VMT and GHG emissions compared to transit.

SANDAG’s failure to accurately depict the varying effect of transit compared to highway development on land use is a particularly frustrating since the 2050 RTP/SCS suffered from this same defect. As we explained,

> A fundamental problem in the 2050 RTP is that it takes credit for the benefits of more compact development while assuming that such a future will be achieved regardless of what transportation system is provided – whether auto-oriented, transit-oriented or a mix of the two. In reality, developers, home buyers and renters, and business owners are all strongly influenced by transportation investments. Investments in freeways have encouraged sprawl. This phenomenon has resulted in a vicious cycle whereby sprawl causes high traffic growth leading to more freeway investments leading to more sprawl. The RTP is in error when it assumes that compact development can be achieved with continued investments in suburban freeways. Accordingly, the agency is taking credit for benefits that will
result from compact land use that will not result if the RTP is followed. See Exhibit 11 [50-10 Plan].

In sum, the EIR’s analysis of the RTP/SCS’s alternatives is riddled with flaws. The document must be revised to accurately characterize existing transit conditions and objectively disclose the effects that highway projects have on VMT and GHG emissions. Such an analysis would likely determine that those alternatives that emphasize transit and delay highways would achieve sustainable reductions in VMT and GHG emissions.

IV. Conclusion

For the reasons set forth above, we respectfully request that SANDAG revise the draft RTP/SCS to incorporate transportation projects that are truly sustainable. Additionally, we request that no further consideration be given to the RTP/SCS until an EIR is prepared that fully complies with CEQA.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Laurel L. Impett, AICP, Urban Planner

Rachel B. Hooper

cc: Mayor Faulconer, City of San Diego
    Mayor Gaspar, City of Encinitas
    Duncan McFetridge, CNFF
List of Exhibits

Exhibit 1  Southern California Association of Governments, *RTP SCS Development Process - 2016/2040*


Exhibit 3  Circulate San Diego, *New Climate For Transportation: How the City of San Diego and SANDAG must improve transportation to meet climate goals*, 2015


Exhibit 5  Dawid, I., *Five Reasons Why Peak Driving is Here to Stay*, Planetizen, August 25, 2014

Exhibit 6  Marshall, N., Smart Mobility, *Comments on the 2015 RTP/SCS and DEIR*, September 2015

Exhibit 7  State Smart Transportation Initiative, *A Follow-Up to the California Department of Transportation: SSTI Assessment and Recommendations*, December 2014


Exhibit 9  Jacobs Consultancy, *Destination Lindbergh*, February 12, 2009

Exhibit 10  SANDAG, *Destination Lindbergh Power Point*, November 2008

Exhibit 11  Marshall, N., Smart Mobility, *The 50-10 Transit Plan: A World Class Transit System for the San Diego Region*, July 2011

Exhibit 12  Marshall, N., Smart Mobility, *The 50-10 Transit Plan: Quantifying the Benefit*, April 2015
Exhibit 13  Oregon Department of Transportation, *Road User Fee Task Force*, Road Usage Charge Program webpage, Accessed September 25, 2015


Exhibit 15  SANDAG, *Transit Oriented Districts: A Strategy for the San Diego Region (Draft)*, August 2015

Exhibit 16  SANDAG, *Regional Parking Management Toolbox*


Exhibit 20  Dodds, A., *Transportation and infrastructure take center stage in President Obama’s 2016 budget proposal*, Smart Growth America, February 3, 2015


702254.7
October 2, 2015

Chair Jack Dale
Members of the Board of Directors
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Re: San Diego Forward: The Regional Plan and Environmental Impact Report
Failure to Include all Reasonably Feasible Mitigation Measures

Dear Chair Dale and Members of the Board,

Please accept the following comments on behalf of Coastal Environmental Rights Foundation (CERF) on San Diego Forward: The Regional Plan and Environmental Impact Report. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California’s coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.

The primary goal of an EIR is to identify a project’s significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. Pub. Res. Code §§ 21002.1(a), 21061. The lead agency must adopt all feasible mitigation that can substantially lessen the project’s significant impacts, and it must ensure that these measures are enforceable. § 21002; Guidelines § 15002(a)(3), 15126.4(a)(2); City of Marina v. Bd. of Trustees of the Cal. State Univ. (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures “that feasible mitigation measures are included in the project. Measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.” Federation of Hillside and Canyon Assns. v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); Guidelines § 15126.4(a)(2).

If implemented, the RTP would result in significant and unavoidable impacts in almost every environmental category -- aesthetics and visual resources; agricultural and forestry resources; air quality; biological resources; cultural and paleontological resources; energy; geology, soils, and mineral resources; greenhouse gas emissions; hazards and hazardous materials; land use; noise and vibration; population and housing; public services and utilities; transportation; and water supply. DEIR at ES-4-19.

The EIR discusses other approaches to reducing the Project’s significant and unavoidable impacts, but it is clear that the agency is not serious about adopting additional viable measures. For example, the EIR mentions that SANDAG considered an “alternative scenario.” DEIR at 4.8-38. Yet, this alternative scenario is not a true mitigation measure as it does not require SANDAG to take any action. Instead, the alternative scenario theoretically discusses how major changes in policies and regulations relating to increases in renewable energy use and electric vehicle penetration might affect VMT and GHG emissions. DEIR Appendix G at 1.
One key component of the alternative scenario calls for achieving a 100 percent zero emission vehicle (“ZEV”) passenger fleet. DEIR at 4.8-38. But the EIR includes no indication that SANDAG is making the necessary effort to enable a 100 percent ZEV fleet within the region. An electronic search of the EIR for this alternative scenario component identified only one reference: “SANDAG is working with its partner MPOs in California and with ARB to identify further strategies to reduce GHG emissions such as substantially expanded zero emission vehicle programs, particularly in the later years of the proposed Plan that do not have SB 375 targets (2036 to 2050).” DEIR at 2-8. Yet, the EIR never explains its partnership with other MPOs or the state to substantially expand ZEV programs. If SANDAG is serious about reducing the Plan’s GHG impacts, it should, at a minimum, adopt an array of strategies to expand ZEV programs. We note that the EIR includes a measure to fund electric vehicle (“EV”) charging station infrastructure, which calls for the agency to install 36,000 EV chargers by 2035 and an additional 44,000 by 2050. Id. at 4.8-40 and 41. This is an important first step but the agency could go considerably further.

SANDAG certainly could undertake certain actions as outlined in “ZEV 2015 Draft Action Plan: A roadmap toward 1.5 million zero-emission vehicles on California’s roadways by 2025”, See ZEV Action Plan, Governors’ Interagency Working Group on Zero-Emission Vehicles, April 20151, attached as Exhibit A. For example, SANDAG could develop and adopt regional zero emission vehicle infrastructure plans and policies as part of its RTP which would include coordination of station maintenance to ensure ongoing fueling/recharging availability and minimize the potential for stranded vehicles. Id. at 13. SANDAG could also undertake a public education campaign so that consumers fully understand the benefits of ZEVs. Consumer education is critical to building interest in ZEV vehicles. Many consumers are unaware that ZEVs are available for purchase or lease. Others don’t fully understand ZEV benefits such as operational cost savings, availability of high occupancy vehicle lanes on freeways, accessible public charging and even free or reduced price parking. Id. SANDAG could also work with local agencies to encourage the conversion of fleet vehicles to ZEVs. To this end, SANDAG could adopt a model ordinance that local agencies would then be able to tailor to fit their specific needs. See, e.g., the model ordinance that the Office of Planning and Research has included in its ZEV in California Community Readiness Handbook2, attached as Exhibit B.

Another component of SANDAG’s alternative scenario calls for a 90 percent landfill waste diversion. DEIR at 4-8-38. Here too, we can find no indication that SANDAG is taking any effort to promote landfill waste diversion, let alone a 90 percent landfill waste diversion. SANDAG could adopt a zero waste initiative or collaborate with San Diego County in adopting such an initiative. At a minimum, SANDAG could require, as a condition of funding, that the construction of all transportation projects result in zero waste.

Another feasible option to mitigate the Plan’s numerous significant and unavoidable impacts is by incorporating specific components included in the EIR’s alternatives. Indeed, it appears that SANDAG has already considered such an approach as the EIR explains that, “Other potential mitigation measures to reduce total VMT are included as components of the alternatives analyzed in Chapter 6.0, rather than as individual mitigation measures in this section. These include still more compact land use patterns, accelerated and increased transit investments, reduced or no highway investments, and policies to reduce transit fares, increase parking prices, and establish

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2 http://opr.ca.gov/docs/ZEV_Guidebook_.pdf
road user fees." DEIR at 4.15-24; (see also DEIR at 4.8-37 stating that mitigation measures to reduce the Project’s GHG impacts are included as components of the project alternatives). But, here too, the EIR’s approach is disingenuous. It asserts that the Type 5 alternatives, or components of these alternatives are mitigation measures, yet it rejects each and every one of the Type 5 alternatives as infeasible. This approach -- setting forth suggestions for mitigation that the agency assumes to be infeasible – violates CEQA. CEQA Guidelines § 15126.4(a)(1). Yet, the EIR provides no actual evidence that the Type 5 alternatives are infeasible.

Inasmuch as SANDAG has the means, as well as the legal obligation, to implement feasible, concrete, and enforceable mitigation measures we strongly encourage the agency to adopt the following measures:

- Complete all revenue constrained transit projects within the urban core by 2025;
- Defer investments in highways and managed lanes until such time as the region has a comprehensive transit network in the urban core;
- Convert existing general purpose lanes to managed lanes. routes;
- Complete all active transportation projects by 2025;
- Adopt a land use scenario that substantially increases land use densities;
- Substantially increase the cost of operating an automobile;
- Require that jurisdictions substantially increase the price of parking as a condition for receiving funding for highway and other projects;

In sum, SANDAG cannot abdicate its responsibility under CEQA to consider and approve specific mitigation measures that would reduce the Project’s significant impacts. The agency cannot approve a project with significant environmental impacts if there are feasible mitigation measures which would substantially lessen those effects (even if they are not completely avoided or reduced to a less than significant level). Pub. Res. Code § 21002.

Thank you for your consideration of these comments.

Sincerely,

COAST LAW GROUP LLP

Marco Gonzalez

Livia Borak
Attorneys for CERF
October 9, 2015

SANDAG Board Members
SANDAG
401 B St. Ste. 800
San Diego, CA 92101

Re: Environmental Health Coalition’s OPPOSITION to the Adoption of the San Diego Forward: The Regional Plan

Dear SANDAG Board Members:

Thank you for the opportunity to comment on San Diego Forward: The Regional Plan. Environmental Health Coalition (EHC) advocates for a Regional Plan that ensures Transportation Justice. Transportation Justice requires that overburdened communities have increased access to transportation options, that there are improvements to public health and safety, and that there is equity in transportation planning, policies, and investment.

The San Diego Forward: Regional Plan expands freeways, delays construction of transit and active transportation, and will harm public health. We urge the SANDAG Board to vote NO.

The Plan does contain a number of transit and active transportation projects we are supportive of because they will greatly benefit the communities in the South Bay, such as the purple line trolley (Trolley 562), Rapid bus stop in Sherman Heights/Gold Hill communities, and 54th Street Rapid (Rapid 550). The benefits of these projects however are overshadowed by the many freeway projects that will be detrimental to the community’s health and will not improve sustainable mobility in the long run. We are particularly concerned about increasing car capacity through lane additions on South Bay Freeways (i.e., I-5, I-805, I-15, SR-94) that cut through many environmental justice communities and believe this type of planning and investment will perpetuate significant disparate impacts. As a result, the San Diego Forward: Regional Plan falls short of community needs.

Residents living in the most impacted communities near the I-5, I-805, I-15, and SR-94 have made hundreds of written and oral comments over the past two years overwhelmingly in support for increasing and advancing public transit and active transportation projects rather than adding capacity to freeways for cars. Yet, the 2015 Regional Plan’s freeway lane addition list looks nearly identical to the 2011 plan. The community has clearly called for advancement of a group of transit projects in order to improve local and regional mobility more quickly, especially in communities that are more transit dependent and overburdened by air pollution. There is a lack of evidence to suggest that the rearrangement of selected transit projects on its own will improve mobility and further reduce GHG emissions. Hence, the region needs a dual approach to improving mobility and reducing GHG emissions and air pollution, because an increase in transit mode share requires a reduction of vehicle mode share. By adding more capacity for cars on freeways, as proposed in SANDAG’s “managed lanes” approach, vehicle miles traveled would thereby be increased. Therefore, we have asked that SANDAG take an alternative “managed lanes” approach that does not add lanes (capacity for more cars) to freeways and highways; but instead, employs innovative corridor...
strategies that convert existing general purpose lanes to managed lanes to accommodate Rapid routes and carpool (HOV). This approach is not reflected in the proposed Plan.

Developing a pathway for real solutions to improve regional transportation will require transitioning freeway funding to transit and active transportation projects. There is flexibility in state and federal funds that can be transitioned from increasing freeway capacity for cars to transit projects. We have urged SANDAG to transition funding from freeway projects to prioritize the development and operation of transit infrastructure and active transportation infrastructure. This approach is not reflected in the proposed Plan.

There is a solution: Many of the elements in Alternative 5 in the DEIR would help meet community needs and we are in favor of transit projects to be phased within the 35 year planning horizon to make the implementation of transit projects more achievable. However, it is our understanding that it is not financially feasible to build all the transit projects within the first 10 years of the plan. Assuming this is so, it is understood that a phased approach will be required and we have stressed our support for the prioritizing building public transit projects that are located within the urban core and communities most overburdened as identified in the CalEnviroScreen tool. This approach is not reflected in the proposed Plan.

There are many residents in our region that are unable to access the existing transportation network due to cost whose access could help increase future ridership and advance the region economically. Therefore, we have recommended the inclusion of no cost transit passes for the youth of families at or below the regional median income level. This is not reflected in the proposed Plan.

There are many routes to existing transit stops in neighborhoods that lack bike and pedestrian infrastructure for safe routes to these transit stops and deters people from taking transit, biking, and walking options it is estimated that meeting this need regionally would take a commitment of $500 million while adding two lanes to the SR-94 for approximately two miles is estimated to cost about $600 million. In order to facilitate and encourage active transportation options we have urged SANDAG commit funding to complete all retrofits for safe routes to existing transit stations/stops, and prioritize retrofits in overburdened. This is not reflected in the proposed Plan.

The Regional Plan falls short of community needs as outlined in this letter. Therefore, we are not able to support the Regional Plan as it stands and urge the SANDAG Board to vote No.

We appreciate your consideration of these comments throughout the process and look forward to working together to further strengthen future Regional Plans.

Sincerely,

Monique G. López, M.A., M.C.R.P.
Policy Advocate - Transportation Justice
September 30, 2015

Hon. Chair Jack Dale  
SANDAG Board of Directors  
401 B Street, Suite 800  
San Diego, California 92101

RE: San Diego Forward: The Regional Plan and Quality of Life Initiative  
LCVSD Opposition

Dear Chair Dale and Board Members:

Please accept this letter on behalf of League of Conservation Voters, San Diego (LCVSD). LCVSD is a chapter of the California League of Conservation Voters (CLCV), which seeks to protect the environmental quality of the state by working to elect environmentally responsible candidates and hold them accountable to the conservation agenda.

As a regional agency comprised of representatives from individual municipalities, SANDAG plays not only a unique role in shaping the region, but a critical responsibility. Today, SANDAG representatives face a significant task in reviewing the San Diego Forward: The Regional Plan (“Regional Plan”). As potentially one of the region’s most important mechanisms to address climate change, the Regional Plan falls in this regard.1 The Regional Plan’s own CEQA documents reveal its failure to meet either interim or 2050 state greenhouse gas reduction targets. In light of its commitment to continued freeway expansion and failure to meet greenhouse gas reduction goals, the Regional Plan is unsupportable. LCVSD strongly urges SANDAG board members to vote against the Regional Plan, especially members that represent agencies with strong local greenhouse gas reduction plans. Of particular concern is the Regional Plan’s role in frustrating member agencies’ attempts to reduce greenhouse gas emissions and a apparent disregard for its member agency’s attempt to do so.2

Historically, SANDAG’s regional plans have dismissed increased transit based on funding constraints. The Regional Plan continues this trend. However, because the Regional Plan is based on a presumption of financial resource allocation, including the Quality of Life Initiative, LCVSD believes the Regional Plan’s commitment to continued freeway expansion projects is a self-fulfilling prophecy based on artificial constraints. Therefore, LCVSD believes further commitment to freeway widening projects in a Quality of Life Initiative is inappropriate.3 Likewise, SANDAG representatives’ attempts to leverage the Quality of Life Initiative for support of the Regional Plan and vice versa is inappropriate.

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1 “Based on the studies cited in the introduction to the mitigation section, however, even full implementation of all identified mitigation measures would not be sufficient to reduce the proposed Plan’s GHG emissions below the regional 2030 and 2050 GHG reduction reference points based on EO B-30-15 and EO-S-3-05.” (Regional Plan, Draft EIR, p. 4.8-44, emphasis added).
3 “It should be noted that the Regional Plan includes assumptions for new fund sources at the local, state, and federal levels. These include a potential new “Quality of Life” sales tax measure collected and managed at the regional level, fees charged for the number of miles driven by cars and trucks, and new gas taxes... None of the new fund sources are assumed to begin prior to 2020, but they would be required in order to complete all of the projects in the Regional Plan.” (Regional Plan, p. 106, emphasis added).
To that end, LCVSD will actively oppose a Quality of Life Initiative that does not achieve the following directives:

1. No funding of freeway expansion projects.
2. A reallocation of TransNet funds to transit projects.
3. Funding to meet long-term requirements for implementing habitat conservation plans in the San Diego region could not be used to mitigate for individual project impacts.

Should you have any questions regarding LCVSD’s position feel free to contact us directly. Thank you for your consideration of our comments.

Sincerely,

Livia Borak
President, LCVSD
October 1, 2015

The Honorable Jack Dale, Chair
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

RE: San Diego Forward: The Regional Plan

Dear Chairman Dale:

On behalf of the Oceanside Chamber of Commerce Board of Directors, we are writing to express our support of the San Diego Forward: The Regional Plan, as recommended by SANDAG. Our organization represents the interests of industry, business and landowners in the Oceanside and North Coastal areas of North San Diego County.

We continue to enjoy steady growth in our community, including increased tourism, and continue to support all efforts to provide adequate public services along with responsible and sustainable growth strategies. Oceanside is the gateway to the rest of the Coastal area in San Diego County and, more importantly, the gateway for most of the tourist traffic using Interstate 5.

The tourism and normal daily traffic along I-5 is dependent on significant infrastructure investment to ensure efficient movement of vehicle traffic through the city. San Diego Forward’s planned expenditures for the improvement of the interchange at I-5 and State Route 78 are critical to keeping the traffic flowing south and east through the coastal corridor. This improvement is needed sooner, not later, than is projected in the plan.

Oceanside is also home to the North County Transit District main transit hub, providing options for all travelers to connect with other North County areas and the City of San Diego.

The San Diego Forward Regional Plan promotes a sound, balanced strategy to accommodate our region’s future growth while protecting the environment, promoting economic development, and maintaining our quality of life.

Best regards,

[Signature]

Marva Bledsoe
Chair, Board of Directors
Oceanside Chamber of Commerce
October 7, 2015

Dear SANDAG:

The San Diego County Bicycle Coalition urges SANDAG to include the Rose Creek Coastal Connection in San Diego Forward: The Regional Plan.

This project, a bicycle and pedestrian bridge over the railroad tracks and Rose Creek at the confluence of Rose and San Clemente creeks, has been designed by the Coalition to be compatible with the MidCoast and other rail projects. The design process, which is nearing completion, has been coordinated with SANDAG and its staff for over three years.

The connection provides an important bicycle and pedestrian connection within the Rose Creek watershed, connecting the communities of Clairemont and University City to Pacific Beach and Mission Bay and our beaches. The project is a key recommendation of the Rose Creek Watershed Opportunities Assessment as it physically will re-link the watershed to allow pedestrian and bicycle circulation that will otherwise be curtailed by the construction of the MidCoast.

The Rose Creek Coastal Connection would serve existing users of Rose and San Clemente (Marian Bear) canyons and future users of the expanding regional bicycle and trail network.

The Rose Creek Coastal Connection is consistent with the City of San Diego Bicycle Master Plan and received near unanimous approval of the three planning groups in the areas served: Clairemont Community Planning group (10-0; February 17, 2015), the University City Planning Group (12-1; April 14, 2015) and the Pacific Beach Planning Group (14-0; January 28, 2015).

Sincerely,

[Signature]

Andy Hanshaw
Executive Director
San Diego County Bicycle Coalition
October 5, 2015

Mr. Jack Dale, Chair
SANDAG
401 B Street #800
San Diego, CA 92101

Dear Mr. Dale,

I am writing to you on behalf of the San Diego Tourism Authority. As you are well aware, tourism is an important component of San Diego’s regional economy. In 2014, over 33 million visitors came here generating $15 billion in economic impact and $176 million in Transient Occupancy Tax revenues for the City of San Diego alone.

Our industry has a vital interest in the region’s transportation system. Obviously, before visitors can enjoy San Diego, they have to get here. They arrive here on all modes of transportation such as land, air, sea and rail. It is estimated that 7 million arrive by plane at Lindbergh Field, 726,000 arrive by train, and 25 million arrive by car. Ease of access can be a major factor in deciding whether to choose San Diego as their destination.

We are pleased to see that San Diego Forward includes a host of far-reaching additions to San Diego County’s transportation network. The $200 billion infrastructure investments called for in the plan presents a significant opportunity for SANDAG to provide a variety of transportation choices for residents and visitors alike.

We have reviewed the alternatives studied in the environmental document and feel strongly that San Diego Forward as proposed offers the best balance among the various transportation modes on which tourism depends. We support the proposed projects and their phasing as the best and most reasonable way to accommodate the needs of residents and visitors.

Please don’t hesitate to reach out of me if I can answer any further questions or be of assistance to you in any way.

All the best,

Joe Terzi
President & CEO
October 7, 2015

SANDAG Board Members
San Diego Association of Governments (SANDAG)
In Care of Board Clerk Tessa Lero
401 B Street, Suite 800
San Diego, California 92101
Via Email to tessa.lero@sandag.org; pio@sandag.org; Andrew.martin@sandag.org

Re: The Sierra Club asks you to defer the vote on SANDAG’s Proposed Regional Transportation Plan for 2015

Honorable Chair Jack Dale and Members of the Board:

The proposed 2015 Regional Transportation Plan (RTP) does not adequately address San Diego County’s urgent transportation needs congruently with the City’s Climate Action Plan (CAP) goals. We respectfully request that you defer the vote until the RTP can be measured by the City’s CAP. This will mean moving transit projects and expenditures to years 0-5 in order to achieve climate-stabilizing targets.

We challenge our regional representatives to have the courage and leadership to stand up for what's right for the greater good of the community and the health of citizens.

Sierra Club encourages SANDAG to revise its draft RTP update to more closely conform to the goals of the City’s Climate Action Plan. SANDAG’S RTP must take the leadership role in ensuring that all jurisdictions within the County of San Diego are meeting the State-imposed mandates to achieve climate stabilizing targets as mandated in Executive Orders S-3-05 and B-30-15. Figure 1 (shown at the bottom of this letter) is Figure 4.8-1of the DEIR of the proposed RTP. It shows that the proposed RTP does not achieve our state’s climate mandates.

The 2015 update to the SANDAG RTP should be based on the following information and principles:
1. The RTP is inextricably linked to the City of San Diego’s Climate Action Plans. According to the Energy Policy Initiatives Center (EPIC) Inventory, cars and light-duty vehicles (LDVs) emit 41% of our greenhouse gas (GHG). How can you approve an RTP without measuring it against the City’s Climate Action Plans?

2. SANDAG must strive to provide modes of transportation that make transit easy and affordable to get people out of their cars, to minimize vehicle-miles travelled (VMT) and therefore the reduction of GHG.

3. Expansion of freeway infrastructure, including new Managed Lanes, and the construction of new freeways will only encourage more driving, will not create viable alternatives to automobile transportation, and in fact will result in increased VMT, more GHG, poorer air quality, and ultimately, no congestion relief, putting us farther behind our climate stabilizing targets as outlined in the CAP.

4. Our July 15 comment letter contains detailed descriptions of measures to reduce driving and we ask that these measures need to be incorporated into the 2015 RTP.

The Sierra Club requests that the RTP include the following to be consistent with San Diego’s proposed CAP include:

1. Re-prioritize transit by moving funding and construction of transit projects to years 0 to 5.
2. Create park-and-ride lots where people can drive from home, park their cars, and ride clean-emissions buses to major commute and travel destinations. Bus schedules are flexible and easily adjusted for peak times and special events. Prioritize using electric buses supported by solar generating stations at bus depots.
3. Increase public transit options (including small vans, buses and light rail) and frequency of service in the urban core and densely populated areas to make using transit easier.
4. Encourage bicycle commuting by creating segregated bicycle paths by re-striping, and providing safe cycling options for cyclists throughout the County.
5. Limit sprawl by discouraging (by disincentives) municipalities from approving subdivisions or planned communities more than 10 miles from job centers, which are not served by adequate transit.
6. Encourage by ease of permitting and economic incentives to increase the use of charging stations with solar installation on warehouse facilities to electrify cars, light delivery trucks and commercial vehicles.
7. Urge the state to adopt environmentally-sound road usage charges and to speed up the pilot project creation currently progressing under SB 1077.
8. Work for a demonstration project of a system to mitigate the harm of bundled-cost parking at places of employment, as described in our July 15th letter.
9. Increase Coaster stops to ease traffic on I-5 in North County, especially by providing a stop at the Del Mar Fairgrounds so people can walk to events.

Sierra Club is confident that SANDAG can, within your 2015 deadline, draft a 2015 RTP that encompasses the principles and priorities outlined in this letter, and which will be consistent with the two Climate Action Plans drafted by the City and County of San Diego.

We represent the Sierra Club’s 12,000+ members who look to you to provide the leadership necessary to create a sustainable and equitable transportation system that protects air quality and helps to reduce climate change for all the citizens of San Diego County.

Sincerely,

Mike Bullock
Chair
Sierra Club San Diego
Transportation Subcommittee
mike_bullock@earthlink.net

Debbie Hecht
Chair
Sierra Club San Diego
Steering Committee
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 12,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.
Bill Tippets  
5850 Soledad Mtn Road  
La Jolla, CA 92037  

October 6, 2015

SANDAG  
Board of Directors, Chair Jack Dale  
Transportation Committee, Chair Todd Gloria  
Regional Planning Committee, Chair Lesa Heebner  
401 B Street, Suite 800  
San Diego, CA 92101  

Subject: Regional Plan Approval and Draft PEIR Certification Hearing

Chairman Dale and Board Members:

I am submitting these comments for inclusion in the Board’s agenda for its October 9, 2015 hearing on the Regional Plan and Draft PEIR and recommend that the SANDAG Board not approve the Final Regional Plan, as revised (pursuant to the CEQA review and public comments). I have previously submitted comments on those documents as part of the CEQA public review process, and am providing additional comments to outline why the Board should not approve the Plan nor certify the EIR.

SANDAG’s decision to produce a Regional Plan that would function as both a Regional Transportation Plan and Regional Comprehensive Plan represented an innovative approach to integrate a comprehensive vision for enhancing the region’s quality of life with a greatly improved transportation system. Unfortunately, the Regional Plan failed to achieve those goals. The Plan fails to provide the regional blueprint for smart growth that reduces greenhouse gas emissions to future levels necessary to meet state targets; it proposes a transportation network system that grossly under-prioritizes and underutilizes transit and active transit; and it fails to achieve the goal of SANDAGs adopted Urban Area Transit Study - to create a world class transportation system. To put the region's transportation system in perspective, based on Federal Transportation Administration/National Transit Board data for 2012, San Diego ranked 33rd in per capita transit ridership in the nation (see: http://fivethirtyeight.com/datalab/how-your-citys-public-transit-stacks-up/). And a recent report on California’s major rail transit stations ranked San Diego’s MTS effectiveness among the lowest, with a C- rating (http://next10.org/transitscorecard); San Diego’s transit approach does not plan for and facilitate transit stations that serve as hubs of thriving, walkable areas that encourage residents and workers alike to ride the train. The Regional Plan does not propose a process and appropriate set of projects that will transform the regional transportation
system from its current low transit ridership rate and effectiveness to a “world class” transit system.

The Regional Plan significantly underplays its comprehensive planning commitment and fails to identify regional opportunities and outline potential actions that would ensure the region’s quality of life: such as substantially increasing the construction of affordable housing; accelerating the pace and number of smart development projects, and identifying how the region could improve its water security (and establish strong water use reduction targets). In its current form, the plan does not provide an appropriate framework upon which the local jurisdictions can develop and implement effective climate action plans – as has been documented in comments and issue papers provided to SANDAG before and after the EIR comment period. Also, the plan fails to substantively control the region’s excessive greenhouse gas emissions, which will contribute to climate change effects that will compromise billions of dollars in existing and planned inland and coastal habitat conservation investments in the region.

In regard to the EIR’s Response to Comments, SANDAG provided less than two weeks for the public to read/assess that 714 page document. The responses identify changes that will be made to the Regional Plan, which will require the public to re-read another several hundred pages to determine whether (or how) those changes address issues raised in the comments. SANDAG has not provided sufficient time for the public to read and evaluate how the Regional Plan has been changed.

The Response to Comments also failed to clarify certain key issues. For example, the response to comments states: “The alternatives (i.e., Alternatives 2 through 5A-D) do not reflect fiscal constraint under current and expected funding forecasts as required by state and federal transportation law because the amount of funds required would exceed the anticipated available revenues...” - which appears to be a critical reason for dismissing the alternatives. But the Response to Comments also states: “…the fact that an alternative is more costly than a proposed project or requires additional revenues does not automatically mean that it is financially infeasible...and the staff reports and Board committee transcripts contain no conclusions finding that the Draft EIR action alternatives would be financially infeasible.” In addition, the Responses state that SANDAG agrees that "With the exception of certain "lock box" projects, projects included in the TransNet Extension Ordinance may be modified by a two-thirds vote of the SANDAG Board of Directors.” If (because) SANDAG can modify TransNet to reprioritize projects and funding, and the need to subsequently additional funds does not disqualify an alternative, then SANDAGs argument for not selecting the Environmentally Superior Alternative is greatly weakened. In light of several independent assessments (e.g., Smart Mobility report submitted by the Cleveland National Forest and the Quickway report) that identify less-expensive ways to
SANDAG Board  
October 6, 2015

implement key transit elements of those alternatives, the Draft EIR incorrectly dismisses the environmentally superior alternative(s) in favor of the Proposed Project.

For these reasons, I respectfully request that the Board postpone approval of the Plan and certification of the EIR to allow all parties to meet and discuss these concerns and make needed changes to the Plan.

Thank you,

[Signature]

Bill Tippets
Dear Chairman Dale and members of the SANDAG Board:

I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region’s most valued natural resources. I hope you will join me in supporting this important plan.

Thank you for your consideration.

Bruce McIntyre
Principal Planner

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942
619.462.1515 tel
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helixepi.com | LinkedIn | Facebook | Twitter

Please consider the environment before printing this email.
To whom it may concern:

I am disgusted at the idea of building even more freeways in San Diego.

I am only 59 years old, but I am old enough to remember how the 805 freeways destroyed the canyons around my home, plowed through our neighborhood, took friends and family members away as their houses were cleared off to make way for it, and helped make the creek we swam and fished in impossible to use anymore.

I am old enough to remember how the Coronado bay bridge took away our ferry, and our bayfront, and created a myriad of health conditions for our people.

I am old enough to remember how walking down 47th street to the dairy was a really nice stroll, past the homes of friends, little stores and the school. Now, the dairy is long gone, and it's extremely dangerous to walk down 47th due to the high speeds people drive getting on and off the 805.

I'm old enough to remember walking down Chollas creek to friends and family houses where the home depot shopping center now stands. There was even an old man who kept reptiles living down there that all the kids were scared of.

Now, there's nothing but yet one more ugly shopping center and so much traffic it's impossible to cross the street in a car, let alone on foot.

Likewise, wherever the 15 crosses the neighborhood it's dangerous. I am old enough to remember how it ripped up our community, paving the way for the ridiculous Costco on Market street as well as the myriad of warehouses and other ugly industrial stuff on that street.

That plaza was a wide open field where kids played, now it's just one more ugly shopping center, where people fly off the freeway, zoom through the neighborhood, in order to get something big at a discount.

Now, I sit and watch as people fly by on all these freeways, oblivious to the communities that they are passing over, or through, driving. I watch as they come roaring off these freeways, ignoring posted speed limits, and continue driving at 50 or more miles an hour down Market, Imperial, Ocean View, Federal, Euclid, and 47th street.

When I am coming down 47th street, I see that hideous on/off ramp coiled up in the sky like an ugly serpent over our neighborhood.

Southeast San Diego used to be a nice family neighborhood where kids could roam, into canyons, along a creek, or up and down streets where people drove reasonably. There were never many parks but the few we had were easy to walk to and people did just that.
We had gardens, small farms, reasonable traffic and clean air.

Now, all that is gone.

Now, there is just a bleak landscape of concrete overpasses and pylons.

Now, people are getting sick from the pollution from all these freeways.

Yet, you people want to put more of them in.

Well, thank you for wanting this.

This only confirms what I have always suspected: there is little or no regard for the health, the environment or the people of southeast San Diego, and has not been since the 1970s, when all of this “redevelopment” began.

So, now you have your fairy tale little city on the bay, with its tourist-friendly façade that ends at highway 5. is it your intention to simply continue building freeways through and over Southeast San Diego until we just get disgusted and move out, or until we just die of lung diseases?

Tell me, is that your agenda? It seems so, because that’s all that will come of more freeways in southeast San Diego – more ugliness, more pollution, more health problems and more destruction of the communities there.

You have no good reason to continue building freeways in Southeast San Diego, that is no reason that is good for us.

But seeing as how none of you live down here, I suppose you will benefit somehow from doing this.

I hope it will be worth the health and homes of our people, but somehow, I doubt it.

Yours truly,

A concerned resident of SE San Diego
Hi,

I recently contacted SANDAG to inquire about future plans for Hwy 56 corridor between Fwy 5 and Fwy 15 since that is my regular commute and not only has it gotten worse recently but seeing the construction of new homes makes it nightmarish to even think how it would be supported on these roads. I was not impressed with the future plan to expand to 6 lanes by the year 2050. If I missed something other than the expansion to 6 lanes to improve the flow of traffic please let me know. I see there are future plans to improve the freeway connectors but that is also far down the road.

I learned about the Rapid bus routes from Ted Williams/Sabre Springs to downtown and I think it was a great idea for commuters to downtown. In fact I think it would be a useful addition to have a Rapid bus route from Ted Williams/Sabre Springs to the Sorrento Valley coaster station or somewhere on Torrey Pines Road for the Hwy 56 commuters and allow a BUS-ONLY use of the shoulder through the heavy traffic sections of Hwy 56 (include one stop in Rancho Penasquitos and one stop in Carmel Valley). I recall seeing a BUS-only shoulder privilege along Hwy 52 that's why I thought of this potential solution.

Thank you,

Kathy Effenberger
Dear Chairman Dale and members of the SANDAG Board:

I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region’s most valued natural resources.

I hope you will join me in supporting this important plan.

Thank you for your consideration.

Peter Callstrom
President & CEO
San Diego Workforce Partnership
Work: (619) 228-2906
www.workforce.org

Join us Thursday, November 5 for the San Diego Workforce Conference: Identifying, Tackling and Closing the Skills Gap. #SDPrioritySectors
Dear Chairman Dale and members of the SANDAG Board:

I urge you to approve San Diego Forward: The Regional Plan. This plan provides a balanced approach to our future growth, investing in significant improvements to the transit network and active transportation, while also ensuring that our road network will function efficiently to support our economy and new transportation technologies. By focusing our future growth in urbanized areas, the plan will support the creation of vibrant, healthy communities, and allow us to preserve our region’s most valued natural resources. I hope you will join me in supporting this important plan.

Thank you for your consideration.

Rex Plummer

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Dear Chairman Dale and Members of the SANDAG Board:

The Associated General Contractors is a strong advocate for investing in the region’s infrastructure, and we support San Diego Forward for its balanced approach. County voters overwhelmingly supported the extension of the ½ cent TransNet sales tax in 2004, where the revenue is dedicated to local streets and roads, highways, transit, and the environment. San Diego Forward continues the march towards an effective and efficient transportation network.

Thank you for your consideration, and we hope you vote “yes” for San Diego Forward.

Sincerely,

Brad Barnum

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"Building Your Quality of Life"
October 7, 2015

SANDAG
Board of Directors, Chair Jack Dale
Transportation Committee, Chair Todd Gloria
Regional Planning Committee, Chair Lesa Heebner
401 B St. Ste. 800
San Diego, CA 92101

RE: Final Comments for SANDAG’s Draft Transit Oriented District Strategy.

Honorable Jack Dale and SANDAG Board and Committee members:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide final comments to SANDAG’s Draft Transit Oriented District Strategy.

1. It is more important than ever for SANDAG to create a meaningful TOD policy.

Local governments in San Diego have made great strides focusing land uses near our region’s transit investments.

However, more work is needed. In 1990, SANDAG projected multi-family housing to make up 52 percent of new development. In 2013, after local governments made different land use decisions, 82 percent of future development is projected to be multi-family. This change demonstrates the vital need for a useful TOD policy.

2. The San Diego region must focus on TOD to remain competitive for Federal and State transportation funding.

As outlined in Circulate San Diego’s report TransNet Today, Federal and state sources of funding are increasingly shifting toward large competitive grant structures. The State Cap-and-Trade funds, and Federal TIGER Grants are two significant examples.

These programs require applicants to show that transportation investments will serve adequate population densities, and will provide sufficient return on investments. For the San Diego region to remain competitive for these types of funding, SANDAG must help localities prepare for TOD.
3. Circulate San Diego appreciates the efforts to create a timeline for implementing elements of a TOD Strategy.

Circulate San Diego wrote earlier to express our concern that the initial draft of SANDAG’s TOD Strategy presented by SANDAG staff at the SANDAG Technical Working Group (TWG) on Thursday July 9, 2015, contained no actionable policy changes.

In response, SANDAG staff prepared an updated document which included “Key Early Actions,” to be completed this year or in upcoming years. With each of the eight recommended actions, parties responsible for taking the lead are listed. These include SANDAG, local jurisdictions, transit agencies, and developers.

Among the eight early action items is the recommendation to develop a TOD readiness tool to “evaluate the readiness of TOD sites and districts.” This has continuously been supported by San Diego planners and developers in order to evaluate areas’ TOD readiness, including market demand, parking ratios, connectivity to transit and other important gauges. Circulate San Diego supports this recommendation as a means to develop a scoring mechanism for a new or modified TOD grant program.

Overall, the Key Early Actions represent an improvement to the original draft strategy. Circulate San Diego is committed to working with SANDAG and other agencies in the San Diego region to help implement these early actions.

4. SANDAG should adopt a Key Early Action to provide a point-of-contact for the Affordable Housing and Sustainable Communities program

SANDAG should supplement the Key Early Actions list for the TOD Strategy to include identification of a point person for the Affordable Housing and Sustainable Communities program.

Recent press coverage from the Voice of San Diego noted that the San Diego region received relatively few dollars from California’s Affordable Housing and Sustainable Communities program, an element of the state’s cap-and-trade funding. While the state program could possibly be updated to favor San Diego, SANDAG can also help projects be competitive.

SANDAG can help address this issue by identifying a point-person that members of the public, project sponsors, and developers of affordable homes can contact if they seek support and technical assistance with making applications to the Affordable Housing and Sustainable Communities program. SANDAG should also include the availability of this point person in their annual work plan, so that adequate staff resources are made available. This will help ensure that San Diego receives its fair share of the state’s program funds.

Adequate support from SANDAG is crucial to the success of applications from the San Diego area. Affordable Housing and Sustainable Communities applications require participation and review by the region’s Metropolitan Planning Organization, and if SANDAG does not provide adequate staffing and information about those resources, then the San Diego region will continue to lose out on its fair share of funding.
5. The TOD Strategy should include more funding for Smart Growth Incentive funds, and a commitment for a study on how to include affordable homes on the land owned by MTS and NCTD.

Missing in the list of Key Early Actions is the expansion of SANDAG’s existing Smart Growth incentives Program. Also missing is funding to help the two local transit agencies, MTS and NCTD to study how to make their lands more easily available for development as affordable homes. As has been recently reported in the press, current policy by the transit agencies result in zero preference for affordable homes, jeopardizing the success of ridership growth and the transit agencies themselves.

These two options would make available more resources for cities to meet their various and diverse smart growth goals, and to help cities achieve the affordable housing goals in their housing elements.

6. The process for adopting a TOD Strategy was flawed, and it should be a lesson for SANDAG moving forward.

While Circulate San Diego does appreciate the commitment by SANDAG to undertake some Key Early Actions, it is important for the SANDAG board to recognize that these “Key Early Actions” do not commit SANDAG to actually changing or implementing policy.

In 2011, SANDAG committed to implement a TOD policy, as a part of the adoption of the 2011 Regional Transportation Plan. Four years later, SANDAG is poised to adopt a document that does not, by its own terms, change or update any element of SANDAG’s policy. It commits only to examine policy changes, pushing the ultimate resolution of a meaningful policy back yet another year.

At best, SANDAG will have spent five years, and $444,809 of the public’s funds, adopting a policy. At worst, in the coming year SANDAG may choose to change no policies, and that $444,809 will have been wasted entirely.

This process for adopting a TOD Strategy undermines SANDAG’s credibility and resulted in a policy document that brings into question SANDAG’s commitment to advancing TOD in a meaningful way.

7. SANDAG’s TOD Strategy can still be improved.

Despite our dissatisfaction with the TOD Strategy, Circulate San Diego would be willing to support the document, as written, if it were paired with a good faith commitment from SANDAG to do two things:

(1) Identify a point-person and staffing resources to help applicants with the Affordable Housing and Sustainable Communities program, and

(2) Fund a study for how MTS and NCTD could make land available for affordable homes.

These commitments would help advocates and the public believe that SANDAG were truly committed to making meaningful policy changes in the course of the next year when it seeks to implement the Strategy’s “Key Early Actions.”
8. Conclusion

We look forward to continuing to work with SANDAG to implement the Key Early Actions identified in the Draft TOD Strategy. Circulate San Diego is committed to the success of sustainable growth for the San Diego region.

Sincerely,

Colin Parent
Policy Counsel, Circulate San Diego
Circulate SD would like to offer these comments on the Regional TOD Strategy to facilitate inclusion of creative placemaking as a component to TOD. Creative placemaking can be seen as an arts-based extension of the work of transportation and urban planning practitioners to develop new techniques for engaging communities, mitigating impacts on affected neighborhoods and expanding community benefits, especially to better reflect and celebrate local culture, heritage and values.

**Summary of Recommendations**

1. Support core areas within transit oriented districts with a compact, and highly interconnected diversity of land uses and activities consistent with the land use targets in SANDAG’s Smart Growth Concept Map, allowing for different housing types at varied densities with a range of price points, and public amenities that celebrate local culture and heritage.

3. **Promote Extend** walking and biking routes within transit oriented districts to bridge the first-last mile gap. Walking and biking can extend the catchment areas around a transit station to provide connections to and from home and work, without the need for a car, and allow more people to take transit. For walking and biking to be viable ways of accessing transit stations, infrastructure improvements may be needed to provide enhanced access to transit that is safe and convenient.

5. Engage a broad range of stakeholders in the planning and design of transit oriented districts and support methods for public involvement, such as the integration of art into the outreach process for creative placemaking. SANDAG can continue its role in presenting examples of successful TODs within and outside the region, including field trips to exemplary districts and the ongoing Smart Growth Outreach program; produce a testimonial on-line video program of people who use transit, live and work in TODs, and are employers in TODs, and consider exploring national models for mediating design and planning conflicts with non-governmental organizations (NGOs) in the region to provide mediation and conflict resolution services.

*(page 52) Strategy #1. Ensure that core areas within transit oriented districts have a compact, diverse, and highly interconnected range of land uses and activities, consistent with targets identified in SANDAG’s Smart Growth Concept Map, allowing for different housing types at varied densities with a range of price points, and public amenities that celebrate local culture and heritage.*

The urban form of transit oriented districts is different in each transit oriented community. A mix of land uses surrounding a transit station can facilitate more housing, access to employment, and neighborhood serving retail to support people living and working nearby. Public open space, civic and institutional uses, and other special use centers also provide opportunities to reflect and celebrate local culture and heritage, establishing strong anchors for transit oriented districts. Parcel configuration, block size, building massing, scale of buildings in relation to the street and people, and the amount of parking relative to active street frontage, and other factors are critical to the success of transit oriented districts. Increasing the number of people that live and work near transit provides more people with convenient access to transit. At the same time, as more people live and work near transit, ridership will increase. Planning policies and regulations that shape urban form, density, and land use, including zoning codes, engineering standards, and design guidelines can have a significant influence on transit oriented districts.

**Strategy #3. Promote Extend** walking and biking routes within transit oriented districts to bridge the first-last mile gap.

Walking and biking can extend the catchment areas around a transit station to provide connections to and from home and work, without the need for a car, and allow more people to take transit. For
walking and biking to be viable ways of accessing transit stations, infrastructure improvements may be needed to provide enhanced access to transit that is safe and convenient.

**Actions to Continue:**

- **Supporting the Implementation of** the Regional Complete Streets Policy as part of the development of all SANDAG transportation infrastructure projects. (SANDAG)

**Actions to Consider:**

- Adapting thresholds for significance established for compliance with CEQA to include reflect walking and biking access; and use exemptions and streamlining to implement infrastructure improvements for walking and biking.

**Strategy #5.** Develop tools, techniques, and resources to engage a broad range of stakeholders and perspectives in the design and planning of transit oriented districts. No two transit oriented districts in the San Diego region are the same, and each one will continue to evolve into a distinct place based on the cultural history and heritage. Public participation is critical for the success of transit oriented districts and can help ensure that opportunities and constraints within each transit oriented district are reflected in plans, policies, and regulations that apply to development projects in transit oriented districts. Public participation can help ensure that urban form, density, and height are compatible with the surrounding community and its cultural heritage, while still allowing incremental and context sensitive growth.

**Actions to Consider:**

- Seeking funding to develop an outreach and information program that could include videos, social media, internet tools, traditional public meetings, and other platforms such as creative placemaking to showcase the benefits of transit oriented districts highlighting places near transit, testimonials of users of transit, examples of integrated arts components, people who live and work in transit oriented districts, and major employers located in transit oriented districts. (SANDAG, Local Jurisdictions, Transit Agencies)

**Strategy #7.** Explore opportunities to streamline CEQA guidance and processes.

**Actions to Consider:**

- **NEW:** Create Regional Traffic Impact Study Guidelines to offer guidance to cities on legislative updates related to adapting thresholds for significance and calculating for Vehicle Miles Travelled. (SANDAG)

**Strategy #8.** Update transportation impact methodology.

**Actions to Consider:**

- Updating local CEQA significance criteria with the focus toward VMT-based thresholds and inclusion of walking and bicycling mitigation factors. (Local Jurisdictions)

**Strategy #9.** Paying for community facilities and infrastructure

**Actions to Consider:**

- Developing facilities financing plans that identify sources of funding for improving, or increasing the capacity of, infrastructure, parks and open space, necessary services, and other public realm improvements such as creative placemaking within transit oriented districts. (Local Jurisdictions)