

Transportation Solutions Defense and Education Fund

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March 5, 2022
By email to:
BoardOfSuper
visors@santa
cruzcounty.us

Manu Koenig, Chair
Santa Cruz County Board of Supervisors
701 Ocean Street
Santa Cruz, CA 95060

Re: Election Code 9111 Report Regarding
the Santa Cruz County Greenway Initiative

Dear Chair Koenig,

TRANSDEF, the Transportation Solutions Defense and Education Fund, is an environmental non-profit focused on reducing the growth in Vehicle Miles Travelled (VMT), as the strategy needed to counter the dual challenges of rising GHG emissions from transportation and congested highways. For the past 26 years, we have advocated for public transit and the land use patterns that support transit.

We have reviewed the Election Code 9111 Report Regarding the Santa Cruz County Greenway Initiative (the Report), and find it inadequate in evaluating the impacts of the Greenway Initiative (the Initiative) on the policies of the Santa Cruz County General Plan (the Plan) and the Sustainable Santa Cruz County Plan. **In short, we find the Report failed to identify how the Initiative would interfere with the County's efforts to address its highway congestion and housing shortage.** In particular, it is shocking that the Report failed to evaluate a transportation initiative's consistency with the Plan's Circulation Element. We request you ask Staff to revise the report to specifically address the following findings:

Consistency with the General Plan

1. The Report fails to acknowledge that the Initiative is fundamentally inconsistent with the General Plan Circulation Element. "The Transportation System Management (TSM) section is the cornerstone of the Circulation Element and Transportation Planning in general." (p. 3-3 of the Plan.)

The Transportation System Management section states:

It is the goal of the County to reduce automobile trips and congestion by improving alternative transportation modes, developing effective travel demand management strategies and whenever possible improving the efficiency rather than increasing the size of the existing road system. (p. 3-5 of the Plan.)

The Initiative would block the only non-highway high-capacity transit mode available to the County "to reduce automobile trips and congestion." It would also block commuter rail's ability to reduce the impact of weekend beach traffic.

2. The Transportation System Goals include:

- Mode Choice: Provide the public with choice in transportation modes on a well-integrated system.
- Limit Increase in Auto Use: Limit the increase in auto usage to minimize adverse impacts. Increase transit ridership, carpooling, vanpooling, walking and bicycling, etc. (p. 3-4 of the Plan.)

The Initiative would reduce mode choice and force more Santa Cruz residents to travel in automobiles. TRANSDEF is unaware of any County documents that demonstrate that the proposed Greenway would attract user volumes equivalent to projected commuter rail ridership, as an alternative to driving.

3. The Report should have indicated that the Initiative will interfere with Plan Objective 3.1: "To limit the increase in Vehicle Miles Traveled (VMT) to achieve as a minimum, compliance with the current Air Quality Management Plan." The Initiative would eliminate the County's only available non-highway high-capacity transit mode option.

4. The Report's evaluation of "Limitations on County Actions Related to Housing" was superficial and conclusory. It focused on land use law, rather than on the fundamental connection between transportation and land use. Higher land use densities are practical if served by rail, because less physical space is taken up by parking and the economic burden of providing parking is lessened.

Envision Utah was a community consensus-building project in a fast-growing area of a conservative state, which had severe geographic constraints preventing further sprawl. The community came to agreement on growing up, not out. Higher density housing would be built, served by a rail network. "Since 2010, over 40 percent of new multifamily housing units have been built within walking distance of a rail station. That means reduced household costs, air emissions, traffic, infrastructure costs, and land consumption." <https://envisionutah.org/about>

The Report fails to discuss the impact of the Initiative on the County's potential for transit-oriented development, a fundamental strategy for affordable housing, stating only that:

To the extent construction of the Greenway would reduce the opportunity for a development to be located in proximity to a rail stop, it would reduce the ability of developments to make use of this particular aspect of permit streamlining and density bonus law. (p. 8 of the Report.)

5. The discussion in Point #4 strongly suggests that this Report conclusion is incorrect:

There is no indication that the General Plan amendments proposed in the Greenway Initiative would decrease capacity for housing or housing opportunities, beyond the factors discussed above under Question 2. (p. 9 of the Report.)

6. The Report should have indicated that the Initiative would interfere with Plan Policy 3.1.1: "Land Use Patterns (Jobs/Housing Balance):

Encourage concentrated commercial centers, mixed residential and commercial uses, and overall land use patterns which reduce urban sprawl and encourage the reduction of vehicle miles traveled per person." (p. 3-5 of the Plan.)

The Initiative would prevent the implementation of this Policy by blocking commuter rail.

7. The Report's conclusion on business retention appears to be deliberately misleading:

County staff is not aware of any detailed analysis that assesses how an interim trail in the Corridor, as opposed to a combination trail with rail facility, would impact the community's ability to retain business and employment should the SCCRTC choose one over the other anytime in the near future. (p. 9 of the Report, emphasis added.)

Common sense (rather than a detailed analysis) is all that is needed to know that a county with a constantly congested main artery is not attractive to business. It should be obvious that a county investing in commuter rail will be seen by business as more attractive than one investing in a trail.

8. The Report's conclusion regarding the availability of freight service on business retention is similarly misleading:

Freight service is currently not available on the section of the corridor that is the subject of the Greenway Initiative and there is a lack of identified funding to make improvements

and repairs needed to support such service in the future. The availability of freight service is therefore not considered a factor in the community's ability to attract and retain business and employment. (p. 10 of the Report, emphasis added.)

The temporary unavailability of freight service is not a legitimate reason to not consider the value of rail freight to business. Again, common sense indicates that some businesses would find the availability of freight service attractive.

9. The Report discusses trail and trail with rail as mere amenities, thereby entirely failing to acknowledge the significance of commuter rail to the mobility of the County's residents, who otherwise are stuck in gridlock.

Many commercial, residential, and mixed-use developments that might be built on currently vacant parcels would realize a general benefit from the amenity of either an interim trail or a trail with rail configuration that could serve employees, patrons, and residents. Determining which of these two uses of the corridor would yield more potential benefit is speculative... (p. 10 of the Report, emphasis added.)

As discussed above, commuter rail would be much more supportive of development and affordable housing. That is not a speculation.

10. The Report's finding on congestion is accurate, but not consistent with the rest of the Report:

It is likely that a trail with rail configuration would have additional benefits related to the reduction of traffic congestion, as travelers would have an additional mode of transportation (rail). (p. 10 of the Report.)

11. The Report is in error when it states "Although passenger rail transit is not funded or planned for the SCBRL at this time, it is possible that the construction of an interim trail on the railroad track alignment would postpone implementation of passenger rail transit on the SCBRL." (p. 7 of the Report.) Passenger rail is planned, and it is certain that an interim trail would postpone implementation of passenger rail.

Consistency with the Sustainable Santa Cruz County Plan

TRANSDEF was unable to locate a non-password-protected copy of this Plan. This odd practice of securing a governmentally adopted Plan that should have been publicly available prevented us from analyzing the Initiative's consistency with it.

Consistency with the Draft Update to the General Plan

The Report made no attempt to evaluate the consistency of the Initiative with the draft Access + Mobility Element (the Element) of the Draft General Plan Update. It is clear that high-capacity transit is needed to meet the dual challenges of highway congestion

and excessive GHG emissions identified in the Element. It should be equally clear that the Initiative's emphasis on personal transport is quantitatively inadequate to face these challenges. VMT reduction and the transportation-land use connection are stressed in this Element even more strongly than in the current Plan:

There is also an increasing awareness of global climate change and how human activity is contributing to greenhouse gas emissions. Vehicle emissions are one of the largest contributors to greenhouse gases. Thus, reducing vehicle miles traveled (VMT) is an important component of reducing greenhouse gas emissions. Because of the strong link between land use decisions and VMT, local governments can play a leading role in reducing emissions by encouraging walkable, compact, and infill development, and promoting alternative modes of transportation through the provision of appropriate transportation infrastructure. (p. 3-3 of A+M Element, emphasis added.)

The County of Santa Cruz experiences severe congestion, with long peak periods of travel and high amounts of delay. The direction of commute traffic reflects the jobs-housing imbalance that exists in the County, whereas the level of congestion demonstrates a shortage of housing supply, lack of roadway connectivity and capacity, limited transportation alternatives, and a shortage of jobs. ... This Access + Mobility Element reflects this re-orientation toward the land use-transportation connection and contains many policies to address that nexus. (p. 3-5 of A+M Element, emphasis added.)

Goal AM-1.0: Manage Travel Demand + Reduce Greenhouse Gases: Reduce automobile trips and VMT by increasing the use of non-drive alone transportation modes through an effective transportation demand management (TDM) program and land use planning that reduces the distance people need to travel for jobs, goods and services. (p. 3-26 of A+M Element, emphasis added.)

Objective AM-1.1: Vehicle Miles Traveled + Greenhouse Gas Emissions: To respond to climate change by reducing greenhouse gases in compliance with regional and state goals by reducing per capita VMT and encouraging clean air vehicle usage. (*Id.*)

Strategy AM-1.1f: Preserve and protect railroad right-of-way by ensuring new development adjacent to rail lines does not encroach on the corridor, and where possible, improves access to the corridor. (p. 3-30 of A+M Element.)

Policy AM-3.1.1: High Quality Transit Service. Work with Metro and SCCRTC to support the implementation of high frequency and high-quality transit services that connect disadvantaged communities to key destinations including but not limited to the SR 1 bus on shoulder project and high-quality transit in the Santa Cruz Branch Line corridor. (p. 3-39 of A+M Element, emphasis added.)

Policy AM-6.2.3: Trip Generation Reductions. Allow for the reduction of trip generation rates for the purposes of VMT analysis if proposed development can demonstrate lower than average trip rates through land use siting close to high quality transit... (p. 3-58 of A+M Element, emphasis added.)

Policy AM-7.1.2: Rail Freight. Support the use of existing rail lines for freight and encourage commercial, industrial, and agricultural businesses to use rail freight.

Points #1 - #4 above apply even more to the Element than to the current Plan. While the Initiative purports to offer recreational and commuting opportunities, there is no basis upon which to conclude that the proposed trail would meet the County's needs, as identified in the Element.

Misleading Language in the Initiative Itself

Finally, the Report fails to call out the Initiative's misleading use of the word "interim." In the world of rail trails, it is extremely rare for a railbanked line to ever be put back into rail use. Once a line is railbanked, the national experience is that, for all practical purposes, it is forever lost to rail. While the Report should have clarified that fact for voters, all it says is "...there is no time frame given or definition of "interim" within the Initiative on when that future system might occur or how long the "interim" use would remain in place." (p. 5 of the Report.)

TRANSDEF requests the Board to have staff revise the Report, so as to present the voters with an accurate evaluation of the impacts of the Initiative, including its inconsistency with existing plans. Thank you for considering these comments.

Sincerely,

/s/ DAVID SCHONBRUNN

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President
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