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December 10, 2025

Chair Lesa Heebner
Board of Directors
San Diego Association of Governments
1011 Union St
San Diego, CA 92101

SUBJECT: Circulate San Diego comments on the 2025 Regional Transportation Plan

Dear Chair Heebner and the SANDAG Board of Directors:

On behalf of Circulate San Diego, whose mission is to promote excellent mobility choices and vibrant, healthy neighborhoods, I am writing to comment on the San Diego Association of Government's (SANDAG) 2025 Regional Transportation Plan (RTP). While not perfect, Circulate applauds SANDAG for improving the soundness of the plan's revenue projections and project prioritizations compared to the 2021 RTP.

1. The Regional Transportation Plan should set a bold yet pragmatic vision for our region's future.

As you are aware, the RTP serves as a long-range planning document to guide the region's transportation infrastructure investments. While these plans are forward looking in nature and are not expected to be implemented exactly as written, the RTP serves as a critical framework for the future of our region's mobility. Plans that are not based on sound revenue projections will reflect unrealistic expenditures and project prioritizations, and ultimately serve as a weak framework for our region's future.

2. The unrealistic revenue assumptions in the 2021 RTP limited the plan's utility.

In 2022, Circulate published a report analyzing SANDAG's Draft 2021 Regional Plan. The report ultimately found that the plan relied on large sums of highly speculative revenues, which presented a significant risk to SANDAG's ability deliver the infrastructure investments outlined in the plan.¹ For example, the 2021 plan assumed billions in revenue from state and local Road Usage Charges (RUC) to be implemented in 2030. Polling on RUC shows that the public would not support implementing these sorts of fees.² SANDAG also does not have the legal authority to enact such measure.

¹ Jesse O'Sullivan, SANDAG Reboot: A Summary of What is Actually in SANDAG's 2021 Regional Plan, Circulate San Diego (November 2021) available at https://d3n8a8pro7vhmx.cloudfront.net/circulatesd/pages/2850/attachments/original/1636419173/SANDAG_Reboot_Report_2021_FINAL.pdf?1636419173, last visited December 9, 2025.

² Clare Nelson, National mileage fee survey [Dataset]. National Center for Sustainable Transportation, UC Davis (2024), available at <https://doi.org/10.5061/dryad.rv15dv4f0>.

Circulate has consistently encouraged SANDAG to utilize more realistic revenue projections, expenditures, and further prioritize near-term transit frequency in future iterations.

3. Unrealistic revenue projections are harmful to transit and climate goals.

In California, Senate Bill 375 requires that RTPs propose a transportation network that meets greenhouse gas goals. Transit projects are often key components to offsetting the greenhouse gas emissions from highways and other forms of car travel.

There is an understandable temptation in transportation planning to assume excessive revenues, so that planners can design a superior transit plan. When RTPs assume unrealistic revenues, they can also assume unrealistic transit networks. These unrealistic transit networks claim on paper to offset larger amounts of car travel and freeway infrastructure. In practice, those unrealistic transit projects serve as an accounting trick, and actually provide cover for RTPs to plan for more car infrastructure. This can allow an RTP to plan for more car-oriented infrastructure, while claiming offsets from unrealistic transit projects that will not actually occur.

Using more realistic revenue projections means that SANDAG must limit its investments in car infrastructure, and simultaneously use more realistic transit projects to meet their greenhouse gas goals. The more realistic transit projects, like bus rapid transit and frequency enhancements for existing routes, are far more likely to be implemented with the resources actually available to SANDAG.

4. The revenue projections in the 2025 RTP are more realistic, to a point.

The 2025 RTP improves upon the revenue assumptions made in the 2021 plan. The 2025 plan no longer accounts for \$19.2 billion in speculative revenue from state and local road usage fees, nor does it contemplate \$27.6 billion revenue from three separate near-term ballot measures.³ This is a positive shift.

With that said, the 2025 plan includes assumptions of high federal discretionary awards, which are almost certainly unrealistic.⁴ Similarly, the plan relies on at least \$14.77 billion in revenue sources that currently do not exist and for which SANDAG does not currently appear to have the authority to establish. These unrealistic revenue sources include:

- \$4.04 billion in new future federal revenues streams,
- \$5.70 billion in new future state revenue streams,
- \$2.31 billion in delivery fee revenues, and

³ San Diego Association of Governments, 2021 Regional Plan Appendix V: Funding and Revenues (December 2021), available at <https://www.sandag.org/regional-plan/2021-regional-plan/-/media/26DD3451989C43D58CF57B6835312F69.ashx>, last visited December 9, 2025.

⁴ The 2025 plan assumes \$6.27 billion in federal discretionary based on recent award history. Recent award history will not translate to future awards as current federal discretionary funding authorization levels lapse at the end of federal fiscal year 2026. Additionally, the awards this estimation is based on were made by an Administration with vastly different transportation infrastructure priorities than the current Administration.

- \$2.72 billion in ride hailing company service fees.⁵

5. The proposed expenditures in 2025 plan better align with mobility needs.

SANDAG's 2021 plan suggested that significant funding would be dedicated for high-cost capital projects including a very expensive version of the Purple Line, infrastructure-heavy managed lane connectors, and a Central Mobility Hub. While some of these projects may have had merit, they were never going to be built as-planned, because the funding that was assumed for them was unrealistic.

These expenditures are prudently scaled back in the 2025 plan. Circulate is supportive of trolley expansions, bus-priority freeway networks, and improving transit connections to the airport. Nevertheless, the scale of these projects must align with realistic revenues and must not cannibalize funding for near-term frequency enhancements. Today's transit needs must be addressed to ensure the ridership and revenues for tomorrow's capital investments. The 2025 plan better embodies this principle.

6. Transit frequency must be prioritized in implementation.

Circulate has long advocated for SANDAG to prioritize transit frequency enhancements in its plans.⁶ With sufficient frequency, riders are able to confidently rely on transit without needing to plan their day around if and when the bus arrives. The 2025 plan proposes adding additional rapid bus routes by 2035. Circulate strongly supports the new rapid routes, and encourages SANDAG to prioritize implementing rapid upgrades sooner if possible. As new rapid routes are implemented, SANDAG must ensure that critical local bus service is maintained.

Sincerely,



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⁵ San Diego Association of Governments, 2025 Regional Plan Appendix I: Funding and Revenues (December 2025), available at <https://www.sandag.org/regional-plan/-/media/D12CBDF4A6214A24AA85250D25E2C458.ashx>, last visited December 9, 2025.

⁶ Maya Rosas, San Diego Forward: The 2021 Regional Plan's Five Big Moves, Circulate San Diego (July 11, 2019), available at: <https://www.circulatesd.org/letter-san-diego-forward-the-2021-regional-plan-s-five-big-moves>, last visited December 9, 2025.