



H A Y W A R D A R E A P L A N N I N G A S S O C I A T I O N

February 3, 2009

To Ashley Nguyen
Metropolitan Transportation Commission
Oakland CA

From Sherman Lewis, President Hayward Area Planning Association

Subject: Comments on RTP and its DEIR

The RTP makes great progress in analyzing land use and pricing and a weak job of implementation. MTC needs to have an Economics Program as proposed by the Advisory Council, or support creation of such through the JPC.

MTC has written a very useful letter to CARB on parking and subsidized parking structures, but needs to create policy in the RTP to fund projects only in jurisdictions that have a policy against subsidizing parking structures. MTC needs to write guidance for localities on how to attract people downtown without parking structures.

The regional HOT network program should help fund transit in each HOT corridor from day 1.

The HOT program should include provisions to reduce the impact on low-income commuters.

The HOT program should include studying pricing on existing mixed flow lanes, and freeways should not be expanded. A FastPass system covering the whole regional freeway system on HOV ramps, bridges, and mainline gateways would work, and work much better than HOV or HOT lanes. According to the I-10 research, maximum throughput occurs at 65 mph in the left lane, 60 mph in the middle lane, and 55 mph in the right lane.

We support the proposed doubling of funding for the Transportation for Livable Communities (TLC) program, new funding for Safe Routes to Transit and Safe Routes to Schools, a Transit Priority Program, and a stronger transportation climate program.

The EIR should include an alternative, already studied and made public in Challenges and Choices, October 2007, that maximizes greenhouse gas benefits with combined transit, land use, and pricing policies.

MTC should start work this year with county and local transportation and land use agencies to reduce greenhouse gas emissions and to comply with SB 375 and include this commitment in the RTP and its EIR.

The No Project Alternative includes, incorrectly, the "committed projects," which prevents evaluation of a true No-project Alternative. The No-project Alternative should have no investments of RTP funds. Travel Forecasts Data Summary, p. 8: "We are showing a 3.1 percent increase in regional lane miles between the 2006 base year and the 2035 RTP no-project alternative. ... The RTP project alternative add 2.3 percent additional lane miles relative to the no-project alternative." A project may be accepted into no-project if bids have been received. However, if more new highway construction is the No-project Alternative than in the Project Alternative, it shows that the former is invalid. >From its founding, MTC has talked transit and built highways. MTC emphasizes the uncommitted funds, trying to hide highway projects by pretending the funding is "committed" when it is not. MTC emphasizes the total spending in the RTP, not the flexible funds, both "committed" and uncommitted, most of which go into highways.

MTC also supports politically expedient rail transit projects that cost billions more than comparable service on conventional rail. MTC supported BART to Millbrae, with expensive tunneling and a gold-plated parking structure on the long way around San Bruno Mountain instead of the cost-effective Cal-BART proposal. MTC supports BART to Warm Springs and San Jose based on crudely hyped ridership projections that will never happen, at the cost of other Santa Clara sales tax projects promised and not being built, when Caltrain could serve the Fremont gap sooner, cheaper, and better.

--

Sherman Lewis, President, Hayward Area Planning Association
Professor Emeritus, California State University, Hayward
2787 Hillcrest Ave., Hayward CA 94542
510-538-3692; sherman@quarryvillage.org; www.quarryvillage.org