

# Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

May 15, 2017  
By E-Mail to  
eircomments  
@mtc.ca.gov

Jake Mackenzie, Chair  
Metropolitan Transportation Commission  
375 Beale Street, Suite 800  
San Francisco, CA 94105

Re: 2017 RTP Merits Comments

Dear Mr. Mackenzie:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating the regional planning of transportation, land use and air quality. Our focus in recent years has been on reducing the impacts of transportation on climate change. This marks the seventh draft Regional Transportation Plan ("proposed Plan") we have commented on. This letter is intended for policymakers. A detailed DEIR comment letter will be submitted later in the comment period.

Our RTP comments have been consistent since 1994: MTC's facilitation of sprawl and solo drivers is a failed strategy for a metropolitan region. MTC has consistently ignored our advice, the consequence of which is demonstrated in the analysis of Impact 2.1-3, which shows a 150% increase in PM peak period LOS F congestion in San Francisco:

These roadway traffic service levels reflect the impact of total VMT growth exceeding the growth of roadway capacity on a county level.

This finding substantiates TRANSDEF's long-standing assertion that the regional commute cannot be feasibly accommodated by a network based on individual transport. The sheer number of person-trips clustered into the peak period commute demands a mass transportation approach.

TRANSDEF asserts that this finding should have resulted in a reevaluation of MTC's strategy, and a thorough consideration of alternative approaches. Not only did that reevaluation not happen, an alternative proposed by TRANSDEF to stimulate that reevaluation was firmly rejected. This rejection (if confirmed in the FEIR) demonstrates

**a clear decision by the Commission to prioritize the preservation of the status quo over the performance of the regional network.** Not placing the public interest foremost in its priorities **should disqualify MTC from being allowed to control regional transportation financial resources.**

#### The Plan Fails to Influence Mode Choice

From TRANSDEF's climate-focused perspective, the central problem with the draft RTP is that MTC has failed to influence local land use decisions. (See Mitigation section, below). The resulting plan, based on local and county plans, shows a VMT increase of 21%, indicating that the region is continuing to sprawl. In support of this sprawl (defined as auto-dependence), MTC proposes to invest a large share of its RTP resources in GHG-increasing highway expansion projects and in transit megaprojects that do not produce a cost-effective increase in transit ridership. Future residents are still driving alone because of MTC's dual failures to curtail sprawl and to plan and fund adequate transit. These are the primary reasons the RTP fails to reduce regional GHG emissions.

TRANSDEF's DEIR comment letter identifies the DEIR tables that confirm that drive-alone mode share and GHG emissions per capita remain nearly static between the years 2020 and 2040. The absence of a cumulative progressive shift to lower emissions is inescapable evidence of the proposed Plan's failure to influence travel mode choice, arguably the most important factor in evaluating the effectiveness of an RTP. Because the RTP fails to shift any of the commute to transit, it fails to stop the region's steady march towards gridlock. Delay in 2040 is projected to increase by 44%.

#### Incorrect Analyses Lead to Flawed Decisions

TRANSDEF's critique of the 2013 RTP EIR served as the predicate for the GHG analysis causes of action in the Sierra Club/CBE challenge. We therefore recommend that the Commission direct staff to respond carefully to TRANSDEF's 2017 RTP DEIR comments. In those comments, we assert that, when correctly assessed, the DEIR demonstrates that **regional GHG emissions increase as a result of the proposed Plan**. TRANSDEF asserts, therefore, that the proposed Plan fails to comply with the legislative intent of SB 375, as expressed in these legislative findings:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve **significant additional** greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)

It should be obvious that **increases in regional emissions threaten the state's ability to achieve its climate targets**. Did policymakers knowingly approve the release of an

RTP showing a significant increase in future GHG emissions? MTC staff has publicly stated that:

Most of the Plan's GHG emission reductions will come from MTC's Climate Initiatives Program. **Transportation and land use strategies are not enough to meet the climate goals of SB375**, requiring the following additional programs: Transportation Demand Management, Alternative Fuel/Vehicle Strategies, and Car Sharing and Vanpool Incentives. (Slide 19, <http://mtc.ca.gov/sites/default/files/Final Preferred Scenario POWERPOINT.pdf>, emphasis added.)

Were policymakers apprised of the full range of options available to MTC to achieve GHG emissions reductions from transportation and land use? This information was withheld from Commissioners. Staff's locked-in strategy resulted in the rejection of alternatives in the scoping of the 2013 and 2017 RTP DEIRs that could achieve the region's goals or the state's goals regarding the reduction of GHGs. Instead of the difficult changes called for by SB 375, staff instead relied on Climate Initiatives.

#### Climate Initiatives Program

When considered from a per capita standpoint, **a mind-boggling 61.8%** of the claimed emissions reductions between 2005 and 2035 **come from Climate Initiatives. The proposed Plan fails to meet the SB 375 target for 2035 without these Initiatives.**

The Commission did not fund the climate initiatives adopted in the 2013 RTP. We were unable to locate any post-RTP-adoption funding for these programs in the TIP. As a result, TRANSDEF is very concerned about the legitimacy of these claimed emissions reductions, and therefore, the legitimacy of claimed compliance with SB 375.

#### A Different Approach

With the DEIR showing the commute getting seriously worse, it is critical for MTC to change strategies. Supporting the regional commute with convenient transit will require different transportation investments than the ones included in the proposed Plan. Not only does the RTP need to focus primarily on transit, it needs to put a stop to land use practices that create dwellings and jobs accessible only by automobile (i.e., sprawl): the new regional trips resulting from sprawl only exacerbate the problem. TRANSDEF asserts that land use and transportation strategies can produce the desired GHG reductions, if they are applied regionwide.

A significant part of the sprawl problem is the direct result of a 2014 vote by the Commission to adopt the draft Countywide Transportation Plan Guidelines. A last-minute amendment to Resolution 2120, Revised, made the Guidelines voluntary. Predictably, the region's counties ignored them completely, resulting in an RTP with excessive VMT growth. Were policymakers made aware of the nearly inevitable consequences of the amendment? Did they knowingly flout SB 375?

Making compliance with those Guidelines mandatory for submission of a county's project list into the RTP would greatly assist in the achievement of regional goals. TRANSDEF's DEIR comment letter explains how SB 375 authorizes the imposition of regional responsibilities on local governments, an otherwise impermissible incursion into their autonomy.

The other major problem with the proposed Plan is its discretionary funding. The largest financial commitments are for projects that either **directly increase VMT**, or fail to cost-effectively reduce VMT. If these projects were all deleted from the RTP, there would be plenty of resources to impact residents' mode choice decisions, both by providing cost-effective convenient transit service, and by keeping fares low. Four of the top ten RTP investments are for projects that meet these criteria for cancellation: Regional Express Lanes; BART to Silicon Valley – Phase 2; Caltrain Modernization – Phase 1; and Clipper. Investing their \$15.6 billion price tag in alternative projects could do wonders for building a convenient comprehensive regional transit network.

Please note that Resolution 3434 was premised back in 2001 on a commitment by VTA to maintain a 600 fleet/500 peak target minimum bus service levels at the time that the BART to San Jose extension commences revenue service. VTA very recently cut back bus service, suggesting it will not be honoring this commitment later this year.

#### TRANSDEF RTP Alternative

TRANSDEF's Scoping Comments called for the study of an EIR Alternative that would attempt to reduce VMT and GHG growth by shifting funding away from projects that either directly increase VMT, or fail to cost-effectively reduce VMT. TRANSDEF previously authored the [TRANSDEF Smart Growth Alternative](#) for the 2005 RTP FEIR. That volunteer alternative was able to reduce the growth in VMT by 10% compared to the adopted plan. How much better would the results be if the same principles were utilized by MTC's transportation professionals? TRANSDEF's proposal that an updated Smart Growth Alternative be studied in the EIR was flatly rejected.

#### Conclusion

We stress that the problem in achieving substantial long-term GHG reductions in the transportation sector is primarily a political problem, and not a technical one. Change on this scale has been compared to turning a battleship. It will require the creation of a strong political consensus around the need for comprehensive solutions. How will the public ever get engaged if it is never informed about the crisis and asked to join in an effort to slow climate change? The proposed Plan does nothing to either inform the public about the scale of change actually needed, or plan to implement it.

The proposed Plan functions poorly in the future, in relation to any forward-thinking set of measures. Its DEIR actively hides MTC's failure to undertake its SB 375 responsibilities to reduce GHG emissions from cars and light trucks. TRANSDEF calls on MTC to study the TRANSDEF Alternative, fix the impact analyses, implement feasible

mitigations, and recirculate the DEIR and proposed Plan. We renew our offer to assist MTC in formulating a forward-looking RTP.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President