Transportation Solutions Defense and Education Fund

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June 15, 2016
By E-Mail to:
eircomments
@mtc.ca.gov

Steve Heminger
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: 2017 RTP/SCS Scoping Comments

Dear Mr. Heminger:

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 Regional Transportation Plan process in which we have participated.

These comments are intended to test a coherent set of the latest policies from Caltrans:

> California's goal for all sectors and economic activities is to reduce GHG emissions while we go about our daily business. For transportation, this means making significant changes in how we travel. We must provide access and mobility for people and businesses, yet reduce our single occupant miles travelled and advance cleaner vehicles and fuels. (California Transportation Plan 2040, Final Draft version ("CTP"), p. 87.)

TRANSDEF recognizes that the environmental review process was set into law for the purpose of improving projects. It was not intended to merely generate stacks of unread paper documenting foregone conclusions. As a result, we believe that the appropriate testing of different conceptual approaches to the solution of regional problems is both warranted and desirable.

An ongoing controversy exists as to the long-held MTC conclusion that "transportation investments do not move the needle," referring to the ability of an RTP to produce significant shifts in travel patterns, mode split and GHG emissions. TRANSDEF, on the

other hand, strongly believes that well-designed cost-effective projects, selected to advance specific strategic objectives, will produce better outcomes.

This was demonstrated in the 2005 RTP FEIR, in which the TRANSDEF Smart Growth Alternative outperformed[1] the adopted staff alternative. We believe that MTC's practice of selecting politically popular costly transportation projects for the RTP over better-performing ones is the core reason that total transit ridership in the Bay Area is now lower[2] than it was in 1982[3]--and far lower per capita, due to population growth.

To resolve this important policy question, we propose that MTC/ABAG study the following transportation sub-alternatives, based on the land use assumptions of the Big Cities Scenario, as defined by MTC/ABAG staff. We believe that comparing the outcomes of these sub-alternatives with the outcomes of the Big Cities Scenario will provide MTC/ABAG with invaluable data for policy making. In addition, utilizing inputs from CTP 2040 Scenario 2 will perform a comparison between MTC's model and the State's.

Cost-Effectiveness Sub-Alternative

This Alternative is guided by the chief conclusion of our strategic analysis: The Bay Area has far too many personal vehicles for the Single Occupant Vehicle (SOV) mode to be viable for commuting. We recognize that when a large percentage of the population insists on commuting at the same time, a mass transportation solution, rather than reliance on individual transportation, is required. The Alternative does not waste funds attempting the hopeless task of maintaining SOV mobility. It builds no additional SOV capacity.

Consistent with CTP 2040 Scenario 2, this Alternative tests building convenient transit options, hopefully resulting in a significant drop in the SOV mode share and GHG emissions.

This Alternative uses the transportation project definitions[4] of the 2005 TRANSDEF Smart Growth Alternative.[5] The input files of transit headways that were developed for the 2005 EIR should still be stored at MTC. If not, we can provide them to avoid unnecessary duplication of work.

Obviously some things have changed since we created the Alternative back in 2004. SMART and eBART will soon be operational, so their trips need to be input to the model. BART built the central section of our Delta DMU proposal, so that project should

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[1] http://transdef.org/RTP/RTP_Analysis_assets/Technical Report.pdf

[2] See graph at http://transdef.org/Bay_Area/Bay_Area.html

[3] TRANSDEF had sought to enforce TCM 2, MTC's commitment in the State Implementation air quality Plan to increase regional transit ridership in 1987 by 15% over the baseline year of 1982.

[4] http://mtcwatch.com/2004_RAFT_RTP/2004_RTP_Main.html

[5] http://transdef.org/RTP/RTP.html

be omitted. Please contact us to resolve questions about handling other changes to the regional network.

Altamont Corridor Rail Project: Since we designed the Bay Area High-Speed Rail Service in 2004, the Altamont Corridor Rail Project was developed as a collaboration of ACE and CHSRA, among others. For our Alternative, we have replaced the Bay Area High-Speed Rail Service with the Altamont Corridor Rail Project, as the latter is better defined. An EIR for the project was scoped in 2009 but never completed. The 2011 Preliminary Alternatives Analysis[6] has a list of preferred alternatives on p. 5-1. (Some of these alternatives bear a striking similarity to the Altamont HSR alternative[7] TRANSDEF proposed to CHSRA in 2010.) For this project, we propose the following specifications/ enhancements:

- 20 minute headways for the peak period and 30 minute off-peak.
- Service to Downtown San Francisco via the Dumbarton Rail Bridge and DTX.
- A new ROW from Stockton to Sacramento, allowing one-seat rides from Sacramento to San Jose and San Francisco.
- San Joaquin trains westbound from Stockton are rerouted to San Jose via this new line, greatly increasing the ridership.
- Travel time from Stockton to San Jose is 1:00.
- California HSR is assumed to not be functional during the Plan period.

Altamont Funding: This Alternative does not provide any regional contribution to BART extensions, making funding available for this project. As the transit solution for one of the top ten congested highway corridors in the region, this project should compete very well for cap and trade funding. For RTP purposes, assume a project cost of $4 billion.

Highway Funding: Please note that, in striving for policy coherence, this Alternative provides no funding for so-called Express lanes or other highway capacity-increasing projects. Instead, like CTP 2040 Scenario 2, HOV networks are made continuous by converting mixed-flow lanes. (Appendix 7, p. 11.) Highway construction funding is used to meet the needs of SHOPP, and highly visible enforcement of HOV lane occupancy limits. HOV lanes will be presumed to operate at at least FHWA minimum speeds. Available funding not needed for basic maintenance is swapped with sales tax counties for money eligible to spend on transit operations.

Transit Speeds: Like CTP 2040 Scenario 2, significantly higher transit speeds are key to productivity and carrying large passenger loads at reasonable operating costs. In this Alternative, we propose these methods of achieving the 50% higher speeds assumed by Scenario 2:

- Widespread use of traffic signal priority for buses

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[6] http://transdef.org/2017_SCS/Altamont Corridor Rail Project Preliminary AA Report.pdf

[7] http://transdef.org/HSR/Altamont_assets/Exhibit_C.pdf

- Arterial HOV lanes where needed to bypass congestion
- Automated enforcement of transit lanes, with all fines going directly to the transit operator.[8]
- Unlike CTP 2040 Scenario 2, HOV minimum occupancies are not changed, as TRANSDEF believes that would result in limiting the HOV mode share.

Land Use: We note with approval that the description of the Big Cities Scenario includes elements that have no basis in current law or policy, including changing parking minimums and the office development cap. MTC had raised serious feasibility concerns about our 2005 RTP Alternative because we proposed innovations like these. It is only by testing proposed policies that decision-makers can determine whether to support legislation to make the innovation possible.

In addition to incorporating all of the Scenario's land use assumptions, the Alternative includes:

- No public subsidies for the operation or construction of parking within PDAs.
- The conditioning of funding for PDAs on enactment of the parking and other policy reforms proposed by the Big Cities Scenario.
- Required unbundling of the parking from leases and residential purchase agreements.
- Encouragement for the permitting of micro-apartments and Junior Second Units.

This Alternative's focus on increasing the availability of convenient transit should meet a critical need of PDAs, and the Big City Alternative in particular. We would be pleased to discuss the proposed headways with staff, and adjust these specifications to find an optimal balance of ridership and cost, as well as adjust the dollar inputs to meet the financial realities of today.

Pricing Sub-Alternative

CTP 2040 Scenario 2 is described in Appendix 7 (pp. 11-12) as increasing the out-of-pocket cost of urban driving by 133% (from $0.23 to $0.55 per mile). We propose to achieve this by implementing some of the following pricing programs:

- Mixed-flow lane freeway tolling during congested periods.
- A parking charge on all commercial parking spaces, including privately owned ones. This could conceivably be achieved through public funding of the installation of parking management hardware: gates and access controls. This would enable excellent administration of employee commuter benefit programs.
- Impose a regional transportation mitigation fee on new development, based on additional auto trips and VMT added to the regional network. If the fee is high enough, it will increase the desirability of developing close to transit and decrease interest in greenfield sites. This could come in the form of an Indirect Source Mitigation Fee, which has been under consideration by BAAQMD.

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[8] http://arch21.org/BusLanes/BusOnlyPaper.html

While the Big Cities Scenario contains cordon pricing and incentive programs, the Notice of Preparation does not specify the degree of cost increase proposed. This Sub-Alternative therefore prescribes the increase in the cost of driving, and some of the potential ways to achieve it.

Back in 2004, the travel demand model was limited in its ability to study pricing. We were forced to use a daily parking charge as a surrogate for the road user charges we wanted studied. Please contact us to discuss what is possible with the current model.

A key part of this Sub-Alternative is drawn from the experience of LACMTA. After it entered into a consent decree with the Bus Riders Union, bus fares were very substantially reduced. Bus ridership went up dramatically. Conversely, after the consent decree expired, fares rose and ridership dropped. TRANSDEF proposes this Sub-Alternative model a fare reduction here in the Bay Area, to test whether price sensitivity is different up here. We propose cross-subsidizing fares from the revenues received through pricing, with a target of reducing fares by 80%.

For simplicity and directness of comparison, this Alternative uses the exact same transportation and land use assumptions as the Cost-Effectiveness Sub-Alternative.

Conclusion

TRANSDEF is committed to achieving GHG emissions reductions and VMT reductions at the regional level. These Alternatives represent our best thinking as to what can be done, and what needs to be done. Studying the Alternatives proposed here will place concrete choices before the agencies. We think it is far healthier for the agencies to either accept or reject the choices in public than avoid altogether the discomfort of "pushing the envelope." We stand ready to provide whatever further inputs might be needed or useful. We look forward to collaborating on the best RTP yet.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

CC:
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