

Transportation Solutions Defense and Education Fund

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October 15, 2014
By E-Mail

Kevin Romick, Chair
Contra Costa Transportation Authority
2999 Oak Road, Suite 100
Walnut Creek, CA 94597

Re: Draft 2014 Countywide Comprehensive Transportation Plan

Dear Mr. Romick:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is a non-profit environmental group advocating for the regional perspective in the planning of transportation, land use and air quality. In the past few years, we have focused on reducing the impacts of transportation on climate change.

Introduction

We write to commend staff for an excellent analysis of the constraints facing CCTA. The Draft 2014 Countywide Comprehensive Transportation Plan ("Plan") is very up-to-date in its understanding of the trends of travel demand for millennials, for example. (ES-8, Note: all citations are to pages of the Plan.) However, as will be detailed below, the list of projects and programs in the Plan is completely disconnected from that analysis. That disconnect is exquisitely captured by the following statement in the "Finding the Right Balance" discussion:

Where feasible and beneficial, improve the throughput capacity of roadways while recognizing that these improvements will not, in the long run, eliminate congestion. (I-28.)

Contra Costa residents and their elected officials seem driven by a naive faith that suburbia can somehow be made to work. That faith blocks them from recognizing the obvious reality that traffic keeps getting worse as CCTA "improve[s] the throughput capacity of roadways."

In short, the "Right Balance" for CCTA has meant believing in the traffic fairy. County residents bought there on the promise of convenient solo commuting--something that is unrealistic for large communities of primarily low-density development. CCTA's core problem is that it is driven by the politics of mass fantasy to spend its resources on

projects that its staff knows are only short-term fixes. In this era of climate change, the time has come to align the planned investments with realistic planning.

It would be unfortunate if the County had to descend into total gridlock before there is a willingness to commit to a realistic transportation system. This comment letter will attempt to lay out what such a system would look like. Interestingly, much of the needed analytical work is already in place.

Constraints

The Plan did an excellent job of identifying the factors that constrain future action:

- It is clear that CCTA has only half the financial resources that it wants to spend over the Plan period. (ES-20) Thoughtful strategic choices must be made.
- "Our ability to expand the roadway system is extremely limited. (1-37)
- **"[E]xpanding roadway capacity to meet demand is no longer an option in Contra Costa."** (1-37) This is perhaps the most important sentence in the Plan.
- "Building new facilities and expanding existing ones face increasing opposition." (1-37)
- "In most areas, even major projects represent only minor increases in total capacity." (1-37)
- "Climate change will have to be considered in our growth management plan due to the California Governor's order mandating an 80 percent reduction of greenhouse gases below 1990 levels by 2050, as shown in Figure E-5" (ES-11) Note that there is no follow-up in terms of Plan recommendations for how climate change should be considered. This is a serious oversight.
- "Will increased frequency of storm surges harm our rail lines and roadways?" (ES-9) It's good planning to recognize these vulnerabilities.

The projected 35% growth in VMT (1-12) indicates a failure to ask the fundamental question: "What transportation investments and policies and land use investments and policies do we need to maintain (or better yet, to reduce) current levels of VMT as we grow?" That 35% growth in VMT is profoundly irresponsible given (1) the inability to expand roadway capacity to accommodate that increase in vehicular travel, leading to massive and inevitable congestion (2) existing state policy to reduce GHGs, in recognition of impending catastrophic climate change.

Contra Costa is like an army with overextended supply lines. Its auto-dependent transportation system is very vulnerable to shifts in conditions, such as the price of gas. The 2006 foreclosure crisis began when gas prices spiked. As identified in the film *The End of Suburbia*, sharply rising gas prices put pressure on family budgets. Commuting costs became unaffordable, resulting in mortgage delinquencies and foreclosures, especially in exurbs like East County. With this systemic vulnerability to price rises, and inevitability of higher gas prices, current transportation patterns are unsustainable.

Refocus the Plan on Responsive Solutions

The Plan already contains most of the needed action elements that are appropriate responses to the constraints cited above:

- CCTA Goal #3, "Expand safe, convenient and affordable alternatives to the single-occupant vehicle." (ES-7) Make it the only priority for system expansion funding. Please note that the extension of conventional BART technology does not qualify as "affordable." We prefer the term "cost-effective."
- Real-time ridesharing. (ES-9) This is a very hopeful technology that harnesses vast unused capacity in Single Occupant Vehicles (SOVs) at a tiny public cost.
- "The Authority also requires each jurisdiction to adopt and implement a transportation demand management (TDM) ordinance or resolution that encourages greater transit use." (1-45)
- Collaboration with Alameda County on planning for the Tri-Valley. (ES-16)
- "[O]ur emphasis has shifted instead to improvements in how we operate, manage and maintain the facilities that we now have." (1-37)
- "By carrying more people per vehicle, buses can make more efficient use of the capacity of existing roadways." (1-41)
- "By providing faster and more reliable travel times to carpools and transit, carpool lanes, also known as high-occupancy vehicle (HOV) lanes, can encourage a shift away from solo commuting..." (1-46)
- "Support land use patterns within Contra Cost that make more efficient use of the transportation system..." (I-30) Land use is key to a future policy redirection. Unfortunately, the quoted statement in the Plan ends with the problematic phrase "consistent with the General Plans of local jurisdictions." Local General Plans that promote conventional suburban development are the heart of the problem.

Land Use

In planning, one takes observed trends and constraints, and attempts to optimize future conditions. In this "plan" responding to the identified challenges was replaced by catering to the public's misunderstandings and fantasies. That is how the observed congestion at the plan horizon came to be treated as inevitable, rather than recognized to be the result of politicized planning-avoidant decisions. The key unaddressed decisions involve land use.

Despite profound changes in the policy environment in the last decade, suburbia has continued to grow, with congestion moving in lockstep. If Contra Costa residents all stayed home during the day, there would be no transportation problems, and no need for transportation plans. Congestion arises, however, when residents want to commute to all parts of the Bay Area. Had the transportation system capacity for that travel been planned, funded and constructed prior to the massive development of suburban housing, Contra Costa would be a very different place now. Mistakes were made...

The projected 35% increase in VMT (I-12) is indicative of a new round of planning mistakes. The increase in VMT/capita implies even lower-density auto-dependent land use practices. If the transportation plan is to improve--or even to maintain--the quality of life--it must strongly influence the pattern of new development. There simply is no alternative: the consequences of continued suburban growth cannot be mitigated.

Now that CCTA has acknowledged it cannot catch up with needed highway capacity (1-37), the First Law of Holes applies:

When stuck in a hole, the First Law of Holes is to stop digging.

The commonsense policy response to today's congestion would be to not make it worse. To protect the existing transportation network, CCTA needs to make it clear to local jurisdictions that land use patterns for new development must change. New jobs and housing need to be located in relation to transit, with adequate density. (I-13) The agency made itself an excellent role model by locating its offices in a new transit-oriented neighborhood.

Because of the congestion crisis and the climate crisis, solo driving cannot and must not remain the foundation of transportation for new development. Instead, CCTA needs to promote creative solutions. The goal needs to be not increasing auto trips as new jobs and housing are built. That requires a convenient, cost-effective, well-coordinated, well-marketed and well-promoted transit network, one that can appeal to existing residents as well. New development needs to be planned simultaneously with the cost-effective transit needed to serve it, such as Bus Rapid Transit.

What's Wrong in the Plan?

- "As the region grows, so will the demands on our roadway system and need to expand and make better use of its capacity. The CTP incorporates a broad range of roadway projects, programs and strategies to meet the needs of growth." (I-36) Sisyphus could have written that. As a strategy, it is doomed to failure. Operational improvements can add only limited capacity. (I-37) While the "make better use of its capacity" was identified above as a solution, expanding capacity is already known to not work in the long-term. What's needed instead is a focus on transit-oriented development, coupled with cost-effective transit. It's clear the author of the quoted text was unwilling to leap to the obvious conclusion that the development of auto-dependent land uses cannot continue.
- "In recent years, focus has shifted from mobility for automobiles to mobility for all modes and for all types of users. The 2014 CTP reflects that shift." (I-21) The projected increase in VMT and flat SOV mode split indicate that, while the rhetoric may have shifted, the funding priorities haven't changed at all.
- The time has arrived to dump Goal #1: "Support the efficient, safe, and reliable movement of people and goods using all available traffic modes." (ES-7) This goal is only a fig leaf for continued status quo dependence on the auto.

- The enthusiasm for technological innovations for the automobile (ES-10) is misplaced. Technology will not be able to preserve suburban mobility if land use planning continues to encourage more driving (although real-time ridesharing could help those willing to abandon their cars).
- "Continue to invest wisely to maximize the benefits of available funding." (I-29) This is not a goal, it is merely a strategy for achieving goals.
- "Improve the highway and arterial system to influence the location and nature of anticipated growth..." (I-29) In 2014, the location of anticipated growth must be influenced by transit investments, not highway investments.
- "Agencies will assign staff to monitor the operation of the HOT lanes and the amount of toll charged, to ensure that the lanes continue to benefit carpools and buses." (I-49-50) Express lanes explicitly discourage carpooling. They are a massive financial commitment to keep the fantasy of solo driving alive.
- "In addition to reducing congestion, HOV and carpool strategies can help reduce greenhouse gases." (I-51) Note how HOT lanes have been mixed into discussions of HOV lanes (I-51 & I-29). This is obfuscation: the two strategies are in direct conflict. HOT lanes--aka Express Lanes--facilitate solo driving, thus discouraging a shift away from solo commuting. With all the policy reasons to not support solo driving, this is a crystal-clear example of politics trumping policy.
- "The increased use of electric vehicles will increase the need for charging infrastructure." (ES-10) If people are only commuting moderate distances to work, this is untrue. Charging will be done at home. Public charging networks (I-30) will prove to be far less important than public agencies believe.

Climate Change

This conflict between policy and politics is sharpest on climate change. The Plan contains an exemplary section on "Managing the Effects of Greenhouse Gases." However, the absence of any implementation makes this nothing more than window dressing. As currently written, the Plan predicts 2040 Vehicle Miles Travelled (VMT) to increase by 35% (I-12), with a parallel increase in GHGs. The projected 28% increase in population (I-12) makes this a 5.5% increase over current VMT/capita. **In the age of climate change, these figures indicate a total policy failure.**

Figure E-5 (ES-12) shows the statewide reductions in GHG emissions needed by 2050. Oddly, there is no corresponding chart for CCTA emissions. The Plan does nothing to change the Forecast 2050 Emissions trendline within the County. By implication, some other agency must be responsible for that... There's a complete disconnect between this Climate Change section and where actual dollars are directed.

All of this is very troubling in the context of the recent U.N. Climate Conference and Peoples' Climate Rally. The world is coming to understand that deep systemic change is needed if the human species is going to survive in coming centuries. What will it take for Contra Costa policy makers to decide to take responsibility for the largest source of the County's GHG emissions and join the worldwide effort to protect future generations?

Additional Recommendations

- Provide a breakdown of how the funding is allocated between the four goals. (I-28-29) Note the comment above that the fifth "goal" is really only a strategy. The funding breakdown is critical information for evaluating Plan coherence: Does the allocation of funding match the policy framework?
- A modern transportation plan must show the current and projected VMT/capita.
- The agency needs to focus on preventing the displacement of lower-income residents as older areas redevelop. Note the overlap on Figure 1-8 (I-23) between Communities of Concern and Infill Opportunity Zones.
- Work with other jurisdictions to encourage the truck freight system to operate at night.
- Increase the use of the Richmond BART station by sponsoring security there, especially at night.
- TDM ordinances (I-45) should include such features as transit passes, car share, unbundled parking in leases and real property sales, and reform in parking ratios.
- Incentives are needed for the implementation of SB 375.

Textual Corrections

- I-31: Does "Link transit investment to increased coordination and integration of public transit services, and improved connections between travel modes" mean "condition" transit investment? The meaning of the text is unclear.
- I-43-44: "And for most trips, a car will get one to a destination faster, for less money "out-of-pocket" and with no waiting other than in congestion. Transit can, however, compete as if the differences between travel time, out-of-pocket cost, and convenience between the two modes are reduced."
- I-45: "And finally, Measure J ~~is~~ funds ..."

TRANSDEF appreciates this opportunity to comment on the Plan. We would be pleased to assist staff in the implementation of any of the ideas offered here.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

CC:

Amy Rein Worth, MTC Representative
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