

TRANSPORTATION SOLUTIONS DEFENSE AND EDUCATION FUND

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Dean Powell
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Marin County Civic Center
San Rafael, CA 94903

Re: Marin Transportation Vision, Public Review Draft version

Dear Dean:

TRANSDEF suggests that the Public Review Draft version of the Transportation Vision should be considered as a catalog of possible elements of a future Vision Plan, rather than a Vision Plan itself. The two key Adopted Planning Principles have not yet been applied to this project catalog: "Make difficult choices on how many and which projects to include in plan" and "Refine projects to eliminate any unnecessary duplications between modes." TRANSDEF would have preferred that a preliminary round of comment be conducted, to which the suggestions below could have been submitted. That would have resulted in an earlier round of decision-making on the basis of the Planning Principles, so that the Public Review Draft could then contain a true vision.

Happily, however, the High-rated projects on the Projects Benefits Matrix (2-37) (with adjustments discussed below) already do constitute a vision. These comments will attempt to identify the factors already identified in the analysis of cause and effect within the document that, if pulled out and amplified upon, would clearly articulate the vision implied in that matrix. First, we present an analysis of the problem. We believe success here will require a willingness to scrutinize the conventional wisdom, and judiciously prune the project proposals that build upon those assumptions. That effort results in strategic goals, which can then be translated into a coherent implementation program, one that can truly be called a vision.

Suggestions of Highlights for the Next Revision

Causes of Congestion:

a). The wealth of Marin County means that a large majority of residents are able to afford their own personal vehicles, leading to an expectation of door-to-door convenience. This is a very large factor in the trip rate. It deserves a bar of its own on the "Growth in Marin County" bar chart, indicating per capita vehicle registration growth.

This increased mobility resulting from our affluence was best captured in the statement on pg. 1-2 that "The increase in congestion experienced in the County is a direct result of our increased tripmaking." The "our" aspect here needs to be highlighted in the Causes of Congestion section, with an unblinking explanation of how the cause of our problems is us, and our way of life.

b). Low density suburban land use needs to be highlighted as the biggest cause of congestion. This issue is identified as "There are few alternatives for travel within Marin County," but is unhelpfully placed at the very end of the discussion (pg. ES-4). Marin and the Bay Area have reached a point where the land committed to suburban development is so extensive that it is unreasonable to expect to significantly reduce congestion levels. We strongly disagree that attempting such a reduction is a realistic goal for a transportation program (p. 2-2). Where in the U.S. has such a reduction occurred? On the contrary, as long as an overwhelming percentage of the population lives and works in low density locations, people will want to drive to their destination. Convenient transit service will not be economically feasible.

Strategic Goals

a). Given the widespread prevalence of personal autos, the ability to pay for them, and the low density land use, it should be clear that no road-based strategy will ever be able to keep up with the demand for road space. Financial reality, the lack of right-of-way for wider roads, and the unacceptable environmental impacts of new road projects doom this approach to failure. It is widely recognized that "we cannot build our way out of congestion." The key to a strategy of improving mobility needs to be providing alternatives to the personal auto. Drivers will decide to divert to alternative modes if they are convenient and reliable when compared to the aggravations of congestion. For the most part, that means these alternative modes need to function well despite the congestion of the road system. That implies separate rights-of-way, inherent in the bike, pedestrian and rail systems. Similarly, the local bus proposals need to consider the costs and benefits of signal priority, queue jumping, and HOV lanes on local roads.

b). However, financial reality for alternative modes means recognizing the need for highly strategic investment. Near-universal auto ownership means that transit service will always be a niche market, at least until global petroleum supplies decline significantly (or developing economies cause a dramatic rise in oil consumption, leading to much higher prices). The foundation principle should be frequent service between nodes of concentrated activity—downtowns, major employment and commercial centers—where the people are. This is an entirely different way of life from the spatial dispersion of suburbia, in which individuals travel from one location to another, alone, in private vehicles. Where people are sufficiently concentrated, either in activity centers or along corridors, it becomes economically feasible to transport them in groups, in public vehicles, thereby significantly decreasing the per capita auto trip generation rate. A further reduction in auto trip generation comes from the nearby availability of many

daily needs via walking and bicycling. A transit system based on serving these activity centers will encourage appropriate Smart Growth land use. This is consistent with the Smart Growth strategy, which follows below. Access to the activity centers would be by walking, bicycling or proximity--mixed use commercial areas containing residential units. A goal should be set for the percentage of trips that will be captured by non-single-occupant-vehicle modes.

c). If additional funding is available after the transit system identified above is funded, shuttle systems connecting neighborhoods to their corresponding town centers would provide access to the county transit network (as well as to the regional transit network) for many more people. This would promote a sense of local community identity.

d). The last sentence in the Land Use strategies (2-35) needs to be highlighted as the other key to an articulated vision: "If development is done carefully under Smart Growth concepts, growth will not increase traffic congestion but will instead improve the viability of transit and other alternative transportation modes." It states an hypothesis, one that identifies positive benefits from a specific course of action. It would be useful to identify the 'virtuous circle' which is the opposite of the vicious circle: As more riders use transit, it becomes possible to provide more convenient service. The message here is that whatever limited growth does occur in Marin, it should be of the Smart Growth variety. To make this happen, part of the adopted Smart Growth strategy (3-3) needs to be agreements between SMART and the cities along the right-of-way to make sure that appropriately dense land use investments are encouraged around transit stops.

e). A further part of the Smart Growth strategy should be an effort on behalf of all Marin and Sonoma jurisdictions to balance the creation of new jobs with the pool of housing affordable to the income level created by those jobs. Marin's Countywide Plan predicts strong job creation with little affordable housing for those jobs. The Commercial Jobs/Housing linkage fee in each of the counties will be a step in the right direction. However, more policy level effort to balance jobs and housing on a county level is needed, because imbalance is a key driver of intercounty trip generation. The Regional Agencies Smart Growth Strategies process will hopefully develop further incentives and resources that would assist Marin jurisdictions in increasing its affordable housing stock. A significant principle coming out of the jobs/housing issue is that Marin and Sonoma should not be building additional highway capacity to transfer additional workers between them. With all the concern on highway congestion, the focus needs to be on generating transit trips to work, because widening 101 between Novato and Petaluma will merely increase the congestion in Marin, by bringing more traffic south.

f). Another key strategy to encourage alternatives to the single occupant vehicle is TDM. It is potentially inexpensive to the public if employers are encouraged to offer employees cash or transit passes in lieu of free parking. This 'parking cash out' could incentivize double digit mode shifts. The high cost of land in Marin would incentivize

employers to offer the program, if they are able to make economic use of newly-surplus parking area.

Disagreement with Assertions in the Draft

ES-1: Minimizing congestion is like permanently calming the ocean. It is impossible.

ES-4: Estimates of hours of delay averted are dubious due to the failure of MTC's traffic model to account for induced and latent demand.

ES-5: What area ever got their congestion problems under control? This is propounding a myth.

ES-6: Thank you for admitting that the Narrows project will increase capacity for single occupant users. The claim that the project will aid transit serves as a fig leaf to justify an expensive project that will allow more single occupant users to use the highway. We are unconvinced that transit has anything to do with the motivation for this project. The cost of the widening is phenomenal, compared to the transit benefit (or to the cost per person hour of avoided delay). Even the Express Bus study itself considered the transit benefit of the project to warrant only a small portion of the overall cost.

ES-7: It is only an assertion that the express bus plan will be designed to complement, not compete with the rail service. Nowhere has it ever been demonstrated that this can be accomplished, or how it would be accomplished.

ES-7: Raw numbers of transit riders are not meaningful to the public, due to a lack of comparisons. Please also state percentage increases above current levels.

ES-9: We are very concerned that Caltrans will be allowed to bring 2 lanes from EB 580 to Hwy 101 North, thereby stopping all traffic on 101. The impact would be too great. We have not seen any official plans that would relieve local congestion for the 580/101 interchange.

2-25: "We believe we can make strategic investments that will help the highway system move people more efficiently." This begs the question as to what the criteria are for a strategic investment. The Calthorpe Study explicitly concluded that widening Hwy. 101 between Novato and Petaluma was not cost-effective. The text appears to imply that a non-strategic investment would be to widen all highways. If cost-effectiveness is a criterion, the Narrows project certainly doesn't meet it. Also, see comment for ES-7 above. Beyond the so-called special benefits for transit, a widened highway will also bring significantly more traffic into Marin, thereby eliminating whatever benefits accrue to the San Rafael Gap Closure project. i.e., the project will move Marin's people less

efficiently, because they will be more stuck in Sonoma's traffic. The marginal comment "While we cannot build our way out of congestion, we can make spot improvements that will help the existing highway system move people more efficiently" is another gross exaggeration. The Narrows project is not a spot improvement, while the San Rafael Gap Closure is. The Narrows would cost more than the entire 70+ mile railroad project, for just a 17 mile stretch. Even if the Narrows project were built as currently planned, there would still be a bottleneck at Gness Field, where the highway would narrow from the new 6 lane plus HOV configuration to the new 4 lane plus HOV configuration of the Narrows.

2-29: It is not true that the WTA is planning to build new facilities at Port Sonoma. The agency is merely studying the possibility.

2-35: "Severe restrictions on growth ... [would send] more traffic from outside the County onto our roads" only if the roads are widened that connect Marin to other counties. The plan unquestioningly assumes widening, due to pressure from paving interests and Marin employers. The political and technical possibilities of alternatives have been ignored.

2-37: The Narrows project does not provide High Maximization of Alternative to Driving Alone, especially not on a cost-effectiveness basis. In fact it would serve more single occupant drivers than it would serve transit riders. Also, it won't relieve Hwy. 101 congestion for Marin residents, because of the added Sonoma traffic.

2-38: Local road projects are likely to be Low in Reducing Local Congestion, because most of them are paving projects, which don't affect congestion. It is unclear what is meant by "improving efficiency of local roads." Does paving improve efficiency? Does this improve the environment?

2-38: The bike contribution to reducing Hwy. 101 congestion is underestimated. Because only 1/3 of all trips are Home-Based Work, many more than just commute trips could benefit 101. We believe the overall Benefit of Bike/Ped is High.

2-38: Land Use should be a High benefit to maximizing mobility for the seniors, youth and disadvantaged that are residents of concentrated and mixed use developments. For residents of outlying areas, the benefit would probably be Med., because the projects would create destinations that are more likely to get good transit service.

3-5: The Narrows project would not eliminate the bottleneck at Gness Field.

3-9: Many of the largest employment sites are directly adjacent to proposed rail stations. The assertion that shuttles will “often” be required is therefore untrue. With an innovative design, the Civic Center station may be able to be made more convenient to the largest employer in the County, thereby eliminating an otherwise-needed shuttle. A useful approach to eliminating duplication and competition between rail and express bus would be for the Vision Plan to call for the listing of the major employment sites, leading to a determination of which can be directly served by rail and walking. For those employment sites that are not convenient to the rail line, a search for concentrations of employees’ residences would identify viable express bus routes. Given the perpetual shortage of operating funds, the express bus report’s exaggerated expectation of the need for rail-shuttle transfers, and the unlikelihood of finding viable levels of rider concentrations, it seems likely that a shuttle system to the off-rail locations would be more cost-effective than an entire express bus system.

3-10: A propos of the previous comment, the express bus routes mentioned here are all in close proximity to proposed rail stations. This is not a complementary proposal.

3-11: The last bullet fallaciously implies that there is a problem with trips from Sonoma County south through Marin. If those trips were conducted by rail to a Central Marin ferry site, there would be no congestion impacts. No study has yet indicated that a ferry in Port Sonoma would take people to San Francisco faster than a rail-to-Marin Ferry system. The land speed of the rail between Petaluma and Central Marin is likely to be much higher than the water speed of a ferry.

3-27: The Ross Valley part of the plan is weak and unclear. While congestion is identified as an issue, there is no bold proposal in response. Was an HOV lane considered on Sir Francis Drake? SFD bus rapid transit service? While we are not ready to advocate any specific solution, the section is inadequate as it currently stands. Also, the issue of Hwy. 101 bypass traffic from Sonoma adding to SFD traffic needs to be addressed.

3-35: “[R]elieving a congested freeway” is not achievable.

4-2: Singling out the area of environmental compliance as a factor in the increased cost of delivering projects is inflammatory and rhetorical. Many other factors exist. Unquantified assertions that “increased environmental review” is “in part” responsible adds little of substance, while appearing to lend credence to the anti-regulatory movement. Either add supportive data, make it balanced or take it out.

4-3: The “\$100 billion worth of needed projects statewide” and “\$33 billion worth of unfunded transportation needs” for the Bay Area are precisely the same kind of wish list as the current form of the Vision document. These are lists of pet projects, submitted

without any kind of analysis as to what the transportation problems are, what the causes are, and what the strategic least-cost approach should be. These lists are meaningless.

4-4: The document should identify how much of the on-going pavement needs (as distinguished from the backlog of deferred maintenance) could be met through Prop. 42 funding.

4-7: The GGBHTD has put out many deceptive figures as to its future deficits. The overly high \$441 million number includes discretionary capital expenditures and inappropriate assumptions (e.g., ignoring future transit fare increases).

4-11: The San Francisco business tax was declared illegal for technical reasons that have no applicability here. The inclusion of this information implies that payroll taxes are illegal, which is not true.

4-13: Traffic Mitigation Fee and public-private partnerships are not authorized outside Marin. They don't belong in this table.

4-14: It is very deceptive to say that "At least \$1.5 billion must be generated to implement these projects." It has not been decided that all these projects need to go forward, or even that that would be a good idea. Any statement about the cost of these projects should indicate "if all the projects here were implemented."

Typos

2-35: discreet should be "discrete."

2-28: principals should be "principles."

3-2: TDM is not a mode. It is a strategy.

3-21 & 22: Blithedale should be "E. Blithedale."

TRANSDEF appreciates this opportunity to comment on the Public Review Draft of the Transportation Vision for Marin County. We would be pleased to answer any questions about the comments raised here. Please contact us using the contact information above.

Sincerely,

David Schonbrunn,
President