# Transportation Solutions Defense and Education Fund

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October 22, 2020 By E-Mail to: ctp2050@dot.ca.gov

Gabriel Corley, Project Manager Division of Planning, MS-32 Department of Transportation P.O. Box 942874 Sacramento, CA 94274

Re: Comments on the Draft California Transportation Plan 2050

Dear Mr. Corley:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is an environmental non-profit focused on reducing the impacts of transportation on climate change. We are pleased to be able to commend you and your team for an exceptional piece of work: identifying and responding to the most far-ranging set of challenges ever addressed in a plan. The draft California Transportation Plan 2050 ("the Plan") is a groundbreaking effort which sets forth a very much-needed new vision for transportation for our State.

We do note, however, that the transportation sector may need to achieve even more than an 80% reduction in GHG emissions, as scientific analyses since 2005 suggest not only that an 80% reduction will be insufficient, but that substantial reductions are needed much sooner than 2050. We offer the following additional comments. (Page references below are to the Plan.)

#### Congestion Relief

The Plan is the first-ever document by Caltrans that, to our knowledge, did not establish congestion relief as a primary goal. This represents a new understanding of induced demand by the Department, furthered by SB 743. We note, however, that Caltrans' past as highway builder is deeply entrenched, and hostile to the Plan's perspective. Because the institutional culture there is still very much in flux, we offer a word of caution. The draft California Transportation Plan 2040 was a similarly visionary document. However, senior management was unwilling to support the climate-friendly policy elements of that plan, and simply deleted them in the Final version. Your superiors are hereby placed on notice that stripping the climate-related policy out of the Plan for the second time, in knowing violation of the mandates of SB 391, will result in legal action.

That said, TRANSDEF believes that a major policy development opportunity was lost in defining each of the three scenarios (pp. 83 & 84) as containing the legacy projects of the Baseline.

The 2050 Baseline scenario assumes regionally-adopted roadway capacity enhancements identified in RTP/SCS's are completed by 2050, although these are likely to increase VMT and GHG emissions from current levels, and could make achieving State GHG reduction targets more difficult. (p. 85.)

We assert that the Plan would be much stronger, and scenario comparisons more revealing, if the scenarios were not diluted by policy-inconsistent projects. A Plan composed of purely climate-responsive projects and programs would make a far better case as to what level of VMT reductions can be realistically accomplished. We urge the elimination from the three scenarios of all legacy capacity-increasing road projects in local, regional and state plans, including the Interregional Transportation Strategic Plan, that are not already under construction. In this time of fiscal shortfalls, clearing the decks of legacy capacity projects makes sense. Other projects that are inconsistent with the Plan's recommendations should also be removed.

Once the policy benefits of the Plan recommendations have been demonstrated by an undiluted scenario comparison, a detailed and controversial process can be undertaken in the Implementation phase of the Plan to develop policy to guide the transition away from the current roster of legacy projects.

TRANSDEF applauds the first paragraph on p. 40 for its clear statement that highway capacity projects will no longer be the State's default response to growth. We further applaud the clarity of the following:

While the model can account for major capacity enhancements such as adding new freeways or lanes, research has proven that these capacity expansions can lead to more traffic, a phenomenon called "induced demand," in which roadway expansions lead to more vehicle travel. The CTP did not explore new major roadway expansions because such enhancements conflict with state goals of reducing VMT. (p. 79.)

On the other hand, we note that most of the performance measures on p. 69 are actually proxies for congestion relief, and are therefore inconsistent with the rest of the Plan. While data for reliability of highway travel and delay should certainly be tracked as indications of the Plan's tradeoffs, these would not be useful performance measures for evaluating the success of the Plan's implementation.

# Our Further Suggestions re: Congestion Relief

The time has come to formally abandon support for peak-period drive-alone, and throw all the resources of the State into alternatives. The first place to start is HOV lanes.

It is an open secret that HOV lanes were Caltrans' strategy to build more highway lanes when the Clean Air Act prohibited new mixed-flow lanes. They covertly expand highway capacity for drive-alones by draining off HOVs from mixed-flow lanes. Once built, however, they have been subject to benign neglect--Caltrans has shown no interest in optimizing the carpooling mode share. This is clear because of the following:

- HOV lanes are not consistently operational during all congested periods, thus failing to provide the incentive of a consistent travel-time advantage to carpools.
- HOV lanes are not enforced, allowing them to become overly congested with drive-alone violators.
- Carpooling is not aggressively promoted.

TRANSDEF urges Caltrans to commit to increasing average vehicle occupancy by maximizing HOV use. The mode shift to carpooling would be significant if adequate incentives were offered, the most important being a significant travel-time advantage resulting from free-flowing HOV lanes on congested highways. To accomplish that:

- 1). Make the HOV lanes operational whenever a highway is routinely congested;
- 2). Put significant resources into publicizing and enforcing HOV occupancy;
- 3). Develop automated means to monitor occupancy, including infrared video cameras mounted on structures and poles;
- 4). Enforce the prohibition on overly dark tinted windows (which make enforcement difficult); and
- 5). Aggressively promote carpooling and real-time ride-matching services like Carma.

To go beyond a minimally functional HOV system, we suggest the sponsoring of federal and state legislation to authorize take-a-general-purpose-lane HOV conversions, both to fill gaps in the HOV network or to add HOV lanes in a corridor where the existing HOV lane is congested enough (with on-going enforcement of violators) because of mode shift to need another lane.

TRANSDEF vigorously opposes Express Lanes because their sole purpose is to facilitate more SOV travel, when excessive SOV travel is the reason roads are congested. Because these lanes increase VMT, TRANSDEF urges Caltrans to stop building Express Lanes, and convert the existing ones to HOV 2. Later in this letter, we oppose restricting HOV lane occupancies to HOV 3 because that would depress carpooling.

It is inconsistent for the Plan to call for road user charges and include the conversion of HOV to HOT lanes. (See Technical Analysis, p. 28, Level 2.) HOT lanes will become a mere transitional step once the Plan's call for the pricing of entire roadways is underway. For long-term planning purposes, they are a duplicative distraction.

Other priorities for transportation spending are addressed in the comment letter of our sister organization, the Train Riders Association of California.

Policy Suggestions (keyed to Draft Plan page number)

- pp. 55 & 58: Facilitate short-haul rail freight with subsidies and infrastructure funding. See the comment letter from our sister organization, the Train Riders Association of CA.
- p. 63: It is preposterous to claim that Autonomous vehicles could provide congestion relief. It is also deeply troubling that the box on "How Might CAVs impact Travel?" failed to include a bullet about the harm to the Plan's downward trend on VMT caused by CAVs, as demonstrated on p. 91.
- p. 68: The growth in regional VMT is undoing the emissions reductions being achieved by the state and endangering the state's attainment of its climate targets. Transportation sector GHG emissions require accurate reporting in CEQA documents. Because the emissions reductions expected to be achieved by the state are available in EMFAC when reporting GHG projections for the future, a typical transportation plan EIR will show a reduction in GHG emissions at the same time VMT is increasing. This is highly misleading. TRANSDEF asked CARB to announce that transportation GHG emissions be reported by EMFAC without the inclusion of statewide measures, including Pavley clean cars. CARB declined to act, thereby abetting the misleading plans.
- p. 69: A performance measure for Equity would be "number of community organization staffers supported to participate in planning efforts."
- p. 69: Include in Objective 2: Insert prior to "It requires": "Speed up transit through signal priority, bus-only lanes etc., by explicitly giving transit priority over single-occupant vehicles. Provide fast rights-of-way for intercity trains, allowing them to be time-competitive with the automobile."
- p. 69: Add the following performance measures: "Average highway auto occupancies;" "VMT/capita"; "Availability of a time- and/or cost-competitive transit alternative on each corridor in the region/State."
- p. 71: Please refer specifically to "implement context-sensitive design" in relation to "thoughtful planning and design." TRANSDEF has commented on far too many Caltrans EIRs that savaged the environment, including historic or scenic resources. Project managers should be directed to accept slower design speeds, for example, where needed in sensitive locations.
- p. 80: Because a shift to HOV3 will eliminate the most convenient kind of carpooling, and therefore severely harm carpool participation, TRANSDEF urges the HOV strategy be changed to HOV2. We can't imagine how the CTP 2050 Modeling Factsheet can possibly be accurate in claiming that a shift to HOV3 will cause a 1% reduction in 2050 VMT, compared to Baseline. It seems far more like it would cause an increase in VMT.
- p. 82: We again stress that land use is the heart of the Plan. The attached Chronicle opinion piece suggests that regulatory barriers to suburban development are needed, to change the expectations of the real estate market. That would shift the incentivizes for

developers away from getting highways widened and towards having frequent enough transit to serve their developments.

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- p. 83: We are alarmed by the impact of CAVs on VMT (see p. 91 and comments on p. 108).
- p. 86: We note the synergistic effect of the Combined Strategy on Total VMT and GHG Emissions. We also note that a 5-point shift in Non-Auto Mode Share seems low for the Transportation Focus. Perhaps that is because of the legacy projects cornering all available funding for new routes.
- p. 88: We note with approval the statement "Accessibility improves when people have a range of high-quality transportation options, and when destinations are closer together. Reduced VMT and increased use of non-auto modes means less congestion on our roadways, and better access to destinations." This has been the thrust of two decades of TRANSDEF advocacy at MTC. That agency insisted on spending its resources supporting solo drivers and transit megaprojects, ending up with massive congestion and a lack of high-quality transportation options. Ironically, the new RTP is proposing to "Implement Per-Mile Tolling on Congested Freeways with Transit Alternatives," after decades of making sure that no transit alternatives would be available.
- p. 90: The per capita VMT numbers seem exceptionally low, compared to present-day numbers. See later comments on the CTP2050 Technical Analysis.
- p. 92: The VHD reduction number is unexpectedly high. Without having reviewed the modeling, this number needs more support to be believable.
- p. 96: TRANSDEF is not convinced that Figure 47 conveys useful information. To the extent that it does, we believe that remote access would also support accessibility and economy; that improved transit would benefit safety; and goods movement and land use could benefit equity if sensitively done.
- p. 99: The enthusiasm of the telecom industry for 5G has led to a fundamental failure of government and industry to protect the public from harmful electromagnetic fields (EMFs). Biological research has now proven that EMFs produce harmful cellular effects at dramatically lower field levels than the levels that cause thermal heating, the basis for current FCC health standards. https://www.jrseco.com/wp-content/uploads/2017-09-13-Scientist-Appeal-5G-Moratorium.pdf
- p. 101: TRANSDEF proposes an additional recommendation: Evaluate the costs and benefits of speeding up local transit and intercity rail to have average speeds that are time-competitive with the personal automobile (between major destinations and origins).
- p. 101, #3: Thermal screening was useful in detecting SARS-1, but is useless in detecting SARS-2 due to the high prevalence of asymptomatic carriers.

- p. 101, #9: As long as fares are to be charged, it is important to sharply define those that need transit subsidies, and avoid creating vague categories like "underserved" or "other transit-dependent riders."
- p. 102, #2: What's especially needed are effective anti-displacement policies.
- p. 102, #7: The biggest barrier to participation in planning and decision-making is financial. Providing funding for a dedicated transportation staffer would go a long ways to enabling marginalized communities to participate. Staff turnover due to financial difficulties is a constant problem for community-based organizations.
- p. 103, #7: Go beyond the proposed language to "Establish resiliency standards for new transportation projects, to ensure that their designs meet appropriate risk management standards." It's not enough to merely prioritize resilient projects. Projects with known vulnerabilities should not go forward.
- p. 105, #1 & #6: We applaud these recommendations. They are very needed in cities.
- p. 106: Explore the incentives/regulations that would be needed to shift trailer truck traffic in urbanized areas to the late evening hours, after highway congestion has died down. There is plenty of capacity for freight outside of normal business hours. See also the comment letter from our sister organization, the Train Riders Association of CA.
- p. 107: TRANSDEF continues to be dubious about two pillars of the State's ZEV plan. We oppose major State investment in hydrogen infrastructure. We believe that the availability of an existing electrical distribution network makes it unreasonable to fund a parallel distribution system for hydrogen. With recent improvements in batteries, EVs are becoming less expensive and more convenient. The electrical grid should be the recipient of any State distribution infrastructure funding. We see no reason for a significant amount of public funds to be spent to provide consumer choice. That said, we do see a role for hydrogen in rail transit, which would require only point sources of hydrogen, rather than a network. See the comment letter from our sister organization, the Train Riders Association of CA.

We are also sceptics about the use of public funds to support public Level 2 charging. Statistics have shown that a very large majority of EV users charge at home. While we do see a need for a network of fast DC chargers, that could conceivably be handled by the private sector, with coordination and possible subsidies from the public.

p. 108: CAVs are a social issue where the profit-seeking of the high-tech industry collides head-on with the interest of the global population in having a livable climate, and with local communities in not having an explosion in traffic congestion. TRANSDEF sees an urgent need for a highly regulated future for CAVs, where hype and self-promotion are not allowed to ride roughshod over the future. Let's not forget that the growth of the auto industry occurred without a planning process to evaluated its potential impacts. In the end, the automobile had a profound effect on the spatial characteristics of American life, making it fundamentally unsustainable. Let's not make that mistake again.

TRANSDEF recommends the State take a skeptical approach to the claims of the industry, and conduct environmental review based on a scenario planning process starting with the findings of the CTP. We envision a future where relatively few CAVs are on the roads, and most of those are for shared travel (transit). Several ideas come to mind: Except for the disabled, CAVs should be considered a luxury good, subject to per-mile VMT and congestion charges.

p. 109: We suggest introducing the issue of roadway pricing with an explanation of why the concept of the freeway was a mistake. While it helped popularize the use of motor vehicles, offering a scarce good (highway capacity) for free is a failed method of allocating resources. (What's worse is that federal subsidies for the Interstate Highway System destroyed passenger rail and rail transit as competition.) Freeways ignore supply and demand, so the "price" drivers that pay is not monetary but temporal. Delays are the hidden cost of highway travel. Tollways are a much more economically rational form of transportation.

From its founding back in 1994, TRANSDEF has been committed to the market pricing of roadway facilities as a key strategy for rebalancing mode shares. We strongly support the inclusion of Roadway Pricing as a strategy, and suggest it be designed to be primarily revenue-neutral (reducing the sales tax as tolls are ramped up), but include a congestion fee as an incentive to shift modes.

- p. 111: It's important to note that urban transit has no last-mile problem: Everyone lives a few blocks from a bus stop. The last-mile problem is a consequence of the suburban land use pattern, which is neither walkable nor economic to serve with transit.
- p. 111, #1: Add "unbundled parking and parking cashout for all employees receiving free parking, regional impact mitigation fees, and transit passes that are included in rent or homeowners' association dues." The latter can be mitigations for lowered parking ratios, and serve as sunk costs of transportation, thus easing entry to transit. Stress that parking reform is the hidden core of smart growth (i.e., efficient land use). Stress reduced vehicle trip generation. Mention TDM as mitigation for reduced parking ratios.
- p. 113, #2: TRANSDEF vigorously opposes Express Lanes, precisely because they <u>increase</u> VMT, rather than decrease it. The sole purpose of Express Lanes is to facilitate more SOV travel, when excessive SOV travel is the reason roads are congested. For that reason, TRANSDEF urges Caltrans to stop building Express Lanes, and convert the existing ones to HOV2.
- p. 113, #7: If this recommendation is intended to be code for "Eliminate delays caused by CEQA" we strongly oppose it.
- p. 114: Because local sources make up such a high percentage of overall transportation funding, achievement of Plan goals requires an enforceable mechanism to align local expenditure plans to State goals and policies. Counties are passing sales tax proposals with plans that show 35% increases in VMT. This must stop if the Plan is to succeed.

It's crucial for CTP staff to understand that local transportation tax measures are always based on what polls well. That translates into "Whatever increases VMT the most." Because local measures aligned with the Plan are not going to receive rousing public support in its early years, long-range funding for transportation should not count on new local funds.

- p. 114, #1: We suggest the road-user charge be designed to be primarily revenueneutral (reducing the gas tax and sales taxes as tolls are ramped up), but include a congestion fee as an incentive to shift modes.
- p. 114, #6: We are enthusiastic supporters of Value Capture and have advocated for it for years. In California, redevelopment agencies got in the way tax-increment financing of infrastructure like transit. New governance structures need to be developed to both replace them and facilitate Value Capture.

## Editorial Suggestions (keyed to Draft Plan page number)

- ES 6: Figure 3 needs to clarify that the reductions in VMT, VHD and mode shift are in comparison to BAU, known here as Baseline, rather than to current levels. Perhaps all that is required is moving the phrase "Compared to 2050 levels if current trends continue" to after the model findings, since it was completely missed on first reading.
- p. 25: The entire section 2 suffers from a lack of clarity about the 2050 projections. The Plan needs to go to great lengths to identify graphically <u>each</u> of its Baseline projections (perhaps with a bold BASELINE 2050 Projection stamp), to make sure that Plan readers do not confuse them with the Plan outcomes. The very language "and how the system may change by 2050. It describes demographic, land use, and economic trends;" is misleading and needs to be modified: "It describes what will happen if current demographic, land use, and economic trends continue. Later sections of this Plan describe the effect of the policy interventions under consideration."
- p. 41: "Growing travel demand as new drivers on the road in 2050..." assumes as a given that status quo auto-oriented development patterns will prevail in the future. See the attached San Francisco Chronicle opinion piece explaining why the dual concerns of congestion and GHG emissions should force us to reconsider how California will develop. This possibility is pointed out in the TOD Opportunity bullet on p. 44.
- p. 41: Induced demand, itself, should not be categorized as a challenge. It is merely the outcome of enabling faster trips. A legitimate challenge could be "New strategies to adapt to growth are needed, as traditional highway capacity expansions are now recognized to not provide net new capacity, due to the phenomenon of induced demand."
- p. 48: A 45% increase in biking and walking seems exceptionally unenthusiastic, given the very low initial mode share. Rereading this section again, I saw the "If current trends continue..." language, which I had failed to notice when I read it. As stressed in the comment about p. 25, this needs to be explicitly identified as a projection of the Baseline.

p. 60: The entire "By 2050" section is infected by a lack of clarity as to what is being projected. It is fundamentally misleading to start a section that projects the BAU case with "How will travel change in California by 2050?" The very assumptions are that nothing significantly changes, other than getting worse. Best to make that explicit!

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- p. 60: It is unacceptable and untrue to state that "By 2050, Californians' mode choice and VMT per capita are not anticipated to change significantly, but the large number of new residents forecasted by California MPOs will significantly affect overall VMT and congestion." This expression of status quo trends should not be allowed to make a claim as to what the future will be like, when the entire purpose of the Plan is to decide whether changes to existing trends are necessary to fulfill the State's goals.
- p. 60: Similarly, the phrase "In the 2050 Baseline" does not adequately capture the tentative nature of the status quo. More accurate would be something like "Unless interventions developed by this Plan are implemented, existing trends are likely to result in a 2050 Baseline in which ..."
- p. 60: Note that the VMT paragraph does not even have the qualifier "Without intervention..." The VMT increase is stated as a fact.
- p. 61: The tentative nature of these Baseline projections is captured by "This demonstrates that while ZEVs will help us reach our climate targets, we will still face accessibility challenges in 2050, such as growing congestion and delay, **unless alternatives to personal auto travel become better options for more Californians.**" This tentativeness is not captured in the "How Travel May Be Changing" section. The Baseline is not a "snapshot." It is one possible future. There is a huge difference between these to.
- p. 64: Perhaps the most important sentence in Section 2 is the following: "The evidence presented in this chapter makes clear that maintaining our transportation status quo is not an option. While our mobility future will be shaped by the many external forces examined in this chapter, it will be shaped just as much by the plans, policies, strategies, and actions we implement along the way." Clarifications as per our comments about p. 25 are needed to support this critical take-away.
- p. 65: While TRANSDEF is fully supportive of the vision stated here, certain parts of it seem especially unlikely to be realizable:

Urban centers such as Los Angeles, the San Francisco Bay Area, San Diego, and Sacramento, will build <u>sufficient</u> <u>housing</u> to meet demand. The majority of new housing will be built in <u>transit-supportive areas</u> and be <u>affordable</u> to lowand middle-income Californians, ensuring that residents have viable alternatives to the automobile, and that those who need to drive can do so amid <u>minimal congestion</u>.

p. 68: "all families and individuals can afford to choose where they live and how they travel" seems equally unrealizeable.

- p. 69: Consider using "mixed-use land development patterns" as more common than "diverse uses."
- p. 69: The text has asterisks on several items, without a legend to explain them. Example: The first performance measure.
- p. 70: Please replace "cost of living" with "cost of housing" as it is more precise.
- p. 70: Environment seems inappropriately separated from Climate. Climate should be a subsection of Environment. Similarly, both Safety and Equity should be subsections of Quality of Life & Public Health, because they contribute to vibrant, healthy communities.
- p. 72: "Transit asset condition" needs to be quantified. Median percentage of average service life?
- pp. 85-94: Similar to the p. 25 comments about the Baseline, the Scenario Analysis Results on these pages need to be clearly established as comparisons to the Baseline. Most of the findings are ambiguous as to whether they are being compared to the 2050 Baseline, or the present. (Note that our stress on the need for a clear comparison is the result of our current involvement in a legal case that asserts that a public agency deceived the public by claiming its tax would reduce congestion, implying a reduction in comparison to the present, when what it really meant was that it would reduce congestion in comparison to a future Baseline of doing nothing.)
- p. 90: Not having a 2015 bar graph here, while having one for Job Growth (p. 92) is concerning, as it looks like the Plan is hiding something.
- p. 92: The changes in VMT would be better displayed with a bar chart than a line chart. Also, it would make the display style more uniform.
- p. 98: Use a plus sign in front of the 7% CAV increase in GHGs to make it stand out appropriately.
- p. 113: The TAMP acronym is undefined.

#### **Typos**

- p. 30: "led" rather than "head" in Environmental Justice box
- p. 68: "class" rather than "glass"
- p. 101: eliminate the space in "th ese"

#### CTP2050 Technical Analysis

Several major flaws are immediately apparent in reviewing the CTP2050 Technical Analysis:

1. Reliance on the MPO socioeconomic forecasts is unwise--even if mandated--given their substantial differences from the DoF forecasts. Because Table 20 (p. 51) shows the State is only able to reach its 2050 GHG goal under the DoF projections, this set of projections should be used consistently throughout the Technical Analysis. It may just be that the MPOs are gaming their population projections to meet SB 375 per capita GHG requirements by greatly increasing the "capita" denominator to cover over their VMT increases. As we wrote in recent Scoping Comments to MTC:

TRANSDEF believes the Regional Growth Forecast to be ludicrous. MTC's demonstrated inability to manage a regional transportation network, coupled with political dynamics that disfavor residential development, strongly suggest that adding 2.7 million people and 1.4 million jobs to the region would result in a complete breakdown of civic functioning. This obviously unconstrained modeling has produced meaningless numbers. Because this is not a realistic set of demographic assumptions, the Plan should be based on Department of Finance projections instead.

- 2. Because the Plan's transportation strategies <u>will</u> affect land use patterns, it is troubling that the CTP is being developed without a land use model. That lack will have the following effects:
  - a). The model outputs are not valid as regards induced demand;
  - b). The synergy between the land use and transportation scenarios may well be understated; e.g., land uses may densify more around transit stations than was assumed.
  - c). The interplay between land use and transportation could result in a substantial underestimation of economic effects.

Please clarify the limitations of the CTP modeling process. Make it explicit that TREDIS is not an urban model with land use linked to transportation improvements. Please provide an indication of how the model outputs would have been different, had the transportation improvements been fed back to a land use model to reflect the advantages future development made of transit investments rather than highway investments.

3. It makes no sense that converting to HOV 3 would reduce VMT. It seems more likely it would decrease carpooling and therefore increase VMT.

### **Conclusion**

TRANSDEF is pleased with the draft Plan. It will be essential in steering transportation policy into a direction that is coherent with adopted State GHG emissions reduction goals. We thank the CTP team for its excellent work and offer our assistance in making the policy shift called for by the Plan a reality.

/s/ DAVID SCHONBRUNN

David Schonbrunn, President David@Schonbrunn.org

<u>Attachments</u> Chronicle Opinion Piece

# The case against Contra Costa County's Measure J: wrong path to traffic relief

### By David Schonbrunn

Feb. 13, 2020



A new diesel-powered train runs on the track during a test run of a new BART extension that runs from the Pittsburg-Bay Point station to Hillcrest Avenue in Antioch, Calif., on Wednesday, May 23, 2018. The new people moving line runs down the middle of Highway 4 for that length

Why is it that governments keep asking us to approve more taxes to "fix congestion" yet congestion keeps getting worse? By hiding in plain sight, the answer is kept invisible: suburban development.

Suburban development is strongly tied to congestion by the fact that suburban residents, for the most part, are dependent on their automobiles for mobility. While that's not true of San Francisco or Manhattan, it is typically difficult to walk, bike or use transit to get to suburban destinations. We define suburban development as that which is conveniently accessible only by private

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approximately as much as current residents (most of the Bay Area is similar). Jamming the cars of 300,000 new residents onto already crowded highways is a formula for gridlock.

The local Transportation Authority predicts that congestion will increase by 166% over that period. And yet it is asking the voters to approve Measure J next month, a doubling of the transportation sales tax, for the purpose of "reducing congestion." When pressed, the authority admits that its tax would reduce congestion *only as compared to doing nothing*.

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If that's the best Measure J can do, what would be better? The only way to avoid all those added cars is to avoid building suburban developments to house the new residents. If the new residents live in townhouses, condos and apartments within walking distance of frequent transit, many of them will use transit rather than drive. They will find that transit is more pleasant than driving in heavy traffic.

Our group is opposing Measure J because we want to call attention to how Contra Costa's quality of life will continue to deteriorate if future development patterns aren't changed. Funding a convenient transit network would be far more beneficial long-term than Measure J's effort to put off the inevitable day of reckoning a while longer by wringing every last bit of capacity out of the road network.

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The good news is that the housing preferences of Millennials have swung away from suburbs toward a more urbanized lifestyle accompanied by good transit. While this raises plenty of issues (including stratospheric rents, gentrification and displacement), highway congestion is not among them.

The legislative fight over SB50, Sen. Scott Wiener's response to the housing crisis, had it exactly backward: rather than mandating higher densities near transit, what is really needed is a requirement that all new development have frequent transit within a convenient walking distance.

This is how development was done a century ago: Developers built streetcar lines to serve the homes they built in what are now called "streetcar suburbs."

Every Bay Area resident knows — either consciously or unconsciously — that the status quo cannot continue indefinitely. Despite decades of tax measures that claim they will "relieve congestion," traffic keeps getting worse. It's time for the Bay Area to put an end to suburban development.

That way of life simply throws off too much auto traffic. The region needs to build around frequent transit.

David Schonbrunn is a transit advocate and president of transdef.org.

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