

The following is a synthesized and edited compilation of comments from TransForm advocates and member organizations on MTC's Draft Environmental Impact Report for the 2009 RTP. Advocates and organizations should feel free to use these as the basis for written and verbal comments on the DEIR.

*Written comments are due to MTC by **4 p.m. on Monday, February 2, 2009**, at 101 Eighth Street, Oakland, CA 94607, Attn: Ashley Nguyen, Planning Section; faxed to MTC, Attn: Ashley Nguyen, at 510.817.5848; or sent via E-mail to anguyen@mtc.ca.gov.*

There are two opportunities to comment on the RTP DEIR through verbal comments:

Tuesday, January 27, 2009

Public Hearing/Workshop: San Francisco
7 p.m. to 9 p.m.
San Francisco State Downtown Campus
Room 609
835 Market Street, San Francisco

Wednesday, January 28, 2009

Public Hearing: Oakland
10:05 a.m.
MTC Commission Meeting
Joseph P. Bort MetroCenter
Lawrence D. Dahms Auditorium
101 Eighth Street, Oakland
(at the Lake Merritt BART station)

Problematic Definition of No Project Alternative

- The structure of the DEIR fails to identify the environmental impacts of the entire RTP. That is because the “committed projects,” and in particular the \$28 billion in committed transit and roadway expansion projects, are included in the No Project Alternative. This prevents evaluation of the impacts of the entire plan against an appropriate baseline of existing environmental conditions. CEQA doesn't allow treating the previous RTP as the No Project Alternative. If projects are not yet built or under contract, they cannot be considered as part of the baseline, even if they are funded.

Alternative Scenarios

- We appreciate that MTC evaluated a scenario that pursued two of TransForm's top priorities, maintenance and climate protection. However, it would have also been ideal to have an alternative that tried to maximize greenhouse gas emission reductions. This is especially true relevant given the inclusion in the draft RTP of many projects (highway widenings in particular) that have been identified as clearly increasing GHGs.
- Given that MTC's initial modeling found that land use and pricing were the most powerful drivers of change to meet the region's adopted targets for VMT reduction and GHG emissions reductions, it would have been useful to study:
 - Project + pricing
 - Project + land-use
 - Project + both pricing and land use
 - Heavy Maintenance/Climate Protection + both pricing and land use.

- It would be useful for the Land Use and Housing chapter to discuss the alternative density development scenarios analyzed in the DEIR. Additionally, it would be useful for MTC to include in its discussion of the selected development approach an evaluation of the relative costs and benefits associated with the selected approach as opposed to a more focused and denser land use scenario.

Induced Demand & Other Modeling Limitations

- There is no discussion of induced demand in the Transportation chapter of the DEIR. Given the evidence that expansion of roadway capacity (including systems managements/operational changes and physical expansions) leads to higher overall VMT, there should be some discussion and evaluation of induced demand.
- Missing entirely in the DEIR is a discussion of induced growth, which is of direct relevance to the evaluation of transportation impacts on land use and community disruption. Growth that may be induced by highway and roadway widening should be included in the EIR's evaluation of land use impacts. The CTC's recently adopted RTP guidelines direct regions to examine both induced growth and induced demand from new capacity construction.
 - Specifically, we would like to see language added to the "Indirect/Cumulative Impacts" paragraph on page 2.3-27 to expand the list of potential indirect effects to include the impact t of inducing development on farmland beyond the Bay Area.
- Page 2.1-7 discusses MTC's travel demand forecasting model. The discussion, however, does not mention the model's limitations that are relevant to any evaluation of the RTP investment package. MTC staff has acknowledged that their travel demand forecasting model poorly reflects travel behavior changes from land use improvements or bicycle or pedestrian amenities. Furthermore, the model does not adequately reflect any behavior changes associated with programs such as Safe Routes to School or other educational/incentive programs. MTC has also indicated that they will be converting to an activity-based model for the next RTP, which should better capture the travel behavior changes from land use, bicycle, and pedestrian investments. This section should mention the model's shortcomings, explain the impacts of these on reported mode shares, and discuss MTC's intentions to acquire a new travel model for use in the 2013 RTP update. This new model should address access and mobility needs everyone, including people who work non-traditional hours and school-age, unemployed, and retired people.

Measurement & Definition Flaws

- MTC's goal for the 2009 RTP is to decrease per capita VMT, but the DEIR uses data that expresses aggregate VMT at LOS F, rather than per capita VMT at LOS F. There is no explanation as to why this is the appropriate metric.
- The Draft EIR and other forecasting documents would benefit from improved bicycle and pedestrian counts. MTC's Project alternative makes a strong, welcome commitment to completing the regional bicycle network at a significant cost. Yet the Draft EIR's comparison between the Project and No Project projections for daily

bike trips in 2035 (Table 2.1-9) shows a decrease of 1,000 bike trips in the Project alternative. However, local and national statistics show bike use on the rise as well as a direct correlation between improved facilities and increased bicycle usage. Numerous studies, including the Portland Oregon Office of Transportation's 2007 Bicycle Count Report, demonstrate that increased bikeway miles translate to increased bicycle mode share. MTC's own projections in its 2004 memo on Route Analysis by Population show that when complete, the Regional Bike Network will be within a half-mile reach of 71% of the Bay Area population, so it is unclear why the DEIR would find that the Project alternative, which includes building out the Regional Bicycle Network, will lead to a decrease total bike trips of any amount.

- Table 2.1-11 and Table 2.1-5 have values that disagree, without sufficient explanation for the disparity. Table 2.1-11 reports that 2006 travel time for work trips was 22.7 minutes. Table 2.1-5 finds that the Bay Area average travel time to work in 2007 was 27.4 minutes. This is a fairly large disparity, and one that far exceeds the differences shown on page 141. These tables may rely on different data sets, e.g. only showing morning commute to work, versus all work-based travel. The disparity does not allow clear evaluation of projected impacts of the alternatives along this metric.
- One of MTC's implicit goals for the 2009 RTP update has been to expand transit service and to increase transit's mode share in the Bay Area. For instance, MTC has elected to spend \$50 million on a Transit Priority Project to improve transit reliability and reduce delays as part of the RTP investments. While Daily Vehicle Hours of Delay is an accepted focus of DEIR measurement, as reflected in Table 2.1-13, , there is no similar measurement to assess the impact of the investments on hours of transit passenger delay. We request that the Final EIR, and future RTP analyses, include this measurement.
- The criteria for transportation impacts and air quality are defined as a "substantial" change, without any associated values; but energy criterion #1 is explicitly defined as "greater than 5% increase in the total consumption." We request a clarification of what "substantial" means for transportation and air quality impacts.
- Page 2.1-9 defines "The regional highway network includes all freeways, freeway ramps, expressways, and major arterials in the network representation; and the regional transit networks include all fixed route, inter-zonal transit service, whether by public or private operator." Where does paratransit fit in? Given our region's aging population and the likely increase in reliance on paratransit over the course of the 2035, as well as the legal requirements that link paratransit service with transit service areas, the omission of paratransit is problematic.

Mitigations

- Mitigation measure 2.1(a) calls for the Bay Area's regional agencies to leverage existing TLC funds and pursue additional funds to provide financial benefits to local governments that have designated Priority Development Areas (PDAs). To better support the PDAs, this mitigation should include additional funding sources such as the RTP's new Safe Routes to Transit funding (\$10 million/year for five years) and the \$7 billion in Local Streets and Roads funds as target sources of funding. Given the limited funding for local streets and roads and the regional interest in focusing growth in Priority Development Areas, it makes sense for most or all of the discretionary Local Streets and Roads funding to be spent in PDAs.

- Mitigation 2.1(b) calls on MTC and the Bay Area’s other regional agencies, local governments, and employers to promote innovative parking strategies. This mitigation measure could be stronger if it included parking cash-out/opt-out, which presents one of the most significant opportunities to leverage investments and MTC’s leadership. And, as TransForm has suggested previously, MTC should fund pilot parking programs and assist local governments in revising parking policies as part of the expanded TLC program—doing so would greatly contribute to this mitigation measure.
- The discussion of Cumulative Impact 2.1-2, relating to vehicle miles traveled at LOS F, mentions MTC’s commitment to working with other agencies on “faster delivery” of the freeway performance initiative to reduce delay on freeways and improve traffic operations on parallel arterials. This commitment ought to include “*without negatively impacting safety and convenience of non-motorized modes on parallel arterials.*”

Land Use & Preparing for SB 375

- While SB 375 does not affect this RTP, it behooves MTC to do as much as possible within this RTP to prepare the region for the next RTP update, which will have to conform to SB 375.
- SB 375 is discussed in the Climate Change and Greenhouse Gas Emissions chapter of the DEIR, however it should also be discussed in the Land Use and Housing chapter since, at its core, SB 375 aims to coordinate transportation, housing and land use planning in California. Page 2.3-4 cites a 1977 study by Pushkarev and Zupan that establishes a relationship between density and mode of travel. *Growing Cooler: The Evidence on Urban Development and Climate Change*, published in 2007 finds that compact development reduces driving from 20 to 40 percent, and more in certain cases. MTC should be relying on the latest research findings. Cervero’s 2008 study on TOD entitled “Effects of TOD on Housing, Parking, and Travel” found that “TOD commuters typically use transit 2 to 5 times more than other commuters in the region.” It also shows that TOD housing generates only 3.55 trips per unit, as compared to the ITE Trip Manual, which uses a figure of 6.67 trips per unit. Furthermore, the background discussion of land use and housing should include illustrative information such as average household VMT for densely developed parts of the Bay Area, such as San Francisco with average household VMT for less densely developed parts, to show the range within our region for different land use types.
- SB 375 calls for regions to achieve a jobs-housing balance and to “identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan, taking into account net migration into the region, population growth, household formation, and employment growth.” The recent draft Joint Policy Committee memo indicates that regional agencies will work together to accomplish the goals of SB 375. At the minimum, the EIR should indicate that MTC will initiate a process to work with counties and local governments immediately so that these goals will be achievable in time for the 2013 RTP update.

Air Quality

- To more clearly evaluate the air quality impacts of the RTP investments, MTC should distinguish between changes that result from implementation of the RTP investments and changes that result from improved vehicle efficiency and cleaner fuels.
- MTC should reflect the new PM_{2.5} standard of 35 ug/m³ adopted by US EPA in 2006.