

June 9, 2014

**BY EMAIL:** [ctp-info@mtc.ca.gov](mailto:ctp-info@mtc.ca.gov)

Steve Heminger  
Metropolitan Transportation Commission  
101 Eighth Street  
Oakland, CA 94607

Re: MTC Guidelines for CMA Countywide Transportation Plans

Dear Mr. Heminger:

We appreciate the opportunity to provide our input while MTC is in the process of developing a draft of its new Guidelines for long-range Countywide Transportation Plans. By holding a pre-draft public workshop on June 3, and soliciting additional written comments prior to the issuance of a draft, MTC is promoting transparency and inclusiveness in its process, and will ultimately achieve a better outcome.

This level of attention is appropriate given the crucial role of these Guidelines. As your April 4 staff memo noted, they are the vehicle for ensuring the “linkage” of the Countywide Transportation Plans (CTPs) to Plan Bay Area, and for reinforcing the importance of the ongoing “iterative relationship” between the regional and countywide plans. (The iteration between long-range countywide and regional planning is what will move the region closer to meeting our goals: A new set of CTPs must be adopted that build on Plan Bay Area, the current Regional Transportation Plan and Sustainable Communities Strategy. In turn, the next RTP/SCS will build on those CTPs.) The overarching task of the Guidelines is to ensure that the next generation of CTPs will include strategies that demonstrate a “linkage” to Plan Bay Area by promoting its goals.

To serve their purpose, the Guidelines must be firmly anchored in Plan Bay Area’s goals and associated performance measures. Plan Bay Area set high goals for improving health and equity in our region. Yet it was built on the foundation of countywide plans that, in some cases, pre-dated SB 375 and, as a result, did not achieve several of its goals. At stake in these Guidelines, then, is nothing less than whether our next regional plan will be able to achieve all of its important goals and performance measures.

In our April 21 letter, we expressed our support for key areas that your April 4 staff report mentioned as subjects for the CTP Guidelines, including (1) the CMA public participation process; (2) consistency with regional goals, objectives, investments and policies, and performance measures linked to Plan Bay Area, (3) the timeframe of proposed projects and programs (near-term, medium-term and long-term), and (4) land use linkage to Plan Bay Area. We also noted two additional important areas that we hope to see addressed: Title VI/Environmental Justice, and the date by which CMA plans will need to be updated in order to be considered in the next iteration of Plan Bay Area.

We write now to offer four major recommendations about the content of the Guidelines as it relates to these issues. The common thread that runs through all of our four is the linkage of the CTPs to the goals and performance measures of Plan Bay Area.

As shown in Attachment 1, each of Plan Bay Area's goals and associated performance measures is tied to a range of specific strategies that would promote and implement it. For instance, the Plan's Climate Protection goal will be promoted by strategies that increase transit ridership, such as fare reductions and affordable TOD housing, and its Healthy and Safe Communities goal by strategies that reduce chronic disease through increased opportunities for active transportation. Other strategies, on the contrary, would move the needle in the wrong direction by, for instance, increasing per capita GHG emissions or reducing non-auto mode share.

To ensure the strong alignment of CTP actions and investments with the promotion of Plan Bay Area's goals, so that our region has all the tools for complete success in the next RTP/SCS, we offer these four recommendations. The CTP Guidelines should guide the Congestion Management Agencies to:

- 1. Demonstrate consistency of the CTP with Plan Bay Area.**
- 2. Identify short-term priorities in the CTP, and ensure that all communities and populations share fairly in their benefits.**
- 3. Explicitly link CTP transportation investments to support of an equitable transit-oriented land-use pattern.**
- 4. Ensure that there is no break in the chain of iteration.**

Some specifics about each recommendation are provided in Attachment 2.

Thank you again for taking this first important step toward adopting a regional plan in 2017 that meets and exceeds all of the region's high aspirations and measures of success.

Sincerely,

Miya Yoshitani, Executive Director  
**Asian Pacific Environmental Network (APEN)**

Anthony Panarese, Organizing Director  
**Association of Californians for Community Empowerment (ACCE)**

Kevin Kosik, Executive Director, Greater Bay Area  
**American Lung Association in California**

Carl Anthony and Paloma Pavel  
**Breakthrough Communities**

William A. Nack, Business Manager  
**Building and Construction Trades Council of San Mateo County, AFL-CIO**

Matt Schwartz, President  
**California Housing Partnership Corporation**

Wendy Alfsen, Executive Director  
**California WALKS**

Dawn Phillips, Co-Director of Programs  
**Causa Justa :: Just Cause**

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**Marin ACE Housing Committee**

Liz O'Donoghue, Director of Infrastructure and Land Use  
**The Nature Conservancy**

Myesha Williams, Co-Director  
**New Voices Are Rising**

Dianne Spaulding, Executive Director  
**Non-Profit Housing Association of Northern California**

Leticia Romero, President  
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**Regional Asthma Management and Prevention (RAMP)**

Jill Ratner, President  
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**Safe Routes to School National Partnership**

Rev. Kirsten Snow Spalding, Executive Director  
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Ben Field, Executive Officer  
**South Bay Labor Council**

Clarrissa Cabansagan, Community Planner  
**TransForm**

David Schonbrunn, President  
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Ellen Wu, Executive Director  
**Urban Habitat**

Derecka Mehrens, Executive Director  
**Working Partnerships USA**

Cc: Alix Bockelman, Ken Kirkey, Doug Johnson  
CMA Planning Directors

**Attachment 1:  
Plan Bay Area Goals and Performance Measures  
Linked to CTP Strategies**

Plan Bay Area Goal and Performance Measure:	Examples of CTP policies, programs and projects that promote this PBA Goal:
<p><b>1. Climate Protection:</b> Reduce per-capita CO2 emissions from cars and light-duty trucks by 15 percent (Statutory requirement is for year 2035, per SB 375).</p>	<ul style="list-style-type: none"> <li>• Increased transit service levels</li> <li>• Reduced transit fares</li> <li>• Affordable TOD housing</li> <li>• Strategies to mitigate displacement risk, particularly in PDAs and neighborhoods surrounding proposed transportation investments</li> <li>• Programs that provide Safe Routes to School and Complete Streets</li> <li>• Increased opportunities for active transportation</li> <li>• Implement HOT lanes without expanding the existing highway footprint, putting net revenues to transit operations</li> </ul>
<p><b>2. Adequate Housing:</b> House 100 percent of the region's projected growth (from a 2010 baseline year) by income level (very-low, low, moderate, above-moderate) without displacing current low-income residents (Statutory requirement, per SB 375).</p>	<ul style="list-style-type: none"> <li>• A strong framework for future PDA Growth and Investment Plans that promote affordable TOD housing in PDAs</li> <li>• Incentives for local jurisdictions to designate PDA-like locations for housing growth near jobs and transit</li> </ul>
<p><b>3. Healthy and Safe Communities:</b></p> <ul style="list-style-type: none"> <li>• Reduce premature deaths from exposure to particulate emissions: <ul style="list-style-type: none"> <li>&gt;Reduce premature deaths from exposure to fine particulates (PM2.5) by 10 percent</li> <li>&gt;Reduce coarse particulate emissions (PM10) by 30 percent</li> <li>&gt;Achieve greater reductions in highly impacted areas</li> </ul> </li> <li>• Reduce by 50 percent the number of injuries and fatalities from all collisions (including bike and pedestrian)</li> <li>• Increase the average daily time walking or biking per person for transportation by 70 percent (for an average of 15 minutes per person per day)</li> </ul>	<ul style="list-style-type: none"> <li>• Reductions in chronic disease from air pollution exposures</li> <li>• Reductions in chronic disease by promoting transportation-related physical activity, including active transportation opportunities</li> <li>• Reductions in injuries and fatalities through programs that provide Safe Routes to School and Complete Streets</li> </ul>

<p><b>4. Open Space and Agricultural Preservation:</b> Direct all non-agricultural development within the urban footprint (existing urban development and urban growth boundaries) (Note: Baseline year is 2010.)</p>	<ul style="list-style-type: none"> <li>• Promoting infill development near jobs, particularly in PDAs and PDA-like places</li> <li>• Locating new and expanded transportation facilities in existing urban areas</li> <li>• Addressing agricultural workforce housing needs near agricultural jobs</li> <li>• Investing in conservation of natural and agricultural lands, especially Priority Conservation Areas</li> </ul>
<p><b>5. Equitable Access:</b> Decrease by 10 percentage points (to 56 percent, from 66 percent) the share of low-income and lower-middle income residents' household income consumed by transportation and housing.</p>	<ul style="list-style-type: none"> <li>• Increased transit service levels</li> <li>• Reduced transit fares</li> <li>• Affordable TOD housing</li> <li>• Strategies to mitigate displacement risk, particularly in PDAs and in neighborhoods surrounding proposed transportation investments</li> </ul>
<p><b>6. Economic Vitality:</b> Increase gross regional product (GRP) by 110 percent — an average annual growth rate of approximately 2 percent (in current dollars)</p>	<p>Strategies that:</p> <ul style="list-style-type: none"> <li>• Connect residents at all income levels to living-wage jobs</li> <li>• Create and retain middle wage jobs</li> <li>• Provide affordable transit and housing opportunities near low-wage job clusters</li> <li>• Ensure that the construction and operating jobs created by all development, transportation and infrastructure projects pay area standard wages and benefits to workers</li> </ul>
<p><b>7. Transportation System Effectiveness:</b></p> <ul style="list-style-type: none"> <li>• Increase non-auto mode share by 10 percentage points (to 26 percent of trips)</li> <li>• Decrease automobile vehicle miles traveled per capita by 10 percent</li> </ul> <p>&gt;Maintain the transportation system in a state of good repair:</p> <ul style="list-style-type: none"> <li>• Increase local road pavement condition index (PCI) to 75 or better</li> <li>• Decrease distressed lane-miles of state highways to less than 10 percent of total lane-miles</li> <li>• Reduce share of transit assets past their useful life to 0 percent (Note: Baseline year is 2012.)</li> </ul>	<ul style="list-style-type: none"> <li>• Increased transit service levels</li> <li>• Reduced transit fares</li> <li>• Affordable TOD housing</li> <li>• Strategies to mitigate displacement risk, particularly in PDAs and in neighborhoods surrounding proposed transportation investments</li> <li>• Implement HOT lanes without expanding the existing highway footprint, putting net revenues to transit operations</li> </ul>

**Attachment 2:  
Detailed Recommendations and Rationale  
For CTP Guideline Content**

**1. Demonstrate consistency of the CTP with Plan Bay Area.**

This recommendation will ensure that CTPs expressly consider regional goals, investments and policies, and performance measures linked to Plan Bay Area, and that CTP programs and projects will promote regional objectives. To that end, the Guidelines should:

- Define “consistency.” For instance: A CTP goal, policy, program or project is “consistent” with Plan Bay Area if it significantly promotes achievement of one or more PBA goals and performance measures, without significantly impeding the achievement of any other PBA goal or performance measure.
- Require the CTP to assess the consistency of each of its goals, and its major programs, projects and policies, with PBA’s goals and performance measures.
- Require the CTP to assess the extent to which project and program alternatives would promote PBA goals and performance measures, and to select and prioritize among them on that basis.
- Require the CTP to demonstrate that it promotes each goal and performance measure in PBA, and does not impede the achievement of any PBA goal or performance measure.
- Require the CTP to consider and adopt strategies, including those in Attachment 1, that directly promote Plan Bay Area goals and performance measures.

**2. Identify short-term priorities in the CTP, and ensure that all communities and populations share fairly in their benefits.**

Title VI and Environmental Justice requirements ensure that low-income and minority populations will share fairly – and without delay – in the benefits (and burdens) of public policy and investment. Identifying short-term CTP priorities will help ensure that EJ populations will share in the benefits and burdens of the regional plan in a fair and timely basis. Identification of short-, medium- and long-term timeframes in the CTPs will also facilitate regional planning, as the RTP must stage its projects in order to demonstrate fiscal constraint in “year of expenditure” dollars. Accordingly, the Guidelines should:

- Define short-, medium- and long-term. E.g., “short-term” means that implementation is expected to occur within five years of CTP adoption.
- Require the CTP to separately identify its short-term priorities.
- Require the CMA to conduct (with the inclusive participation of EJ community members) an appropriate Title VI and Environmental Justice analysis to ensure that low-income and minority communities and populations will share fairly in the benefits of proposed CTP investments and actions, both

in the short-term and overall, while not bearing an undue share of burdens (including displacement and public health impacts).

- Require the CTP to demonstrate that, taken as a whole, its short-term investments and actions will promote each goal and performance measure of Plan Bay Area, without impeding the achievement of any of them.

**3. Explicitly link CTP transportation investments to support of an equitable transit-oriented land-use pattern.**

The hallmark of regional planning under SB 375 is concretely tying transportation investments to land-uses that promote the creation of job and housing opportunities. Plan Bay Area took important steps to make those ties, such as in its OneBayArea Grant program. Strengthening those ties in the next regional plan will require a stronger foundation of local actions. To promote that foundation, the Guidelines should:

- Require CTPs to include incentives for local jurisdictions that have designated, or agree to designate, transit-oriented (“PDA-like”) locations for housing growth, by tying transportation investment to local land-use provisions that promote transit ridership and affordable housing near jobs.
- Require CTPs to include both an analysis of the effectiveness of the CMA’s first PDA Investment and Growth Strategy, and a program for increasing its effectiveness in the future, including an analysis of local affordable housing production, and of the extent to which local displacement risk has been mitigated.

**4. Ensure that there is no break in the chain of iteration.**

Finally, the important purposes of the Guidelines will not be served if any CMA does not conduct a timely update of its CTP in accordance with the Guidelines. If there is a breakdown in the iterative chain in any county, the linkage of the CTPs to Plan Bay Area will be compromised, with impacts on the ability of our next regional plan to achieve its goals. To prevent a breakdown in the iterative process, the Guidelines should:

- Require adoption of updated CTPs, consistent with the new Guidelines and with Plan Bay Area, by a fixed date.
- Provide appropriate RTP incentives, such as streamlined review of projects and programs included in an updated and consistent CTP to the extent that they have been fully assessed and vetted, in an inclusive and participatory CTP process, for their promotion of Plan Bay Area goals and performance measures, their equity, and their cost-effectiveness.
- Provide appropriate RTP consequences for CMA projects and programs not included in an updated and consistent CTP, such as reduced eligibility for regional funds (e.g., funds under the OneBayArea Grant program).