



June 9, 2011

MTC Planning Committee
ABAG Administrative Committee
101 Eighth Street
Oakland, California 94607

Re: Defining Alternative Scenarios for Plan Bay Area (Agenda Item 3C)

Dear Members of the MTC Planning Committee and ABAG Administrative Committee,

Thank you for the opportunity to comment on alternative scenario definitions for Plan Bay Area, the region's Sustainable Communities Strategy and Regional Transportation Plan. As you consider alternative scenarios for this stage of the development of Plan Bay Area, TransForm has seven specific recommendations, laid out in the following pages.

We urge you to design alternative scenarios that your agencies *could* adopt as the final SCS. We recognize that the preferred scenario will mix and match several alternatives. But each scenario should itself be able to be adopted. We are concerned that it appears that four of the five scenarios presented may not be able to be adopted as a final SCS. If you proceed with these alternatives, that will make comparisons, and the eventual process of selecting a preferred scenario, more difficult.

Three of our recommendations apply to all scenarios:

1. Transportation network must reflect operations & maintenance shortfalls
2. SCS must use same land use assumptions to meet housing & GHG targets
3. Design the Express Lane approach to maximize its benefits

Three more recommendations apply to specific scenarios or transportation/land use options:

4. Design an equity-focused scenario, as recommended by MTC Policy Advisory Council
5. Apply Policy Initiatives to IVS/T2035 scenario (Scenario 1)
6. Do not decrease commitment to Fix it First approach (Scenario 5)

And finally, we have a recommendation on the scenario development process:

7. Provide details on scenario definitions and analyses

1. Transportation network must reflect operations & maintenance shortfalls

The 2009 RTP included shortfalls of \$25 billion for public transportation (\$17 billion for capital maintenance, \$8 billion for operations) and \$11 billion for local streets and roads maintenance.¹ Despite these shortfalls, the full road and transit networks were included in the RTP. Due to the economic downturn the situation has only gotten worse.

For Plan Bay Area, the three Transportation Options described in staff's presentation (slide 8) contemplate differing levels of funding commitment to operations and maintenance. We understand staff plans to use the same approach as in previous years at this point in the process – model a transportation

¹ MTC, *Transportation 2035: Change in Motion*, April 2009, page 41.

network that fits with land use scenario under consideration – with small adjustments to recognize the differing funding levels. Even with these adjustments, however, the model will continue to include transit and roadway networks the region does not have the funding to maintain and (for transit) to operate.

The result will be a model based on a network we cannot afford, absent dramatic changes in funding priorities. For example, even the 5% shift in priorities contemplated for the “Core Transit Capacity Network” (85% O&M instead of 80% O&M) would increase O&M commitments by approximately \$12 billion, still leaving at least half of the shortfall from the last RTP.

We understand why MTC has continued to model a transit and road network we cannot afford: there’s little chance the region will meet our GHG goals, or any of the other adopted targets, without those networks in place. We support designing the alternative scenarios based on the networks we need, not just the networks we can currently afford. At the same time, the region needs to understand the impacts of continuing to fail to secure funds to maintain and operate our road and transit networks.

Recommendation: Direct staff to conduct a sensitivity analysis, as part of the scenario analysis, that shows the impact (on GHGs and other SCS targets) of modeling only the amount of transit and road network that the region can afford, by modeling networks with reduced capacity and extent to reflect not filling the expected shortfalls.

2. SCS must use same land use assumptions to meet housing & GHG targets

Three of the five Land Use Options described in staff’s presentation (slide 6, Options 3-5) are described with the note: “Housing target may not be met.” We understand the motivation: there are numerous challenges to meeting our region’s full housing need: costs of infrastructure and municipal services, costs of below-market-rate housing, neighborhood opposition, and market realities.

But meeting the housing target is a key SB375 requirement (slide 2). The region cannot adopt an SCS that uses one land use assumption to meet the housing target and a different land use assumption to meet the GHG requirement – an idea that some have floated. Using two different land use assumptions would not comply with letter, or the spirit, of SB 375

To adopt an SCS, the Bay Area must address our jobs-housing imbalance and also meet our GHG targets. Designing scenarios that do not meet the housing target would essentially be giving up and starting to design an Alternative Planning Strategy before we even start.

Recommendation: Direct staff to design each scenario to meet the housing target, identify and quantify the barriers that must be overcome to achieve that target (e.g., costs of infrastructure and subsidies for below-market-rate housing), and identify the policy tools that can help overcome those barriers. If it is simply impossible to make one of the scenarios meet the housing target, that scenario should be presented as one that would not comply with SB 375.

3. Design the Express Lane approach to maximize its benefits

Over the long term, the Bay Area will not be able to fund and effectively manage the operation of our highway system without some kind of road pricing strategy. Many stakeholders opposed MTC’s 2010 proposal for an 800-mile Express Lane network because it would have committed no funding to public transportation. By expanding highways at all of the major gateways into the Bay Area, it would have increased in-commuting and undermined the goals of SB 375. But MTC is now considering a smaller 500-mile network focused more on conversions of existing HOV lanes.

But we should not be implementing a system based on just maximizing the miles of Express Lanes. Rather, MTC should design a system that maximizes benefits for the region. Specifically, the scenarios should include an Express Lane system that helps the region meet the 10 adopted goals, including reducing GHGs and reducing transportation costs for low-income commuters via passes, discounts, and provision of transit along the same corridor. Further, for highways with at least 8 mixed-flow lanes but no HOV lanes, MTC should at least evaluate converting an existing lane in each direction to an Express Lane. It is alarming that there has been almost no information disclosed by MTC during 2011, even though MTC wants approval to move ahead with the system by the end of this year.

In staff's presentation, the Policy Initiatives (slide 9) do not explicitly list this Express Lane approach, although the concept does appear in some of the descriptions of the Transportation Options (slide 8).

Recommendation: Direct staff to include in the Policy Initiatives for each scenario an Express Lane network designed to reduce GHGs, fund transportation choices, and decrease the overall transportation costs for low-income commuters while reducing congestion. In each scenario, this should include a focus on conversion of existing lanes that can bring in significant net revenue and expanding transit and vanpool options on day one, as is being done in regions such as Los Angeles.

4. Design an equity-focused scenario, as recommended by MTC Policy Advisory Council

A substantial portion of the public comment and participation in Plan Bay Area so far has focused on the need for greater social equity. This was reaffirmed this week: MTC's Policy Advisory Council passed a motion calling for one of the scenarios to be specifically designed to maximize equity benefits; the joint agency Regional Equity Working Group asked staff to convey a similar message to today's meeting.

None of the five scenarios presented to you is specifically designed to maximize benefits to low-income families. We believe that a scenario focused on equity would respond to input from the public and your own advisory committees, and perform very well on the ten targets you have adopted for the SCS. An equity-focused scenario would have the following major components:

- Prioritize existing and new funding for local transit operations.
- Prioritize capital funds that cannot be shifted to transit operations for maintenance over capital expansion.
- Include only the most cost-effective transit expansion projects, including those prioritized in Community-Based Transportation Plans.
- Set aside a portion of local streets and roads funds to reward local jurisdictions that accommodate, build, and preserve their share of the region's lower-income housing need.
- Include a housing distribution pattern based on the methodology developed by the Housing Methodology Committee, distributing a significant portion to high-opportunity areas.

Recommendation: Design a scenario that focuses on maximizing equity outcomes, based on the recommendations from MTC's Policy Advisory Council, the joint agency Regional Equity Working Group, and the Housing Methodology Committee.

5. Apply Policy Initiatives to IVS/T2035 scenario (Scenario I)

The IVS/T2035 scenario in staff's presentation (slide 10, #1) is incomplete. It includes only transportation infrastructure and land use options, without any policy initiatives. This scenario has already been analyzed and shown to not meet GHG targets. It is not an adoptable scenario.

Recommendation: Modify Scenario I (IVS/T2035) to include appropriate Policy Initiatives.

6. Do not decrease commitment to Fix it First approach (Scenario 5)

The “Expanded Network” Transportation Option (slide 8, #5) would decrease O & M funding from the levels assumed in T2035. At the Regional Advisory Working Group meeting on June 7, representatives from Solano and Sonoma counties pointed out that this is completely untenable, as the region already suffers from significant shortfalls.

This option also conflicts with your prior direction. Staff reports that a key point from the May joint MTC/ABAG committee meeting was “Assuming major roadway and transit expansions in scenarios beyond what’s in the current RTP may not be realistic because it’s a challenge today to maintain our existing transportation system with available resources” (slide 5, last bullet).

We understand the motivation for Land Use Option #5: to see whether improving the jobs-housing balance of many suburban communities could result in shorter commute-trip distances and thus reduce GHGs. But there is no way that we can meet SCS targets if we also reduce the capacity of our existing transit and road networks. The Expanded Network transportation option is not an adoptable scenario.

Recommendation: Do not use the “Expanded Network” transportation option.

7. Provide details on scenario definitions and analyses

Throughout this process, staff from local jurisdictions involved in the multiple advisory committees have asked for details to be made available about the scenarios and policy options under consideration. Several stakeholders have echoed this request. If work proceeds according to the timeline laid out in the staff presentation (slide 12), this desire is likely to become even stronger during the next phase of the process: detailed design of the alternative scenarios and analysis of their results, scheduled to run from now through a presentation of results in October.

The scenario descriptions of the transportation investments, land use assumptions, and policy initiatives in this packet are very conceptual. They do not provide the level of detail necessary to allow your partner jurisdictions or the public at-large to understand and evaluate the choices at hand. According to the timeline in the meeting packet, the next presentation on the scenarios will be a release of both the scenario definitions and the analytical results, all in October, followed shortly by the required release of a preferred land use scenario to conform with RHNA schedule (November).

We understand that staff need to do extensive technical work. However, it should be possible for staff to post, on the OneBayArea.org website, detailed information about each scenario’s definition and analyses.

Recommendation: Direct staff to post details about each scenario – transportation investments, land use assumptions, and policy initiatives – as they are developed and analytical results as they are completed.

Thank you for the opportunity to present these recommendations. We look forward to following up with you and your staff to discuss the details of these recommendations and how they may be incorporated into the scenario development and analysis process.

Developing this Sustainable Communities Strategy will be a difficult and complex process, and we remain committed to working as a partner in the effort to ensure that we can cost-effectively and equitably meet the region's goals and its residents' needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Hobson". The signature is fluid and cursive, with the first name "Jeff" being larger and more prominent than the last name "Hobson".

Jeff Hobson
Deputy Director

Cc: Steve Heminger, Executive Director, MTC
Ezra Rapport, Executive Director, ABAG
Doug Kimsey and Ashley Nguyen, MTC
Ken Kirkey, ABAG