

May 17, 2019

Metropolitan Transportation Commission  
375 Beale St, Suite 800  
San Francisco, CA 94105

Dear MTC Commissioners and Ms. McMillan:

SPUR is a member-supported nonprofit organization that promotes good planning and good government in the San Francisco Bay Area through research, education and advocacy. We are located in the three largest cities of the Bay Area and work to drive local and regional change.

SPUR commends MTC and ABAG for undertaking the Horizon effort and for seeking input on the strategies to include in the Futures Round 2 analysis. The approach — considering the cumulative impact of the various projects and policies and using reports and papers as inputs to define and determine the strategies — offers the potential for Plan Bay Area 2050 to better address the issues and challenges facing our region.

To address the challenges posed by the various futures, the Futures Round 2 analysis needs to include bold, aggressive strategies. Indeed, many of the strategies slated for inclusion — invest in free last mile service, apply tolls to all freeways — are just that. At the same time, SPUR believes there are opportunities to think bolder and more strategically.

The following letter includes several overarching comments about the Futures Round 2 analysis as well as specific comments related to several of the proposed strategies.

**1. While we strongly support the public outreach process, additional criteria should be used to inform the Futures Round 2 strategy selection.**

MTC/ABAG staff pulled together 44 strategies for potential inclusion in the Futures Round 2 analysis from the Perspective Papers, the project performance assessment, stakeholder feedback, and other ongoing regional initiatives that might address or mitigate the challenges facing the region. The selection criteria are unclear. Staff should clarify how the 44 strategies were selected and provide the methodology.

The main metric used to winnow the list from 44 to 26 was stakeholder feedback. Public accountability is essential; but so too is performance accountability. We appreciate that MTC engaged in a robust outreach process, but other metrics should be used to determine the strategies to include in the Futures Round 2 analysis. What is palatable now to the public and policymakers may change over time; just a handful of years ago tolls on freeways was a non-starter. What we know from research, performance-based analyses and from the implementation of strategies in other places should be used as inputs to inform the strategy selection process. For example, the Horizons analysis opted not to include as a strategy “implement parking fees” because it



performed poorly in the outreach, but pricing parking is a proven best practice for reducing solo driving.<sup>1</sup>

We cannot lose sight of the vision of what we want the future our region to be; this future may be challenging to achieve and will certainly require trade-offs. We need to assess strategies that have the potential to get us there, rather than accept current trends.

## **2. Include bolder and more creative strategies on carpooling and travel demand management.**

Making smarter transit investments is important, but we must do more to leverage other strategies. Carpooling and other TDM strategies can deliver a much larger share of our congestion and emissions reduction. MTC's commitment to delivering a functioning network of managed lanes and carpool lanes will dramatically change the benefit of carpooling. Technology is rapidly changing the landscape for carpooling: apps allow carpools to form more efficiently and provide more reliable enforcement tools for qualifying carpools. Horizon anticipates that these tools cannot deliver a growing part of the solution, but explored at a different scale of policy and financial incentives, we think they can.

TDM and carpooling strategies MTC/ABAG could study as part of the Futures Round 2 analysis include:

- Parking cash-out programs, which offer employees the cash equivalent of their parking space if they choose not to drive;
- Discounted transit passes that employers can buy in bulk, passing the savings on to employees;
- Priority carpool parking at transit stations;
- Pricing parking, with discount for carpools, to incentivize commuters to drive less and encourage transit ridership; and
- State legislative changes to eliminate parking minimums and establish parking maximums in particular transit-served locations.

Establishing vehicle trip reduction requirements for all new development is another TDM strategy that was not selected as a finalist for the Futures Round 2 analysis even though it is a proven best practice for reducing solo driving.<sup>2</sup>

## **3. Develop and evaluate a much bolder active transportation strategy.**

Now is the moment to dramatically increase participation in active transportation in our region. Localities around the region are promoting development patterns that support walking and cycling, reducing parking requirements, and thinking more creatively about how walking, biking, and transit can work together. At the same time, there is an explosion of new options including expansive bike sharing networks, as well as electric assist bicycles, scooters, and a host of other

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<sup>1</sup> TDM programs that include paid parking have been shown to reduce auto trips by 15-30 percent depending on the availability of transit. See: National Evidence on TDM Program Impacts Vehicle Trip Reduction from Background Conditions Source: Cambridge Systematics, 2010 (Fairfax County, VA)

<sup>2</sup> For example, see the San Francisco Department of Planning's Transportation Demand Management Program, which was designed explicitly to reduce vehicle miles traveled generated by new development projects, <https://sfplanning.org/transportation-demand-management-program>

new modes. Jurisdictions that are investing in active transportation infrastructure are seeing results. As part of Plan Bay Area 2050, we must plan and deliver infrastructure to support the immense potential for active transportation modes.

The Futures Round 2 analysis should include infrastructure investments and policy changes of the scope and scale that can expand active transportation mode share to 20%. These investments and policy changes should prioritize safety; the region should strive to fully eliminate traffic-related fatalities and serious injuries. Policy changes that could be included in the analysis include automated speed enforcement and lowering speed limits by removing the 85th percentile rule which requires that traffic speeds be set to the speed at which 85 percent of drivers drive at or below.

#### **4. Prioritize investments in the regional rail network that add reliability, availability, speed and move towards greater interoperability.**

We can get more capacity on the rail network by adding more service to the existing systems and stitching them together into a network. We can get farther by fully utilizing our existing assets and investments.

The state is encouraging the Bay Area to move to a pulsed- hub network that links together great places with frequent, reliable service. Our capital investments should focus on what it takes to establish reliable travel times and to create timed transfers at stations, which are pleasant and easy to navigate. As we move towards a networked system, the transition will be hard. MTC can support the transition not just through capital projects but by programs that help make our institutions more capable of delivering transformative change. To that end, we recommend MTC:

- review all proposed or previously planned investments with this goal in mind to determine if they work towards this or not;
- leave flexibility to adjust projects included in C-9 and C-10 until MTC completes its own regional rail studies, including the forthcoming update to the regional rail plan and southern alameda county rail study;
- create a regionwide transit map, unified marketing, integrated fare structures, stations with amenities and public spaces, and pursue other improvements that enhance the transit customer experience;
- work with operators to rethink how transit is planned and delivered. Only then can we really maximize the benefits from any new investments in the regions rail and bus systems. We encourage MTC to incorporate funding programs in Plan Bay Area that support the transition. These should include:
  - funding for user experience designers, funding for fare integration;
  - funding for change management professionals and training; and
  - funding for salary levels and benefits that attract transportation professionals in a competitive market.

**5. Include an express lane network and regional express bus network in Strategy C-4.**

We can use our highways to move many more people efficiently, sustainably and equitably. It is expensive to build new transportation infrastructure; at the same time, our highways are approaching the end of their useful life as currently designed and operated, and are ready for thoughtful repurposing. Thus far, the region's partial implementation of Express Lanes has been clunky, expensive, and incomplete — and the results to date don't really work for transit.

A truly regional, frequent, and rapid express bus network supported primarily by the conversion of existing carpool or general-purpose lanes to Express Lanes has the potential to not only alleviate capacity constraints on highways and existing rapid transit systems (such as BART and Caltrain), but offer new access: a network of buses (private and public), shuttles, and jitneys that uses highways can go where trains don't, especially suburban neighborhoods, corporate campuses and office parks, shopping and entertainment complexes, centers of higher education and major medical facilities. A well-designed express bus network can significantly reduce the need to transfer between systems and could speed travel times, make buses time-competitive with or even superior to driving. For these reasons we believe the Futures Round 2 analysis should include an analysis of an optimized express lane and regional express bus network.

**6. Include fare integration in the “Price Transportation Services” column.**

The project performance assessment includes as a strategy integrating the region's transit fare system but this strategy is not included as a “Price Transportation Service” column for the Futures Round 2 analysis. While we commend MTC/ABAG for including the strategy “Provide free transit to low-income riders,” this should not preclude an analysis of fare integration which also has equity and behavior change benefits. Disparate and disjointed fares create customer confusion, inhibit people from using more than one transit service and undermine the benefits the region should derive from the significant investments it is making in new transit infrastructure and fare payment technology. The region's fragmented approach to fares pushes people to make inefficient and often costly transit decisions — or to get behind the wheel and drive themselves, adding to traffic congestion, pollution and carbon emissions. SPUR's research shows that streamlining and integrating fares could help grow transit ridership and support the seamless use of multiple operators, which in turn supports the ways that Bay Area cities plan to grow.

The “Price Transportation Service” column also includes as a strategy for the region to develop a single platform to access all mobility options, commonly referred to as a “Mobility as a Service” or MaaS. MaaS is a nascent concept and many of its core assumptions have been proven in only a few markets. Moreover, its success is highly contingent on the underlying fare policies: if the region's transit fare policies remain uncoordinated and confusing, it will be harder to compete with less-space efficient and more congesting modes.

**7. Work with non-transportation stakeholders to identify a broader suite of options to model under the “Environmental and Resilience strategies” column, and include a strategy to rapidly scale up Sustainable Streets in the Bay Area.**

The list of strategies under “Environment and Resilience” addresses only two regional environmental issues: the protection of land and open space from sprawl, and the impacts of sea level rise. While these two issues are very important, environmental protection, restoration, climate mitigation, and even climate adaptation are broader than these topics. More engagement



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of stakeholders in the Bay's wetland, environmental protection and quality, and public health communities could yield additional ideas that could be modeled in the next round of Horizon Futures. For example, heat wave stress, smoky air emergencies, creek flooding and extreme rainfall, and other events could be mitigated by making various investments in the region's resilience. As the Bay Area is home to several cities that have prepared Resilience Strategies as part of the 100RC program, a census of key strategies from city resilience plans could identify additional investments to model, that resources eventually devoted to Plan Bay Area could help support.

The Futures Round 2 Analysis should include a strategy to significantly invest in restoring the Bay's wetlands as both an environmental protection AND an adaptation strategy; as we know from the regional scientific consensus in the Baylands Ecosystem Habitat Goals Climate Change Update (2016), we have only until about 2030 to prepare marshes for accelerating levels of sea level rise, or they will drown within years or decades following, and we will lose the chance to do significant nature-based adaptation based on the region's historical ecology.

Finally, regional stakeholders have been engaged with the SF Estuary Partnership, the City and County Association of Governments of San Mateo County, the Bay Area Stormwater Management Agencies Association (BASMAA) and others, to identify ways to significantly scale up sustainable, green streets throughout the region. Many cities are preparing Green Infrastructure Plans by the end of 2019, as required by the Regional Water Quality Control Board. However, funding to build out these plans deeply lags the cities' planning ambitions. Under the category of "Reduce our Impact on the Environment", MTC should include a Horizon strategy for fully building out green infrastructure plans and sustainable streets in cities around the region. These plans will likely yield multiple community benefits for climate mitigation, local environmental improvement, and adaptation/resilience.

In closing, we encourage MTC/ABAG to make opportunities and deadlines for input more prevalent on the Horizons website. Information regarding the Futures Round 2 analysis, including the deadline for feedback, can only be found in the RAWG packet which is not linked to on the Horizon webpage.

We appreciate the opportunity to provide comments on the Futures Round 2 analysis. We look forward to your responses and ongoing collaboration.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Fleisher", with a stylized, wavy line extending to the right.

Arielle Fleisher  
Senior Transportation Policy Associate