



May 16, 2013

The Honorable Amy Rein Worth, Chair
Metropolitan Transportation Commission
Councilmember, City of Orinda
22 Orinda Way
Orinda, CA 94563
aworth@cityoforinda.org

The Honorable Mark Luce, President
Association of Bay Area Governments
Supervisor, Napa County
County Administration Building
1195 Third Street, Suite 310
Napa, CA 94559
mark.luce@countyofnapa.org

Re: Final Comments on the Draft Plan Bay Area and the Future

Dear Chair Worth and President Luce:

On behalf of the Safe Routes to School National Partnership, I am writing to provide comments on the Draft Plan Bay Area. The Safe Routes to School National Partnership is a network of more than 600 nonprofit organizations, government agencies, schools, and professionals working together to grow the Safe Routes to School movement in the United States; dozens of our partners are based in the Bay Area. Our mission is to advance safe walking and bicycling to and from schools, and in daily life, to improve the health and well-being of America's children and to foster the creation of livable, sustainable communities.

Safe Routes to School National Partnership – Bay Area Network Region
Marty Martinez, Bay Area Policy Manager, 415-637-6488, marty@saferoutespartnership.org

Introduction

We support regional planning and the overall efforts that the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) have made to address California and the Bay Area's planned population growth. However, more needs to be done to address the region's goals on health and climate protection. Stronger investments in active transportation will help the region meet its targets related to AB 32, SB 375, reducing greenhouse gas (GHG) emission levels, rising sea levels, and for addressing the health of our population, including reducing incidents of adult and childhood obesity, diabetes, asthma, heart disease and traffic injuries and fatalities.

We strongly support MTC's and ABAG's adoption of Healthy and Safe Communities targets on reducing injuries and fatalities from collisions and increasing walking and bicycling, but we are very disappointed that none of the considered Draft Plan Bay Area alternatives or scenarios gets the region anywhere near those targets. Significant new investment in active transportation, coupled with investment in transit, and housing policies that encourage transit oriented development with affordable housing is the only way the region will move closer to our targets.

To truly make the Bay Area sustainable, MTC needs to make a much, much larger investment in active transportation, including a significant increase in the Regional Safe Routes to School Program and reinstatement of the Regional Bicycle Program. In addition, improved evaluation and monitoring of the Complete Streets and One Bay Area Grant (OBAG) requirements as well as increased data collection on active transportation and improved modeling of the benefits are essential for forward progress.

Plan Bay Area Does Not Meet Healthy and Safe Communities Targets

In particular, we would like to address the following Healthy and Safe Communities targets that were adopted by MTC and ABAG:

- Reduce by 50 percent the number of injuries and fatalities from all collisions (including bicycle and pedestrian), and
- Increase the average daily time walking or bicycling per person for transportation by 70 percent (for an average of 15 minutes per person per day).

These are strong goals, and we applaud MTC and ABAG for adopting them. However, it is unfortunate that Plan Bay Area falls so short of meeting these targets. We are disappointed, for instance, that in [MTC's performance report \(http://onebayarea.org/pdf/Draft_Plan_Bay_Area/Performance_Report.pdf\)](#), the analysis shows that under all scenarios and environmental impact report (EIR) alternatives explored, there will be a significant *increase* in the number of injuries and fatalities from collisions (between +16 percent and +35 percent). The performance report states that, "to a certain extent, this is due to model limitations. MTC's model-based collision forecasting is based on vehicle miles traveled (VMT) and speed data, and it does not capture safety-enhancing infrastructure on the region's roads or safety improvements to the vehicle fleet." As we will address below, this indicates that there is a need to invest significantly in MTC's ability to model and capture this information so that we can determine whether infrastructure improvements are making a positive or negative change in improving collision rates. We are also disappointed that the performance report does not attempt (or perhaps have the ability) to differentiate the injuries and fatalities that will come from bicycle and pedestrian collisions, and provide specific recommendations for their reduction, or assess how the alternate scenarios differentially change bicycle/pedestrian collisions.

The target of increasing daily walking and/or bicycling an average of 15 minutes per person per day is also not met under any examined scenario/EIR alternative. Under each of the scenarios/EIR alternatives examined, there was increased daily walking or bicycling, but only between 10 percent and 20 percent. This is well short of the 70 percent goal MTC and ABAG set, and well short of what is needed to achieve the region's climate protection and health goals. We need much greater investments in creating a built environment that encourages walking and bicycling.

Several studies of urban areas have shown that significant investments in active transportation networks could achieve between 8-14.5 percent reductions in GHG emissions, as well as significant co-benefits to public health.^{1 2} In addition, 23 percent of serious roadway injuries and fatalities statewide involve a bicyclist or pedestrian. In order to create a healthier, more climate-friendly Bay Area, MTC and ABAG must increase its financial commitment to dedicated pedestrian and bicycling programs, most notably including the highly successful and national model, the Regional Safe Routes to School Program.

Dedicated Funds Needed to Increase Walking, Bicycling and Safe Routes to School

Currently, the region has only one dedicated program for pedestrian and bicycling projects. We greatly appreciate that last year MTC and ABAG both supported \$20 million in dedicated funding for the Regional Safe Routes to School program for a four-year period. Safe Routes to School is improving mobility and traffic safety, and through increasing physical activity the program is benefitting the health of children and the communities in which their schools are located across the Bay Area. Safe Routes to School initiatives focus on improving the built environment around schools so that streets are safe for children to walk and bicycle. Safe Routes to School programs also utilize education, encouragement and law enforcement techniques to promote safety, and to encourage parents and children to regularly choose walking and bicycling, which are active and healthy ways to get to school. This comprehensive approach results in building physical activity into children's daily routines and in improving the built environment around schools so they can be safe hubs for physical activity. Studies show that when children engage in physical activity, they also perform better on test scores and in terms of classroom behavior, so Safe Routes to School benefits many goals related to traffic safety, reduction of greenhouse gas emissions, safety, improved academic performance and reduction of GHG emissions.

Safe Routes to School programs have been so successful nationally, statewide, and regionally that we believe an expanded regional commitment is a logical and important step to take in the Bay Area to work achieving toward our health and climate protection goals, and for helping to teach children at a young age about the importance of transportation choices and how they impact traffic, safety, the environment and health. Over the coming months, we will work with MTC and ABAG staff, as well as with Safe Routes to School programs in the region to determine what amount of increased investment would result in meaningful expansions of programs in each of the Bay Area's nine counties, to help to achieve MTC's stated goals.

Assessing OBAG to Evaluate Active Transportation Investment

The OBAG program also provides funds to counties and local jurisdictions for projects, but not all of these projects need to increase active transportation. We are asking again for MTC staff to conduct an assessment this fall, after all OBAG funds have been allocated, to determine how much funding was dedicated to projects that will increase walking and/or bicycling, and thus contribute to meeting the region's health and climate protection targets. The region is falling so short of its active transportation targets so there is a clear need for increased dedicated investments, and there should be a strategy to match that need. In addition to our recommendation for a significant increase in the Regional Safe Routes to School Program, MTC and ABAG should bring back funding for the Regional Bicycle Program, which was discontinued in this RTP cycle.

Complete Streets

MTC should also push to improve current Complete Streets policies, including holding county Congestion Management Agencies (CMAs) accountable for enforcement of these policies, and investing in improving data collection and modeling capacities related to active transportation so that we can evaluate our progress in meeting

¹ City of Seattle Office of Sustainability & Environment, "Technical Advisory Group Recommendations for the Seattle Climate Action Plan Update - Transportation and Land Use Sectors Final Summary Report," Nelson Nygard 2009. Accessed at: http://www.seattle.gov/environment/documents/TAG_Transp&LandUse_Report.pdf

² Neil Maizlish, PhD. "Health Co-Benefits and Transportation Related Reductions in Greenhouse Gas Emissions in the Bay Area." California Department of Public Health, November 2011.

our regional goals, and plan investments for the next RTP which will enable the Bay Area to measure meet its health and safety targets.

We appreciate MTC's and ABAG's vote of support last year for a Complete Streets policy that requires local jurisdictions that receive OBAG funds to have passed a Complete Streets policy resolution meeting nine criteria by April of this year, or to certify that their General Plan complies with the California Complete Streets Act of 2008 (AB 1358).

We have a concern that some local jurisdictions will certify that their General Plans comply with AB 1358 when in fact they do not comply, and perhaps have not even been recently updated. Alameda County's CMA has recently been highly successful in requiring each of their local jurisdictions to pass a Complete Streets policy resolution (regardless of whether the jurisdiction has updated its General Plan), and placing the resolutions on its website. [See here \(http://www.alamedactc.org/app_pages/view/8563\)](http://www.alamedactc.org/app_pages/view/8563). This is a best practice MTC and ABAG should require of all CMAs in the region. This will increase ease of enforcement for MTC staff and public accountability for following the policies.

In addition to a requirement for all jurisdictions to pass a Complete Streets policy resolution (regardless of the status of their General Plan), MTC should also develop and provide to CMAs as soon as possible, guidance on how to determine whether a General Plan complies with AB 1358 to avoid confusion and provide regional consistency. We also look forward to continuing to work with MTC staff on the Complete Streets Checklist to ensure that it is appropriately updated and evaluated to maximize its usefulness as a tool to ensure that the needs of pedestrians and bicyclists are considered at every stage of project design and selection.

Data Collection and Modeling

It is critical that MTC invest in improvements to its active transportation data collection and modeling efforts, in a timely fashion, so that we can track what worked and to guide the region's next RTP. This is essential to get the Bay Area closer to achieving our health and climate protection targets. We urge MTC to prioritize and dedicate funding to improve and adopt activity-based models, and accelerate the implementation of the San Francisco County Transportation Authority's bicycle route choice model into the MTC travel model. This would allow for the direct quantification of the benefits of bicycle-focused infrastructure at the regional level while also supporting CMAs and local jurisdictions with active transportation planning and implementation. We also urge MTC to fund quarterly on-street data collection of bicycle and pedestrian travel, and to conduct annual user-intercept surveys, to learn more about the types of trips people are making, and the trends for usage, which will affect our ability to do good modeling. We also urge MTC to work more closely with Public Health Departments to improve data collection and models to demonstrate the benefits of investments in active transportation. It is critical that MTC move forward to invest in the activity based model now, so that the Bay Area will be ready to model walking and bicycling in a meaningful way for the next RTP. We would like to meet with MTC executive staff and the modeling team in the near future to discuss this need and the benefits of accelerating this process.

Equity

Finally, we want to emphasize the need to ensure that equity considerations are factored into the decision-making at MTC and ABAG. Low-income communities and communities of color have higher rates of obesity and chronic disease, have lower levels of car ownership, and are more reliant on public transportation and have higher traffic risks. We need to ensure that investments related to safety and health-promoting active transportation are targeted to communities most in need of them. In addition, it is important to work on housing policies that include lower income housing and anti-displacement policies.

Conclusion

In conclusion, while we strongly support MTC and ABAG in your efforts to plan for a healthy and climate-friendly region, all of the scenarios and alternatives currently under assessment fall far short of the region's health and

climate goals. Significant new investments in Safe Routes to School, and bicycle and pedestrian programs are required to meet our targets. We look forward to working with MTC and ABAG in the near future on ways to identify appropriate investments, evaluate OBAG funding and implementation of Complete Streets policies, and improve data collection and modeling efforts in time for the next RTP.

We also look forward to working with you on responding to changes in funding at the federal and state levels, including the possibility that there will be new funding for the region from Governor Brown's proposed Active Transportation Program (ATP). We hope you will agree with us that any new active transportation funding should be dedicated to increasing our region's total investment in Safe Routes to School, and dedicated walking and bicycling funding programs. The proposed Active Transportation Program would give more money to the regions due to distribution of state funding in addition to federal funding, so there would be an increase in revenue. We look forward to your response, and hope to meet soon about modeling and evaluation, as well as the proposed Active Transportation Program. Please do not hesitate to contact us with any questions. Thank you.

Sincerely,



Marty Martinez, MPP
Bay Area Policy Manager

CC: One Bay Area comments email addresses: info@OneBayArea.org, eircomments@mtc.ca.gov
Steve Heminger, MTC Executive Director, sheminger@mtc.ca.gov
Ezra Rapport, ABAG Executive Director, EzraR@abag.ca.gov
Alix Bockelman, Director, Programming and Allocations, abockelman@mtc.ca.gov
Craig Goldblatt, Transportation Analyst, cgoldblatt@mtc.ca.gov
Sean Co, Transportation Planner, sco@mtc.ca.gov