



# LEAGUE OF WOMEN VOTERS OF THE BAY AREA

An Inter-League Organization of the San Francisco Bay Area



May 9, 2012

TO: Chair Spring and Members of the MTC Planning Committee  
Chair Green and Members of the ABAG Administrative Committee  
RE: Comments on the Draft Transportation Investment Strategy

The Bay Area League of Women Voters fully appreciates the enormous challenges facing our regional agencies as they try to modify our well-established transportation and land use patterns. We strongly support making changes that will reduce the severity of climate change and at the same time provide mobility for a growing population. The proposed Transportation Investment Strategy provides some steps forward, particularly in its recognition that transportation and land use planning must be joined.

Our overall assessment of the proposals for allocating \$277 billion over the next three decades, as proposed in the Transportation Investment Strategy, is that they do not solve many of our transportation problems or effectively mitigate the effects of climate change, as noted below.

- 1) The Strategy when implemented will not meet the targets set by the regional agencies or the goals of SB 375 for significant greenhouse gas (GHG) reductions.
- 2) Major changes to the network of regional express lanes are being planned without careful study and evaluation, and with few opportunities for public participation.
- 3) Anticipated improvements in vehicle technology are being relied upon to an unrealistic extent for solutions to some of the complex problems we face.
- 4) "Fix-it-first" proposals fail to include safeguards to ensure that maintenance needs will be given priority over expanding the transportation network.
- 5) The language of the Transportation Investment Strategy should be clear and unambiguous. Unfortunately, this document as written falls short of meeting this fundamental requirement for democratic participation.

### Greenhouse Gas Reduction Targets

The League of Women Voters has consistently advocated for transportation and land use policies that will reduce the impacts of climate change and the risks they pose to the well-being of Bay Area residents and the sustainability of our communities. Unfortunately, the Transportation Investment Strategy does not accomplish this purpose, in large part because its targets for GHG reductions are inadequate and the strategies fall short of meeting even these inadequate targets.

Therefore, we ask that each of the elements of the Investment Strategy be evaluated separately to identify and give priority to those that will reduce GHG emissions and to find alternatives to those that will not. The Investment Strategy should then be reformulated and new targets should be established that call for real progress toward reducing GHG emissions.

### Express Lanes

It is far from clear that investments in an express (HOT lane) network will result in benefits that justify their costs. We therefore recommend that further work on these plans, especially those



calling for construction of 120 miles of new freeway lanes, be held in abeyance pending a thorough re-evaluation of the proposal. Among the questions that should be answered are the following:

- 1) Will the express lanes result in increased vehicle miles traveled, either by making space available in general purpose lanes during peak travel periods, or by encouraging longer trips?
- 2) Will any induced trip-making cancel or severely reduce any savings in GHG emissions that result from reduced congestion?
- 3) How long will it be until increased travel (due to a growing population or other causes) will create congested conditions similar to those that now exist?
- 4) What is the anticipated impact on GHG production if impacts from the construction and operation of the additional lane miles are included in the calculations?

It is important to note that opportunities for public participation in planning and developing this billion-dollar project have been inadequate. We call for public involvement now, rather than later when the participatory requirements of CEQA to come into effect.

#### Improvements in Vehicle Technology

Improved vehicle technology should not be relied upon to meet the goals of the investment strategy. Increased vehicle efficiency can reduce per capita GHG emissions, but it is not clear that over-all emissions will drop significantly, particularly when life-cycle assessments are considered. It is reasonable to expect that the newly efficient vehicles, together with the expanded express lane miles that are being considered, will encourage additional trip-making in single-occupant vehicles. This scenario -- more vehicles on the road and new infrastructure that will add to GHG emissions as it is built and maintained -- cannot be counted upon to solve our climate change problems.

Moreover, improved technology will not meet the many other needs of transportation in the Bay Area. For example: it will not reduce the enormous investment in land and resources required to accommodate private vehicle use and parking, nor will it encourage walking and other alternative forms of transportation that produce livable communities; and it will not reduce the time wasted in commuting on crowded freeways.

The alternative to a reliance on technological fixes is a much stronger emphasis on public transit. The changes on our Bay Area transit network that would almost certainly help to reduce GHG emissions are well known: we would need to create a transit system with reliable, efficient, and affordable services; one that provides regularly-scheduled services to neighborhoods in all but the least densely-populated communities in the Bay Area, and that accommodates the range of trip purposes that define daily travel needs. We strongly recommend that the Transit Investment Strategy be reformulated to focus on transit as the most promising strategy to meet the challenges of the Bay Area's future.



# LEAGUE OF WOMEN VOTERS OF THE BAY AREA

An Inter-League Organization of the San Francisco Bay Area



## “Fix-it-First”

It is well documented that the Bay Area’s transit systems, particularly BART and MUNI, suffer from shortfalls in transit capital maintenance that if unresolved, will threaten reliable and safe operations and eventually lead to a loss in ridership. Therefore, we ask that funding for maintenance needs be given priority over funding for extensions to these systems. We strongly recommend that the Investment Strategy include a mandate for strict oversight to ensure that the funds are used only for well-defined maintenance projects, and that only after the pressing maintenance problems are resolved can funds be used to expanded and enhance BART and MUNI services.

## Clear, Unambiguous Language

It is not possible to overemphasize the need for transparent, unambiguous language in both the Investment Strategy and in Plan Bay Area. We ask that these documents be subjected to review by potential readers who can point to words, phrases, and perhaps entire sections that are unclear to lay readers.

We call your attention to one example of a misuse of language in summaries of the Strategy that could have serious implications for public understanding. This is the claim that 88% of all funds allocated through the Investment Strategy will go to “fix it first” projects. It is clear that this 88% figure includes a combination of funds for maintenance and for routine operations, perhaps with some amenities added to the mix. But in common parlance, “fix-it-first” implies attaining and maintaining a state of good repair. It is not generally perceived as referring to transit operations.

To avoid misleading the public, please give clear definitions of: “maintenance,” “fix-it-first,” and “state of good repair.” The voting public deserves to know exactly how public funds will be allocated.

## Summary

The League asks that greater priority be given to projects and programs that are the most likely to reduce greenhouse gas emissions; that all information provided to the public about the Transportation Investment Strategy be clear and unambiguous; and that maintenance shortfalls be a top priority for the program

Thank you for your attention to our comments.

Marion Taylor, President

Cc: Steve Heminger, Executive Director, Metropolitan Transportation Commission