February 2, 2012

Mr. Steve Heminger, Executive Director, sheminger@mtc.ca.gov
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: One Bay Area Grant Recommendations and Requests

Dear Steve:

Leaders from the Safe Routes to School National Partnership (SRTSNP) and the Bay Area Bicycle Coalition (BABC) appreciated that MTC staff made some bicycle and pedestrian eligibility improvements to your recommended One Bay Area Grant (OBAG) process which was discussed at the MTC Planning Committee meeting on January 13. However, we are still concerned about the severe reduction in dedicated regional funding for pedestrian, bicycle and Safe Routes to School projects, and respectfully request that you consider the following requests for your next OBAG revisions, which we understand will be presented at the March 9 Planning Committee meeting.

Safe Routes to School

We greatly appreciate that the January 2012 staff report restored $10M in dedicated funding for Safe Routes to School, but we are concerned that this still falls far short of the $17M which was provided in the Cycle 1 grants. We strongly believe that now is not the time to cut back on regional support for this national model signature project. We have heard you state that counties can choose to supplement the regional Safe Routes to School funding with their OBAG funding; however, there is currently no incentive for counties to choose this approach, and we are concerned that this could result in a major set-back for implementation of this new program which is improving safety, reducing greenhouse gas emissions, shifting short auto trips to be walking and bicycling trips, and training the next generation to walk and bike more often, which will translate into continued behavior for many as they become adults.

Safe Routes to School Requests

Option 1 (preferred): We respectfully request that MTC fully restore the Safe Routes to School funding to a $17M regional climate initiative. The additional $7M could come out of the TE portion of the OBAG grants. In the July 2011 OBAG staff report, there were no TE funds included in OBAG. The January 2012 recommendations rolled $18M of TE into OBAG (increasing the total grants from $211M to $250M). MTC could easily take $7M of the TE funds to restore Safe Routes to School, and keep $11M for TE in OBAG which would make the OBAG total funding $243M, which is still far above the $211M July recommendations.
Option 2: After all of the positive testimony for Safe Routes to School at your hearing, if MTC staff is still not inclined to fully restore the $17M Safe Routes to School regional set-aside, we strongly request that you make changes to the structure of the $10M program to incentivize counties to match MTC’s contribution. We suggest the following process:

A) Out of the $10M Safe Routes to School regional program, $8M would be distributed to counties based on formula and $2M would become a Safe Routes to School matching fund to incentivize counties to match MTC’s Safe Routes to School investment with their OBAG funds on a 1:1 basis.

B) Counties which provide a 100% Safe Routes to School match with their OBAG funding would receive their proportion of the $2M incentive fund.

C) The incentive pot would be divided among counties based on the amount of the match and other existing MTC formulas for distribution of funds among counties. MTC would notify counties of their potential match amount in the application guidelines process, so counties would be encouraged to use OBAG funds to supplement Safe Routes to School with a 100% match, so that they would receive their portion of the incentive funding.

D) If there are counties that do not match Safe Routes to School with OBAG funding, their designated proportion of the match would be split among the counties that do choose to match 100%.

E) In the applications provided to MTC, counties should specify how they plan to use their Safe Routes to School incentive matching funds. Please note – this incentive proposal will only work if MTC specifies that the match must be through OBAG funding, not through existing sales tax or other state or federal funding. This requirement is critical for our support of this concept.

F) MTC would provide counties with their final match amount through the Safe Routes to School incentive fund within four weeks of when the final OBAG project programming is due to MTC, so that they could begin project programming.

We would like to have a discussion with MTC staff about these Safe Routes to School proposals to see if we can come to an agreement prior to the March 9 hearing. There was tremendous support for Safe Routes to School at the January 13 hearing, from parents, non-profit organizations, health officials, University staff and MTC Commissioners, and we are eager to find a solution that ensures that MTC is moving forwards, not backwards on its commitment to Safe Routes to School and the next generation.

Priority Development Areas: Need to Define Proximate Access

We understand that MTC created the concept of Priority Development Areas (PDAs) to achieve a Sustainable Communities Strategy that will meet the California Air Resources Board SB375 requirements for greenhouse gas emissions reductions.

We do support PDA-serving bicycle and pedestrian projects to be eligible for the OBAG grants, but we are concerned that “proximate access” to a PDA (which was recommended but not defined in the January staff report), potentially opens up the PDA concept too broadly and goes beyond MTC’s original intention of ensuring that transportation funding is directly linked to housing opportunities.
To make PDAs truly work as planned, where people can comfortably exist without intense dependence on automobiles, cities will need to build bicycle and pedestrian projects not only within the PDAs, but also to connect from outlying areas to PDAs. This will help to create maximum mode shift potential from bike/ped throughout the region, and to develop non-motorized connections to transit to solve the “last mile” problem. However, funding a roadway that accesses a PDA does not necessarily serve the same goal, and could result in having the opposite affect that was originally intended.

Federal Transit Administration went through a process to determine what would be eligible for funding in terms of bicycle and pedestrian access to a transit station, and drafted guidance based on an analysis. We recommend that MTC create guidance for PDA-proximate access.

**PDA Criteria Requests**

1) We respectfully request that MTC define criteria for what will be eligible as a PDA-proximate access project, and that these criteria encourage bicycle and pedestrian projects, and set boundaries on the types and lengths of segments of roadway projects that would be eligible.

2) We also recommend that an analysis of greenhouse gas emissions be undertaken to ensure that your criteria are narrow enough to result in projects that will support the state-mandated SB375 emissions reductions.

3) We request that MTC track what projects are being funded by the counties through the PDA block grants, including which are within the PDAs, which are proximate access, and what dollar amount the counties are dedicating toward Transportation for Livable Communities, Regional Bike Network, Safe Routes to School, and Local Streets and Roads projects.

**Complete Streets**

We greatly appreciate that MTC recommended including requirements for Complete Streets policies as a condition for cities and counties to receive OBAG funding. This builds on [AB1358 (Leno, Complete Streets Act of 2008)](https://leginfo.legislature.ca.gov/faces/billText.xhtml?billId=ab1358-0809&billType=AB&billVersion=0), and provides opportunities to improve on [MTC’s Resolution 3765](https://www.mtc.ca.gov/about-mtc/meet-minutes/mtc-resolution-3765/) adopted in 2006. Complete Streets (and more narrowly defined PDA-proximate access eligibility) will be critically important to advancing active transportation in the Bay Area because MTC is eliminating the Regional Bike Funding set-aside (which was just recently included for $1 billion for full funding of the Regional Bike Network in the T2035 plan adopted in 2009).

**Complete Streets Requests**

We are pleased with the Complete Streets process, timeline and plans that MTC Planner Sean Co recently outlined to the MTC Active Transportation Working Group. We see these elements as critical for moving forward:
1) Updates to MTC’s new Complete Streets process (as detailed in the January 17 MTC Active Transportation Working Group memo) should be fully in place by April 2012, before the counties are asked to select their projects for funding.

2) MTC should clearly define minimal language that cities and counties must include in their Complete Streets policy in order to be eligible for funding. These criteria should be based on national best practices, the policies should be approved by MTC, and MTC should maintain a webpage with links to all of the Complete Streets policies.

3) Since it will be difficult to have general plan amendments in place by July 2013, we recommend that the general plan date be moved forward (but that a date still be provided as this is what the Leno Complete Streets Act requires), and that instead MTC require all cities and counties to adopt a resolution or ordinance supporting Complete Streets (with the MTC minimal language requirements) by June 30, 2012, to ensure all projects proposed for funding through OBAG meeting Complete Streets requirements.

4) MTC should continue and expand training for engineers, planners and consultants in Bay Area cities and counties on Complete Streets best practices.

5) MTC should provide a standardized reporting format and require cities and counties to report on the number of miles of new bicycle and pedestrian facilities (classified by sidewalk, Class I, Class II or Class III bike facilities, as well as the numbers of improved and new street crossings and warning signage that were added as part of Complete Streets through OBAG. This information should be made publicly available and inputted in the Bike Mapper system.

Data Collection and Modeling

While the OBAG grants do not describe details about data collection and modeling, we believe that it is critical to provide comments on this topic, as these forecasting and collection practices are critical for advancing the benefits of active transportation as the nation moves more toward a performance based environment.

As the National Household Travel survey has shown, there is great potential for continued gains in walking and bicycling as a mode of transportation as 50 percent of trips are three miles or less in length, 41 percent are two miles or less in length, and 25 percent are one mile or less. The main obstacle to increasing the mode share is concerns around safety, which are well founded, as in California, 20 percent of traffic fatalities are bike/ped, which is 50 percent higher than the national average.

Data Collection and Modeling Requests

Quantifying Active Transportation Benefits

1) We urge MTC to conduct an assessment after projects have been awarded by the counties to see what actually was selected and funded. This is important for determining if the relaxed guidelines are actually funding projects which help us to meet our RTP goals. We urge MTC to require that counties quantify the amount of OBAG funding going to dedicated bicycle, pedestrian and Safe Routes to School projects. Since MTC is proposing to reduce Safe Routes to
School regional funding and eliminate Regional Bicycle Funding, this quantification is critical for measuring if the region is going forward or backwards on its commitment to active transportation, which is a proven strategy for reducing greenhouse gas emissions. We recommend that MTC provide a form and require counties to tally what projects at what cost fall into MTC categories including: Local Streets and Roads, TCL, Regional Bike Network and Safe Routes to School.

2) We ask that MTC work with us to develop a format for this quantification process which includes a verification of the amount of dedicated funding provided for stand-alone bike/ped projects, and the miles of facilities created through the new Complete Streets requirement.

Data Collection and Modeling Plans and Funding
1) We urge MTC to prioritize and dedicate funding to 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.

2) We 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.

3) As new technology for bike/ped counts are deployed, we urge MTC to utilize and test the systems, so that the Bay Area remains state-of-the-art.

Results of Current RFP Work on Modeling
As mentioned in our November 28, 2011 letter, we are pleased to see that bicycle and pedestrian modes were mentioned in the fall 2011 RFP that MTC released for modeling. We are reiterating that we would like the results of that modeling contract to include:

1) Methods for estimating projections in the growth of bike/ped use for bike/ped projects including mode-share, latent demand, and the cumulative impact of short trips;

2) Synergies for bike/ped connections to transit, and how these modes inter-relate for co-benefits;

3) Methods for calculating mode-share, air quality benefits and physical activity benefits from bike/ped projects including projections for when facilities and networks are constructed;

4) Opportunities for a cost-benefit analysis as a result of these calculations;

5) A user-friendly system which can easily be incorporated into county data modeling systems so that all counties can benefit from the bike/ped modeling methods.

We hope to work with MTC to lead the country in creating bike/ped data collection and activity based modeling systems, continuing its trend as a national model for MPOs.

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We greatly appreciate MTC’s emphasis on multi-modal transportation systems that will reduce greenhouse gas emissions and serve other goals including public safety, mobility and equity. We thank
you for your long-standing commitment to bicycle and pedestrian transportation, and look forward to working with MTC further as we enter this new era of transportation planning and funding.

Sincerely,

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