



Re: Plan Bay Area 2050: Transportation Element Next Steps
To: Bay Area Partnership Board, Metropolitan Transportation Commission
From: Seamless Bay Area

January 5, 2020

Dear Partnership Board Members, MTC Commissioners, and Staff,

Thank you for considering the following comments on the Plan Bay Area 2050 project evaluation process in advance of the upcoming MTC workshop on January 30.

We are very glad to see that this iteration of project evaluation includes valuable advances over previous years, such as:

- An equity lens to evaluate the benefits and impacts of projects on low-income and disadvantaged populations;
- Giving agencies opportunities to refine and improve projects;
- An open submission process that has generated valuable ideas from nonprofits, community groups, and local governments; and
- The use of scenarios to explore project performance in a range of futures.

However, the scoring also reveals how Plan Bay Area does not provide a strategic vision or plan for a well-performing, well-integrated transit network. This reflects the institutional reality that there is no public agency whose job it is to do strategic transit network planning on behalf of the nine-county Bay Area.

We have compiled a list of detailed observations of the project scoring results, included in Attachment to this letter. These observations have led us to the following critiques of the current scoring framework:

1. Project scoring depends greatly on how projects are grouped, which is often a reflection of transit agency jurisdictional boundaries and mandates, resulting in potential missed benefits of certain grouped investments.
2. Project scoring sometimes does not include an accurate reflection of both project costs and benefits when these extend beyond the region's boundaries, leading to wildly different assessment of project cost-effectiveness.
3. Project scoring evaluates capital projects based on current fare policies that render some parts of the system more affordable than others, resulting in muddled assessment of capital program priorities
4. Equity appears to be assessed too narrowly, rather than considering the equity benefits of freedom of movement across the region to a range of opportunities and destinations.

The Bay Area needs an integrated plan, rather than a jigsaw puzzle with mismatched parts

The fundamental issue is that the Plan Bay Area transportation “Regional Transportation Plan” isn’t developed as a plan for a transit system that works as a system, with an integrated network of routes designed to move people across the region quickly and affordably. Instead, the MTC asks many transit agencies and jurisdiction to submit projects, and then patches together a collection of projects that have been developed in isolation from each other. The outcome is a whole that is less than the sum of the parts, a system that moves fewer people than it should because it is less convenient, predictable, and affordable.

Ways to Improve scoring in 2020

Fortunately, the scoring process includes a window of time to improve projects. This window can be used proactively. Instead of waiting for individual agencies to propose changes, MTC can identify sets of gaps and potential changes, and reach out to update projects and scores that are affected by these systematic gaps. We request that MTC take the following steps to refine the scoring:

- Harmonize assumptions about projects that are potentially part of a family of projects, such as the Transbay program
- Align costs and benefits - for projects that have costs and benefits at a mega-regional and statewide travel, consider both sides of the equation (or neither, if such analysis may not yet be feasible, as in the case of HSR features for the Caltrain corridor)
- Assess project equity with a scenario of integrated, affordable fares (and not just assuming current fares); and considering feeder local service to fast regional service
- Assess project equity considering the economic opportunities provided by enabling low-income neighborhoods to have access to middle-wage jobs

Actively Support Establishing a Transportation Network Manager agency as soon as possible

Regions around the world that have well-coordinated, high-performing transit systems have an agency that plays the role of a [“Network Manager”](#), which is in charge of planning transit as a network, and making sure that the network is operated as an integrated system, with coordinated fares, schedules, wayfinding and branding. The book [Transport for Suburbia](#) makes the case that in regions that are polycentric and mixed-density such as the Bay Area, this approach is essential in achieving high transit ridership. This is clearly missing in the Bay Area.

While improving project scoring for this Plan Bay Area iteration, we urge the Commissioners and MTC staff to reflect on what’s missing, and start the process now move toward the creation of a regional Transportation Network Manager entity, so that the next round of Plan Bay Area can prioritize projects that together create a whole that is greater than the sum of the parts.

In summary, we hope that MTC, transit agencies, jurisdictions, and the region learn from this experience to fill in the gaps where feasible in this iteration of Plan Bay Area, and move toward creating a process and process for long range transportation network planning that can produce an integrated system plan where the whole is significantly greater than the sum of the parts.

Sincerely,

A handwritten signature in black ink, appearing to be 'Adina Levin', with a large loop at the top and a vertical line extending downwards.

Adina Levin
Seamless Bay Area
<https://seamlessbayarea.org>
650-646-4344

ATTACHMENT: Observations of Plan Bay Area 2050 draft scoring that reveals lack of regional leadership or accountability for an integrated regional transportation network.

1. The Transbay Rail program scores better as a whole than its component parts separately

The largest project the region is contemplating, a second Transbay Rail Crossing, which incorporates the downtown extension (DTX) of the Caltrain tracks to the Salesforce Transbay Terminal in its conventional rail options, scores better as a system than the one-mile, one-station DTX segment as a standalone project. The additional value provided by greater number of destinations and trip options, and the ability to decongest the constrained transbay crossing makes the expensive tunnel in downtown San Francisco worth the cost.

<https://www.greencaltrain.com/2019/11/why-so-expensive-deciphering-and-improving-caltrain-network-cost-benefit-scores/>

		Benefit-Cost Ratio		
		Rising Tides Falling Fortunes	Clean and Green	Back to the Future
New San Francisco-Oakland Transbay Rail Crossing - Commuter Rail (Crossing 5)	\$46.1B	0.7	2	2
New San Francisco-Oakland Transbay Rail Crossing - BART + Commuter Rail (Crossing 7)	\$83.5B	0.6	1	1
Caltrain Full Electrification and Blended System: High Growth	\$36.9B	<0.5	1	0.5
Caltrain Full Electrification and Blended System: Moderate Growth	\$24.6B	<0.5	0.9	0.5
Caltrain Downtown Extension	\$4.8B	<0.5	<0.5	0.5
Dumbarton Rail (Redwood City to Union City)	\$3.9B	<0.5	<0.5	0.5

2. Caltrain Business Plan scoring considers HSR costs but not benefits

While the Transbay Rail Crossing scores well using MTC’s project assessment methods, the evaluation of the Caltrain Business Plan growth scenarios show subpar cost-benefit results. The benefits are high - the growth scenarios are expected to increase ridership between San Francisco to San Jose by 3 to 4 times - [the equivalent of double-decking Highway 101](#).

Looking more closely, though, the costs and benefits in MTC’s analysis for the region don’t line up. The costs included in the estimate for the large Caltrain program also incorporates passing infrastructure that will be needed for High Speed Rail. The cost-benefit accounting includes the costs for the High Speed Rail infrastructure. But it does not account for the benefits of the long distance trips enabled by High Speed Rail. If the benefits can’t be accounted for, the costs should also be deducted.

3. BRT projects score well - but feasibility is uncertain due to lack of a common transit priority framework on roads

This approach has generated some insightful conclusions. Lower-cost transit improvements, such as arterial BRT lines have advantages along many dimensions - cost-benefit, equity, and value in an uncertain future.

Unfortunately, the region’s current process to approve BRT projects leaves their fate uncertain, since any of the jurisdictions along the route can halt or cripple the project which provides benefits for the region.

SamTrans El Camino Real BRT: Capital and Service Improvements *	CCAG	\$0.4B	0.7	2	1	Advances	Even	Challenges
SamTrans El Camino Real BRT: Capital and Service Improvements *	CCAG	\$0.4B	0.7	2	1	Advances	Even	Challenges
Geary BRT (Phase 2)	SF	\$0.6B	1	2	3	Even	Even	Challenges

4. Fares treated as a constant, not a variable

MTC’s project analysis attempts to consider social equity as an aspect of the scoring, which is a valuable initiative. However, the equity scoring shared in first-draft project evaluation is misleading, and reveals the fragmented approach taken in this PlanBayArea assessment.

The equity scoring assumed that the fares associated with each project are a fixed attribute of the system, the way that the cost of electrifying a railroad includes the cost of poles and wires. This can be seen by comparing the scores of increasing the capacity of the crowded Caltrain line using mostly existing rail lines and infrastructure, versus building a brand new BART line parallel to Caltrain on the same corridor - a project submitted by VTA

While the “Replicate Caltrain” project scores poorly on cost-benefit (it would cost \$48 billion to duplicate a rail line that’s already in place), it scores better than Caltrain on equity, because it takes for granted the current fares for both BART and Caltrain; and BART’s fares are lower on a per-ride basis than Caltrain current fares. To achieve the same equity benefits, it would be possible to take a tiny fraction of the \$48 billion and use it to pay for more moderate Caltrain fares.

The fact that current fares are considered a given calls into question the equity scores of all of the projects. The equity score appears to be more of an indication of current fares rather than an assessment of which projects, when coupled with an equitable fare policy, would provide the greatest benefit to low income people and other disadvantaged groups.

			Equity Score		
			Rising Tides Falling Fortunes	Clean and Green	Back to the Future
Caltrain Full Electrification and Blended System: High Growth	VTA, City of San Jose	\$36.9B	Challenges	Even	Challenges
Caltrain Full Electrification and Blended System: Moderate Growth	Caltrain + HSR	\$24.6B	Challenges	Even	Challenges
BART Gap Closure (Millbrae to Silicon Valley)	VTA	\$40.4B	Advances	Advances	Even

5. Fare integration may offer great value

As of the writing of this letter, the MTC staff have not yet published the scores for a “transformative project” submission from SPUR and Seamless Bay Area for a system of integrated fares. A “sneak preview” from staff revealed that the fare integration projects are expected to score very well, with the only “drawback” being that a system of integrated, affordable fares would draw so many new riders that capacity would need to be added to the system to carry all of the new people who would be attracted by simpler, more affordable fares.

If the outcome of fare integration is much higher transit ridership, greater mobility, lower carbon emissions, cleaner air and healthier residents, this sounds like a major win and not a drawback. And if integrated, affordable fares result in higher transit ridership and greater equity, it would make sense to plan for this in advance - starting with assumptions of integrated service.

6. Equity scoring underestimates access to opportunity

Another drawback in the method for equity scoring is lack of consideration of access to economic opportunity. It is good that the equity scoring includes potential access to jobs for low income commuters. Unfortunately, the scoring only considers access to low-wage jobs, which are spread out around the region in every county and can be accessed with local transit. However, the scoring does not include the potential for access to middle wage jobs that likely require longer commutes, and would benefit from faster and more affordable regional transit.

The scoring is missing a more detailed assessment of where the middle-wage jobs are located, including a more granular assessment of wage bands within industries, and assessing routes that serve areas known to have middle wage jobs, such as hospitals, education centers, etc.

As a region, We should strive for a regional transportation system that helps people in lower-wage jobs access middle and higher-wage jobs. We shouldn't assume that people with lower-wage jobs will always have lower-wage jobs and moreover, we should build a transportation system that helps them access better jobs.

7. Access to communities of concern should include feeder service

Fast rail lines received lower equity scores because access was measured by walking distance to a stop. Physical access is greater with effective feeder bus service; access should be measured considering the watershed of feeder buses with integrated fares and schedules.
<https://www.greencaltrain.com/2019/12/equity-benefits-of-coordinating-caltrain-and-samtrans/>