



**San Francisco  
County Transportation  
Authority**

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November 5, 2019

James P. Spering, Chair  
MTC Planning Committee  
MTC/ABAG  
375 Beale Street  
San Francisco, CA 94105

Subject: November 8 MTC Planning Committee, Agenda Item 5a. Horizon/Plan Bay Area 2050: Draft Project Performance Assessment Results

Dear Chair Spering,

The San Francisco County Transportation Authority would like to thank the Horizon/Plan Bay Area team for sharing their preliminary results of the project performance assessment with agency staff before going public. Horizon and Plan Bay Area 2050 has taken a lot of time and effort from MTC staff, as well as required a significant number of both group and individual agency meetings. We would like to take this opportunity to share with the Planning Committee our comments on MTC staff's assessment of specific projects, as well as high level comments about how the project scores might be used to inform subsequent Plan Bay Area policy discussions. We previously shared the majority of these comments with MTC staff.

Our comments below are related to the overall presentation of project scores and initial findings. We have provided additional details on these comments and project-level details on project benefits not captured in this process in Attachments 1 and 2 respectively.

- **Methodology limitations.** MTC has undertaken a very complex and extensive benefit/cost performance analysis that can provide valuable information to guide project prioritization and policy discussions in Plan Bay Area. We appreciate that for the first time, they have included transit crowding in the assessment. However, like any methodology of this sort, key assumptions can drive outcomes and there are always areas where the particular tools used don't adequately capture certain kinds of benefits. For instance, several projects in San Francisco are designed to deliver benefits that are not able to be captured in the tools used in the benefit/cost assessment. Specifically, benefits from bicycle and pedestrian projects, particularly where an existing facility is proposed to be upgraded, and transit reliability improvements are not captured (or captured adequately) in the scores as presented. Similarly, we are concerned that the equity analysis only presents a single dimension - ratio of benefits accrued to low income populations versus the population at large, when there are other ways of looking at this multi-faceted topic. Boiling equity down to a single calculation oversimplifies a complex



issue and misses the opportunity to identify projects that may advance equity for disadvantaged populations.

- **Confidence Assessment.** Following on the above comment, to aide stakeholders in knowing how to use the performance assessment results, it is important to be transparent about key assumptions and limitations that influence the results. Thus, **we strongly urge MTC to include the Confidence Assessment with the draft results for public release.** Based on prior MTC materials, our understanding is this will include notes by project about transit reliability and other qualities that are not captured in the benefit/cost and equity analyses. We have listed out many project benefits not captured in the current methodology in Attachment 2. We would appreciate an opportunity to review the Confidence Assessment before this is made public, similar to the underway review for the draft project performance results. Please see related comment below.
- **Travel Model 1.5 Validation.** During Plan Bay Area 2040, we raised concerns about MTC Travel Model 1.0 validation for Muni, which significantly underestimated Muni ridership compared to observed ridership in the 2010 base year. Earlier in the Horizon/Plan Bay Area 2050 process, we again raised this concern with MTC staff hoping that Travel Model 1.5 would bring some improvement in this area. Travel Model 1.5 transit validation data released by MTC shows that Muni ridership validated has improved, but is still underestimated by 7% while south bay and east bay transit ridership are overestimated by 15% to 21%. We wonder how much these discrepancies - which appear to underestimate transit ridership in urban areas and overestimate transit in suburban environments - have influenced the draft performance evaluation results. We would appreciate working with MTC and the relevant transit operators to understand this.
- **VMT impacts.** As a proxy for greenhouse gas emissions, impacts on VMT is a crucial data point that we would like to see included in this assessment. We continue to request that MTC include the number of VMT increased or decreased for each project, on the table of project assessment results. We understand this is captured in the benefit/cost assessment but reporting VMT out separately is more transparent and understandable to the public.
- **Consistency and transparency.** With such a complex system of scoring, it would be helpful to have each project coded consistently. Some projects have been modeled with strategies that boost project scores, while others have not. This includes fare programs on the crossings rail projects, which were not included in the other rail projects, and grouping projects together in ways that are not immediately evident in the project lists. We request that MTC produce project definitions that clarify which projects are bundled with other projects or include other projects as prerequisites, so that our policymakers are fully-informed.



- **Regional rail network planning.** We understand why MTC has elected to use a project-based approach to evaluate segments and select packages of rail projects for Plan Bay Area purposes. However, while a project-based benefit/cost analysis is a useful measure, it is not designed to fully capture the benefits of an integrated rail system and is no substitute for comprehensive regional rail network planning. Thus, we encourage MTC to present the rail project results as a conversation starter, and just one consideration of many that should be used to inform rail project prioritization and funding decisions.

We are fortunate to have MTC's active participation in a number of underway bay area and statewide rail planning efforts such as Caltrain's Business Plan, the second transbay crossing work led by BART, the California High Speed Rail project, and the Caltrain Downtown Extension program of projects. We are heartened by MTC's growing involvement in regional rail planning, funding and coordination and suggest that these processes offer a more comprehensive and nuanced approach toward determining our long-term regional rail vision, and the appropriate phasing of projects to attain that vision, than PBA. We understand the constraints MTC must comply with related to Plan Bay Area and welcome working with MTC and regional partners to ensure that these efforts can speak to each other appropriately.

In compiling our comments, we have been conferring with our partner agencies and want to associate ourselves with the comments submitted by **Caltrain** and **TJPA** regarding the Caltrain service vision projects and the Caltrain Downtown Extension.

Again, we appreciate the opportunity to share these comments with the Planning Committee. We look forward to continuing to collaborate on Plan Bay Area 2050.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Lombardo'.

Maria Lombardo  
Chief Deputy Director

cc: Comm. Halsted, Josefowitz, Ronen  
A. Bockelman, M. Maloney, D. Vautin, MTC  
T.Chang, M. Beauilieu, A. Crabbe, SFCTA



### **Attachment 1: Detailed Comments**

As MTC staff have said, the benefit/cost ratio provides one piece of information about how projects can be prioritized. We agree that there are other factors that should be part of the conversation to help identify priorities for investments. For example, some benefits are incredibly difficult to capture in modeling, but we believe they should be included in the decision-making process. Complementary strategies are important for all projects, across the entire region. Equity is far more complex than the calculations performed here can capture. And we would like to make sure that our commissioners have as much information about project definitions and impacts as possible. We have detailed each of these points below.

- **Use of the project performance scores:** We appreciate that MTC staff are proposing a process of discussing policies and strategies that in conjunction with these projects, will improve the future outcomes. Given the limitations of MTC's methodology and recognizing that some benefits are just very challenging to quantify, these discussions should start with MTC's acknowledging: 1) benefits of projects that are not captured in the assessment, such as bicycle and pedestrian infrastructure upgrades and transit reliability projects and 2) strategies that are already in place, but have not been or aren't able to modelled such as Muni's existing Lifeline and Free Muni for Seniors and Youth discounts (see strategy section below for more examples). We would like to see a stronger emphasis that these scores are only part of the process. In particular, they should not be the only components used to identify high-performing projects or to direct regional discretionary funding.
- **Equity:** There can be no doubt that equity is the most important concern on the MTC Commissioners' minds. We appreciate that MTC has included additional information about how projects impact equity in this cycle, and that the COC-impacts information is forthcoming. However, we think that a conversation about transportation equity should not be limited to these components. For example:
  - How many low-income residents are benefitting from each project? A project may have a better equity ratio in MTC's methodology, but only be benefitting a small absolute number of low-income people or the converse could be true.
  - Muni ridership is currently 59 % low-income, and other operators in the region have similarly high ridership from low-income communities. What changes to transit demographics are being assumed?
  - Does the project also benefit communities of color, people with mobility challenges, and other communities that are historically disenfranchised?



- Does the project improve safety for bicyclists and pedestrians through improved infrastructure? We know that low-income, seniors, youth and other disadvantaged communities experience higher rates of severe and fatal traffic injuries than other groups.

### **Strategies that improve projects**

We appreciate that MTC staff are seeking strategies that can be coupled with transportation project investments to improve outcomes. In San Francisco, there are several strategies in place that we believe will increase the benefits from projects, which we hope MTC will recognize and incorporate into the reporting of project scores.

- **Regional means-based transit fare pilot program:** Caltrain, BART, Muni and Golden Gate Transit are all engaged in the regional means-based transit fare pilot program, and we believe that this good-faith effort by these agencies should be reflected in their projects' equity scores or accounted for in parallel as a positive, equity-supporting strategy.
- **New PDAs:** San Francisco Planning has submitted several new Priority Development Areas (PDAs), covering a significant new portion of the city in addition to the existing PDAs. Every project submitted by San Francisco is located either entirely or mostly within a PDA.
- **Tenant protections and affordable housing preservation:** We recognize that due to San Francisco's neighborhoods' accessibility and proximity to job centers, these communities are some of the highest-income in the region. However, the City and County of San Francisco has some of the strongest tenant protection policies and affordable housing preservation programs in the region. We feel that these increase the equity impacts for all projects that improve access to and for our Communities of Concern, including the Muni Metro Southwest Subway, Better Market Street, Southeast Waterfront Transportation Improvements, Muni Forward, Treasure Island Congestion Pricing and Downtown Congestion Pricing.

We look forward to being a part of the conversation about how to group projects with other complementary projects or with the policies and strategies such as the ones listed above.



**Attachment 2: Project-specific Benefits, Not Captured**

All models have limitations, and it is important to make this acknowledgement up front. The following San Francisco transportation projects are designed to deliver benefits that are not able to be captured in MTC’s project performance assessment methodology, and some are just difficult to capture through any methodology. We recommend that MTC include a section on non-modeled benefits in their report of project performance assessment scores, either as part of the Confidence Assessment or in a separate table.

Project	Benefits not captured in model
<p><b>1. Better Market Street*</b></p> <p>*MTC staff has subsequently removed this project from the performance evaluation due to challenges capturing the project’s benefits in the model.</p>	<p><b>Transit Reliability:</b> A significant benefit from this project is to improve the reliability of the bus service on Market Street through bus stop consolidation and the creation of a separated cycle track, which has a ripple effect across the entire system of buses that converge on this facility. Bus routes that touch every district of San Francisco and connect to regional transit hubs (BART, Muni Metro, etc.) are impacted by conditions on Market Street.</p> <p><b>Bicycle and Pedestrian Improvements:</b> We request that MTC apply a multiplier to demonstrate increased mode share attributable to this significant infrastructure investment, consistent with the approach that MTC has taken for the regional bike infrastructure project. Market Street is on the high-injury <a href="#">network</a>, and this project will separate active modes from private vehicles and transit, encouraging cycling and walking by improving safety and comfort.</p> <p><b>Muni benefits to low-income residents:</b> SFMTA has 59% low-income ridership, according to MTC’s regional means-based transit fare study. Muni currently offers a 50% discount “Lifeline” transit fare pass, for which residents making less than 200% of AMI are eligible. Muni also has Free Muni for Youth and Seniors programs. These represent significant benefits to low income residents.</p>



Project	Benefits not captured in model
<p>2. <b>Caltrain Downtown Extension</b></p>	<p><b>Inter-regional connectivity:</b> With the buildout of High-Speed Rail, this project will connect Downtown San Francisco with the rest of the state. Similar to other projects included in the list, this project’s full benefits include High Speed Rail ridership-related benefits within this region, and those accrued outside of the region, and are not reflected in MTC’s performance results. Finally, as US101 is a very congested corridor, each new rider from VMT avoided brings a significant benefit that would be easier to understand by publishing VMT generated/avoided.</p> <p><b>Regional Rail Network:</b> This methodology does not take into account the potential benefits from integrating the region’s rail systems into full corridors or a single regional or mega-regional network. From San Francisco’s standpoint, this project is a foundational building block for a 2<sup>nd</sup> Transbay standard gauge rail crossing.</p>
<p>3. <b>Caltrain Full Electrification and Blended System, all projects</b></p>	<p><b>Transit Reliability:</b> Increases to Caltrain’s service and investing in grade separations would increase ridership and improve overall travel times. Without representing the delay from existing at-grade crossings in the baseline, it is hard to demonstrate the benefits of these investments. Further, other primary benefit of grade separations are improved transit reliability (both for rail and surface transit), traffic circulation and emissions, improved pedestrian and bicycle connectivity, and in some projects, reconnecting neighborhoods and street grids. These benefits are not captured in the project performance evaluation.</p> <p><b>Regional Rail Network:</b> See explanation under project #1.</p>



Project	Benefits not captured in model
<p><b>4. Downtown Congestion Pricing</b></p>	<p><b>Equity:</b> This project is being designed with the explicit goal of improving equity in San Francisco as the current situation with transit stuck in traffic, disproportionately burdens low income persons, as does air pollution from motor vehicles and the risk of severe and fatal crashes. The final form has not been decided, but we request that this acknowledgement be included in the public release of materials for this assessment.</p>
<p><b>5. Geary Rapid, Phase 2</b></p>	<p><b>Transit Reliability:</b> By removing transit from the flow of automobile traffic, the Geary Rapid project improves transit reliability significantly, which is not captured in MTC’s modeled benefits. This is a significant limitation that leaves major benefits out for transit priority projects.</p>
<p><b>6. Muni Forward</b></p>	<p><b>Transit Reliability:</b> Similar to Geary Rapid, Muni Forward projects improves transit reliability significantly. See explanation under project #5.</p>
	<p><b>Pedestrian Improvements:</b> Muni Forward projects also include bus stop bump-outs and other improvements to pedestrian safety, which are accounted for in the capital cost but not captured in MTC’s modeled benefits.</p>
	<p><b>Muni benefits to low-income residents:</b> See explanation under project #1.</p>
<p><b>7. Muni Metro Southwest Subway</b></p>	<p><b>Transit Reliability:</b> Similar to Better Market Street, this project will improve the reliability of every rail line that travels through the Muni Metro subway.</p>
	<p><b>Muni benefits to low-income residents:</b> See explanation under project #1.</p>



Project	Benefits not captured in model
<b>8. Regional Express Lanes</b>	<b>Transit Service:</b> In San Francisco, our regional express lane project has express bus service incorporated into the project definition from the start. We are unclear why MTC choose to model the project without the bus service.
	<b>Transit Reliability:</b> SFMTA and SamTrans each has buses that operate on the existing express lane facilities. These routes suffer from reliability concerns due to congestion levels on 101 and 280 in San Francisco. The Regional Express Lanes will improve that reliability as well as travel time.
	<b>Muni benefits to low-income residents:</b> See explanation under project #1.
	<b>Equity Focus:</b> See explanation under project #4.
<b>9. Treasure Island Mobility Management Program</b>	<b>Affordability Program:</b> The Treasure Island Mobility Management Program has been designed with an affordability program built in. This will include subsidized transit passes and discounts to services like car and bike share, to make transit affordable and accessible. We request that this effort be acknowledged in the public release of materials for this assessment.