

METROPOLITAN TRANSPORTATION COMMISSION Agenda Item 4b Bay Area Metro Center 375 Beale Street San Francisco, CA 94105 TEL 415.778.6700 WEB www.mtc.ca.gov

Memorandum

TO: Planning Committee

DATE: December 1, 2017

FR: Executive Director

RE: Federal Performance Target-Setting Update – December 2017

Background

The Moving Ahead for Progress in the 21st Century Act, also known as MAP-21, was signed into law in 2012 and established a suite of new performance requirements for state Departments of Transportation (DOTs), metropolitan planning organizations (MPOs), and transit agencies as shown in **Attachment A**. Over the past five years, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have been working through the rulemaking process to identify a set of performance measures that meet the requirements of the law. With these rules now coming into effect, MPOs must either support short-range statewide targets or set short-range regional targets on a recurring basis. Furthermore, MPOs must incorporate these short-range targets into their planning process – most notably, the Transportation Improvement Program (TIP) and the Regional Transportation Plan (RTP).

Under the final performance rules, MTC is responsible for setting targets for each performance measure on an ongoing rolling basis. Each measure has its own schedule and cycle for target updates, meaning that ongoing collaboration with state, regional, and local partners will be essential. These performance targets are fundamentally different from those in Plan Bay Area 2040 – focused solely on short-term transportation objectives defined by federal law. Under MTC Resolution No. 4295 adopted in June 2017, the Planning Committee delegated authority for target-setting to staff, requiring regular consultation with stakeholders through the Partnership working groups and semiannual updates to the committee going forward.

2018 Safety Targets

As discussed in Attachment B and Attachment C, staff has been focused on identifying year 2018 roadway safety performance targets for the five performance measures identified in federal regulations. Like most of the other performance measure areas, MPOs may either support the statewide targets or set region-specific targets. For calendar year 2018, staff is proposing to support the ambitious statewide targets adopted by Caltrans earlier this year, similar to what is being done by other major MPOs in California.

By supporting Caltrans goals to achieve zero traffic deaths by 2030 and significantly reduce nonmotorized fatalities and injuries, MTC is making a strong commitment to improving roadway safety. Working towards these statewide targets will improve safety performance in the Bay Area. These targets will be set this month, in advance of the February 28 deadline for MPOs to take action on this. This decision will be reviewed and reconsidered on an annual basis going forward. Feedback received during the consultation process is summarized in **Attachment D** and **Attachment E**.

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Note that while there are no direct funding impacts from an MPO's failure to achieve a given performance target, MPO target-setting and performance-based planning processes will be evaluated as part of the agency's triennial review. Federal requirements also mandate that MPOs report their targets to their respective state DOT and that MPOs quantify progress made towards targets in the context of their TIPs and RTPs.

Next Steps

In addition to expanding the Vital Signs performance monitoring website to report new shortrange targets, staff has also updated the Vital Signs indicator pages for safety in recent weeks (refer to <u>vitalsigns.mtc.ca.gov</u> for more info). Both of these actions will boost transparency around recent safety trends, building upon our existing performance monitoring framework. In early 2018, staff will be seeking input on future target-setting requirements related to asset management and system performance.

Steve Heminger

Attachments:

- Attachment A: List of Federally-Required Performance Measures
- Attachment B: December 2017 Target-Setting Summary
- Attachment C: Proposed 2018 Targets for Roadway Safety
- Attachment D: MTC Federal Safety Performance Measures: Stakeholder Input
- Attachment E: Letters Received During Public Comment Period

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List of Federally-Required Performance Measures

FEDERAL GOALS & PROGRAMS	GENERAL MEASURES IN LAW	FINAL PERFORMANCE MEASURES	Target- Setting Frequency	1 st Cycle Target- Setting Due Dates
Safety HSIP TSOP	Number of Fatalities on Roads	1. Total number of road fatalities	Annual	State: August 31, 2017 MPO: February 27, 2018
	Rate of Fatalities on Roads	2. Road fatalities per VMT	Annual	State: August 31, 2017 MPO: February 27, 2018
	Number of Serious Injuries on Roads	3. Total number of serious injuries on roads	Annual	State: August 31, 2017 MPO: February 27, 2018
	Rate of Serious Injuries on Roads	4. Serious injuries on roads per VMT	Annual	State: August 31, 2017 MPO: February 27, 2018
	Non-Motorized Safety on Roads	5. Combined total number of non-motorized fatalities and serious injuries	Annual	State: August 31, 2017 MPO: February 27, 2018
	Safety of Public Transit Systems	 6. Total number of reportable transit fatalities 7. Reportable transit fatalities per RVM by mode (example below) a. Motor bus b. Light rail c. Heavy rail d. etc. 8. Total number of reportable transit injuries 9. Reportable transit injuries per RVM by mode (example below) a. Motor bus b. Light rail c. Heavy rail d. etc. 10. Total number of reportable transit safety events 11. Reportable transit safety events per RVM by mode (example below) a. Motor bus b. Light rail c. Heavy rail d. etc. 12. Mean distance between major mechanical failures by mode (example below) a. Motor bus b. Light rail c. Heavy rail d. etc. 	Annual	Operators: TBD* MPO: TBD* * = measures approved in January 2017 regulatory action but transit & MPO safety target-setting requirements are slated for additional regulation later this year

FEDERAL GOALS & PROGRAMS	General Measures in Law	FINAL PERFORMANCE MEASURES	TARGET- Setting Frequency	1 st Cycle Target- Setting Due Dates
	Pavement Condition on the IHS	 Percentage of pavements on the IHS in good condition Percentage of pavements on the IHS in poor condition 	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
	Pavement Condition on the NHS	15. Percentage of pavements on the non-IHS NHS in good condition 16. Percentage of pavements on the non-IHS NHS in poor condition	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
	Bridge Condition on the NHS	17. Percentage of NHS bridges classified in good condition 18. Percentage of NHS bridges classified in poor condition	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
Infrastructure Condition NHPP NTAMS	State of Good Repair for Public Transit Assets	 19. Percentage of revenue vehicles that have met or exceeded their useful life benchmark (ULB) by asset class (example below) a. 40-foot bus b. 30-foot bus c. Light rail vehicle d. etc. 20. Percentage of facilities within a condition rating below fair by asset class (example below) a. Maintenance yards b. Stations c. Electrical substations d. etc. 21. Percentage of guideway directional route-miles with performance restrictions 22. Percentage of non-revenue vehicles that have met or exceeded their ULB 		Operators: January 1, 2017 MPO: July 1, 2017
System Reliability NHPP	Performance of the Interstate System	23. Percentage of person-miles traveled on the IHS that are reliable	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
	Performance of the NHS	24. Percentage of person-miles traveled on the non-IHS NHS that are reliable	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
		25. Percent change in NHS tailpipe CO₂ emissions (compared to 2017 baseline)	Every 2-4 years	State: October 1, 2018** MPO: October 1, 2018** ** = FHWA is currently proposing a repeal of this measure due to shift in federal climate policy; timeline subject to change

FEDERAL GOALS & PROGRAMS	GENERAL MEASURES IN LAW	FINAL PERFORMANCE MEASURES	TARGET- Setting Frequency	1 st Cycle Target- Setting Due Dates
Freight Movement and Economic Vitality NHFP	Freight Movement on the Interstate System	26. Percentage of IHS mileage providing reliable truck travel times	Every 2-4 years	State: May 21, 2018 MPO: November 21, 2018
Congestion Reduction CMAQ	Traffic Congestion	 27. Annual hours of peak-hour excessive delay per capita by urbanized area a. San Francisco-Oakland UA b. San Jose UA c. Concord UA*** d. Santa Rosa UA*** e. Antioch UA*** *** = not required during 1st target-setting cycle 	Every 2 years	State: May 21, 2018 MPO: May 21, 2018
Congestion Reduction (continued) CMAQ	Traffic Congestion (continued)	 28. Percent of non-SOV travel by urbanized area a. San Francisco-Oakland UA b. San Jose UA c. Concord UA*** d. Santa Rosa UA*** e. Antioch UA*** *** = not required during 1st target-setting cycle 	Every 2 years	State: May 21, 2018 MPO: May 21, 2018
Environmental Sustainability CMAQ	On-Road Mobile Source Emissions	 29. Total emissions reductions from CMAQ-funded projects by pollutant a. PM_{2.5} b. PM₁₀ c. CO d. VOC e. NOx 	Every 2 years	State: May 21, 2018 MPO: May 21, 2018
Reduced Project Delivery Delays	none	<i>none</i> (neither MAP-21 nor FAST included performance measures for this goal)	n/a	n/a

December 2017 Target-Setting Summary: Road Safety Targets

<u>Overview</u>

The safety performance management final rule published by FHWA in March 2016 established national road safety performance management in accordance with MAP-21. The rule contained new requirements for State DOTs and MPOs. The major requirements of the rule are:

1) **Road Safety Performance Targets** – The final rule established five performance measures to assess safety on all public roads and targets must be established for each measure. The final rule establishes the following road safety performance measures:

Measure	Definition
Number of fatalities	The total number of persons suffering fatal injuries in a motor
	vehicle crash during a calendar year.
Rate of fatalities	The ratio of total number of fatalities to the number of vehicle
	miles traveled (VMT, in 100 Million VMT) in a calendar year.
Number of serious injuries	The total number of persons suffering at least one serious injury
	in a motor vehicle crash during a calendar year
Rate of serious injuries	The ratio of total number of serious injuries to the number of
	VMT (in 100 Million VMT) in a calendar year.
Number of non-motorized	The combined total number of non-motorized fatalities and
fatalities and non-motorized	non-motorized serious injuries involving a motor vehicle during
serious injuries (bicyclists	a calendar year.
and pedestrians)	

The measures are reported using 5-year rolling averages to capture long-term performance trends. The first performance period, calendar year 2018, represents the annual average for 2014 to 2018. State DOTs must set annual numerical targets each year for each safety measure to comply with the regulation. MPOs have the option of supporting State targets or setting their own region-specific numerical targets on a target-by-target basis. This decision may be revisited annually.

- 2) Reporting MTC must report annually to Caltrans on its proposed safety targets. If MTC chooses to set region-specific numerical targets, MTC must also report progress made towards meeting set targets. The measures and targets should inform agency planning and funding decisions to carry out the Highway Safety Improvement Program (HSIP). MPOs will report progress on these measures in future Regional Transportation Plans (RTPs) and Transportation Improvement Programs (TIPs).
- 3) **Evaluation** State DOTs and MPOs meet or make "significant progress" towards their safety goal if they achieve the target or improve performance in at least four out of five of the safety measures. If a State DOT does not meet or make "significant progress" then it will lose flexibility in spending HSIP funds. FHWA *will not* evaluate MPOs on their progress towards targets. However, FHWA will review MPO performance as part of the triennial review process.

MPOs are required to establish their 2018 safety targets no later than February 28, 2018, six months after the state DOT requirement. The process will be repeated on an annual basis going forward.

Target-Setting Approach and Rationale

In compliance with new federal performance management rules, state and regional safety performance targets must be coordinated with Caltrans. In August 2017, Caltrans set the 2018 statewide safety performance targets. Caltrans used a vision-based target-setting approach to establish ambitious targets that aligned with the State's Towards Zero Deaths goal for zero traffic fatalities in 2030 and the State Highway Safety Plan. The State's most aggressive safety target is for non-motorized fatalities and serious injuries.

This fall, staff sought input from stakeholders on target-setting options for MTC's MPO safety performance targets. Staff sought feedback at meetings with CMA Planning Directors, Partnership Board, and Partnership working groups and through outreach to safety advocates. Stakeholders provided input on their preferred target setting approach and discussed strategies the region could take to improve safety performance. Most stakeholders backed the option to support the State's targets (known as Option 1). There was also support for setting more ambitious region-specific numeric targets (known as Option 3). Stakeholders also noted that this was an unfunded mandate and suggested areas that MTC's programming and policies could be enhanced to improve regional safety and the ability for the region to achieving federal safety targets. A summary of input from stakeholders and comment letters received can be found in **Attachments C and D**, respectively.

Based on target-setting coordination with Caltrans and feedback from Bay Area stakeholders, staff has identified supporting Caltrans 2018 statewide targets as the preferred targets option for MTC. Caltrans' statewide targets are ambitious and align with a Vision Zero approach adopted by several Bay Area jurisdictions. Supporting these aggressive targets reflects the importance of roadway safety to MTC and its stakeholders while providing strong alignment with the state. MTC will monitoring regional progress toward statewide target and report region-specific data for the safety performance measures through Vital Signs.

Measure	2018 Target
Number of fatalities	Support State Target
Rate of fatalities	Support State Target
Number of serious injuries	Support State Target
Rate of serious injuries	Support State Target
Number of non-motorized fatalities and non-motorized serious injuries	Support State Target
(bicyclists and pedestrians)	

Summary of Proposed Targets

Targets to be Set in the Next Six Months

Over the next six months, staff will work to set 2020 targets related to CMAQ (including traffic congestion and mobile emissions) as well as 2018 transit asset management targets. Future work in 2018 will focus on other asset management categories (pavement and bridges) as well as system performance (reliability and goods movement).

Proposed 2018 Targets for Roadway Safety

General Information

Goal	Safety
Performance Measure(s)	 Number of fatalities (5-year rolling average; all public roads) Rate of fatalities per 100 million vehicle miles traveled (5-year rolling average; all public roads) Number of serious injuries (5-year rolling average; all public roads) Rate of serious injuries per 100 million vehicle miles traveled (5-year rolling average; all public roads) Rate of serious injuries per 100 million vehicle miles traveled (5-year rolling average; all public roads) Number of non-motorized fatalities and non-motorized serious injuries (5-year rolling average; all public roads)
Target(s) for Year	2018
Target(s) Deadline for MTC Approval	February 28, 2018

The Metropolitan Transportation Commission has elected to support safety targets adopted by Caltrans in August 2017 for use in calendar year 2018. These targets align with a Towards Zero Deaths goal by year 2030.

MTC Federal Safety Performance Measures: Stakeholder Input

In October and November, staff sought input from Bay Area stakeholders on potential safety targets. The three target-setting options were presented at meetings with CMA Planning Directors (CMA PD), Partnership Board, Project Delivery Working Group (PDWG), Local Streets and Roads Working Group (LSRWG), Active Transportation Working Group (ATWG), and Partnership Technical Advisory Committee (PTAC). Staff also reached out directly to local road safety and active transportation advocacy groups to request feedback on the potential targets and publicized the opportunity to submit comments via the MTC website. MTC also received comment letters from the Vision Zero Network, San Francisco Municipal Transportation Agency (SFMTA), and the Oakland Department of Transportation (Oakland DOT).

In the discussions at these meetings and comments received, stakeholders discussed their preferred target-setting option and additional strategies MTC should consider to achieve the safety goal. A summary of feedback is shown below.

Category	Comment	Group(s)
Key points raised in support of Caltrans targets	Backing Caltrans statewide targets demonstrates support for the State	CMA PD
	Since the region does not have a safety-specific funding program at this time, MTC should not set a region-specific target	CMA PD; PDWG; LSRWG; PTAC
	Coordinating transportation programming between various agencies will be less complicated if Caltrans and MTC are fully aligned on safety targets	CMA PD; ATWG
Key points raised in support of setting region- specific targets more ambitious than the State	Setting a region-specific numerical target would make MTC a leader in prioritizing safety	Vision Zero Network; Silicon Valley Bicycle Coalition
	MTC should set ambitious safety targets	Vision Zero Network; SFMTA; Oakland DOT
	Can set a clear target to reduce fatalities and serious injuries	Oakland DOT
Key points raised in support of setting region- specific targets	Achieving the State's non-motorized target may be difficult because the measure does not consider bike/ped rates and the Bay Area has a higher (and growing) bike/ped mode share	ATWG
less ambitious than the State	MTC targets should be realistic and achievable	PTAC

Category	Comment	Group(s)
Vision Zero	Targets MTC adopts should be aligned with Vision Zero/Towards Zero Deaths	PDWG; LSRWG; Vision Zero Network; SFMTA; Oakland DOT
Going beyond targets	To achieve any safety target, MTC should make efforts to incorporate safety into programming and planning going forward	CMA PD; PDWG; LSRWG; PTAC; Vision Zero Network; SFMTA; Oakland DOT; Silicon Valley Bicycle Coalition
	Additional data and methodologies for tracking crashes, exposure to crash risk, and fatality and injury rates – especially for non-motorized modes – is needed to inform safety programming and policy decisions	PDWG; LSRWG; ATWG; East Bay Bike Coalition; Vision Zero Network; SFMTA; Oakland DOT
	MTC should actively support road safety policies such as speed management, automated speed enforcement, Vision Zero, and Complete Streets	Vision Zero Network; Oakland DOT



Department of Transportation 250 Frank H. Ogawa Plaza, Suite 4344 Oakland California 94612-2033 (510) 238-2967

November 8, 2017

Ken Kirkey Director of Planning Metropolitan Transportation Commission 375 Beale Street, Suite 800

Subject: 2018 Safety Performance Targets

Dear Mr. Kirkey,

Thank you for the opportunity to provide input on 2018 Safety Performance Targets for the Bay Area. We appreciate the analysis provided by MTC staff to the Partnership Board and are writing to encourage the Metropolitan Transportation Commission to select Option 3, to establish region-specific targets no higher than the 2016 baseline. The City of Oakland has committed to Vision Zero to end all traffic deaths and serious injuries and strongly supports the region and state adopting similarly ambitious goals.

Unfortunately, traffic deaths are on the rise nationally, in California, and in many Bay Area cities, and the greatest increases are being borne by people walking (including walking to transit) and bicycling. As a region working toward ambitious mode-shift goals, we must focus on addressing these trends to save lives today and support the mode-shift goals we hope to achieve.

The 2018 Safety Performance Target's "Option 3" sets clear reductions in the number of traffic deaths and serious injuries on our regional transportation network, and helps advance MTC's Vision Zero planning efforts. Ideally, setting a clear target will help guide MTC's allocation of resources for regional funding programs and in the next Plan Bay Area, resulting in increased safety projects at the local level and greater benefits for the communities we serve. We look forward to working with MTC and other regional partners to implement projects and programs that support achieving this goal.

We also encourage MTC to develop additional methodologies for tracking the safety benefits of projects. In the previous Plan Bay Area, this benefit was calculated as proportional to reductions in Vehicle Miles Traveled (VMT). However, reducing VMT on highways is likely to have a different impact on safety than reducing VMT on crowded urban streets. Further, many effective safety

projects, such as the pedestrian safety elements idenfitied in our Pedestrian Plan, are unrelated to VMT.

Finally, as many cities in the Bay Area are commiting to a Vision Zero approach, we encourage the MTC to support regional tracking, including the development of a regional high injury network for people walking, bicycling and in motor vehicles, and tracking regional deaths and serious injuries to inform priorities.

We can achieve significant reductions in traffic deaths and serious injuries region-wide by ensuring that every project prioritizes safety and that no opportunities are missed. In order to achieve ambitious reductions in death and disability, we recommend that MTC sets similarly ambitious targets by selecting Option 3 and providing incentives for safety improvements within existing funding programs.

Sincerely,

Ryan Řusso Director, Department of Transportation

VISION/4:CONETWORK

TO: MTC Partnership Board, Steve Heminger, Dave Vautin, Stephanie Mak,
FROM: Leah Shahum & Jenn Fox, Vision Zero Network
RE: Comments on 2018 Safety Performance Targets
DATE: October 26, 2017

This memorandum contains comments on the Metropolitan Transportation Commission's (MTC's) proposed 2018 road safety performance targets and ongoing efforts to improve road safety in the San Francisco Bay Area. Thank you for this opportunity to share our feedback on behalf of the Vision Zero Network, a nonprofit project based in San Francisco working to promote Vision Zero – the goal of zero traffic deaths and severe injuries – across the nation. We are proud to be working with dozens of communities, including several in the Bay Area, to help them reach their Vision Zero goals, ensuring safe mobility for all.

Proposed safety performance targets

With the Highway Safety Improvement Program (HSIP), MTC is setting five targets for: fatalities, rate of fatalities, number of serious injuries, rate of serious injuries, and non-motorized fatalities and non-motorized serious injuries. We received staff's memorandum on the target-setting process for the Safety Performance Measures Final Rule and are providing the below feedback, encouraging MTC to set specific targets.

We encourage MTC to adopt meaningful, aggressive and measurable safety targets as well as evaluation measures to track progress toward these targets. Rather than not stating any numbers (option 1), we encourage MTC to be a leader in prioritizing safety and to set ambitious Bay Area targets based on region-specific methodology (option 3).

Additionally, as important as the targets (where MTC can decide to adopt the California target or set their own), is the measurement of the targets. We encourage MTC to accompany the targets with specific evaluation measures, such as:

- Safety infrastructure investments: number, cost, and percent of safety projects in the RTP investment packages region-wide and in communities of concern
- Exposure to crash risk: approximates the risk of exposure to crashes region-wide and in communities of concern

Related to HSIP targets, we encourage MTC to continue to work with State and local jurisdictions to bring in additional data to ensure that the data used to measure progress on HSIP targets is locally and regionally relevant and informative in safety efforts. For example, San Francisco has made advances in deepening its data for decision-making by combining the traditional police-reported traffic injury data with data from hospitals/emergency services. This could be a model for the regional approach to gathering, analyzing, and using data to prioritize efforts and funding toward safety. We hope that whatever approach MTC chooses for 2018 targets, they will seek to set targets that help the region and localities work toward zero deaths.

Additional opportunities to improve safety

We want to thank MTC senior staff for being interested in actions that will achieve the ultimate goal of HSIP targets - a data-driven, strategic approach to improving safety on all public roads. To that end, we encourage the following in addition to the above suggestion to set, measure and support safety targets.

- 1. **Support speed management**. We encourage MTC consider ways to promote proven speed management strategies (including roadway design) as best practices with multiple benefits in addition to safety. We hope MTC will provide additional support for automated speed enforcement efforts (such as CA Assembly Bill 342).
- 2. **Include safety in all funding**. There are opportunities to increase priority to safety goals within existing funding sources, for example, to integrate safety with arterial system synchronization. We encourage MTC to think about how safety can be incorporated in all programs.
- 3. **Boost data analysis and information** to help the region understand and address safety issues. A regional map of speed limits could be overlaid with a regional high injury network, and emergency and hospital service data to help localities and the region work together on traffic safety priorities.
- 4. Work with CMAs on Complete Streets and safety. In recent letters to MTC, <u>Sierra Club</u> and <u>Safe Routes to Schools</u>, described the importance of the Complete Streets program in meeting Plan Bay Area performance targets. We all encourage MTC to adequately staff active transportation work, emphasize safe speed design strategies, and provide leadership and trainings to help CMAs implement the Complete Streets requirements and checklist.

We commend MTC for convening the <u>Partnership</u> and acknowledge all of the member agencies' roles to improve safety, mobility and air quality. Additional resources include this national resource on <u>Centering Safety at Metropolitan Planning Organizations</u>, model MPO <u>safety</u> <u>targets and performance measures</u>, the National Association of City Transportation Officials safety <u>design resources</u>, and this <u>MPO guidebook for using safety as a prioritization factor</u>.

We look forward to working with MTC and the Partnership to assist MTC to set clear, measureable traffic safety goals for the Bay Area, including:

- Establish safety targets (including interim targets) for all modes of transportation walking, biking, driving and public transport
- Fully leverage federal and state funding for safety
- Incentivize projects that include safety
- Advance policies and practices toward speed management with the goal of safety
- Recognize and support local Vision Zero strategies

We hope MTC leaders on the Commission and staff, as well as city and community leaders throughout the Bay Area, will leverage the recommendations the Vision Zero Network has developed to continue to elevate safety within MTC's priorities and efforts.

Thank you again for this opportunity to share our feedback. To learn more about Vision Zero and our efforts at the Vision Zero Network, please visit visionzeronetwork.org



Edwin M. Lee, Mayor

Cheryl Brinkman, Chairman Malcolm Heinicke, Vice-Chairman Cristina Rubke, Director Gwyneth Borden, Director Lee Hsu, Director

Joél Ramos, Director Art Torres, Director

Edward D. Reiskin, Director of Transportation

November 8, 2017

Ken Kirkey Director of Planning Metropolitan Transportation Commission 375 Beale Street, Suite 800

Dear Mr. Kirkey:

Thank you for the opportunity to participate in setting 2018 Safety Performance Targets for the Bay Area. We reviewed the memorandum to the Bay Area Partnership Board and are writing to encourage the Metropolitan Transportation Commission to select Option 3, to establish regionspecific targets no higher than the 2016 baseline. San Francisco aims to achieve zero traffic deaths by 2024 and strongly supports the region and state adopting similarly ambitious goals.

We understand that due to the rolling-average calculation, reductions below the 2016 baseline will be difficult to achieve. We look forward to working with MTC and other regional partners to implement projects and programs that support achieving this goal. If this means that safety must become a higher priority for regional funding programs and in the next Plan Bay Area, we support that outcome.

We also encourage MTC to develop additional methodologies for tracking the safety benefits of projects. In the previous Plan Bay Area, this benefit was calculated as proportional to reductions in Vehicle Miles Traveled (VMT). However, reducing VMT on highways is likely to have a different impact on safety than reducing VMT on crowded urban streets. Further, many effective safety projects, such as the pedestrian safety elements incorporated into our Muni Forward program, are unrelated to VMT.

We feel that we can make significant progress Toward Zero Deaths region wide by similarly ensuring that every project is a safety project, and recommend that MTC provide incentives for safety elements within existing funding programs.

Regards,

Edward D. Reiskin **Director of Transportation**

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