

## Responses to Comments on RTP Amendment

The following are the staff responses to comments received on the draft RTP Amendment describing how with implementation of the RTP transit ridership is expected to increase by 15% above FY 1982/83 levels, as required by a recent federal Court Order. Viewed as whole, the strategy is comprised of two main components:

- Sustain existing service, to the extent possible, given current adverse economic conditions
- Deliver transit improvement projects defined in the RTP and TIP

### **1. RTP Amendment and Interagency Consultation Procedures**

Comment. MTC did not consult with the Air Quality Conformity Task on the RTP Amendment prior to its release, including modeling assumptions and issues related to financial constraint.

Response. The interagency consultation procedures are for the purpose of making a federal air quality conformity determination that the RTP is consistent with the State Implementation Plan (SIP), which is the Bay Area's air quality plan under the federal Clean Air Act. The RTP amendment is descriptive in nature, does not alter the projects and strategy of the existing RTP, and requires no conformity determination.

### **2. Modeling requirements.**

Comment. Several commenters state that MTC must prepare new transit forecasts using the travel demand model and criticize MTC's approach to making adjustments in the model forecasts.

Response. The Order does not require MTC to prepare new, modeled forecasts for the RTP Amendment. Instead, the Order required MTC to "describe all projects it will fund as part of its strategy for achieving the required ridership increase." The Order also notes: "Because MTC contends that the RTP already contains sufficient projects to achieve the ridership increase, it should not...be burdensome for MTC to prepare the required RTP amendment."

Notwithstanding, the RTP Amendment does provide an estimated range for regional transit ridership for the year 2006 that takes into account recent economic trends. The High range uses the forecast developed for the 2001 RTP, whereas the Low range reflects an adjustment to this forecast that takes into account a host of variables that may operate to reduce ridership growth compared to the earlier RTP projection. Expressing future ridership estimates as a range is a reasonable approach in the transportation planning profession, and is particularly appropriate when the key variables that determine ridership are in a state of flux and are undergoing rapid change.

As stated in the RTP Amendment, the Low forecast is conservative in that it assumed regional ridership would be about 6-7% lower from FY 2001/02 through FY 2005/06 compared to the forecasts for the 2001 RTP. The methodology for preparing the Low range is described in the RTP Amendment. MTC recently obtained information from the transit operators for FY 2001/02, showing that boardings only declined 2.6% from FY 2000/01. This information shows that ridership was not as adversely affected by the

current economic downturn as was initially anticipated. MTC believes that ridership levels will continue to be within the High and Low range, with the Low range still achieving the Court-mandated 2006 target of 544.8 million annual riders.

With respect to comments that ridership projections should not be interpolated for different modeling years, there is no requirement in the Order that a separate model run be conducted with 2006 specifically identified as the horizon year. Interpolating and extrapolating from modeled results for different horizon years is clearly an acceptable approach when modeling is not required and when there are only a few existing model runs from which to derive the information required by the Court.

MTC has further revised the forecast chart to present the forecast range only for the single ridership target year, 2006.

### **3. Changing Economic Conditions and Transit Service Levels**

Comment. Several commenters contend that the state of the economy coupled with declines in transit operator fare increases, and/or service cutbacks will inhibit transit ridership growth in the coming years.

Response. These factors, which are all outside of MTC's control, are good examples of the reasons why MTC has emphasized that it cannot guarantee a particular ridership level by a date or year certain. "Demand side" effects are far more powerful than "supply side" effects of the limited funding stimuli within MTC's control. As stated in the RTP Amendment, transit funding decisions and other MTC functions comprise only some of the broad mosaic of factors that ultimately determine the number of users of Bay Area transit.

In addition, MTC cannot produce its own ad hoc economic forecasts and must rely on ABAG for this information. Any new data will not be available until March 2003 at the earliest.

Commenters express concern about the slope of the transit ridership growth projections in Figure 6. Figure 6 has been revised to show only the target year forecast. There are, therefore, many slopes possible from the current FY 2001/02 transit levels to points within the High and Low forecast range, and to the 2006 target level itself (a lower slope than either the High or Low forecast).

The Low ridership forecast, which shows a continued upward trend in ridership, is not inconsistent with the fact that the Bay Area's housing and population is continuing to increase and gasoline costs could rise in the future above levels assumed by MTC. Transit operator service cuts will likely affect only those routes with the lowest ridership. Fare increases are already assumed in MTC's existing forecasts. Significant service adjustments, such as those contemplated by VTA are within MTC's adjusted Low range, as VTA comprises only 10% of regional ridership.

#### **4. Financial Constraint in the RTP**

Comment. The RTP is no longer “financially constrained” because of loss of transit revenues, which will also impact transit service levels.

Response. Changing events can occur between RTP adoption cycles, but these events do not undermine the status of the RTP as a fiscally constrained document at the time of adoption, or require reopening the entire RTP more frequently than every three years, when there is no change in the projects contained in the Plan. The RTP as a whole is a long-range plan; thus declines in revenues in the short term may be compensated for by increased revenues (e.g. new county sales tax measures, new bridge tolls, or higher federal and state funding levels) in the longer term. The immediate impact of loss of transit operator revenues is being addressed by MTC through changes in MTC’s funding priorities for the next fiscal year (FY 2003/04). MTC is already working with the transit operators to make federal funds normally used for capital rehabilitation and replacement available next year for preventive maintenance (basically operating funds) to help sustain existing service levels. While this would lead to a short-term deferral of some transit capital replacement, most transit operators should be able to “catch up” in future years.

#### **5. New Urbanized Area Definitions**

Comment. Commenters imply that new federal definitions for urbanized areas will alter current funding formulas to operators and deprive the Bay Area transit operators of revenue.

Response. MTC anticipates that the new urbanized area formulas will actually increase federal transit funding in the Bay Area, not decrease it. While the results of these new definitions are not entirely known at this point in time, it is MTC’s intention to minimize the impact on any individual operator.

#### **6. Expected Ridership Gains**

Comment. MTC does not list the expected ridership gains for transit projects as required by the Court Order.

Response. Since the mandated target for the region is total boardings for 2006, it stands to reason that the gains must be in total regional boardings as well. Further, the boardings from the limited number of individual transit projects in the RTP are only a subset of a larger array of factors that will achieve the 2006 target: growth in population and jobs in a transit operator’s service area, new routes or increased service frequencies not identified as separate RTP “projects”, improved system reliability, enhanced customer service programs, etc.

A further complication in reporting on ridership “gains” projected for a particular project is that they can either be new boardings (which could potentially come from other transit services) or pure new riders (which would be riders who previously used a non-transit mode). Some “gains” are therefore not true net gains. The task of deciphering one type of gain from another is quite complex and is not the straightforward task that the commenters may assume.

Given these complexities and the need to be consistent with how transit statistics are normally generated and reported in the transit industry, MTC obtained and reported total

ridership estimates for each project from the individual transit operators, and expresses "gains" in the only meaningful way, that is, in the context of regional forecasts relative to the court-mandated regional 15% increase target. This also provides consistency with the numbers that the transit operators themselves have developed. The integration of all the factors affecting transit use in 2006 takes place in the regional-level forecasts, and even these forecasts do not capture the ridership effects of certain types of transit improvements (e.g. station parking improvements, intermodal station improvements, etc.), which necessarily require reliance on operator-generated information.

## **7. Ridership Target Insurance**

Comment. One commenter suggests that MTC needs to identify in the RTP Amendment a set of additional transit projects to ensure that the ridership targets are met.

Response. The Court Order requires that MTC demonstrate how the RTP is expected to reach a 15% transit ridership increase, not some other percentage of increase. Further, adding new transit projects and services beyond those currently in the RTP would not be possible without new sources of operating funds, which have not been identified and which will become more difficult to obtain due to the impacts of the economic slowdown on the transit operator revenue base.

In this regard, however, MTC has taken a number of policy actions which could increase the demand for transit service in the near term and that are not reflected in any of the modeling-based analysis to date. These include:

- Support for raising the toll on the seven state owned bridges to \$3
- Support for peak period congestion pricing the Bay Bridge, the effect of which would be to divert additional riders to transit
- Support for indexing the federal gas tax to raise revenue and keep the cost of using transit competitive with the cost of operating a car

Also, as noted above, there are a number of transit projects whose ridership estimates are developed "off model" and would generally represent ridership gains beyond those currently accounted for in the travel model results.

## **8. Implementation Schedule**

Comment. MTC must provide a more detailed implementation schedule showing project start, milestones, and completion timeliness.

Response. The Order requires an implementation schedule but does not define that term and does not require start dates and milestones. The most relevant date for an implementation schedule is obviously the anticipated completion date, when a project will be operational and contributing to ridership increases. While additional interim project milestones can be provided for some projects, these are typically subject to change over the life of a project and are being constantly adjusted as a project progresses. MTC has, in any event, augmented Table 1 to show the start date for each project and added a reference to the TIP, which provides funding dates for various project phases (design, right of way, construction) based on the best current information. Other project-related information can be found in the final "Project Notebook" for the latest 2001 RTP.

## **9. Baseline Transit Number**

Comment. MTC must demonstrate consistency in reporting of transit numbers from FY 82/83 forward, particularly whether paratransit riders are included.

Response. Paratransit is one form of publicly funded transit service. Several transit operators had paratransit services in 1982/83; and while there remains some uncertainty about individual ridership numbers, the total counts for that year and since then reflect paratransit riders (which were and are a relatively small in number). Further after the ADA legislation was passed, many paratransit riders who would formally have used separate services rode fixed route services and cannot be separated from the fixed route riders in current reporting systems. Therefore, counting such riders is consistent with the FY 82/83 baseline.

## **10. Additional Transit Projects that could Be Implemented**

Comment. Several comments refer to transit projects from AC Transit and Muni vision plans that could be considered in the RTP amendment. The commenters question the statement in the RTP that “Introducing new projects today...is unlikely to impact transit ridership by 2006 due to the time required to develop, fund, and implement these projects.”

Response. The Order does not require MTC to adopt or consider any alternative set of transit projects or otherwise instruct MTC on how to meet the mandated ridership increase target.

Current constraints on operating funds make the first priority sustaining existing service levels, which MTC is attempting to facilitate. The lack of operating funds is a significant constraint for any proposal for adding new service. Secondly, project sponsors tend to underestimate the time it actually takes to get a project up and running. For example, AC Transit began an Alternatives Analysis study in 1992 to analyze Bus Rapid Transit and other transit investment concepts in its service area and is just now beginning a scoping process for an EIS/EIR in one of the corridors studied. Even “enhanced bus” concepts will take significant amounts of time including planning, coordination among multiple public entities in a corridor, and public involvement. The AC Transit San Pablo Ave. Corridor Study, which is an example of where “enhanced bus service” could be implemented, started in 1995 and continues to be engaged in discussion of many specific project implementation issues.

## **11. Reporting of Track 1 Projects**

Comment. The Track 1 projects are not relevant to the achievement of transit ridership levels by 2006.

Response. The Track 1 project listings were included as supplemental information to show MTC’s commitment to transit improvements in the region beyond 2006 as well as to indicate what other transit projects approved for inclusion in the RTP will require funding over the longer term. These funding commitments mean that any additional transit projects that might be considered for an earlier timeframe could impact funding that has already been assigned to other transit projects in a later timeframe.

## **12. Park and Ride Lots**

Comment. Parking expansion projects do not support transit ridership increases.

Response. Most of the parking expansion projects are served by transit (e.g. BART parking expansion, park and ride lots, etc.) and thus support transit ridership growth.

## **13. Transit Ridership Estimates for Various Projects**

Comment. MTC does not provide a reliable source for its transit ridership estimates and the estimates differ from other estimates for the same project.

Response. As mentioned in the report, most of the transit ridership estimates came directly from the transit operators (see comment # 6). Ridership estimates for the larger projects (e.g. Caltrain Express) were provided by the operators as input for MTC's Regional Transit Expansion Program (included in the 2001 RTP). The report points out that the ridership estimates shown in Table 1 differ from those in Table 3. Table 3 shows "new riders", which is a smaller subset of transit boardings that are shown in Table 1. (see comment #6 for more detail on this issue).

## **14. Improve Bicycle and Pedestrian Facilities**

Comment. Improved and expanded bicycle and pedestrian facilities will support transit ridership increases.

Response. MTC has included Regional Transit Expansion Program criteria to ensure that new major transit stations include bicycle and pedestrian facilities. MTC is currently evaluating bicycle and pedestrian access issues as part of a "Further Study Measure" to its 2001 Ozone Plan.

## **15. Other Comments**

Comment. Construct new Skaggs Island Airport

Response. This project is not directed at increasing transit ridership.

Comment. Put new ferry terminal at Port Sonoma

Response. This is currently being studied by the Water Transit Authority; there is no identified funding for this project, and it likely would be operational beyond 2006.

Comment. MTC should continue to support Commuter Check program and other employer-sponsored programs

Response. This and other customer service programs (e.g. TransLink®, RIDES, TravInfo®) receive full funding support in the TIP and RTP.

Comment. Support is needed to ensure clean fuel buses

Response. This effort does not support transit ridership increases to achieve TCM 2. However, transit operators are following a program prescribed by the California Air Resources Board to improve bus fleet emissions.

Comment. Consider expanding existing automatic vehicle location (AVL) programs to provide transit riders more "real time" transit data.

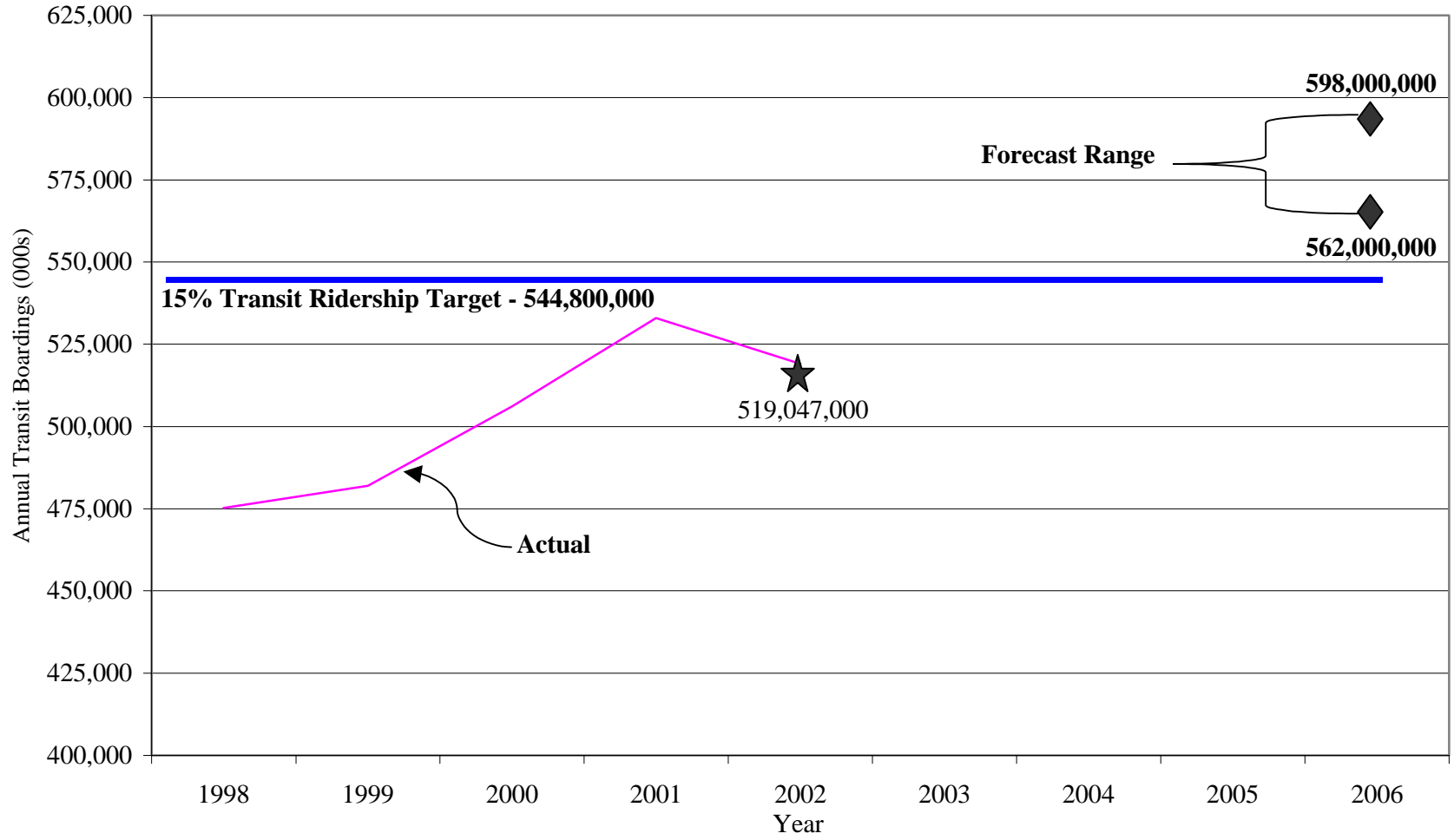
Response. The impact of this program on increasing transit ridership is difficult to quantify as are a number of customer service type programs. MTC continues to fund

several transit operator AVL programs as requested by the operators. MTC is also expanding its TravInfo® program (accessed by calling 511) to provide this information.

Comment Include more passenger amenities for BART riders including allowing: food and drink on trains and purchase of discount tickets at more stations.

Response These improvements would not have any measurable impact on regional transit ridership

**Revised Figure 6**  
**Bay Area Transit Ridership, 1998-2006**





## Changes to Final Report

1. Figure 5 (see page 5): revised to add 2001-02 regional transit ridership data from the Bay Area transit operators – ridership declined 2.6% from 2000/01 to 2001/02.
2. Page 2. Added additional language from the Court Order.
3. Figure 6 (see page 9): revised to show range of forecasts for 2006, and not intermediate years.
4. HOV Lane Projects (see page 10): section was added to show that HOV lanes in the TIP could increase new and existing express bus ridership about 6% by providing additional travel time savings (since HOV lanes themselves do not appear in Table 1 of the report.). Table 2 (page 19) was also added to show programmed HOV lanes, travel time savings for express buses, and overall ridership gains.
5. TIP (page 8): Revised description of TIP.
6. Table 1 (see pages 11-16): revised to:
  - delete 7 projects (Alameda West End ferry, BART Daly City Improvements, Caltrain Hillsdale Station Improvements, Muni F-line extension, Sunnyvale Multimodal Station, Sonoma County Transit bus purchase and Union City Intermodal Station) because they were found to be either already operational or not operational by 2006.
  - add 7 projects (two CCTA bus purchases, Fairfield/Vacaville Train Station, Marin Parklands Access Improvements, Sonoma County Transit bus purchase, two Vacaville Park & Ride/Transit stations) because they were inadvertently left out off the draft list.
  - include a “Start” year for each project
  - re-order by “Year Project Completed”
  - add note to identify projects that would not indicate ridership gains in our travel demand model
  - add note to refer readers to the TIP for more detailed project milestones and schedule
7. Page 19. Added language about MTC policy initiatives that could positively impact transit ridership growth, and are not part of the demand forecasting process.
8. Appendix B was re-formatted to provide a more condensed project listing and refers readers to the 2001 RTP Project Notebook for additional project detail.

## RTP Amendment Commentors

### Written Comments Received

Name	Affiliation
1. David Schonbrunn	TRANSDEF
2. Deborah Reames/Susan Britton	Earthjustice
3. Daniel Gildea	Private citizen
4. Charlie Cameron	Private citizen
5. David Lipsetz	ABAG
6. Michael Smith	Walk San Francisco
7. Stuart Cohen	TALC
8. Roy Nakadegawa	BART Board Member (commenting as private citizen)
9. Harvey Goldberg	Private citizen
10. Milan Radovic	Private citizen
11. Michael Graff	Private citizen
12. Jim Seal	Jim Seale Consulting Services
13. Peter Lydon	Private citizen

### Public Hearing Testimony

October 11, 2002

Name	Affiliation
1. David Schonbrunn	TRANSDEF
2. Harvey Goldberg	Private citizen
3. Bruce DeBenedictis	Private citizen
4. Michael Sarabia	Private citizen
5. Dennis Fay	Alameda County CMA

November 8, 2002

Name	Affiliation
1. David Schonbrunn	TRANSDEF
2. Gene Farber	NextBus
3. Kirsten Tobey	Earthjustice
4. Susan Britton	Earthjustice
5. Bill Smith	Virtual Agile Manufacturing
6. David Nelson	Peninsula Traffic Congestion Relief Alliance
7. Linda Civitello-Joy	American Lung Association
8. Jim Seal	California Bus Association