



October 30, 2015
Scott Wiener, Chair
Programming and Allocations Committee
Metropolitan Transportation Commission
101 Eighth Street Oakland, California 94607



Re: OBAG Complete Streets Requirement

Dear Supervisor Wiener:

We, the undersigned seven organizations, are writing to express an urgent need to build upon the Complete Streets policies approved two years ago by local jurisdictions as part of the One Bay Area Grant Program. We value and appreciate the sustained efforts of MTC commissioners and staff in working with the advocacy community for years to improve the OBAG program.

OBAG's Complete Streets requirement has succeeded in getting over ninety percent of jurisdictions in the Bay Area to adopt a resolution or have a general general plan that complies with AB 1358, California's Complete Streets Act of 2008. OBAG Cycle 1 required jurisdictions to either pass a policy resolution with specified criteria, or update their General Plan circulation element. The original staff proposal for OBAG Cycle 2 would have required a General Plan update even if a resolution had been passed. Now the latest staff proposal eliminates this and returns us to the Cycle 1 requirement.

The requirement for a General Plan update should not be taken off the table, with a notice that this might be an option for Cycle 3. For Cycle 2, MTC should assess how Complete Streets policies are translating into on-the-ground improvements.

In the Plan Bay Area adopted on July 18, 2013, the performance analysis determined that many of the key targets relating to Complete Streets would miss the mark. Performance analysis predicted an increase of injuries and fatalities from all collisions by 18% from a target of 50% reduction (Target #4). Furthermore, the time Bay Area residents would spend walking or bicycling for transportation increased

by just 1 minute over 35 years - a 17% increase from a target of 70% (Target #5). The Plan also missed targets to increase non-auto mode share, reduce VMT per capita, and clearly calls for MTC and ABAG to “focus future attention on conceptualizing breakthrough strategies to achieve the four targets”.

Even though these targets are being revised, their spirit remains the same, and in order for OBAG 2 to reach the region’s health and safety goals, MTC needs to ensure that Complete Streets policies are working to make impacts in the day to day lives of the region’s residents.

Our recommendations for building upon the Complete Streets Requirement are two-fold:

- Improve the Complete Streets checklist.
- Initiate a Complete Streets implementation monitoring program/system.

We believe that these recommendations will act to help guide cities to plan and implement projects that meet the intent of the Complete Streets Program.

1. Enhancing the Effectiveness of the Complete Streets Checklist

Resolution 3765 requires project sponsors to complete a checklist that is intended to ensure that the accommodation of non-motorized travelers is considered at the earliest conception or design phase. The CMAs ensure that project sponsors complete the checklist before projects are considered by the county for funding and submission to MTC. CMAs were required to make completed checklists available to their Bicycle and Pedestrian Advisory Committee (BPAC) or similarly relevant advisory bodies for review prior to CMAs’ project selection actions for Cycle 2.

The checklist, in its current iteration, is purely informative; it serves no purpose beyond documenting a city’s effort to consider the needs for bikes and pedestrians. Although feedback is solicited, BPACs are not given any means to do more than provide feedback on the checklist, and are not assured that their review will be taken into consideration. Some BPACs are not presented with the checklists at all. The lack of a formal review process hinders the effectiveness of BPAC input.

Step 1: Update the Complete Streets checklist and establish new rules for its usage to ensure it is a useful tool for improving projects

The Complete Streets Checklist created in 2006 needs to be updated in order to stay relevant. Each jurisdiction applying for project funding through MTC is required to fill out the Complete Streets Checklist at the earliest phase of conception or design.

CMAs are required to make completed checklists available to their BPAC for review prior to CMAs’ project selection actions for Cycle 2. However the checklists lack key information in regards to project scope and do not reference newer types of bicycle and pedestrian infrastructure which are already being built in the Bay Area. See **Appendix A** for a list of suggested updates.

Requested Action: Direct staff to work with the MTC Active Transportation Working Group to develop a set of updates for the Complete Streets checklist.

Step 2: Establish a Review Process

Create a means for BPACs or relevant advisory groups to flag projects that do not meet complete streets standards for review with MTC or CMA, if there is no existing forum or venue. The goal is to create a feedback loop that will facilitate conversations and ensure project applications include adequate design for non-motorized users. If a BPAC is concerned that a project sponsor has not considered all feasible options to design a street for all users, they would alert the appropriate entity who would pass the information along to the project sponsor as well as the MTC.

This will be an extension of MTC resolution 3765 item 10:

“MTC and its partner agencies will monitor how the transportation system needs of bicyclists and pedestrians are being addressed in the design and construction of transportation projects by auditing candidate TIP projects to track the success of these recommendations.”

Staff from the active transportation program within MTC would compile a list of flagged projects for more thorough review when funding requests are submitted, and would report to the commission on the number of funded projects which were flagged and what changes were made to the projects to address BPAC concerns.

This process would allow the MTC to comply with its own directive: *“MTC should review the success of the application process and ensure project application responses include adequate designs for non-motorized users wherever appropriate and feasible”* (MTC, June 2006, [Understanding Routine Accommodations for Bicyclists and Pedestrians in the Bay Area](#) p. 28).

2. Reporting back on the Outcomes of Complete Streets

MTC must work with advocates and jurisdictions to create a meaningful process for assessing how well Complete Streets policies are meeting their objectives. In order to do so, we ask MTC to direct staff to create an outcome-based evaluation of projects.

Performance measurement is an important tool in the implementation and evaluation of policies, whether qualitative or quantitative. As the requirement currently stands, implementation of Complete Streets is driven solely by incentivization and lack of outcome-based evaluation hinders the success of the requirement. As Complete Streets policies continue to be implemented throughout the nine counties, the MTC should lead and assist jurisdictions in gathering data that illustrates the policies' success as needed.

Step 1: Draft proposal for performance measurement based on PBA goals

In order to better quantify the quality of projects being approved through OBAG and heralded as Complete Streets, we ask that MTC establish a set of metrics by which to evaluate projects post-construction. These performance measures should be both output and outcome based and can be based on Plan Bay Area targets and on the checklist. In addition, exceptions may be made if there are other overlapping metrics for the project area. See **Appendix B** for relevant Plan Bay Targets that may be used to measure the success of Complete Streets.

The MTC Active Transportation Working Group is a good forum for having these discussions. However, MTC must ensure staff capacity for having meaningful discussion and evaluation of projects. MTC should take a leading role in this important program by assisting cities perform these performance metrics and in reviewing the results in a timely manner at commission meetings.

[Requested Action: Direct staff to work with the MTC Active Transportation Working Group to develop a set of performance measures based on Plan Bay Area targets to evaluate the outcome of the Complete Streets checklist.](#)

In conclusion, we strongly believe that the current Complete Streets Requirement proposed for OBAG 2 does not advance Plan Bay Area's agenda enough from the foundation built by OBAG 1. Approving this program without more consideration will result in more missed targets and further delays in safety, equity, transportation, and health goals.

The Complete Streets Requirement has successfully established widespread policy action throughout the Bay Area. We look forward to working with MTC to ensure that in the future projects are more closely examined and that project sponsors are given guidance and held accountable in achieving best possible results. Let's build upon the strong policy from OBAG 1 by beginning a more qualitative and evaluative approach to the process.

Thank you for your time and consideration.

Sincerely,

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Appendix A

Suggestions meant to provide BPACs with more complete information for reviewing.

Section I.1: Project Area

- Include the following information: Number of vehicle lanes, vehicle lane widths, existing bike lane width, speed limit.

Section I.3: Collisions

- Include the following information: Number of collisions, modes involved, severity, cause.

Section II.5: Policies, Design Standards and Guidelines

- Include the National Association of City Transportation Officials (NACTO) guide and Caltrans Protected Bikeway Guidelines in list of approved design standards and guidelines.

Section III.7: Project Scope

- Remove mention of “wide outside lanes or improved shoulders” as acceptable bicycle facilities.
- Include Class IV bike lanes, bike boxes, protected intersections, green paint in conflict zones, and raised cycletracks as acceptable bicycle facilities.
- Include bulb-outs, curb expansions, and slip lane removal, as possible pedestrian facilities.

Section III.8.b: Right-of-way

Include the following questions:

- Was a road-diet considered?
- Was parking removal considered?

Appendix B

The performance measures could be organized in three main categories:

- Output: for example, miles of bike lane/sidewalks, crossing improvements, etc.
- Equity: number of projects or dollars spent in communities of concern vs. other communities.
- Outcomes: changes in safety and mode share along a project.

The following Plan Bay Area 2035 targets (from [Performance Assessment Report](#)) demonstrate the close ties between the Bay Area’s goals and the potential impact of the Complete Streets Requirement. The updated targets for Plan Bay Area 2040 could be the basis for performance measures in the Complete Streets Requirement.

- Healthy and Safe Communities:
 - Increase the average daily time walking or biking per person for transportation by 70% (for an average of 15 minutes per person per day)
 - Reduce by 50% the number of injuries and fatalities from all collisions (including bike and pedestrian)

- Reduce premature deaths from exposure to particulate emissions: Reduce premature deaths from exposure to fine particulates (PM2.5) by 10% Reduce coarse particulate emissions (PM10) by 30% Achieve greater reductions in highly impacted areas
- Equitable access
 - Decrease by 10% the share of low-income and lower-middle income residents' household income consumed by transportation and housing
- Economic Vitality
 - Increase gross regional product (GRP) by an average annual growth rate of approximately 2%
- Transportation System Effectiveness
 - Increase non-auto mode share by 10% Decrease automobile vehicle miles traveled per capita by 10%