



**METROPOLITAN
TRANSPORTATION
COMMISSION**

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Memorandum

TO: MTC Planning Committee

DATE: December 9, 2008

FR: Minority Citizens Advisory Committee

W.I. 1114

RE: MCAC Comments on the Transportation 2035 Equity Analysis

For the past year, the Minority Citizens Advisory Committee (MCAC) has been accomplishing its work through four subcommittees. One of these subcommittees – the Transportation 2035 Equity Analysis Subcommittee – has spent the year reviewing and commenting on the methodology of the Transportation 2035 Equity Analysis.

MCAC's Transportation 2035 Equity Analysis Subcommittee held a total of 11 meetings during 2008 to discuss the methodology for the equity analysis and provide staff with feedback. During these meetings, the subcommittee familiarized itself with past equity analyses, weighed in on the indicators to be used for this equity analysis, and discussed possible ways to improve the overall methodology in the future. As a result of these meetings, MCAC will assemble a new subcommittee in January to continue the discussion of improving and informing the next equity analysis.

Overall, MCAC feels the Transportation 2035 Equity Analysis does not give an accurate reflection of how the proposed projects will affect communities of concern. That being said, MCAC feels that over the last few RTP processes, MTC staff has made strong efforts to address these limitations. MCAC believes that MTC should implement different methodologies in future long-range transportation equity analyses and will work with staff to evaluate possible models.

In addition, MCAC has the following specific comments on the methodology and draft results.

Methodology

Early on in the discussions, MTC staff concurred that the current methodology and long-range forecasting system used for the equity analysis has limitations with respect to analyzing equity. Staff agreed to work with the subcommittee beginning in 2009 to look at new models under development that have the potential to offer improvements in data, data collection, and analytical methods to better reflect travel activities unique to households in communities of concern.

MCAC strongly believes that MTC should continue to move in this direction in order to create a new and better analytical framework for performing an equity analysis in the next long-range transportation plan.

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Financial Analysis

The financial analysis shows a great deal more spending per low-income household over 25 years; however, the analysis does not make clear whether the investments in transit are truly being directed toward the transit services that low-income people and people of color use most. It would be more helpful if this data could be broken out by mode and/or project type (i.e. capital, operating and expansion), as well as by county.

Emissions

The committee is pleased to see that emissions related to RTP investments will decrease over the next 25 years. However, MCAC would like to see this information disaggregated into smaller geographic areas, possibly by zip code or minimally by concentrated communities of concern. Several communities of concern in the region face numerous environmental health risks besides emissions from the road and highway network (for example, proximity to shipping facilities, airports, hazardous materials sites, and other potential health hazards). MCAC suggests MTC replicate the six communities of concern identified by the Bay Area Air Quality Management District's Community Air Risk Evaluation (CARE) program and at a minimum track/analyze mobile-source emissions in those six communities.

Affordability

The housing and transportation affordability indicator assumes that the region's housing costs keep pace with inflation over the next 25 years, but remain static as a percentage of the overall formula used to calculate this indicator, even while incomes are forecast to increase. MCAC believes this assumption is faulty, as it does not take into account the natural volatility of the housing market. It does not make sense to track the three variables underlying this indicator (housing, transportation and income) using different sets of assumptions for each. The result is an opaque measure of questionable value.

Policies

MTC as a regional agency should require standards for funds supplied to transit providers. A regionally consistent outlook needs to be encouraged among the various transit agencies, possibly by setting regional goals and finding ways to incentivize agencies to adhere to those goals. Also, by requiring transit agencies to submit reports and ridership surveys in a standardized manner (for example, consistently reported customer satisfaction data), MTC would be better able to compare apples to apples when evaluating equity across the region.

Furthermore, while the Land Use scenario seems to offer greater benefit to communities of concern than the other alternatives, the specific policy assumptions behind this scenario have not been made clear to the committee. There is concern that some of these unspecified but aggressive land use policies would, in practice, ultimately lead to gentrification, or displacement in communities of concern located in or near these areas of intensified land use.

Short-Range Mobility “Snapshot”

MCAC recommended and MTC staff agreed that a “snapshot” analysis might help give a more complete picture of the state of mobility within communities of concern by focusing in greater depth on current (rather than forecasted) demographic, economic, and transportation data. This “snapshot” would complement subsequent long-range RTP Equity Analyses by comparing snapshots over time to determine whether people are better off, the same, or worse off within the communities of concern. Essentially it would create a tracking system for the region’s transportation investments and their effect on the communities of concern.