



**SANTA CRUZ COUNTY  
GROUP**

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**Santa Cruz County Regional Transportation Commission**

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**Re: Transit Corridor Alternatives Analysis (TCAA)**

**Review of the draft “Initial List of Alternatives” and the “Analysis Framework” documents**

Dear Commissioners and Staff,

The Sierra Club has completed its review of the draft “Initial List of Alternatives” and “Analysis Framework” documents and is concerned the draft documents are lacking in several important respects. Because the type of high capacity public transit selected for implementation on the existing rail corridor will have a significant impact on the environment as well as social equity, establishing a solid foundation for the Transit Corridor Alternatives Analysis is essential in equipping our community to make the best decision.

One concern we have is a global in scope and seems unconnected to either of the documents for which the SCCRTC is soliciting feedback. Our concern is that for our community to receive the maximum benefit from an all new, transportation corridor dedicated to hi-capacity public transit the entire public transit system should be evaluated and reconfigured as needed to optimize the efficiency of the entire system. For example, new stops along a new main line service operating exclusively in the new corridor could be met with feeder bus routes minimizing user transfer times under a “pulse scheduled system”. The TCAA does not appear to be addressing this type of “out-of-the-corridor” thinking and we are concerned failing to consider same, may lead to a poor choice of vehicle/service type. As such, we urge you to consider this global concern

We trust our suggestions for improving these documents will be carefully considered and incorporated into the final version of these key guidance documents. For simplicity, our comments and suggestions for improvement are grouped by document.

**Regarding the “Initial List of Alternatives”, we offer the following:**

- A. It appears the study is unnecessarily focused on smaller capacity vehicles. Larger vehicles, carrying more passengers should be more energy efficient in moving more people. Accordingly, the following bullets should be added to the “Form Factor and Capacity...” section:

- 101-150 passengers seated / standing
  - 151-200 passengers seated / standing
  - 201-250 passengers seated / standing
  - 251-300 passengers seated / standing
  - 301-400 passengers seated / standing
- B. Given our community’s already high bicycling mode share, the capacity of vehicles to carry bicycles as well as people should be specifically considered. Accordingly, a new section titled “Bicycle or other wheeled personal equipment capacity per vehicle” should be added with the following sub-bullets:
- 0-5 bicycles or equivalent
  - 6-10 bicycles or equivalent
  - 11-20 bicycles or equivalent
  - 21-30 bicycles or equivalent
- C. Given the importance of making public transit more equitable and more accessible, a new section titled “Wheelchair, Scooter or similar mobility device capacity per vehicle” should be added with the following sub-bullets:
- 0-2 wheelchairs or equivalent
  - 3-5 wheelchairs or equivalent
  - 6-10 wheelchairs or equivalent

**Regarding the “Analysis Framework”, we offer the following:**

General Comment: Given the crucial importance of making sure the TCAA includes the best metrics for the final evaluation of selected options, we recommend the community be given the opportunity to revisit all Phase 2 Performance Measures after the Phase 1 effort is finished.

Specific Comments:

- A. Add to or modify the following items in the “Supports Economy” section
- Under the evaluation metric “Capital cost,” add a “per user” criteria to give the capital cost a more meaningful context
  - Under the evaluation metric “Capital cost,” add a “per user” cost to expand the project to provide double the initial ridership capacity in the future
  - Under the evaluation metric “O&M costs,” add “O&M cost per passenger mile” to the Phase 2 Performance Measures
  - Under the evaluation metric “Funding,” add “Percentage of project funding likely to come from future sources”
  - Add a new goal “Is fiscally responsible” with an Evaluation Metric: “Total Cost of Ownership” with a Description: “What is the project’s total cost of ownership in present day dollars” with a Phase 2 Performance Measure: “Total Dollars”
- B. Add to or modify the following items in the “Supports Equity” section

- Under the goal, “Promote active transportation,” add “Bicycle capacity on transit per vehicle or per train set” to the Phase 2 Performance Measures
- Under the goal "Provide accessible and equitable transportation system that is responsive to the needs of all people," add “Ease of independent boarding for those using wheelchairs, scooters and other mobility equipment” to the Description with a Phase 2 Performance Measure letter grade comparing options against other options.
- Under the goal "Provide accessible and equitable transportation system that is responsive to the needs of all people," add "Accessibility, capacity and ease of use for users with physical or mental disabilities" to the Description with a Phase 2 Performance Measure letter grade comparing options against other options.
- Under the goal “Offer reliable and efficient transportation choices that serve the most people,” modify the description for ‘Travel Time’ to read “To what extent does the project improve transit travel time, during peak traffic commuting periods.”
- Under the goal "Provide accessible and equitable transportation system that is responsive to the needs of all people," divide the description: "Does the project provide transportation access to disadvantaged populations?" into two sentences differentiating "disadvantaged" into 1) "Economically disadvantaged populations" and 2) "Populations with higher levels of physical/mental and other mobility limitations (such as children and the elderly)"
- Under the goal "Offer reliable and efficient transportation choices that serve the most people," add "Number of connections" as an Evaluation Metric with “Does the project reduce numbers of connections required for disadvantaged users?” as the Description.

C. Add to or modify the following items in the “Supports Environment” section

- Add a new evaluation metric titled “Public Transit Mode Share” with Description: “To what extent will the project promote use of public transit” with Performance Measure: “County-wide public transit mode share”
- Add a new evaluation metric titled “Life Cycle Emissions” with Description: “To what extent will the vehicle type impact landfill” with Performance Measure: “Vehicle Useful Service Life”
- Add a new evaluation metric titled “GHG Emissions” with Description: “To what extent will the project vehicle type itself emit GHG?” with Performance Measure: “GHG Emissions per Transit Vehicle Mile Travelled”
- Add a new evaluation metric titled “Area of Paved Roadway” with Description: “To what extent will the project rely on expansion of existing or construction of new paved surfaces within the rail corridor and including streets and highways” with Performance Measure: “Area of New or Expanded Pavement”
- Add “Micro Plastic Pollutants” to the Performance Measures included under the “Emissions Reduction” Evaluation Metric
- Add a new evaluation metric titled “Biological Resources” with Description: "Sensitive or native species and ecosystem impact or fragmentation" and with Performance Measure: “High, Medium, Low”

D. Add to or modify the following items in the “Other Goals” section

- Add a new evaluation metric titled “Desirability” with Description: “To what extent will the project attract and retain new public transit users” with Performance Measure: “Ridership”
- Add a new evaluation metric titled “ROW” with Description: “How much of the existing rail corridor will be used by the project” with Performance Measure: “Miles of Corridor Used”
- Add a new evaluation metric titled “ROW” with Description: “Is the project allowed under current rail corridor easements” with Performance Measure: “Miles of Corridor without Easement Issues”
- Add a new evaluation metric titled “Land Use” with Description: “To what extent will the project promote compact land development patterns and reduce GHG emissions” with Performance Measure: “Letter Graded Score”

Thank you for the opportunity to submit our comments and suggestions. Should you have any questions or wish to discuss these matters in more detail, please contact the undersigned.

Respectfully submitted,



Michael Guth, Transportation Committee Chair



Micah Posner, Executive Committee Chair

Sierra Club, Santa Cruz Group