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**Comments on *Plan 2040: NYMTC Regional Transportation Plan***

**Regional Trends and Shared Goals:**

The seven “Shared Goals” of Plan 2040 outline broad-based objectives to ensure the region is capable of addressing 21<sup>st</sup> century challenges and opportunities. The goal to improve resiliency in the regional transportation system in the aftermath of Super Storm Sandy and in the ongoing threat of climate change is of particular importance.

However, a goal not included in Plan 2040 is one that would work to reduce the **number of vehicle miles traveled, or VMT, by 2040**. Plan 2040 must include this goal, and use this goal as a way to reframe how the plan addresses the regional challenges over the next 25 years.

In addition, the plan projects 12 percent increases in daily VMT by 2040. While this 12 percent is less than the 16 percent projected in NYMTC’s 2035 Long Range Plan, it still remains far too high an estimate given trends stretching back nearly a decade. At the same time, Plan 2040 only projects a 20 percent growth in transit ridership in the region.

- A 2013 Victoria Policy Institute (VPI)<sup>i</sup> found that United States car ownership per capita plateaued beginning in 2000 and has declined since 2005;
- VPI also found growth in United States VMT leveled off in 2000 and began declining in 2007, and by 2010 remained significantly below the trend line;
- VPI also found that transit ridership in the United States grew by 34 percent from 1995 to 2011, roughly double the growth in population;
- Even Plan 2040 refers to a report by Davis, Dutzik and Baxandall<sup>ii</sup> finding that between 2001-2009, 16-34 year olds:
  - Reduced per capita VMT by 23 percent;
  - Took 16 percent more walking trips and 24 percent more biking trips;
  - Traveled 40 percent more annual passenger miles on public transit;
  - Reduce the share of that has drivers licenses by 5 percent;
- A 2012 AARP<sup>iii</sup> report found that per capita VMT among baby boomers is declining;
- The same AARP report found that per capita transit trips among baby boomers is increasing;

NYMTC must insert the goal of reducing VMT into Plan 2040 as a shared goal, and revisit trends predicting higher VMT based on existing and past research.

### **Project Prioritization:**

Plan 2040 says little about how projects throughout the region will be prioritized. There are many competing interests for projects in the region, but in order to best achieve Plan 2040's vision of an enhanced regional environment, improved regional economy, improved regional quality of life, and a convenient, flexible, safe, secure and resilient transportation system, backed by sufficient financial resources, Plan 2040 must outline a project prioritization process that prioritize the following:

- *Reduction in VMT*
  - Projects should be prioritized on the basis of how likely they will reduce VMT or slowest growth of VMT.
- *Improved Safety for the Most Vulnerable*
  - Projects should be prioritized on the basis of improving the safety of the most vulnerable users of the transportation system, namely pedestrians, cyclists, seniors and children.
- *Growing Transit Mode Share*
  - Projects should be prioritized on the basis of how likely they will grow transit ridership in the region.
- *Fix-it-First*
  - Projects should be prioritized on the basis of maintaining existing road and bridge infrastructure in the region.

### **Near Term TIP Projects:**

According to Tri-State Transportation Campaign's ([www.trackstatedollars.org](http://www.trackstatedollars.org)) analysis of the New York State DOT's Statewide Transportation Improvement Program (TIP) from 2010-2014, four percent of spending will go towards road and bridge expansion, 22 percent of funding will go towards road and bridge maintenance, two percent will go to bicycle and pedestrian infrastructure and 62 percent towards transit infrastructure. The 2014-2018 TIP for the NYMTC region, including projects listed in Plan 2040, continue this trend. Tri-State was particularly excited to see the next phases of Select Bus Service in New York City, planning for the LIRR second track project between Farmingdale and Ronkonkoma, Central Avenue Bus Rapid Transit and Transit Signal Priority in Westchester County and Suffolk County's Connect Long Island plan, among others, included in Plan 2040. Nevertheless, several projects serve to expand road capacity or overemphasize road expansion and widening components in projects that are more multi-modal in nature. As a result, Plan 2040 should reevaluate and revisit these projects including:

- ***Long Island Expressway (Queens) HOV/Active Transportation Demand Management:*** Tri-State supports the use of dedicated bus lanes to enhance transit access, reduce transit commute times and incentivize transit usage. However, new lanes must not be built, but repurposed from existing lanes. Furthermore, if studies project that HOV lanes will be sufficiently utilized; HOV3 lanes should be utilized as well.

- **Route 347 “Greenway”:** NYSDOT’s multi-modal Route 347 project is a testament to effective collaboration among NYSDOT, local civic groups and advocates to foster a corridor that better accommodates different users of the roadway. As the project continues, NYSDOT must continually reevaluate the need for future widening components of the project, and fast track efforts to partner with adjacent properties to make good on the promise of creating a more walkable and smart growth oriented corridor.
- **Tappan Zee Bridge:** Tri-State believes the Tappan Zee Bridge should be rebuilt, but with a bus rapid transit system operating thereon at the time of opening or as soon as possible thereafter. Failure to add transit to the I-287 Corridor would gridlock the Hudson Valley’s economy and do nothing to prevent rising traffic congestion and air pollution. It is imperative that the Governor’s Mass Transit Task Force identify short, medium and long term transit improvements – in particular bus rapid transit – to be included in any new Tappan Zee Bridge project.

NYSDOT must reprioritize the fix-it-first components of these projects, as well as reevaluate all project criteria to ensure investments are made that will support existing downtowns and main streets first and foremost. Doing so will do more to best prevent sprawl on Long Island and in the Hudson Valley, sustainably mitigate traffic congestion, spur economic development and increase Long Island’s the region’s quality of life, all underlying objectives for Plan 2040.

### **The Transportation System:**

#### *Transit:*

Plan 2040 incorrectly defines ‘Rapid Transit’ as “a passenger railway system that can carry large numbers of people with great frequency.” Plan 2040 neglects to recognize that true bus rapid transit (BRT) systems are also considered ‘Rapid Transit’. For example, *CTfastrak* in Connecticut will be Connecticut’s first rapid transit system with planned headways of roughly 6 minutes during peak periods. These are shorter headways than any of the commuter rail systems in the region and very competitive with headways of subways during the peak period. BRT could play a major role in enhancing the transit network in the region, and should also be recognized as ‘Rapid Transit’ in Plan 2040.

In order to further encourage transit use, Plan 2040 should call for New York City Council legislation mandating businesses with 50 or more employees to provide pre-tax commuter benefit options and to work to discourage parking perks offered by employers.

Finally, Plan 2040 fails to recognize the importance of one of the most integral projects to the region, namely the need for a Third Track along the LIRR’s Main Line Corridor. According to a report by Regional Plan Association and the Long Island Index<sup>iv</sup>, the Third Track is integral to expand capacity of the Long Island Rail Road, create redundancy in the rail network and expand the employee catchment area for Long Island businesses. This project is imperative for the future economic strength of the region, promotion of TOD, reduction of congestion and fostering of redundancy and resiliency in the region’s transportation network.

#### *Parking:*

Plan 2040 misses an opportunity to call for broader parking reforms. Plan 2040 should encourage municipal bodies to revisit their zoning codes to reduce parking requirements. Doing so, especially in

areas with high transit usage, discourages car ownership, promotes transit usage, and can free up developers from building parking, instead using those savings to increase affordable housing and potentially support expanded transit operations.

In addition, market-based approaches to parking management should be expanded, including the NYCDOT's ParkSmart program that has shown wide success in pilot program areas.

#### *Pedestrian and Cycling Infrastructure:*

According to Plan 2040, nearly 50 percent of all traffic fatalities in the region are pedestrians and cyclists. While Plan 2040 emphasizes the need for better and safer walking and bicycling environments in the NYMTC region, the plan does not go far enough in advocating for safer walking and bicycling environments. With nearly half of commuters in the NYMTC region relying upon walking and biking as a part of their trip to work, and with a 73 percent growth in bike commuting from 2000-2010, it is imperative that NYMTC do more to advance funding and priority to expand active transportation opportunities in the region. While New York State's Complete Streets law went into effect in 2012 and numerous municipalities in downstate New York have adopted local resolutions and policies to fill gaps in the New York State law, significantly sized municipalities and organizational structures have still failed to adopt Complete Streets policies and/or legislation.

To address this Plan 2040 should:

- Encourage municipalities like Westchester, Nassau, Putnam, Orange Counties and others to adopt Complete Streets legislation/policies;
- Ensure NYMTC adopts a Complete Streets policy to not only institutionalize NYMTC's commitment to Complete Streets, but also to assist in prioritizing local and regional projects that accommodate all users of the road safely;
- Ensure increased funding to programs that support safer walking and cycling environments from federal sources like the Highway Safety Improvement Program;
- Explicitly recognize the role that pedestrian and cycling infrastructure play in the resiliency of the region's transportation system. In the aftermath of Super Storm Sandy, cycling infrastructure allowed New York City to get back to work quicker. According to NYCDOT, on the Thursday after the storm, cycling across the East River Bridges grew by 150 percent over a typical Thursday.

According to Plan 2040, NYSDOT Region 10 only plans to add 32 miles to Long Island's 189 mile network of on/off road bicycle network by 2030. **This number is far too low.** As a point of comparison, NYCDOT added 200 miles of bicycle lanes in the three years from 2007-2009. NYSDOT Region 8 makes no commitment to add bicycle lanes in any substantive way in Plan 2040.

In addition, many of the region's bus and train systems do not foster multi-modal transportation as a result of the lack of bike racks on buses and the prohibition of bike access to trains during peak periods. This discourages cycling as a solution to the 'last mile' problem faced in many of the region's suburban communities.

Plan 2040 must more clearly outline objectives for growing cycling in the region by:

- Committing to grow cycling as a transportation mode share by 10 percent in NYC;

- Committing to grow cycling as a transportation mode share by to 5 percent in the metropolitan suburbs;
- Doubling the cycling network by 2040 in the metropolitan suburbs and New York City;
- Increasing the percentage of bicycle and pedestrian projects in implementation stage;
- Increasing the ratio of miles of roads under construction that include bicycle and pedestrian facilities;
- Decreasing percentage of pedestrian fatalities occurring within a quarter mile of transit stops;
- Increasing number of miles of facilities for pedestrian and bicyclists in a state of good repair;
- Expanding bike racks on suburban bus systems like Westchester and Nassau Counties;
- Recommending a change to LIRR and MNR policy to allow bicycles on trains during peak hours and to work with Amtrak to reform its bicycle access policies on the Northeast Corridor;
- Expansion of New York City's Citi Bike system to all five boroughs in the next five years and advocate for regional bike share systems on Long Island and the Hudson Valley.
- Expanding the High Crash Corridor Program, but mandate NYSDOT to work with local municipalities and stakeholders to identify specific pedestrian safety treatments;
- Adopting a 'Vision Zero' policy as opposed to just exploring this strategy.

Plan 2040 rightly acknowledges the need for investment in safe street infrastructure like Complete Streets, but the available opportunities listed in the document are dated. Plan 2040 wrongly suggests programs like NYSDOT's Region 10 Local Safe Streets and Traffic Calming grant program and the SafeSeniors pilot program are current options available to municipalities.

Despite broad-based support from elected officials throughout Long Island—local municipalities, civic groups and advocates—the LSSTC program was defunded by NYSDOT in 2012. Plan 2040 states that NYSDOT's intention is: *“that after a decade of funding by NYSDOT, the municipalities are ready now to implement the LSSTC program on their own.”*

At the same time, NYSDOT Region 10's SafeSeniors program has not been expanded beyond two initial pilot program project sites along Hempstead Turnpike and Main Street in downtown Smithtown.

There are other serious pedestrian safety challenges in the region. According to research conducted by Tri-State<sup>v</sup>, nearly two-thirds of all pedestrian fatalities occurred around bus stops in Nassau County. NYCDOT has established a Safe Routes to Transit program to combat similar unsafe transit access points but a similar region-wide program does not exist. Unsafe transit accessibility likely drives down transit ridership as people choose other options if they feel unsafe accessing transit services.

In order to combat unsafe walking environments for pedestrians in the downstate region, Plan 2040 should call for the:

- Reinstatement of NYSDOT funding for the Local Safe Streets and Traffic Calming grant program to Long Island and the other areas in the NYMTC region;
- Expansion of SafeSeniors to other areas in the NYMTC region where our seniors are at high risk for fast moving traffic;
- Establishment of a NYSDOT “Safe Routes to Transit” program modeled on NYCDOT's program;
- Expansion of the number of schools enrolled in the Safe Routes to School program.

Finally, while Plan 2040 calls for a “reduced rate of annual injuries and fatalities on the region’s transportation system”, it does not set a firm metric or goal to be measured. NYMTC should lead efforts to create a “Pedestrian Safety Action Plan”, modeled on a similar PSAP conducted by NYCDOT. The Action Plan would study causes, factors and geographic distribution of fatalities and severe injuries caused by crashes throughout the region, but particularly in the metropolitan suburbs, and should set goals to cut traffic fatalities by 50 percent by 2040.

### **Increased Support for Transit Oriented Development**

Plan 2040 recognizes that connecting smart land use policies to smart transportation investment is integral to the economic competitiveness, environmental health and quality of life of the region. Of particular importance to successful TOD and the economic strength of communities is the inclusion of equity into TOD efforts. Doing so ensures that TOD works for communities of all incomes today and in the future.

As the discussion surrounding the 2015-2019 Capital Program’s for the Metropolitan Transportation Authority and New York State Department of Transportation begin in earnest next year, Plan 2040 should:

- Call for the creation of a Transit Village Planning program for the downstate region to assist municipalities in designing, rezoning and planning TOD districts around rail and bus hubs, modeled on New Jersey’s successful program;
- Call for the creation of a Transit Village Capital Program to support municipalities primed to build TOD but lack the resources to build the necessary infrastructure to support higher densities. (e.g. sewers, pedestrian, cycling infrastructure to access stations, parking garages)

### **Financing Plan:**

Plan 2040 anticipates that the projected needs for implementation of Plan 2040 will cost roughly \$395 billion by 2040 yet federal funds will only cover 84 percent of the plan. One way to close this gap is to reprioritize projects that emphasize walking and biking and maintenance and repair of existing roadways and bridges, projects that cost less than large road and bridge capacity expansion projects. But this reallocation will only go so far in closing the budget gap. While increased federal transportation funding is welcomed, given the recent austerity climate in Washington, D.C. it is unrealistic for the region to expect increased revenues in the near future. In the meantime, Plan 2040 should firmly endorse additional transportation revenues like:

- Tolling currently free bridges;
- Increasing the gas tax.

One area where Plan 2040 should be careful is to the continuing overreliance upon debt to fund transit and roadway infrastructure capital programs. Since 1982, the MTA’s Capital Program, for example, has been funded by roughly \$32 billion<sup>vi</sup>. This long term debt, currently on the MTA’s balance sheet, puts pressure on future fare and service levels. Riders have seen fares go up four times in the past six years, while at the same time in 2010, riders so the largest service cuts in a generation. In lieu of more debt financing, the elected officials of New York will need to find dedicated funding sources to ensure the system remains in a state of good repair and targeted expansions can move forward.

Plan 2040 should also call upon New York State Governor Cuomo to sign legislation that will better protect dedicated transit funds from being diverted to plug New York State's General Fund deficits.

In addition to calling upon New York State elected officials to do more to fund transportation and transit in particular, Plan 2040 should also call upon local elected officials to be better supporters of their local transit networks. Nassau County, in particular, has a poor track record of funding its bus system, leading in 2011 to a severing of ties with the MTA and to the privatization of one of the largest suburban bus systems in the country. Since privatization in 2012, service has been cut and fares hiked, leading to a roughly 4 percent drop in ridership in 2012 over 2011. This drop led to the lowest ridership on the system since 1998. Nassau County's local elected officials must do more to increase its contribution to the bus system to rebuild its ridership and expand the system.

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<sup>i</sup> "The Future isn't What it Used to Be: *Changing Trends and Their Implications for Transport Planning*." March 2013, <http://www.vtppi.org/future.pdf>

<sup>ii</sup> "Transportation and the New Generation: *Why Young People Are Driving Less and What it Means for Transportation Policy*," April 2012, <http://www.frontiergroup.org/reports/fg/transportation-and-new-generation>

<sup>iii</sup> "Impact of Baby Boomers on U.S. Travel, 1969-2009", AARP Public Policy Institute, October 2012, [http://www.aarp.org/content/dam/aarp/research/public\\_policy\\_institute/liv\\_com/2012/impact-baby-boomers-travel-1969-2009-AARP-ppi-liv-com.pdf](http://www.aarp.org/content/dam/aarp/research/public_policy_institute/liv_com/2012/impact-baby-boomers-travel-1969-2009-AARP-ppi-liv-com.pdf)

<sup>iv</sup> "How the LIRR Could Shape the Next Economy", RPA and LI Index, January 2013, [http://www.rauchfoundation.org/files/9913/5818/7008/How\\_the\\_LIRR\\_Could\\_Shape\\_the\\_Next\\_Economy.pdf](http://www.rauchfoundation.org/files/9913/5818/7008/How_the_LIRR_Could_Shape_the_Next_Economy.pdf)

<sup>v</sup> "Increased Focus on Pedestrian Safety around Transit Needed in Connecticut and Nassau County", Tri-State Transportation Campaign, May 2013, <http://blog.tstc.org/2013/05/20/increased-focus-on-pedestrian-safety-around-transit-needed-in-connecticut-and-nassau-county/>

<sup>vi</sup> "The Road Back", PCAC, May 2012, <http://www.pcac.org/2012/05/31/pcac-issues-new-report-on-the-history-of-the-mta-capital-program/>