EXHIBIT 1



February 1, 2019

TECHNICAL MEMORANDUM

From: Craig Fajnor, Principal

RE: Comments on AB 987 Application for the Inglewood Basketball and Event Center (IBEC)

The following provides comments on the AB987 Application (Application) for the Inglewood Basketball and Event Center (IBEC or Project) dated November, 2018, prepared by AECOM. Comments are presented for the following sections of the Application:

- Greenhouse Gases
- Regional Land Use Plans and Policies
- Solid Waste and Recycling Policies

GREENHOUSE GASES

Comments regarding the section of the Application that presents information establishing that the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.

A. The Application Establishes an Artificially High Baseline.

- 1) The Application underestimates the Project's emissions by incorporating aggressive assumptions regarding the "baseline" condition that are not consistent with standard modeling practice, agency guidance for evaluating GHG emissions from development projects, and long-standing regulations governing emissions from stationary sources under the state and Federal Clean Air Act. As described on page 5, the Application incorporates numerous assumptions to reduce the Project's GHG emissions inventory by taking credit for "baseline" emissions in a manner that is not consistent with common standards and agency guidance for determining baseline conditions, as highlighted below. Moreover, the Application is inconsistent with long-standing agency guidance and rules employed under the Clean Air Act for verifyinh when a new facility can take credit for the elimination of an existing emissions source. Lastly, the analysis fails to employ the rigor and consistency necessary to substantiate the numbers reported in the Application.
 - a) First, modeling tools developed by the air agencies to evaluate project-level GHG emissions do not reduce project emission inventories by taking credit for emissions that might exist in the region, but will not be affirmatively eliminated by the Project. For example, new commercial developments include emissions from all vehicles coming to and from the new building, when, in reality, many of those emissions are likely existing trips that may result from an existing business moving into that new building. CalEEMod, which is a statewide program designed to calculate both criteria and GHG emissions from CEQA development projects in California, does not count

these emissions as part of the baseline and does not "net out" these emissions for evaluating projects. CalEEMode was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts, and is recommended by the South Coast Air Quality Management District SCAQMD). The Application's treatment of baseline emissions and taking credit for offsite emissions reductions is not consistent with industry standard approach for using CalEEMod.

b) Second, the Application is inconsistent with agency guidance for baseline emissions. The industry standard approach is consistent with the Bay Area AQMD CEQA guidance, which describes the standard methodology for determining baseline emissions and the technical basis for doing so when evaluating a project's emissions profile:

"If a proposed project involves the removal of existing emission sources, BAAQMD recommends subtracting the existing emissions levels from the emissions levels estimated for the new proposed land use. This net calculation is permissible only if the existing emission sources were operational at the time that the Notice of Preparation (NOP) for the CEQA project was circulated or in the absence of an NOP when environmental analysis begins, and would continue if the proposed redevelopment project is not approved. This net calculation is not permitted for emission sources that ceased to operate, or the land uses were vacated and/or demolished, prior to circulation of the NOP or the commencement of environmental analysis. This approach is consistent with the definition of baseline conditions pursuant to CEQA." The guidance defines direct emissions as occurring on-site; indirect emissions offsite are limited to "emissions produced offsite from energy production and water conveyance".¹

c) Third, stationary source permitting under the Clean Air Act provides further evidence that the Application is not consistent with long-standing regulations governing taking credit for verified emissions reductions. As highlighted in SCAQMD Rules and Regulations, the approach for a closing facility to obtain emission reduction credits is rigorous, and requires actual data on historical emissions, and cannot employ speculative reductions that are not real, additional, permanent, verifiable and enforceable verifiable (see Rule 1306², Rule 1309³, and Application for Emission Reduction Credit Certificate of Title⁴). The regulatory approach relies upon the actual operating levels of the facility in the most recent time period. Similarly, the New Source Review Permitting

¹ BAAQMD. 2017. CEQA Air Quality Guidelines. Available at: <u>http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en</u>. Accessed January 2019.

² SCAQMD. Rule 1306. Emission Calculations. Available at: <u>http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-1306-emission-calculations.pdf?sfvrsn=4</u>. Accessed January 2019.

³ SCAQMD. Rule 1309. Emission Reduction Credits and Short Term Credits. Available at: <u>http://www.aqmd.gov/docs/default-source/rule-book/reg-xiii/rule-1309.pdf?sfvrsn=4</u>. Accessed January 2019.

⁴ SCAQMD. Form 401. Application for Emission Reduction Credit (ERC) Certificate of Title. Available at: <u>http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/401-erc-form.pdf?sfvrsn=14</u>. Accessed January 2019.

Program, which was developed as part of the Federal Clean Air Act, uses "baseline actual emissions" to calculate emissions increases and decreases.⁵

- i) The SCAQMD's regulations also require detailed evaluation and a calculation that reduces the credited emissions based on a specific ratio (i.e., 1.2-to-1.0⁶). The Application should apply a greater standard of rigor in its analysis.
- ii) Importantly, SCAQMD enforces the Federal Clean Air Act and the state Clean Air Act by requiring that emission reductions be permanent and verifiable for a facility operator to obtain emission reduction credits (i.e., "take credit"). The SCAQMD requires that the source cannot be restarted without a new operating permit and physical limitations are in place. For example, an operator cannot just disconnect a fuel line, there must be physical limitations where the device cannot operate, such as a hole in a crankcase.
- d) Fourth, in the framework of AB987, where the project must ensure that there are no net additional emissions of GHGs, the GHG reductions claimed in the analysis should be well substantiated. Notably in the context of baseline emissions, they should be held to a standard where those emissions claimed as being removed are real, additional, permanent, verifiable and enforceable. The Application does not provide adequate information or analysis to confirm these standards are being achieved. As a result, there is no certainty that existing operations at the Staples Center or other facilities will not simply be "backfilled" and there will be no actual decrease in emissions from those locations. This error is highlighted by the Application taking credit for the unsubstantiated elimination of "market shifted" events, even though the Application provides no proof of any kind that the events will actually be eliminated due to the Project.
- 2) The Application appears to rely mostly upon default assumptions regarding the baseline. The default assumptions of CalEEMod are generally designed to be conservatively high to ensure that Project emission inventories are not underpredicted. By using this approach, the Application likely artificially inflates the results to minimize the Project's GHG emissions inventory. In other words, by using default assumptions in the baseline, the Application is *less conservative* than if site-specific data is used, resulting in a likely underestimation of Project emissions. Unless the applicant can demonstrate that site-specific data is not available, the default assumptions should not be used when calculating baseline emissions to avoid inflating the baseline.
 - a) Regulatory programs generally use site-specific data to assess emissions such as it relates to baseline.

⁵ Review of New Sources and Modifications. 40 CFR Part 51.165(a). Available at: <u>https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=0f84e0de247038b7002afe9d179782a9&rgn=div6&view=text&node=40:2.0.1.1.2.6&idno=40.</u>

Accessed January 2019.

⁶ SCAQMD. Emission Reduction Credits. Available at: <u>http://www.aqmd.gov/home/permits/emission-reduction-credits</u>. Accessed January 2019.

- i) See above comment A.1.c.
- ii) California's Mandatory Report Rule (MRR) describes "facility fuel use and other facility process data" as the "best available data and methods".⁷
- iii) CalEEMod notes that "for any project that substantially deviates from the types and features included in the surveys, site-specific data that are supported by substantial evidence should be used".
- b) The Application uses a mix of default and site-specific assumptions for the mobile calculations for the baseline sources as shown on page 10. As stated above, these calculations should be based on actual data consistent with common regulatory approaches.
- c) The Application appears to use default information for waste, water, and area sources. As discussed above, the analysis should use site specific data.
- 3) As discussed on page 6, the Application assumes, without technical substantiation, that events from other arenas will leave those arenas and that those arenas would then not find other events to backfill such events. Beyond the unsubstantiated assumption that this market-shift of events would even occur, there is no standard or guidance to support such an approach. In fact, as discussed above, CalEEMod does not employ this approach to develop project inventories and it is not consistent with agency guidance. From a technical standpoint, this approach is highly speculative because there is no evidence that the market-shift of events would occur and there is no reason to assume the vacated capacity would not be backfilled. As noted below, the Application recognizes the error with this approach with respect to the office uses, where it recognizes the offices will be backfilled.
 - a) This is inconsistent with the standard of approach for GHG analyses. For example, if a project were to build new dwelling units, that project does not discount the emissions for people who may move in from existing homes. As discussed above, CalEEMod does not approach project emissions inventory in this way and does not contain a methodology to consider market-shifted events.
 - b) The MRR defines baseline to be the "offset projects GHG emission sources, GHG sinks, or GHG reservoirs within the offset project boundary."⁸ Netting out emissions outside of the Project site is inconsistent with this definition of baseline.
 - c) The Application has incorporated the shifting of non-NBA events from various venues without substantial evidence. On page 9, the Application notes that it would be "speculative to include the emissions associated with any specific market-shifted event or venue;" however, the Application then continues to calculate emissions associated with market-shifted events by assuming specific venues: the Staples Center, the Honda Center, and the Forum. Notably, one of the venues chosen, the Honda Center, has one of the highest GHG utility intensity values.

⁷ MRR Section 95102(a). Available at: <u>https://www.arb.ca.gov/regact/2016/ghg2016/mrrfinalreg.pdf</u>. Accessed January 2019.

⁸ Mandatory Reporting Rule. Available here: <u>https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2016-unofficial-2017-10-10.pdf? ga=2.94310430.20304827.1547741790-1837698206.1539707075</u>. Accessed January 2019.

Additional information is necessary to substantiate that any events would leave the Honda Center for the project and that the Honda Center would not backfill events.

4) As discussed previously, the standard approach for CEQA is to include existing on-site structures at the Project site in the baseline. The attached Table 1 illustrates what this baseline would look like. A modified version of Table 12 is provided in the attached Table 2 showing the net new emissions from the Project with this more appropriate baseline assumption. This analysis shows that the actual net change in the Project may be more than 400,000 MT CO₂e (see Table 1), and that the Project would be more than 300,000 MT CO₂e short in necessary reductions.

However, it is noteworthy that the existing emissions would similarly decrease into the future as the state's efforts lead to reductions in GHG emissions associated with electricity usage and mobile sources. If similar reduction factors are applied, the Project is short 422,952 MT CO₂e.

B. The Application Uses Inconsistent Methodology When Calculating the Baseline and Project Emissions.

- 1) The Application includes a non-conservative assumption by holding the baseline emissions constant going into the future, while the Application assumes that Project emissions reduce from 2024 into the future due to projected utility intensity factors and vehicles getting cleaner. This approach is internally inconsistent, inflates the reductions of the analysis, and minimizes the Project emissions inventory. The emissions identified as "baseline" emissions would also decrease in the future just as the Project's emissions are shown to decrease. To be more accurate, the Application should similarly apply reductions in future years to baseline as it did for the Project's future emissions. If similar reductions were applied, the Project would be short 422,952 MT CO₂e. However, as explained above, any use of offsite reductions associated with the Staples Center and market-shifted events is not supported by agency guidance or industry standards.
- 2) The Application appears to mix and match utility intensity values without a clear logic. For example, the Application lists a mix of years in terms of the basis of the utility information. The calculations should rely upon the utility emission factor that matches the site-specific usage data time period that the analysis is based on. For example, the baseline inventory includes GHG utility intensity values for different years (i.e., 2018 data for SCE, 2017 data for Anaheim Public Utilities, and 2016 data for LADWP).

C. The Application Does Not Account for Increases in Regional VMT Caused by Moving Games and Events to Less-Centrally Located Facility

1) The Application should account for the change in VMT due to the moving of arena events from a better transit-oriented location to a lesser location. The traffic analysis included in this comment letter shows that a portion of the guests/employees will no longer benefit from the same proximity to downtown transportation services and alternative travel modes. Based on the traffic consultant's estimates, VMT is expected to increase in all peak periods, leading to a corresponding increase in GHG emissions. If the total annual VMT increases, the mobile GHG emissions will proportionally increase.

- 2) The Application contains internal inconsistencies. Table 7 of the TDM section (Attachment D) reports total annual trips (with TDM) of 2,972,568. The "Mobile Source Emissions" table of Attachment G reports total annual trips of 2,646,393 (sum of attendees light duty vehicles, attendees other vehicles, and delivery trips). If the trips were corrected, the mobile component of the Project GHG emissions would increase by approximately 12% as shown in attached Table 3.
- 3) As discussed by the review of the traffic analysis, the TDM is not likely to be as effective as currently claimed by the Applicant. If the TDM program is not as effective as shown, the GHG emissions reduction would be less than what is shown. For illustrative purposes, if the TDM Program's VMT reductions are half of what the application currently estimates, the emissions would be more than 27,000 MT CO2e higher to represent a more achievable TDM Program in a less centrally located facility.

D. The Analysis in the Application Lacks Sufficient Technical Details

- 1) There is not enough documentation to understand how the reported emissions are compiled. There should be additional tables and text explaining how these numbers were compiled.
- 2) The Application indicates that the Project will be 10% better than Title 24 2019 (T24 2019) because of the commitment to Tier 1 of the CALGreen Code (Application, page 19, Attachment G page 18). The calculations and Application do not adequately substantiate how this will be achieved.
 - a) First, while there are meaningful requirements as part of Tier 1, it is not clear that they will achieve a 10% reduction from T24 2019 building code requirements. The analysis should provide substantiation on how the Tier 1 commitments are going to achieve energy reductions 10% beyond T24 2019. The Tier 1 requirements are included in the 2016 version of CALGreen, and thus were established well before the T24 2019 code.
 - b) Second, it is also not clear what, if anything, the analysis incorporated to have CalEEMod estimate what T24 2019 energy usage is. Without greater explanation and substantiation, the calculation is speculative.
- 3) The Application claims to take a reduction for the LEED commitments (Application, Table 3, page 21). The LEED commitments often do not result in any material GHG reductions. Thus, any such reduction from LEED should be further substantiated and explained. For example, the Application refers to heat island reduction, light pollution reduction, green education program and other measures that are unlikely to result in material GHG reductions. Furthermore, since LEED is a point checklist approach, if the analysis will take reductions from certain LEED point commitments, then those commitments should be enforced (i.e., the Project should not be allowed to get their points using a different approach that does not result in the same GHG reduction).
- 4) The Application appears to rely upon EMFAC2014 rather than EMFAC2017. It is not clear why they are relying upon an older model when the newer version has been available since March 2018.

5) The Application identifies on page 17 the use of a "white box model" related to energy usage, but provides no details on what this model includes or assumes. The calculations should be substantiated and illustrated to meet the standards of such as for CEQA, offset protocols, and stationary source emission reduction credits

E. The Application Does Not Provide Adequate Information to Evaluate NO_x and PM Emissions or Related Health Impacts

- 1) The Application does not provide enough information to assess if the Project will be able to meet the requirements on NO_x and PM reductions. Of the information that is provided, it does not appear that the Project can meet the requirements. Specifically, the CalEEMod output files show unmitigated NO_x emissions of 1.70 tpy and mitigated NO_x emissions of 1.62 tpy. This suggests that the Project reduces only 0.08 tpy NO_x, or 0.8 tpy NO_x over 10 years. Without additional information, the Application does not provide substantial evidence that it will be able to comply with the NO_x reductions required under AB 987. Similarly, the CalEEMod output files show unmitigated PM_{2.5} emissions are 0.10 tpy (rounding); this suggests that minimal PM_{2.5} reductions are occurring on an annual basis, or over the 10 years required by AB 987.
 - a) The analysis for the NO_x and PM_{2.5} reductions should meet the same standards as highlighted for the GHG reductions. Notably, the SCAQMD standards on evaluating NO_x and PM_{2.5} emissions should be applied. The standards could pertain to the Rules and Regulations as previously cited (e.g., Rule 1306, 1309), or they should achieve the standards that SCAQMD requires to ensure that they are SIP creditable.⁹
 - b) It is also noteworthy that the criteria pollutants are a local issue and local criteria pollutant emissions have the potential to cause localized health impacts. National Ambient Air Quality Standards (NAAQS) are established by the EPA for criteria pollutants, which include NO₂ and PM_{2.5}. These standards are designed to protect the most sensitive people from illness or discomfort. Increased emissions of NO_x and PM_{2.5} are correlated to local ambient air quality impacts. The emissions at the new stadium should all be considered project emissions, and even greater consideration should be incorporated in terms of how the Application nets out "baseline/existing" emissions. Furthermore, the reductions the Application will try to achieve should come from local sources directly from the Project, or if through offsets, they should be local offsets generated in and around the arena.

⁹ SCAQMD. State Implementation Plan (SIP) Credit Guidance. Available at: <u>http://www.aqmd.gov/home/air-guality/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/sip-credit-guidance</u>. Accessed January 2019.

- c) There are a number of studies that highlight how criteria pollutant emissions correlate to health impacts.^{10,11} Therefore, if the Application underestimates the level of local PM and NOx emissions, it will underestimate the potential health impacts associated with neighboring communities being exposed to criteria pollutants. Known health impacts associated with localized exposure to PM and NOx include respiratory effects (e.g., decreased lung function, increases in pulmonary inflammation, asthma development) and cardiovascular effects (e.g., congestive heart failure).^{10,11,12}
- d) In addition, by underestimating the Project's emissions, the Application may be underestimating actual emissions of toxic air contaminants, such as diesel particulate matter. Diesel particulate matter is identified by the State of California as a known carcinogen. Exposure to DPM also may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{11,13,14,15}
- e) Also, the expected VMT increase will result in increased emissions of criteria pollutants locally. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities.

REGIONAL LAND USE PLANS AND POLICIES

Comments regarding the section of the Application that presents information to show the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization's

¹⁴ CARB, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community:PreliminarySummaryofResults,March2008,www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.

¹⁰ SCAQMD. 2016 Air Quality Management Plan (AQMP). Appendix I. Health Effects. Available at: <u>http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14</u>. Accessed January 2019.

¹¹ World Health Organization, International Agency for Research on Cancer (IARC). 2016. IARC Monographs on the Evaluation of Carcinogenic Risks to Humans. Available at: <u>https://monographs.iarc.fr/wp-content/uploads/2018/06/mono109.pdf</u>. Accessed January 2019.

¹² Health Effects Institute. 2010. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. Available at: <u>https://www.healtheffects.org/system/files/SR17Traffic%20Review.pdf</u>. Accessed: January 2019.

¹³ CARB, Diesel and Health Research, www.arb.ca.gov/research/diesel/diesel-health.htm

¹⁵ Michael Guarnieri, MD and John R. Balmes, MD. 2014. Outdoor Air Pollution and Asthma, May 03, 2014. Available at: https://europepmc.org/backend/ptpmcrender.fcgi?accid=PMC4465283&blobtype=pdf. Accessed: January 2019.

determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.

The Application's analysis of consistency with applicable regional land use policies of the Southern California SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is flawed because: (1) it fails to take into account that the centerpiece of the Project, the arena, would be relocating from a regionally more desirable location under policies of the RTP/SCS to a considerably less desirable location; (2) the Project does not contribute to the development of a "Complete Community" in Inglewood; (3) the Project does not represent "compact growth" as called for in regional land use plans; (4) the Project does not implement regional growth policies related to "Livable Corridors"; and (5) the Project is inconsistent with the intent of regional land use policies related to Transportation Demand Management (TDM), and pedestrian and bicycle movement. Accordingly, the Project has not been shown to be consistent with the applicable sustainable communities strategy, and should therefore not receive preferential treatment under AB 987.

- 1) The Application includes an analysis of Project consistency with several land use policies of the 2012 and 2016 versions of the RTP/SCS (Application, pages 12-15). These include:
 - 1. Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment and services all within a relatively short distance;
 - 2. Encourage compact growth in areas accessible to transit;
 - 3. Identify regional strategic areas for infill and investment;
 - 4. Plan for jobs closer to transit and housing, in sustainable transit-ready infill areas that can be reached by planned transit service and can readily access existing infrastructure;
 - 5. Develop strategies focused on high-quality places, compact infill development, and more housing and transportation choices;
 - 6. Encourage development in High Quality Transit Areas (HQTAs) and along "Livable Corridors";
 - 7. Develop nodes on a corridor intensify nodes along corridors with people-scaled, mixed use developments;
 - 8. Promote the use of TDM programs; and
 - 9. Invest in biking and walking infrastructure to improve active transportation options and transit access.
- 2) As shown below, the Project demonstrates notable inconsistencies with all of the listed policies.
 - a) The Project would relocate the operations of a major professional sports team and other events from downtown Los Angeles, the regional center of transportation and transit service, to a location which is characterized by considerably poorer transportation and transit access, which is inconsistent with regional growth policies set forth in the RTP/SCS.
 - i) This analysis makes no mention of either the arena use, which would draw patrons from throughout the region, or the hotel use, which is designed to serve patrons from outside the community. The proposed arena use would involve the relocation of the Los Angeles Clippers

NBA franchise from downtown Los Angeles, a regional transportation hub. A Blue Line/Expo Line Metro Rail station is located within 0.2 miles of the current home court of the Clippers, Staples Center, that also hosts other entertainment and family events, some of which could take place at the new arena in the future. The existing station provides nearby convenient access to multiple transit options, including the Metro Red and Purple Lines, the Metro Gold Line (upon completion of the Regional Connector, presently under construction, in 2021), and regional commuter rail lines (via Union Station). In addition, the 100,000 permanent residents and 70,000 employees located downtown can access the existing arena via walking, bicycle, taxi and rideshare services.

- ii) The proposed location for the arena use under the Project is 1.3 miles from the nearest rail transit station via roadway. As noted in the analysis provided in the Application, the only transit service that directly serves the proposed arena site consists of two bus lines adjacent to the site and one line within 0.5 miles (Application, page 14). Future rail service would include a station in downtown Inglewood that is located at a distance of 1.6 miles from the proposed arena (Application, p.14). The fact that the Project's TDM program is required to include extensive additional multi-passenger services to connect with the far away transit facilities is an admission that the Project would not be located in an area that is easily accessed by transit. As indicated in the Application, 1,947,990 annual trips associated with the arena use and Clippers operations would be relocated from downtown, 56% of the total of 3,503,351 annual trips (Application, Attachment D, page 16).
- iii) Given its centralized location and access to regional transit and transportation, there is no more regionally strategically significant area for infill and investment than downtown Los Angeles. The relocation of a major professional team and other events from downtown to an area more poorly served by transit would be inconsistent with regional growth goals and policies.
- iv) Specifically, of the policies listed in the Application, the arena and hotel components of the Project would be inconsistent with the following:
 - Encourage compact growth in <u>areas accessible to transit</u> (#2).
 - Identify regional strategic areas for infill and investment (#3);
 - Plan for jobs closer to transit and housing, in sustainable transit-ready infill areas that can be reached by planned transit service and can readily access existing infrastructure (#4);
 - Develop strategies focused on high-quality places, compact infill development, and <u>more</u> <u>housing and transportation choices</u> (#5).
- b) The Project does not contribute to the development of a Complete Community in this area of the City of Inglewood.
 - i) The proposed mix of uses in the Project, primarily the proposed arena, contributes nothing to development of a complete community in Inglewood. According to the RTP/SCS, Complete Communities is a conceptual land use pattern that is designed to:

"provide households with a range of mobility options to complete short trips. The 2016 RTP/SCS supports the creation of these mixed-use districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile (2016 RTP/SCS, p. 79)."

- ii) Not only would an arena and hotel be inconsistent with this concept, the Project would remove a potential site for housing and community serving uses that could contribute to development of a Complete Community at this location. The Project does not include any housing or educational uses, recreation or cultural uses, and only a minimal amount of retail, restaurant and medical office uses.
- iii) Specifically, of the policies listed in the Application, the arena and hotel components of the Project would be inconsistent with the following:
 - Support projects, programs, policies and regulations that encourage the development of complete communities, which include <u>a diversity of housing choices and educational opportunities</u>, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment and services all within a relatively short distance (#1).
- c) The Project does not represent "compact growth" as called for in regional land use plans.
 - i) "Compact growth" refers to the concentration of uses in walkable urban centers that is designed to conserve land and avoid urban sprawl. The Project does not constitute compact infill development as the arena and parking uses occupy approximately 80% of the site and the hotel is separated from the primary use by a parking lot and intervening development. Only a small portion of the site would be developed with retail and restaurant uses that would potentially serve the community.
 - ii) Specifically, of the policies listed in the Application, the arena and hotel components of the Project would be inconsistent with the following:
 - Encourage <u>compact growth</u> in areas accessible to transit (#2);
 - Develop strategies focused on high-quality places, <u>compact infill development</u>, and more housing and transportation choices (#5).
- d) The Project does not implement regional growth policies related to "Livable Corridors".
 - i) The Livable Corridor Strategy specifically advises local jurisdictions to plan and zone for increased density at key nodes along the corridor and replacement of single-story underperforming strip retail with well-designed higher density housing and employment centers. Livable Corridor strategies include the development of mixed-use retail centers at key nodes along the corridors, increasing neighborhood-oriented retail at more intersections and zoning

that allows for the replacement of under-performing auto oriented strip retail between nodes with higher density residential and employment (2016 RTP/SCS, p. 78). The Project would not implement any of these concepts, as it includes only a small amount of retail and restaurant use that would potentially serve the community, with the predominant use being the arena. This imbalance in uses within the Project would not serve to implement the Livable Corridors Strategy.

- ii) Specifically, of the policies listed in the Application, the Project would be inconsistent with the following:
 - Encourage development in High Quality Transit Areas (HQTAs) and <u>along "Livable</u> Corridors" (#6);
 - Develop nodes on a corridor intensify nodes along corridors with people-scaled, mixed use developments (#7).
- e) The Project is inconsistent with the intent of regional policies related to TDM, and pedestrian and bicycle movements.
 - i) Transportation Demand Management (TDM) strategies contained in the 2016 RTP/SCS focus on reducing the number of drive-alone trips and overall vehicle miles traveled (VMT) through ridesharing, which includes carpooling, vanpooling and supportive policies for ridesourcing services such as Uber and Lyft; redistributing or eliminating vehicle trips from peak demand periods through incentives for telecommuting and alternative work schedules; and reducing the number of drive-alone trips through increased use of transit, rail, bicycling, walking and other alternative modes of transportation (2016 RTP/SCS, p.7). From a regional perspective, these strategies refer to and are intended to promote permanent changes in travel behavior associated with residents and employees, not to provide mitigation for periodic or infrequent trips. The Project's TDM program primarily addresses trips to and from the arena, and is comprised of components mainly designed to compensate for the fact that the Project Site is not well served by transit. Far fewer TDM measures are required in downtown Los Angeles because of the more extensive transportation infrastructure available. Accordingly, the Project does not promote the changes in travel patterns promoted under the RTP/SCS.
 - ii) Moreover, the Project includes no provisions for pedestrian or bicycle facilities on the Project Site other than a pedestrian bridge between its own parking garage and the arena, a possible pedestrian bridge across Century Boulevard to serve arena patrons, and some bicycle parking spaces, all of which are designed specifically to serve its own needs. The Project provides nothing to enhance pedestrian or bicycle circulation in the community and therefore does not implement regional policies designed to promote alternative modes of transportation.
 - iii) Specifically, of the policies listed in the Application, the Project would be inconsistent with the following:

- Promote the use of <u>TDM programs</u> (#8);
- Invest in <u>biking and walking infrastructure</u> to improve active transportation options and transit access (#9).
- f) Overall, contrary to the analysis presented in the Application, the Project would not be consistent with the applicable policies specified for the project area in a sustainable communities strategy for which the State Air Resources Board has accepted a metropolitan planning organization's determination that the sustainable communities strategy would, if implemented, achieve greenhouse gas emission reduction targets and therefore should not receive preferential treatment under AB987.

SOLID WASTE AND RECYCLING POLICIES

Comments regarding the section of the Application that presents information establishing that the project will comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code section 42649) and 12.9 (commencing with Public Resources Code Section 42649) and 12.9 (commencing with Public Resources Code Section 42649.8), as applicable.

A. The Applicant does not include sufficient information to establish that the Project's construction and demolition waste recycling will meet City and State diversion targets.

The Applicant claims, without evidence, that the IBEC Project would achieve 75 percent recycling of demolition materials. In its Construction and Demolition Permit Application (https://www.cityofinglewood.org/DocumentCenter/View/187/Construction-and-Demolition-Permit-Application-PDF?bidId=, the City of Inglewood notes "The State of California requires that 50% of construction and demolition debris from covered projects, and 100% of land-clearing debris (from nonresidential, newly constructed buildings), be diverted from land filling. "Covered projects" are defined to include, among others, "all new construction (residential, commercial and industrial)". There appears to be no mechanism for the City to require or enforce a diversion rate for construction or demolition debris that exceeds 50 percent. Moreover, the Applicant provides no information to indicate how the suggested 75 percent diversion rate nor the 100 percent diversion of land-clearing debris would be achieved. Accordingly, insufficient information has been provided in the Application to demonstrate that the IBEC Project would comply with Division 30, Chapter 12.8 (commencing with Section 42649) of the Public Resources Code (PRC).

- B. The Applicant does not include sufficient information to establish that the Project will comply with Division 30, Chapter 12.9 (commencing with Section 42649.8) of the Public Resources Code regarding organic waste recycling.
- The City of Inglewood does not appear to have established an "organic waste recycling program" as required by PRC Section 42649.82. A review of the City Department of Public Works, Environmental Services Division website (<u>https://www.cityofinglewood.org/279/Recycling-Programs</u>) identifies the following Recycling Programs of the City:

- Bottle & Can Recycling Centers
- Business & Recycling
- Green Waste
- Household Hazardous Waste
- Recycling Household Batteries
- Sharps Recycling Program
- Thrift Shops
- Weekly Hazardous Waste Roundups
- 2) Under "Business & Recycling", the City provides information and advice to City businesses regarding recycling. In addition, the City provides a flyer dated February 27, 2017 that sets forth recycling requirements for commercial businesses and multi-family complexes operating in the City of requirements of PRC Sections Inglewood that meet the 42649 et seq.: https://www.cityofinglewood.org/DocumentCenter/View/11479/Commercial-And-Multi-Family-Recycling-Requirements?bidId=. Under "Green Waste", the City addresses "yard trimmings, such as leaves, grass, thatch, chipped brush and plant cuttings." None of the recycling topics specifically addresses the area of organics recycling, which includes "food waste" and "food-soiled paper waste that is mixed in with food waste" per PRC Section 42649.8(c). The proposed arena component of the IBEC Project would be expected to generate substantial quantities of such waste.
- 3) The Applicant claims that the Project will comply with Sections 42649.8 et seq. by "subscribing to a municipal solid waste collection service that is approved by the City". The current solid waste franchise holder in the City of Inglewood is Consolidated Disposal Service (CDS), a Republic Services Company (https://www.cityofinglewood.org/353/Waste-Collection). According to Republic Services' website (http://local.republicservices.com/site/los-angeles-ca/resources#organics), the services provided to assist customers in complying with AB1826 (which enacted PRC 42649.8 et seq.) include "waste audits" and "educational programs and materials". Neither of these services provides any assurances that the Project would be able to meet organic waste diversion requirements as set forth in PRC Section 42649.81(a)(3) ("On and after January 1, 2019, a business that generates four cubic yards or more of commercial solid waste, ..., per week, shall arrange for recycling services specifically for organic waste.") Moreover, the cited website (<u>http://local.republicservices.com/site/los-angeles-</u> ca/inglewood) specifically identifies food waste as an "Unacceptable" material for placement in CDS' recycling containers. Although the site also references "organic containers for a fee, posters and additional tools", no evidence of the availability of disposal services is provided. Accordingly, insufficient information has been provided in the Application to demonstrate that the IBEC Project would comply with PRC Division 30, Chapter 12.9 (commencing with Section 42649.8).

Attachments

Table 1. GHG Emissions by Year - Baseline Revised (Existing Site) without GHG Reduction Measures

Los Angeles, California

	Applica	tion Reported Em	Baseline Revi	sed Emissions	
	IBEC Project without GHG Reductions	Baseline Emissions	Net Emissions IBEC Project without GHG Reductions	Baseline - Revised	Net Emissions IBEC Project without GHG Reductions
Emissions Year	(MT CO ₂ e) ¹	(MT CO ₂ e) ¹	(MT CO ₂ e) ¹	(MT CO ₂ e) ^{2,3}	$(MT CO_2 e)^2$
2021	1,750	1,203	547	1,203	547
2022	5,630	1,203	4,427	1,203	4,422
2023	6,401	1,203	5,198	1,203	5,198
2024	11,430	6,213	5,217	1,203	10,22
2025	19,418	11,223	8,195	1,203	18,21
2026	18,917	11,223	7,694	1,203	17,714
2027	18,468	11,223	7,245	1,203	17,26
2028	18,062	11,223	6,839	1,203	16,859
2029	17,693	11,223	6,470	1,203	16,490
2030	17,358	11,223	6,135	1,203	16,15
2031	16,858	11,223	5,635	1,203	15,65
2032	16,362	11,223	5,139	1,203	15,15
2033	15,893	11,223	4,670	1,203	14,69
2034	15,446	11,223	4,223	1,203	14,24
2035	15,021	11,223	3,798	1,203	13,81
2036	14,616	11,223	3,393	1,203	13,41
2037	14,230	11,223	3,007	1,203	13,02
2038	13,861	11,223	2,638	1,203	12,65
2039	12,902	11,223	1,679	1,203	11,69
2040	13,161	11,223	1,938	1,203	11,95
2041	12,828	11,223	1,605	1,203	11,62
2042	12,503	11,223	1,280	1,203	11,30
2043	12,184	11,223	961	1,203	10,98
2044	11,871	11,223	648	1,203	10,66
2045	11,562	11,223	339	1,203	10,35
2046	11,548	11,223	325	1,203	10,34
2047	11,538	11,223	315	1,203	10,33
2048	11,529	11,223	306	1,203	10,32
2049	11,522	11,223	299	1,203	10,31
2050	11,516	11,223	293	1,203	10,31
2051	11,516	11,223	293	1,203	10,31
2052	11,516	11,223	293	1,203	10,31
2053	11,516	11,223	293	1,203	10,31
2054	11,516	11,223	293	1,203	10,31
۲otal ⁴	448,142	346,512	101,630	40,902	407,240

Notes:

¹ IBEC Application, Attachment G, Table 10, pg 24.

 $^{\rm 2}$ Baseline emissions represent an existing setting baseline consistent with industry standard for CEQA.

³ Baseline emissions obtained from emissions reported for years 2021-2023. IBEC Application, Attachment G, Table 10, pg 24.

 $^{\rm 4}$ Total IBEC Project emissions may not match the Application due to rounding.

List of Abbreviations:

CO2e - carbon dioxide equivalent

IBEC - Inglewood Basketball and Entertainment Center

GHG – greenhouse gas

MT - metric tonnes

Los Angeles, California

	Application Reported Emissions ¹		Baseline Revise	ed Emissions ^{2,3}
IBEC Project Condition and Reductions	Emissions Estimates (MT CO2e)	Percent of Net New Emissions	Emissions Estimates (MT CO₂e)	Percent of Net New Emissions
Total Net New Emissions IBEC Project Without GHG Reduction Measures	101,623	100%	407,240	100%
- Required GHG Reductions from Local, Direct Measures	50,812	50%	50,812	12%
- Total Emissions Reductions from LEED Gold	7,925	8%	7,925	2%
- 50% of Total Emission Reductions from LEED Gold Qualifying as Local Direct Measures	3,962	4%	3,962	1%
- Total Reductions from IBEC TDM Program	54,233	53%	54,233	13%
- Total Amount of Reductions from Local, Direct Measures (TDM Program and 50% of LEED Gold)	58,195	57%	58,195	14%
Total Amount of Reductions from GHG Reduction Measures (TDM Program and 100% of LEED Gold)	62,158	61%	62,158	15%
Additional Reductions Needed from Offset Credits and/or Co-benefits of NO $_{\rm x}$ and PM $_{\rm 2.5}$ Reduction Measures	39,466	39%	39,466	10%
Total Net New Emissions ⁴	-1	0%	305,616	75%

Notes:

¹ IBEC Application, Attachment G, Table 16, page 32.

² Recalculated net new emissions using revised baseline.

³ In the Baseline Revised Emissions scenario, reductions reported in the Application were retained; only net new emissions were revised.

⁴ Total IBEC Project emissions may not match the Application due to rounding.

List of Abbreviations:

CO₂e - carbon dioxide equivalent

- IBEC Inglewood Basketball and Entertainment Center
- LEED Leadership in Energy and Environmental Design
- GHG greenhouse gas
- MT metric tonnes
- NO_X oxides of nitrogen
- $\ensuremath{\text{PM}_{2.5}}\xspace$ particulate matter less than 2.5 microns in diameter
- TDM Transportation Demand Management

	IBEC Application ¹	Corrected IBEC Application ²
Trips (with TDM M	leasures) (trips/year)	
Light Duty Vehicles (Auto and TNC Trips) ³	2,601,746	
Other Vehicles⁴	18,660	
Delivery Trips ⁵	25,987	
Total trips ⁶	2,646,393	2,972,568
Percent change trips ⁷	12	%
CY 2024 Emissions (with T	DM Measures) (MT CO2e/year)	
Light Duty Vehicles (Auto and TNC Trips) ³	9,854	
Other Vehicles ⁴	269	
Delivery Trips⁵	133	
Total ⁸	10,256	11,520.10

Notes:

¹ Values as reported in the IBEC Application.

² Values reported in the IBEC application are corrected for total trips as reported in the TDM section.

³ IBEC Application, Attachment G, Mobile calculations (PDF pg 139).

⁴ IBEC Application, Attachment G, Mobile calculations (PDF pg 140).

⁵ IBEC Application, Attachment G, Mobile calculations (PDF pg 141).

⁶ Total trips in the column "Corrected IBEC Application" is found in Table 7 of Attachment D.

 7 The calculated percent change in trips between the values reported in Attachments D and G.

⁸ Total GHG Emissions for the "Corrected IBEC Application" are calculated by assuming the emissions will be scaled by the percent change in trips.

List of Abbreviations:

 CO_2e – carbon dioxide equivalent

GHG – greenhouse gas

IBEC - Inglewood Basketball and Entertainment Center

MT - metric tonnes

TDM - Transportation Demand Management

TNC - transportation network companies

EXHIBIT 2



MEMORANDUM

TO: MSG Forum, LLC

FROM: Patrick A. Gibson, P.E., T.E., PTOE, and Brian Hartshorn

DATE: January 31, 2019

RE: Technical Review of Transportation Components for IBEC Arena AB-987 Application Inglewood, California

Ref: J1691

Gibson Transportation Consulting, Inc. (GTC) has prepared this technical memorandum summarizing our detailed review of the transportation components for *AB* 987 *Application for the Inglewood Basketball and Event Center*, prepared by Murphy's Bowl LLC, November 2018 (IBEC Report).

EXECUTIVE SUMMARY

Based on our review of the IBEC Report, there is no evidence that the proposed Transportation Demand Management (TDM) plan will achieve a 7.5% reduction in vehicle trips to the IBEC by the end of the first National Basketball Association (NBA) season, or a 15.151% reduction by 2030.

To achieve the predicted 7.5% and 15.151% reductions in trips, the IBEC Report relies almost entirely on a reduction in trips of attendees and employees to events at the arena. The IBEC Report forecasts a total of 3,503,351 trips to the IBEC without the TDM plan. Of these approximately 3.5 million trips, more than one-half, 1,867,072, are attributed to the arena component.

The TDM plan assumes that these arena trips will be reduced by just over 27% to achieve the 15.151% reduction. The other components of the IBEC's trips are projected not to be reduced at all or to be minimally reduced between 0.5% and 4.5%.

Table 1 summarizes the target reductions assumed by the IBEC Report's TDM plan.

LAND USE	WITHOUT	WITH	TARGET
TYPE	TDM*	TDM*	REDUCTION
Arena (Employees)	148,624	107,426	27.72%
Arena (Attendees)	1,718,448	1,247,532	27.40%
Clippers Office	80,918	76,872	5.00%
Practice & Training	14,108	13,403	5.00%
Sports Medicine	173,445	169,819	2.09%
Community Space	67,439	66,038	2.08%
Restaurant/Bar	133,389	132,359	0.77%
Restaurant/Lounge	152,444	151,267	0.77%
Coffee	375,638	371,998	0.97%
Quit Restaurant	286,532	284,320	0.77%
Team Store	38,755	38,512	0.63%
Other Retail	94,119	93,530	0.63%
Hotel	219,492	219,492	0.00%
Annual Total Trips	3,503,351	2,972,568	15.15%

TABLE 1 - SUMMARY OF REDUCTIONS BY LAND USE

*Source: IBEC Report, p. D-17

The IBEC Report's conclusion that arena attendee and employee trips will be reduced by 27% is unsupportable.

Based on our analysis, given the arena's distance from existing and proposed rail transit and the exclusive reliance on shuttle buses to carry attendees and employees from rail transit stations from the station to the arena, it is not reasonable to assume that between 5% and 10% of all arena attendees and employees will arrive by rail transit.

The IBEC Report states that at STAPLES Center today, 11% percent of attendees arrive by rail transit to a station that is a few hundred feet from the arena. This number may be inflated. A survey conducted at a recent sold out NBA game at STAPLES Center found that the 2.6% of the attendance (495 people) arrived by train and 1.8% (351 people) left on the train.

If accurate rail transit ridership assumptions are applied to arena employees and attendees (i.e., recalculating the difference of 10% credit down to 4% credit), the TDM plan can only achieve a trip reduction of 11.95%, as shown in Table 2.

	Reporte	d Trips	RAIL	ADJUSTED
LAND USE	WITHOUT WITH		ADJUSTED	TRIP
	TDM*	TDM*	TARGET	RESULT
Arena (Employees)	148,624	107,426	21.72%	116,343
Arena (Attendees)	1,718,448	1,247,532	21.40%	1,350,700
Clippers Office	80,918	76,872	5.00%	76,872
Practice & Training	14,108	13,403	5.00%	13,403
Sports Medicine	173,445	169,819	2.09%	169,820
Community Space	67,439	66,038	2.08%	66,036
Restaurant/Bar	133,389	132,359	0.77%	132,362
Restaurant/Lounge	152,444	151,267	0.77%	151,270
Coffee	375,638	371,998	0.97%	371,994
Quit Restaurant	286,532	284,320	0.77%	284,326
Team Store	38,755	38,512	0.63%	38,511
Other Retail	94,119	93,530	0.63%	93,526
Hotel	219,492	219,492	0.00%	219,492
Annual Total Trips	3,503,351	2,972,568	11.95%	3,084,655

TABLE 2 - SUMMARY OF ADJUSTED RAIL TRANSIT (ARENA ONLY)

*Source: IBEC Report, p. D-17

This is a best-case scenario since it assumes the IBEC Report's mode split assumptions for all other IBEC uses are held constant, even though they also overstate transit usage. More accurate rail transit assumptions for all uses would degrade the trip reduction percentage even further.

Beyond this foundational error in the TDM plan, the IBEC Report contains additional errors and unsupported assumptions and conclusions. These include the following:

- Traffic generation calculation equations/rates that are missing or incorrect
- An underestimation of certain traffic generating components
- Errors in transcribing project use trip rates that, when corrected, reduce the TDM plan's efficacy and cause it to miss the 15% reduction target
- Does not acknowledge travel time and speeds during congested hours before events will affect shuttle services and reduce rail transit use

- No mechanism nor implementation plan provided in the study that can demonstrate the reality of pre-TDM vs post-TDM goals
- Full credit assumptions taken for all TDM strategies without a plan to enforce or mandate the plan
- Traffic generation results cannot be replicated

When these issues are accounted for, applying the empirical data gathered in the field, and based on our research and expertise detailed in this review, a reassessment of the IBEC Report summaries (Table 7, page D-17) shows that the TDM plan may only achieve a 7.13% reduction in the overall trips.

Lastly, the IBEC Report does not attempt to quantity the IBEC's overall vehicle miles traveled (VMT) as compared to VMT generated at STAPLES Center. The IBEC's location far from transit and outside of the downtown Los Angeles urban core will likely result in an increase in VMT as compared to existing conditions at STAPLES Center.

TRANSPORTATION TECHNICAL REVIEW

Transit Ridership

The IBEC Report states that zero employees and zero attendees would use rail transit to arrive at the arena prior to implementing a TDM plan. Based on the planned arena's proximity to existing and future rail stations, this assumption is reasonable.

However, with the TDM plan, that base number increases to 10% on rail. The 10% rail assumption is premised on the use of shuttles operating at the future rail stations. The 10% rail usage assumption is unsupported and will not be achieved for the following reasons and based on the following facts.

Travel Difficulty & Travel Time Will Discourage Rail Use

A shuttle system must assume the following basic travel mechanics (at minimum):

- Transport to a remote transit portal, park vehicle or transfer
- Use of transit to get near the destination, not including transfers, making all stops
- Boarding of a shuttle to get to the destination using the congested street network
- Return trip requires the reverse of these steps

In all, a shuttle user must engage in three modes of transportation to get to the destination and three more to return to the origin, thereby increasing overall travel time and degrading the experience, when the alternative is to use one mode of transportation and drive a car to the event.

A few indicators of why such convoluted travel is not appealing to commuters can be found when testing operations at a current venue and in recent historical transit trends.

<u>STAPLES Center Data Capture</u>. Rail-transit ridership data was collected at a sold-out STAPLES Center event on January 18, 2019. All pedestrians arriving at and leaving the Los Angeles County Metropolitan Transportation Authority (Metro) fixed rail stop (Blue Line and Expo Line) immediately east of the venue were counted. Data was collected for two hours before and for two hours after the event (with a 30-minute overlap to the start and end of the event to capture late arrivals and early departures). Table 3 summarizes the pedestrian demand (captured at both platform ends to account for all pedestrians exiting the train regardless of the ultimate destination).

PRE-GAN	ИE IN	POST-GAME OUT						
Location	Location # of Peds		# of Peds					
OVERALL TOTAL (2 HOURS)								
Pico Blvd.	178	Pico Blvd.	108					
12th Street	317	12th Street	243					
2 Hour Peak	495	2 Hour Peak	351					
% of Attend	2.6%	% of Attend	1.8%					
P	EAK SUMM	ARY (60 MIN)						
Pico Blvd.	104	Pico Blvd.	65					
12th Street	177	12th Street	189					
60 Min Peak	281	60 Min Peak	254					
% of Peds	56.8%	% of Peds	72.4%					
Р	EAK SUMM	ARY (30 MIN)						
Pico Blvd.	65	Pico Blvd.	51					
12th Street	102	12th Street	142					
30 Min Peak	167	30 Min Peak	193					
% of Peds	33.7%	% of Peds	55.0%					
Attendance	1/18/19 =	19,068						

TABLE 3 - FIXED RAIL TRANSIT RIDERSHIP

With this conservative approach that assumes all riders entering/leaving the platform are destined for the STAPLES Center event, the data shows that 2.6% of the attendance (495 people) arrived by train and 1.8% (351 people) left on the train during the data collection window.

Further analysis of the arrival/departure pattern shows that approximately 33% of the attendees arrived in the peak 30 minutes before the event and 55% left during the peak 30 minutes after the event. Notably, more than 56% arrived in the peak one hour before the event and 72% departed during the peak one hour after the event.

This data suggests that with a venue located in a high-density urban environment with a rail station within one block of a sold-out venue, less than 3% are utilizing the service. In real numbers, fewer than 500 people used rail transit at an event totaling more than 19,000 attendees.

Consider also that the rail service that directly serves over 100,000 downtown employees and drops them within one block of the STAPLES Center only attracts 500 patrons for an event at the venue. The IBEC has no such density of patrons served nor does it have comparable direct

service to the venue and yet the IBEC Report assumes that more than twice as many patrons will use rail service even with a required shuttle bus trip.

Without evidence, the IBEC Report suggests that the shuttle service alone (from three potential fixed rail transit stops in the area) will transport more than 1,200 attendees for a similar-sized event.

<u>Declining Transit Ridership</u>. Metro ridership trends (published at www.metro.net) show a consistent reduction in transit riders over the last five years of reported data. Table 4 summarizes the data available from the Metro website from 2014-2018, each year declining by at least 3% over the previous year.

	2014	2015	2016	2017	2018
Ridership	36,989,999	34,755,021	32,441,599	31,350,137	30,307,505
Yearly Decline %	0%	-6.0%	-6.7%	-3.4%	-3.3%

TABLE 4 - METRO RIDERSHIP TRENDING DATA

The IBEC Report does not provide data that demonstrates how ridership will increase on bus/rail from 1% (Table 3, page D-9) to 12% (Table 5, page D-13) while Metro's own empirical data points to a downward trend in transit ridership.

Shuttle Bus/Rail Transit Travel Time

The TDM plan relies on shuttle buses to move the IBEC rail transit riders from the rail stations between 0.8 miles and 2.0 miles from the Project site. Our analysis indicates that it will not be feasible to move the projected number of rail transit riders from the rail stations to the IBEC as projected.

Given arrival patterns and existing and projected roadway congestion, attendees will arrive to their event after it has started. Negative experiences on transit are highly influential. If transit causes an attendee to be late to an IBEC event, that attendee is unlikely to use transit a second time. This will further degrade the number of attendees arriving by transit.

Page C-2 of the IBEC Report states that dedicated shuttles will be provided for "convenient connectivity with short wait times," but does not provide data to reflect travel times to/from venues.

Real time travel studies were conducted in the field during a Forum concert event that drew approximately 50% of its maximum capacity on Friday, January 11, 2019. Three primary routes were included for travel time testing along Manchester Boulevard, Century Boulevard, and Prairie Avenue, with each origin occurring at the planned rail stop assumed to require shuttle services to/from the IBEC. The travel time across each network path was tracked by direction through the system for 90 minutes before and 90 minutes after the event (including a 30-minute overlap at the start/end of event). The results of the base travel times for the partial attendance event are shown in Table 5.

				RA RESI		DW	/ELL TIMI		ON	SOLD		SOLD	
	Ta	F	Distance			Durall	Avg Run+	Adj	# Runs	50% Adj	# Runs	50% Adj	# Runs
PRE-EVENT	То	From	Distance	Time		Dwell	Dwell	Speed	in	Speed	in	Speed	in
	Arena	Arena	(Miles)	AVG	MPH	(secs)	(secs)	MPH	2 hrs	MPH	2 hrs	MPH	2 hrs
Via Manchester	A	В	2.54	11:33	13.2	300	993	9.2	7	4.6	3	2.3	1
	В	А	2.54	10:08	15.0	300	908	10.1	7	5.0	3	2.5	1
Via Century	С	D	1.51	9:06	10.0	300	846	6.4	8	3.2	4	1.6	2
	D	С	1.51	4:54	18.5	300	594	9.2	12	4.6	6	2.3	3
Via Prairie	E	F	1.01	3:29	17.4	300	509	7.1	14	3.6	7	1.8	3
	F	Е	1.01	4:54	12.4	300	594	6.1	12	3.1	6	1.5	3
							Avg Run+	Adj	# Runs	50% Adj	# Runs	50% Adj	# Runs
POST-EVENT	То	From	Distance	Time		Dwell	Dwell	Speed	in	Speed	in	Speed	in
	Arena	Arena	(Miles)	AVG	MPH	(secs)	(secs)	MPH	2 hrs	MPH	2 hrs	MPH	2 hrs
Via Manchester	A	В	2.54	6:18	24.2	300	678	13.5	10	6.7	5	3.4	2
	В	А	2.54	7:29	20.4	300	749	12.2	9	6.1	4	3.1	2
Via Century	С	D	1.51	6:04	14.9	300	664	8.2	10	4.1	5	2.0	2
	D	С	1.51	4:07	22.0	300	547	9.9	13	5.0	6	2.5	3
Via Prairie	E	F	1.01	2:55	20.8	300	475	7.7	15	3.8	7	1.9	3
	F	Е	1.01	3:13	18.8	300	493	7.4	14	3.7	7	1.8	3

TABLE 5 - TRAVEL TIME DATA

The raw travel time does not include any dwell time or turnaround time required by the shuttle services. To account for the behavior of shuttles to load/unload and reenter the roadway network, a five-minute standing time was added to the travel time. Using this data, estimated travel time and miles per hour (mph) were calculated.

The next step was to adjust the data to account for a Forum event that would generate full attendance, or approximately 3,200 more vehicles (using a 2.5 average vehicle ridership [AVR] per the IBEC Report). This magnitude of additional vehicles is expected to decrease travel speeds by half.

With inclusion of an IBEC event and a sold-out Forum event, travel speeds would be expected to again drop by half to simulate the effect of concurrent sold-out events.

As shown above in Table 5, travel speeds on all three corridors are expected to be less than four mph. During the two-hour window (either before or after events) of shuttling operations, a shuttle would be able to make one to two round trips via Manchester Boulevard, two to three round trips via Century Boulevard, and three round trips via Prairie Avenue.

The IBEC Report states that 27 shuttles will deliver 1,215 passengers (excluding claims of employee transport). The IBEC Report also assumes that each shuttle will be filled to capacity for each run (which would likely affect the dwell times while waiting for a full shuttle before departure) and that these shuttles are evenly distributed throughout the two-hour shuttle window.

Using the data for the rail ridership demand, 33% of rail transit patrons arrive at an event within 30 minutes of the start time. This represents 400 persons and nine shuttles. Based on the travel time data, and depending on which station is being served, it will take between 30-60 minutes to make the shuttle trip to deliver those passengers to the venue. These 400 patrons will likely be late to the event and must subsequently alter their travel choices to arrive at the rail station at least 45 minutes before an event or seek alternative modes of travel.

This creates a domino effect for the remaining patrons who normally arrive 45-60 minutes before an event, who now must compete with those who are forced to arrive earlier for a shuttle seat. They too must change their behavior or more shuttles must be queued up at the rail stations to handle a larger percentage during the heavy demand windows.

These results do not factor in any new traffic expected from the new National Football League stadium or the Hollywood Park development expansion, which would continue to degrade the travel speeds in this network during multiple events.

Thus, even if the projected number of attendees arrived via rail transit, the area's existing infrastructure and projected number of shuttle buses is inadequate to accommodate them and to ensure that they arrive at the event in a timely manner.

Mode-Split Based on Event Type

A further faulty assumption is that that sporting events and concerts have the same mode splits and ridership. A sporting event is a repeat event and typically has a high draw of return users who

understand local congestion, transit schedules, and other modes available in order to decide on a particular travel mode.

A concert event is an infrequent use that attracts a high draw of new users. New users, and particularly parents who take their children to such events, are generally less familiar with public transit, routes/transfers, and event operations, preferring to utilize personal vehicles.

As such, the IBEC Report should include a discussion and analysis of mode-split by event type to refine those metrics and provide a more realistic assessment of travel modes.

Shared Mobility

Shared mobility (i.e., taxi, Uber, Lyft) is used as a mode-share split in the IBEC Report, which states on Page D-10 that, based on surveys of existing guests at STAPLES Center, approximately 4% utilize shared mobility, but this rate was increased to 10% claiming that the IBEC will have dedicated space for shared mobility.

Increasing dependence on shared mobility equals an increase in trips, not a reduction.

For instance, a typical guest will drive to an event, park, then leave after the event (two trips). Using shared mobility, the shared ride vehicle will enter and leave prior to the event, then enter/leave after the event (four trips).

A recent study¹ conducted on the effects of Transportation Network Companies (TNC) on traffic concluded that in densely populated cities, such services add 2.8 new vehicle miles on the road for each mile of personal driving removed (an overall 180% increase in driving on city streets).

As such, an added trip value must be applied to the shared mobility influence, not used as a mode-split reducer. The 10% value represents nearly one-third of the overall TDM traffic reduction used in the IBEC Report.

TDM Goal Vulnerability

The IBEC TDM strategies rely on estimated traffic reductions to reach the target goal of 15%. Overestimating assumptions by fractional degrees would result in an overall reduction less than the stated goal.

Using the data gathered in the field and research detailed in this review, a reassessment of the IBEC Report summaries (Table 5, page D-13 and Table 7, page D-17), shows that missed targets with reasonable assumptions for arena events significantly impacts the reduction goals.

In order to demonstrate the effect on the TDM strategies, Table 6 compares the mode-share split assumed in the IBEC Report and then applies realistic splits using the results of research and empirical field data, which includes the fallacy of shared mobility as a traffic reducer, as well as adjustments to rail and bus transit participation.

¹ The New Automobility: Lyft, Uber and the Future of American Cities, Schaller Consulting, July 25, 2018.

	ESTIMATES FROM IBEC REPORT*				ESTIMATES FROM EMPIRICAL DATA			
Transportation	GAMES/CON	ICERTS	OTHER EV	ENTS	GAMES/CON	ICERTS	OTHER EVENTS	
MODE	Employees	Guests	Employees	Guests	Employees	Guests	Employees	Guests
Drive (Auto)	66%	66%	66%	82%	77%	80%	77%	90%
Rail	10%	10%	10%	5%	5%	5%	5%	5%
Bus	10%	2%	10%	2%	5%	5%	5%	2%
Park and Ride	0%	11%	0%	0%	0%	10%	0%	0%
Vanpool	5%	0%	5%	0%	5%	0%	5%	0%
Microtransit	5%	1%	5%	1%	5%	0%	5%	0%
Shared Mobility	1%	10%	1%	10%	0%	0%	0%	0%
Walk	2%	0%	2%	0%	2%	0%	2%	0%
Bike	1%	0%	1%	0%	1%	0%	1%	0%
Totals	100%	100%	100%	100%	100%	100%	100%	100%

TABLE 6 - SUMMARY OF TRANSPORTATION MODE SHARE

*Source: IBEC Report, p. D-13

Using the results of Table 6, Table 7 shows the resulting missed target values when applied to the actual trip generation. As shown, the percentage of TDM reduction drops to 7.13%.

	Reporte	d Trips		ADJUSTED
LAND USE	WITHOUT WITH		ADJUSTED	TRIP
	TDM*	TDM*	TARGET	RESULT
Arena (Employees)	148,624	107,426	19.00%	120,385
Arena (Attendees)	1,718,448	1,247,532	11.80%	1,515,671
Clippers Office	80,918	76,872	5.00%	76,872
Practice & Training	14,108	13,403	5.00%	13,403
Sports Medicine	173,445	169,819	2.09%	169,820
Community Space	67,439	66,038	2.08%	66,036
Restaurant/Bar	133,389	132,359	0.77%	132,362
Restaurant/Lounge	152,444	151,267	0.77%	151,270
Coffee	375,638	371,998	0.97%	371,994
Quit Restaurant	286,532	284,320	0.77%	284,326
Team Store	38,755	38,512	0.63%	38,511
Other Retail	94,119	93,530	0.63%	93,526
Hotel	219,492	219,492	0.00%	219,492
Annual Total Trips	3,503,351	2,972,568	7.13%	3,253,669

TABLE 7 - SUMMARY	OF MODE SPL	ITS & RESULTING TRIPS

*Source: IBEC Report, p. D-17

Page C-1 of the IBEC Report states that TDM is to "encourage" alternative modes rather than mandate. That makes this plan voluntary.

None of the proposed TDM strategies are enforceable nor mandated, yet the full credit for buses/shuttles at capacity are assumed.

TDM Plan Monitoring Is Not Feasible

Page D-11/12 of the IBEC Report states that the 15% TDM reduction will be verified but provides no plan on how the baseline and TDM plan effectiveness will be monitored.

Based purely on a logistical approach, tracking vehicles, pedestrians, and other modes of travel over 365 days with varying points of entry and influenced by adjacent land uses would be an impossible task.

The applicant should provide a detailed monitoring plan that explains and establishes how the TDM plan's efficacy will be monitored.

TDM Plan's Additional Features are Undefined and Unlikely to Achieve Projected Usage

While the TDM plan relies almost entirely on attendees and employees using a rail/shuttle bus system, it contains additional components that are equally undefined and unlikely to achieve the projected usage. These include the charter coach program (park-and-ride), vanpool, and microtransit. Each is discussed below.

Park-and-Ride

Page C-2 of the IBEC Report describes the TDM-6 Park-and-Ride strategy and suggests that 1,980 persons would be delivered for every event in 45-person capacity buses, from locations not identified in the report. This value equates to 44 bus loops required at these unknown park-and-ride locations.

No data is provided to establish that 1,980 persons (10% of attendees) would ride a bus and that each bus would be filled to capacity in order to meet the goals. Based on our knowledge of parkand-ride programs in the Southern California region, it is unlikely that the TDM plan will achieve the target 10% the TDM plan predicts.

As outlined previously, factors that affect the ability and attraction to park-and-ride usage include the user-mechanics of driving to a remote location and catching a shuttle for a second leg of the journey and the ability of that shuttle to navigate to the venue on schedule using heavily congested streets.

The trip generation section of the IBEC Report does not indicate if these shuttles were analyzed as added trips.

Vanpool

The mechanics of using a vanpool system are undefined, including the area of influence and any suggestion that the employees are incentivized to participate. It would be reasonable to mandate employees use the program since operations can control employee behavior, yet without such a mandate, it cannot be assumed that all shuttles are utilized/maximized and, therefore, these targets cannot be assured.

The trip generation section of the IBEC Report does not indicate if these shuttles were analyzed as added trips.

<u>Microtransit</u>

Page C-2 of the IBEC Report states that the TDM-9 strategy will deliver 66 employees and 180 attendees on event days using microtransit. It is unclear if these are the same 66 employees for TDM-5 or TDM-6, both of which include the same number of employees.

In order to evaluate the effectiveness of microtransit, more detail needs to be included in the IBEC Report, including how the service will attract ridership, how the routes are defined, and how the service can meet schedules during peak commute hours with concurrent events at adjacent venues.

The trip generation section of the IBEC Report does not indicate if these shuttles were analyzed as added trips.

<u>VMT</u>

The IBEC Report states that VMT will be reduced by moving locations from a dense urban, transitrich environment to a remote location lacking employee centers, accessible transit, and transitoriented developments.

On the surface, the statement that this relocation will reduce VMT is not supported by the statistics.

For instance, the demographics for STAPLES Center ticket purchases provided in the IBEC Report (page D-12) are derived from zip-code tracking, which typically captures the home address of the purchaser (not the location from which the purchaser will travel to the event).

The IBEC Report ignores the fact that, with millions of square feet of adjacent office space and thousands of nearby hotel rooms within walking distance of the STAPLES Center, those patrons who work/visit within that sphere have significantly more options to travel to that venue than they would in Inglewood. Ticket holders who work/stay in nearby locations can walk or take transit to the front door of STAPLES Center without getting into a personal vehicle and driving to an event.

To test this, a Southern California Association of Governments (SCAG) model was prepared for estimating the VMT at the STAPLES Center. The base results are provided in Table 8.

	Average VMT*						
Location	AM	MID	РМ	EVE	NIGHT		
STAPLES Center	10.66	11.56	12.18	8.16	8.25		
IBEC Arena	11.39	12.10	12.72	9.99	9.78		
Increase in VMT	0.73	0.53	0.54	1.83	1.52		
*source: SCAG Model for STAPLES Center, manually adjusted for IBEC Arena							

TABLE 8 - VEHICLE MILES TRAVELED

A manual adjustment of the STAPLES Center VMT output discounted those data points within 2.0 miles of the venue to reflect the dynamic loss from relocating outside the dense urban sphere. The results show that VMT will increase in all peak periods. In other words, by moving to Inglewood, the round trip VMT will almost certainly increase over the existing VMT at STAPLES Center.

Trip Generation Rates

The IBEC Report does not provide trip generation rates for all on-site components, particularly those generating the highest volume of traffic. In order to reveal the rates used for these components, the undisclosed rates were reverse-calculated using the IBEC Report's resulting trip generation and the estimated volume of employees/guests.

The trips applied to the Management & Operations component revealed a rate of 1.13 trips per employee (275 employees). Compared to the Institute of Transportation Engineers (ITE) rates for a "corporate headquarters office building" at 2.31 per employee, the IBEC Report assumes 50% fewer trips than a similar use but does not defend that reduced base rate.

This 1.13 per employee rate means that for every two employees, one of them is not driving (or a 2.0 AVR), which is not supported by the IBEC Report's own estimate (Table 3, page D-9) that 95% of employees drive to work. The rate ignores the potential for employees to leave the site for lunch or meetings and that neither visitors nor deliveries are generated by this use.

Similarly, the Team Practice & Training Facility assumes 1.0 trip per employee (for 54 employees), which would also mean that 50% are either carpooling or taking alternative modes of transportation, contradicting the 95% solo-driver attribute within the IBEC Report. On top of this rate, with TDM factored in, the study takes an additional 5% reduction.

Using the IBEC Report's own statistics, the rate for both the Management & Operations and the Team & Training Facility should be set closer to the corporate office rate, even if 5% use "other transport," and that rate would then account for visitors, deliveries, lunchtime and meeting travel.

Application of a more realistic rate for these uses would nearly double those components' base traffic totals in the IBEC Report.

Where the IBEC Report does publish the ITE rates, these were compared to the source and found that the IBEC Report underestimates the trip generation for the Sports Medicine Clinic (Table D-2, page D-6 for Land Use Code 630). The rate used in the study is 30.18/per 1000 square feet (ksf); however, the published ITE rate is 38.16/ksf.

Recalculating this rate on 25,000 sf results in 199.5 trips per day. Based on 260 weekdays in a year, this underestimates base trips by 51,870 trips/year for this use. By making this single change to the trip generation, the overall TDM reduction calculates to 14.96% -- thus, missing the required 15% legislation target.

No documentation is provided to support the values for pass-by and internal capture rates that reduce gross traffic volumes, which makes replicating the data impossible. Full disclosure of all rates and calculations are needed to provide an accurate analysis of assumptions.

Table 9 uses the base assumptions from the IBEC Report, and adjusts the rates based on the discussion above. The resulting base trip generation calculates to 3,605,922.

In comparison to the base traffic generation in the IBEC Report (Table 2, page D-6; and Table 7, page D-16), which reports 3,503,351, the report is underestimating the initial traffic by 102,571 yearly trips.

TABLE 9 - PROJECT TRIP GENERATION ESTIMATES (REVISED)

Land Use	ITE Rate	Unit		Weekday	Weekend	NOTES:		
Event Uses								
Arena Employees	N/A	per employee		1.32	1.32	Reverse calculated (not shown) Reverse calculated (not shown)		
Arena Guests	N/A	per guest		0.94	0.87			
Ancillary Uses								
Management & Operations	714	per employee		2.31	0.00	Study used 1.13 (weekday) Study used 1.00 (weekday) Rate in report used 30.18		
Team Practice & Training	714	per employee		2.31	0.00			
Sports Medicine Clinic	630	per ksf		38.16	0.00			
Community Space	495	per ksf		28.82	0.00			
Quality Restaurant	931	per ksf		83.84	90.04			
Coffee Shop	930	per ksf		315.17	318.62			
Fast Casual Restaurant	930	per ksf		315.17	318.62			
Team Store (Retail)	SANDAG	per ksf		40.00	40.00			
Other Retail (Retail)	SANDAG	per ksf		40.00	40.00			
Business Hotel	312	per room		4.02	5.79			
TRIP GENERATION ESTIMATES								
Land Use				1		Yr-Wkdy	Yr-Wknd	Yearly
	Rate	Size		Weekday	Weekend	260	105	Total
EVENT USES								
Arena Employees	N/A	112,240	e/yr	68,955	43,285	91,364	57,260	148,624
(events x employees)			- j ·		,	- ,	,=	,
Arena Guests	N/A	1,882,000	g/yr	1,145,000	737,000	1,075,784	642,664	1,718,448
(events x guests)		, ,	0,					, ,
Management & Operations	N/A	275	empl	635	0	165,165	0	165,165
Team Practice & Training	N/A	54	empl	125	0	32,432	0	32,432
	600					040.040		040.040
Sports Medicine Clinic	630	25	ksf	954	0	248,040	0	248,040
Community Space	495	15	ksf	432	0	112,398	0	112,398
		10	Roi	102		,		,
Restaurant/Bar+Lounge	931	15.00	ksf	1,258	1,351	326,976	141,813	468,789
Coffee Shop	930	5	ksf	1,576	1,593	409,721	167,276	576,997
Quick Service (Feet Cooucl)	930	1.00	kaf	1 061	1,274	327,860	133,820	461,680
Quick Service (Fast Casual)	350	4.00	ksf	1,261	1,214	021,000	100,020	-01,000
Team Store (Retail)	Sandag	7.00	ksf	280	280	72,800	29,400	102,200
Other Retail (Retail)	Sandag	17.0	ksf	680	680	176,800	71,400	248,200
	240			600	000	150 700	01 400	047.070
Business Hotel	312	150.0	rm	603	869	156,780	91,193	247,973
TOTAL GROSS PROJECT TRIPS				1,221,759	786,332	3,196,120	1,334,825	4,530,946
		Y/INTERNAL CAPTURE VALUES)						
TOTAL NET PROJECT	RASSD 1/IN I D		URE VALUE	.5)	3,605,922			

Attachment A

The New Automobility: Lyft, Uber and the Future of American Cities (Schaller Consulting, July 25, 2018)

The New Automobility: Lyft, Uber and the Future of American Cities

July 25, 2018



94 Windsor Place, Brooklyn NY 11215 718 768 3487 bruceschaller2@gmail.com www.schallerconsult.com This report was prepared by Bruce Schaller, Principal of Schaller Consulting. An expert on issues surrounding the rise of new mobility services in major U.S. cities, Mr. Schaller served as Deputy Commissioner for Traffic and Planning at the New York City Department of Transportation and Policy Director at the NYC Taxi and Limousine Commission, and has consulted on transportation policy across the United States. He is the author of the February 2017 report, "Unsustainable? The Growth of App-Based Ride Services and Traffic, Travel and the Future of New York City," and co-author of a 2015 National Academy of Sciences report on emerging mobility providers. He also served as an Advisor for the City of New York's study of for-hire vehicle issues. He has been called "a prominent transportation expert" (*New York Times*), "a widely acknowledged expert" on issues related to taxis, Uber and Lyft (*Politico*) and a "nationally recognized expert" on for-hire transportation issues (*Washington Post*). Mr. Schaller has published extensively in peer-reviewed academic journals including *Transport Policy, Transportation* and the *Journal of Public Transportation*.

This report was researched and written by Mr. Schaller to further public understanding and discussion of the role that app-based ride services and other vehicle-for-hire services can and should play in furthering urban mobility, safety and environmental goals.

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WHO'S WHO - FOR-HIRE GROUND TRANSPORTATION SERVICES

Taxicabs

- Until TNCs arrived, predominant provider of for-hire services in the United States.
- Door-to-door service (not shared between strangers)
- Fare based on initial charge, mileage and time
- Trips arranged via street hail, taxi stands, telephone orders and sometimes on-line or using smartphone app.
- Drivers treated as independent contractors, not employees
- Vehicle may be responsibility of driver or provided by company
- Drivers pay a daily, weekly or monthly lease fee.

Microtransit

- Shared-ride service in which passengers walk to a pick-up location.
- Via and Chariot are the largest companies in the U.S.
- Flat fares, typically around \$5.
- Drivers usually paid an hourly wage
- Drivers are treated as independent contractors (Via) or employees (Chariot)
- Vehicle may be responsibility of driver or provided by company

OTHER DEFINITIONS

Trips, riders and ridership

- For bus, rail, walk and bike trips, these terms refer to one person traveling between two points except that, for bus and rail each boarding is counted separately. A trip involving a transfer from bus to Metro is thus counted as two riders and two trips.
- For personal auto, TNC and taxi, "riders" and "ridership" means one person making one trip between two points. "Trips" refers to vehicle trips. Two people traveling together in an auto, TNC or taxi count as two riders but as one trip.

Personal vehicle (or personal auto)

 Motor vehicle owned or leased by individuals or households, e.g., "the family car." Does not include taxis or TNCs.

Transportation Network Companies (TNCs)

- Sometimes called ride-hail or rideshare
- Uber and Lyft are largest companies; other companies are in specific markets
- Fare based on time and distance
- Primarily provide door-to-door private ride service (not shared between strangers), e.g., UberX and Lyft.
- Also provide shared trips which pick up additional passenger(s) after the first passenger(s) board, (e.g., UberPOOL and Lyft Line)
- Recently introduced variations on shared rides that involve passengers walking to a pick-up location (e.g., Uber Express POOL and Lyft Shared Rides)
- Trips arranged using smartphone app
- Drivers treated as independent contractors, not employees
- Companies charge a commission on fares
- Drivers responsible for providing their vehicle

ADA Paratransit

- Transportation for people with disabilities who are unable to use the regular, fixed route rail and bus service.
- Usually a door-to-door service using vans and/or sedans.
- Trips are generally arranged in advance.
- Transit agencies are mandated to provide ADA paratransit service by the federal Americans With Disabilities Act (ADA).
- The service is typically provided by private companies under contract with the local transit agency.

Executive Summary

Municipal and civic officials in cities across the country are grappling with how to respond to the unexpected arrival and rapid growth of new mobility services. These include ride services such as Uber and Lyft (also called Transportation Network Companies, or TNCs), "microtransit" companies such as Via and Chariot and more recently dockless bikeshare and electric scooter offerings.

Are these new mobility options friendly to city goals for mobility, safety, equity and environmental sustainability? What risks do they pose for clogging traffic or poaching riders from transit? What will happen when self-driving vehicles are added to ride-hail fleets?

While these questions are widely discussed, the information available to inform policy making is limited and often fragmentary. This report is designed to fill the gap, focusing on ride services (TNC and microtransit), which currently produce the most far-reaching issues among new mobility offerings.

This report combines recently published research and newly available data from a national travel survey and other sources to create the first detailed profile of TNC ridership, users and usage. The report then discusses how TNC and microtransit services can benefit urban transportation, how policy makers can respond to traffic and transit impacts, and the implications of current experience for planning and implementation of shared autonomous vehicles in major American cities.

Key results, conclusions, methodology and sources are summarized below. (Additional details on methods and sources are provided in section 2 of this report.)

TRIPS, USERS AND USAGE

1) TNCs have more than doubled the overall size of the forhire ride services sector since 2012, making the for-hire sector a major provider of urban transportation services that is projected to surpass local bus ridership by the end of 2018.

- TNCs transported 2.61 billion passengers in 2017, a 37 percent increase from 1.90 billion in 2016.
- Together with taxicabs, the for-hire sector is projected to grow to 4.74 billion trips (annual rate) by the end of 2018, a 241 percent increase over the last six years, surpassing

projected ridership on local bus services in the United States (4.66 billion).

Sources/methodology: TNC trips and ridership based on published data on Lyft ridership and market share for 2017. Taxi ridership based on published data for 2012 and city-specific reports of declines since 2012. Bus ridership based on American Public Transportation Association data.

2) TNC ridership is highly concentrated in large, denselypopulated metro areas. Riders are relatively young and mostly affluent and well-educated.

- 70 percent of Uber and Lyft trips are in nine large, denselypopulated metropolitan areas (Boston, Chicago, Los Angeles, Miami, New York, Philadelphia, San Francisco, Seattle and Washington DC.)
- People with a bachelor's degree, over \$50,000 in household income, and age 25 to 34 use TNCs at least twice or even three times as often as less affluent, less educated and older persons.

Sources/methodology: National Household Travel Survey; published TNC trip totals in Massachusetts municipalities; industry sources.

3) TNCs dominate for-hire operations in large urban areas. But residents of suburban and rural areas, people with disabilities and those without smartphones continue to be reliant on traditional taxi services.

- TNCs account for 90 percent of TNC/taxi trips in eight of the nine large, densely-populated metro areas (New York is the exception) and in other census tracts with urban population densities.
- In suburban and rural areas, however, taxis serve slightly more riders than TNCs. The same is true in New York City (counting car services in the taxi category).
- People with disabilities make twice as many TNC/taxi trips as non-disabled persons, but taxis account for two-thirds of their TNC/taxi trips.
- TNCs account for only 13 percent of TNC/taxi trips taken by those without a smartphone.

Sources/methodology: National Household Travel Survey.

2

ROLE IN URBAN MOBILITY

1) TNCs added billions of miles of driving in the nation's largest metro areas at the same time that car ownership grew more rapidly than the population.

- TNCs have added 5.7 billion miles of driving annually in the Boston, Chicago, Los Angeles, Miami, New York, Philadelphia, San Francisco, Seattle and Washington DC metro areas.
- Household car ownership increased across all large U.S. cities from 2012 to 2016, in all but a few cities exceeding the rate of population growth.

Sources/methodology: Mileage based on trip volumes (see above) and analysis of mileage increases from TNC growth from later in the report. "Additional mileage" includes both miles with passengers and mileage between trips and nets out reductions due to TNC passengers switching from their personal vehicle. Household car ownership is from American Community Survey.

2) TNCs compete mainly with public transportation, walking and biking, drawing customers from these non-auto modes based on speed of travel, convenience and comfort.

- About 60 percent of TNC users in large, dense cities would have taken public transportation, walked, biked or not made the trip if TNCs had not been available for the trip.
- About 40 percent would have used a personal vehicle or a taxicab had TNCs not been available for the trip.

Sources/methodology: Published data based on surveys of TNC users in the cities of Boston, Chicago, Denver, Los Angeles, New York, San Francisco, Seattle and Washington DC and a statewide survey in California.

3) TNCs are not generally competitive with personal autos on the core mode-choice drivers of speed, convenience or comfort. TNCs are used instead of personal autos mainly when parking is expensive or difficult to find and to avoid drinking and driving.

• The most-often cited reasons to use TNCs instead of personal autos involve expense or hassle with parking and to avoid drinking and driving. Speed, comfort and convenience are cited rarely or never.

Sources/methodology: Published results of surveys of TNC users in the cities of Boston, Chicago, Denver, Los Angeles, New York, San Francisco, Seattle and Washington DC.

SHARED RIDES AND TRAFFIC

1) Shared ride services such as UberPOOL, Uber Express POOL and Lyft Shared Rides, while touted as reducing traffic, in fact add mileage to city streets. They do not offset the trafficclogging impacts of private ride TNC services like UberX and Lyft.

- Private ride TNC services (UberX, Lyft) put 2.8 new TNC vehicle miles on the road for each mile of personal driving removed, for an overall 180 percent increase in driving on city streets.
- Inclusion of shared services (UberPOOL, Lyft Line) results in marginally lower mileage increases – 2.6 new TNC miles for each mile in personal autos taken off the road. (This is based on the current rate of about 20 percent of TNC trips being shared.)
- Lyft's recently announced goal of 50 percent of rides being shared by 2022 would produce 2.2 TNC miles being added to city streets for each personal auto mile taken off the road.
- Shared rides add to traffic because most users switch from non-auto modes. In addition, there is added mileage between trips as drivers wait for the next dispatch and then drive to a pick-up location. Finally, in even a shared ride, some of the trip involves just one passenger (e.g., between the first and second pick-up).

Sources/methodology: Analysis based on published mileage for passenger trips and mileage between passenger trips and published data on rates of pooled rides.

PUBLIC POLICY

1) TNCs and microtransit can be valuable extensions of – but not replacements for – fixed route public transit.

- Pilot programs around the country demonstrate that TNCs and other private transportation companies can help provide subsidized services to seniors, low-income persons and some people with disabilities.
- TNCs and other private transportation companies also show promise in providing subsidized connections to public transit services, e.g., taking commuters to rail and bus stations and park-and-ride lots.
- TNCs and microtransit companies like Via can also be helpful in providing subsidized transportation for trips that are geographically dispersed. Trip volumes tend to be quite low, however, and unless there are common origins or

destinations like a transit hub, relatively few trips are shared between passengers.

Sources/methodology: Published reports, news articles and personal interviews.

2) Trip fees, congestion pricing, bus lanes and traffic signal timing can help cities manage current congestion generated by increasing TNC trip volumes combined with other demands on limited street space.

- States and cities are generating valuable revenues for public transportation and other purposes from fees and taxes on TNC trips.
- Other measures to alleviate congestion can be valuable where there is public support and where competing needs for street space can also be accommodated.

Sources/methodology: Analysis of recent policies implemented by city and state governments based on published reports and news articles and personal interviews.

3) If additional steps are needed to reduce traffic congestion, policy makers should look toward a more far-reaching goal: less traffic. Key steps involve limiting low-occupancy vehicles, increasing passenger occupancy of TNCs and taxis, changing commercial vehicle operations, and ensuring frequent and reliable bus and rail service.

- Working toward a goal of less traffic means making spaceefficient modes such as buses and bikes more attractive than personal autos and TNCs on key attributes of speed, reliability, comfort and cost.
- Policies can include limiting parking supply and limiting or banning low-occupancy vehicles from certain streets (possibly based on time of day). These serve to discourage personal vehicle use in congested areas.
- Policies can also increase utilization rates of TNCs and taxis so they spend less time without passengers and carry more passengers per mile of overall operation.
- An essential additional element is providing frequent and reliable bus and rail service. Less traffic will make bus service more attractive and build ridership, creating a virtuous cycle of faster trips, shorter waits, easier transfers and thus broader accessibility.

Sources/methodology: Analysis of recent policies being discussed or implemented by city governments based on published reports, news articles and personal interviews.

AUTONOMOUS VEHICLES

1) Without public policy intervention, the likelihood is that the autonomous future mirrors today's reality: more automobility, more traffic, less transit, and less equity and environmental sustainability.

- Tech companies, automakers and others are currently racing toward an autonomous future that envisions shared, door-to-door ride services weaning people from personal autos and combining the convenience of TNCs with the space-efficiency of shared trips.
- Today's TNC experience, however, calls into question the viability of the door-to-door shared service model. Most Uber and Lyft rides are still private rides (each traveling party riding by themselves) and the addition of pooled options fails to offset TNC traffic-clogging effects.
- Uber and Lyft are investing heavily in options like Uber Express POOL and Lyft Shared Rides that minimize turns to straighten out the zig-zag routing that limits the popularity of door-to-door pooled rides. Even if successful, these services are unlikely to draw people from their personal autos and will thus serve to add to traffic congestion.

Sources/methodology: Analysis of TNC service models and traffic impacts.

2) Policy-makers should steer AV development away from this future starting today with steps to manage TNCs and personal autos and emphasize frequent, reliable and comfortable high-capacity transit service.

 Key steps are limiting personal auto use in congested city centers; requiring that TNCs and other fleet-operated vehicles use street space efficiently; and providing highfrequency transit service.

CONCLUSION

New mobility has much to offer cities: convenience, flexibility, on-demand technology and a nimbleness to search for the fit between new services and inadequately served markets. But development of ride services must take place within a public policy framework that harnesses their potential to serve the goals of mobility, safety, equity and environmental sustainability. Without public policy intervention, big American cities are likely to be overwhelmed with more automobility, more traffic and less transit and drained of the density and diversity which are indispensable to their economic and social well-being.

1. Introduction

Uber and Lyft have become household names, ever-present in the news and on millions of smartphones and credit card bills. Yet accompanying their familiarity are many gaps. The business pages report the multi-billion-dollar valuations of Uber and Lyft, but not how many passengers they transport. Patrons experience them as providing a welcome new mobility option, but to whom exactly? Everyone knows they are growing rapidly, but what is their role in urban transport systems? News articles point to connections between TNC growth, traffic congestion and falling public transportation ridership, but what do these trends mean for public policy?

This report seeks to add facts and analysis to the increasingly important public discussion of these "new mobility" services. The report focuses mainly on "Transportation Network Companies," or TNCs, also called ride-hail or sometimes rideshare companies. Uber and Lyft are the main two companies in the United States, available to almost the entire American population, and the focus of this discussion. This report also looks at "microtransit" companies that pick up passengers along a route that may be predetermined or assembled on the fly by sophisticated computer algorithms. Chariot, which started in San Francisco, and Via, which first operated in New York City, are the main two microtransit companies and now operate in about a dozen U.S. cities.

After a review of sources and methodology in section 2, the report provides an overview of TNC ridership – how many trips, who uses, for what types of trips and where in sections 3 and 4. This profile uses a combination of data sources to provide the most detailed and comprehensive profile of TNC usage and users yet available. Its main conclusion – that TNC trips are concentrated in a relatively small number of large metro areas, and that users are predominantly affluent, educated and skew younger – will likely surprise few readers. However, putting numbers on intuition does provide a few twists in the storyline

and creates an important factual basis for the more policyfocused discussion that follows.

TNCs have recently begun to push back against the narrative that developed in 2017 that they are contributing to big-city traffic congestion and falling transit ridership. They say they are a complement to public transit, not its competitor, and point to their heavily-promoted shared-trip options. The fifth section of the report assesses these claims.

There has been much interest across the country in "partnerships" between TNCs and microtransit companies on the one hand and cities and transit agencies on the other hand. Perhaps these private companies can truly complement transit services, or replace very inefficient bus routes, or reduce costs for services to seniors and people with disabilities. Pilot projects are beginning to show the potential for creating public benefits that merit public subsidy – and the limits as well. Section 6 looks at the experience with these pilots and what approaches have the most promise for public benefit.

The final two sections of the report examine some of the mostdiscussed aspects of TNCs and microtransit: what to do about traffic and transit impacts in big cities, and what they mean for a future in which self-driving vehicles are integrated into TNC operations.

The ride services and public policy issues discussed in this report are evolving rapidly and leave many uncertainties. But after six years of TNC growth, the picture is becoming more and more clear. In the process, policy implications and policy options are coming into focus. Thus, it is timely to be asking and putting forth at least preliminary answers to the three questions that are the focus of this report. What's happening? What does it mean? What should cities be doing?

2. Methodology

Findings in this report draw on published reports and news articles and newly available national travel survey and TNC trip data that have become available over the last 18 months. Information from this range of sources is brought together to form a detailed picture of TNC operations and discuss policy issues arising from their rapid growth. Results are presented nationally, with detail for cities and metro areas where available.

This section presents information on key data sources and methodology. Additional data sources used for specific tables and figures are referenced where results are presented.

TRIP AND RIDERSHIP VOLUMES

The report presents total TNC trips for the United States and for groups of metropolitan areas. Estimates of total trips are based on 2017 ridership reported by Lyft (365 million trips) and Lyft's market share based on credit card transactions compiled by the research firm Second Measure.¹

Geographic breakdowns of trip volumes are estimated using a combination of sources. These include TNC trip counts in New York and several other major cities that TNCs provided to city or state agencies; results from the 2016-17 National Household Travel Survey (NHTS); and data from industry sources showing relative trip volumes for different size metro areas and urban and suburban/rural population densities. In addition, data released by the Massachusetts Department of Public Utilities showing TNC trip volumes for Massachusetts municipalities was used as a check against results from national estimates.

TNC ridership figures assumes 1.5 passengers per trip, based on a customer survey conducted in the Boston area and NHTS data showing average personal auto occupancy for urban trips of 1.5 passengers (including the driver).²

Taxicab ridership was based on a Transportation Research Board report for 2012,³ combined with estimated declines in taxi ridership based on city-specific data where available, and news reports.

USER AND TRIP CHARACTERISTICS

The main data source for TNC user and trip characteristics is the 2016-17 National Household Travel Survey (NHTS). The 2016-17 NHTS was the first national travel survey conducted since

2009, and thus is quite timely for documenting information about TNC users.

The NHTS consists of an interview portion, in which each respondent answers a series of questions, and a travel diary, which captured details of each trip on a designated day. These include mode, start and end times of each trip, trip distance and trip duration. A total of 264,000 people completed the 2016-17 NHTS survey, reporting 924,000 trips (all modes) on the travel day. Data are weighted to reflect U.S. population characteristics.

There were 3,463 "Taxi/Limo (including Uber/Lyft)" trips in the sample. TNC trips within this group were identified based on responses to a question from the interview portion. This question asked how many TNC trips the respondent took in the past 30 days. For respondents who took one or more TNCs trips in the past 30 days, taxi/limo trips recorded in the travel diary were classified as TNC trips. All others were assumed to be taxi trips. (Limos account for only a tiny percentage of all taxi/limo trips.)

This methodology likely categorized some taxi trips as TNC trips, in the case of respondents who used both taxis and TNCs in the past month. However, the effect appears to be small, for two reasons. First, trip volumes estimated using the interview question (TNC trips in the past 30 days) align closely with results from the travel diary. Second, the market shares for TNC and taxi trips nationally, based on the survey results, aligns closely with national market shares from the estimates described earlier.

GEOGRAPHIC CATEGORIES

This report shows trip volumes and user and trip characteristics for the United States, groups of metro areas and a typology based on population density at the census tract level. The latter categorization is described here.

Generally speaking, TNC usage is strongly related to metro area size and density. On a per capita basis, big, densely-populated cities have higher trip volumes than more sprawling cities, which in turn have higher rates of TNC use than suburban or rural areas. These differences are generally due to differences in the number of households without a personal vehicle and the cost and convenience of parking, both of which reduce rates of auto travel.

The NHTS data files include the population density of each respondent's home address. To highlight the higher usage of TNCs in more urban, higher-density areas, results are reported separately for persons living in more urban census tracts (defined as at least 4,000 persons per square mile) and for those living in suburban or rural census tracts (fewer than 4,000 persons per square mile). This cutoff for urban versus suburban/rural is consistent with research showing that people living in neighborhoods with more than 4,000 persons per square mile tend to see themselves as living in urban neighborhoods; conversely, those living in areas with fewer than 4,000 persons per square mile tend to see their neighborhoods as suburban or rural.⁴

The urban category includes virtually the entire populations of large, dense cities such as New York, Chicago and Philadelphia, as well as the relatively dense portions of their suburbs. "Urban" census tracts also cover most of the population of large but less dense cities such as Baltimore, Detroit, Minneapolis and Milwaukee. In addition, there are numerous urban-density census tracts in smaller cities and towns, primarily in older, walkable residential neighborhoods. Maps of selected metro areas showing census tracts classified as urban is available at www.schallerconsult.com/rideservices/maps.

To show differences in TNC usage rates in section 3, a three-part typology was developed based on population density and size of metro area:

- Large, densely-populated metro areas (a group of 9 metros, listed below).
- Large but less-densely populated metro areas (a group of 11 metros)
- All other metro areas combined with non-metropolitan and rural areas.

The first group is composed of Boston, Chicago, Los Angeles, Miami, New York, Philadelphia, San Francisco, Seattle and Washington DC. These metro areas and their central cities have high population densities and large numbers of no-car households and public transportation commuters. This group is intuitive as encompassing the country's distinctively large, dense, urban centers with a host of leisure and entertainment activities and multi-modal transportation system. The second group consists of eleven large metro areas that have at least 300,000 people living in urban census tracts but fewer no-car households and public transit commuters and a generally less multi-modal transportation system than the first group. These are Baltimore, Dallas, Detroit, Denver, Houston, Milwaukee, Minneapolis, Phoenix, San Antonio, San Diego and San Jose.

It should be noted that any list of metro areas aimed at capturing size, density and urban character is necessarily arbitrary. A larger list could easily include Portland (Oregon), Las Vegas, Riverside (California), Sacramento, Cleveland and Austin. However, the typology of these 20 metro areas works well in practice to portray patterns of TNC use across different types of urban and suburban land uses.

The Appendix contains detailed data on each of the 20 metro areas and their central cities.

3. How Big

Taxicabs for many decades served niche markets ranging from business travelers to low-income households without a personal auto. Cabs were usually readily available at airport taxi stands and downtown hotels and entertainment venues. But otherwise, service availability could be unreliable and wait times unpredictable, with wait times commonly running 10 to 15 minutes or longer. Using a cab was often further complicated by the small-scale and fragmented nature of the industry, with different companies in each local market, each with their own branding and business practices.

TNCs changed all that. Lyft and Uber are now available to nearly all Americans. The same smartphone app can be used throughout the country and internationally. Pick-up times are prominently shown counting down the minutes until the driver arrives. Uber and Lyft are well-known brands and deliver a much more consistent user experience than was possible for taxicabs.

RIDERSHIP GROWTH

TNCs' popularity has transformed the for-hire sector into a major provider of urban transportation service, rivaling other non-auto modes of travel. Figure 1 shows estimated TNC and taxi ridership over the past quarter century.

TNCs are popularly assumed to have revived a moribund taxi sector. In fact, taxi ridership had been increasing prior to 2012. As shown in Figure 1, taxi ridership grew substantially in the 1990s and 2000s, showing about a 30 percent increase from 2000 to 2012, reflecting growth in population, jobs and tourism in cities across the country.⁵

Not surprisingly, as TNCs started to spread across U.S. cities in 2012, growth in for-hire ridership accelerated, reaching 3.3 billion passengers (2.61 billon TNC and 730 million taxi) in 2017, an increase of 140 percent from 2012.

Uber and Lyft's growth came in part from traditional taxis. About 20 percent of the 2.61 billion TNC ridership in 2017 represents a loss of taxi ridership, which declined by about 50 percent from 2012 to 2017.

TNCs also attracted people from rental cars, buses, subways and personal motor vehicles, with the result that about 80 percent of TNC ridership represents net growth in the for-hire sector.

5.0 # TNC 4.5 🛛 Тахі 4.0 3.5 Ridership (billions) 3.0 2.88 2.9

Figure 1. TNC and taxi ridership in the U.S., 1990-2017

Sources: See Methodology section

(annual ridership, in billions)

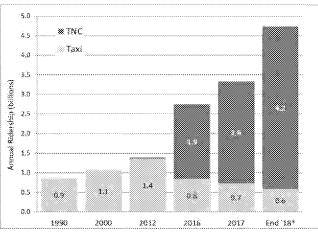
TNCs continue to grow very rapidly. By the end of 2018, ridership is projected to reach an annual rate of 4.2 billion At this rate of growth, for-hire ridership passengers. (combining TNCs and taxis) will surpass ridership on local buses in the United States by the end of 2018. If current trends continue, the gap will widen over time, given that bus ridership fell from 5.5 billion in 2012 to 4.8 billion in 2017.

GEOGRAPHIC CONCENTRATION OF TNC TRIPS

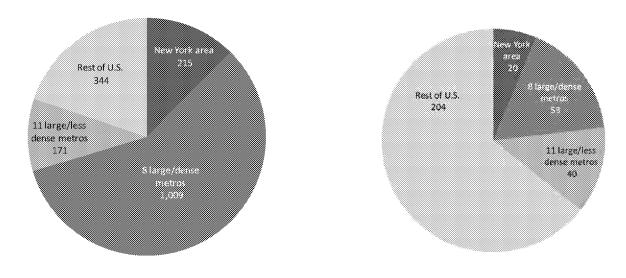
As shown in Figures 2 and 3, TNC usage is concentrated in the nation's largest and most densely populated urban centers.

- The nine largest and most densely-populated metropolitan areas in the United States accounted for 1.2 billion trips, or 70 percent of TNC trips nationally. This includes 215 million trips in the New York area and a total of 1.0 billion trips in the Boston, Chicago, Los Angeles, Miami, Philadelphia, San Francisco, Seattle and Washington DC metro areas.
- 11 large but less densely-populated metro areas accounted for 171 million trips in 2017. (These 11 metros are Baltimore, Dallas, Denver, Detroit, Houston, Milwaukee, Minneapolis, Phoenix, San Antonio, San Diego, and San Jose.)
- The remainder of the U.S. accounted for 344 million TNC trips.





(annual trips, in millions)



The 8 large metro areas are Boston, Chicago, Los Angeles, Miami, Philadelphia, San Francisco, Seattle and Washington DC metro areas. The 11 metro areas are Baltimore, Dallas, Denver, Detroit, Houston, Milwaukee, Minneapolis, Phoenix, San Antonio, San Diego, and San Jose. Sources: See Methodology section.

The 9 large metro areas accounted for 70 percent of all TNC trips while having 23 percent of total U.S. population, indicating much higher usage rates than in the rest of the U.S. (See Figure 3.)

Furthermore, TNC trips are concentrated within the central cities and other census tracts with relatively urban population densities:

- 38 percent of all TNC trips were in the center city of the 9 large metro areas listed above.
- 26 percent were in urban-density census tracts (population densities over 4,000 persons per square mile) outside the central city in these 9 metro areas. Included in this group are cities that are separate from the central city such as Newark, Oakland and Long Beach, and higher-density suburban areas such as Orange County, California.
- 7 percent were in suburban or rural areas in these 9 large metro areas (census tracts with less than 4,000 persons per square mile).

The nine large metro areas have high densities of population and employment, large transit systems and a substantial number of households that do not have a motor vehicle. They also have very substantial levels of entertainment and social activity and draw large numbers of business and leisure travelers. The combination of density, transit usage, relatively low rates of car ownership, and social and entertainment activity contribute to much more frequent use of TNCs among their residents.

Figure 3. Population by metro area group

(population in millions)

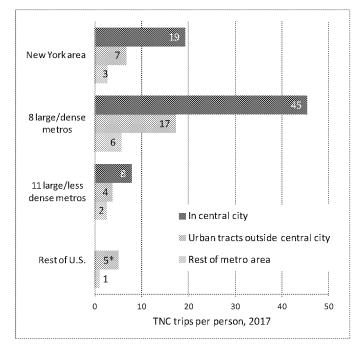
The group of 11 large but less dense metro areas accounted for 10 percent of all TNC trips. Trips were divided about evenly between the central city and the rest of these metro areas.

Outside these 20 large metro areas, TNC trips were split about evenly between urban-density census tracts and areas with suburban and rural population densities.

TRIP RATES

Figure 4 shows trip rates for central cities, urban census tracts outside the central city, and suburban/rural tracts. Annual TNC trips per resident are far higher in the central city and urban portions of large metros than elsewhere in the country. In the central cities of the eight largest, most densely-populated metros (excluding New York), there were 45 TNC trips per person in 2017. Trip rates were lower but still substantial in urban tracts outside the center city (17 trips annually per person) and much lower in suburban and rural tracts (6 per person).

Figure 4. TNC trips per person by metro area size and density, 2017 (TNC trips per person, annually)



 In Rest of U.S., the 5 trips per person is for all urban-density census tracts (over 4,000 persons per square mile) and the 1 trip per person figure is for all suburban/rural tracts.

Sources: See Methodology section.

Perhaps counter-intuitively, TNC trip rates in the New York metro area are lower than for the other 8 large metros. This is primarily because taxicabs account for an approximately equal number of trips as TNCs in the New York area. By contrast, taxi ridership in the other 8 large metros is approximately 15-20 percent of combined TNC/taxi ridership. Using combined New York taxi, TNC and other for-hire services' trip volumes, trip rates for all for-hire services are similar in the New York metro area as in the other 8 large metros.

In the next group of 11 large but less densely-populated metro areas, TNC trip rates are one-third to one-fifth those found in the 8 large metros.

The concentration of TNC trips in the core of just nine major metropolitan areas is quite striking. It underscores concerns discussed in section 7 about potential traffic and transit impacts of TNC growth. At the same time, it should be recognized that a substantial number of TNC trips in these large metro areas are outside the most congested downtown core neighborhoods. News reports have documented the value of Uber and Lyft service in some of these neighborhoods,⁶ although studies have also shown mixed results about TNC service in minority areas with relatively less transit service.⁷ Equity issues are

Table 1. TNC and taxi trips in selected cities, 2017 (annual trips in millions)

	2017 trips (millions)				
City	TNC	Taxi	Total		
San Francisco	75	6	81		
Washington DC	45	12	57		
Boston	35	6	41		
Seattle	20	3	23		
New York City*	159	167	326		
Manhattan	66	106	172		

Table 2. TNC and taxi trips per person in selected cities, 2017

	Trips per person, annually		
City	TNCs	TNC+taxi	
San Francisco	86	93	
Washington DC	66	84	
Boston	54	64	
Seattle	33	37	
New York City*	19	39	
Manhattan	42	108	

Data are for central cities (not metro areas).

*New York City includes both Manhattan and the other 4 boroughs.

Sources: Faiz Siddiqui, "As ride hailing booms in DC, it's not just eating into the taxi market — it's increasing vehicle trips," Washington Post, April 23, 2018. Massachusetts Department of Public Utilities, "Rideshare in Massachusetts," available at https://tnc.sites.digital.mass.gov. Kelly Rula, Seattle Department of Transportation (personal correspondence), May 29, 2018. San Francisco estimated based on intra-Manhattan trips reported in San Francisco County Transportation Authority, "TNCs Today," June 2017. Author's analysis of NYC Taxi and Limousine Commission TNC and taxi trip data.

particularly important where TNCs growth comes at the expense of traditional taxi operations.

DATA FOR SELECTED CITIES

TNC and taxi trip volumes are available at the city level for a few large cities. In addition, the State of Massachusetts recently released TNC trip totals for all cities in Massachusetts.

Table 1 summarizes the TNC and taxi trip volumes data for San Francisco, Boston, Washington DC, Seattle and New York City overall, and for Manhattan only. (Like San Francisco, Boston and Washington DC, Manhattan comprises the relatively small core of a large metro area and is more comparable in population to the other three cities than is New York City as a whole.)

Table 3. Trip volumes and trip rates in Massachusetts

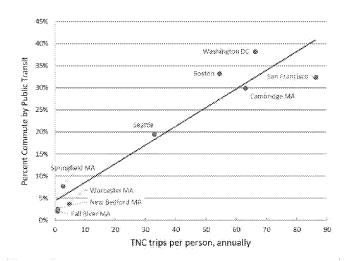
	TNC trips,	TNC trips per
Municipality	2017	person
Boston MA	34,911,476	54.1
Cambridge MA	6,782,366	62.8
Somerville MA	2,727,951	35.7
Brookline MA	2,074,425	28.3
Newton MA	1,051,030	13.3
Medford MA	966,710	16.3
Quincy MA	957,311	10.3
Malden MA	906,043	14.9
Worcester MA	848,943	4.6
Everett MA	775,773	17.7
Revere MA	722,136	13.6
Waltham MA	711,420	11.4
Chelsea MA	656,686	17.5
Lynn MA	549,822	6.0
Lowell MA	490,389	4.5
Brockton MA	433,885	4.6
Springfield MA	378,381	2.5
Lawrence MA	350,752	4.5
Salem MA	296,482	7.0
Arlington MA	258,133	5.8
Belmont MA	195,807	7.7
Melrose MA	129,355	4.7
New Bedford MA	64,621	0.7
Fall River MA	59,477	0.7
Swampscott MA	51,522	3.6
Marblehead MA	43,184	2.1

Sources: Massachusetts Department of Public Utilities, "Rideshare in Massachusetts," available at https://tnc.sites.digital.mass.gov, and U.S. Census Bureau, American Community Survey for city population.

The number of TNC trips varied from 20 million in Seattle to 75 million in San Francisco and 159 million in New York City in 2017. (See Table 2.) On a per capita basis, San Francisco, Boston, Washington DC and Manhattan have between 42 and 86 TNC trips per person per year. (See Table 3.) Manhattan is at the bottom end of this range, but that is largely because of much higher taxi usage in Manhattan. Combining TNC and taxi trips, Manhattan moves to the top of the list. (See Table 2.)

Among cities in Massachusetts, Cambridge, Somerville and Brookline (in addition to Boston) had at least 28 TNC trips per person in 2017. (See Table 3.) Seattle is also in this range, with 33 TNC trips per person.

Figure 5. TNC trips per person and percent commuting by public transit, selected cities



Sources: TNC trips per person from Tables 2 and 3. Public transit commuters from American Community Survey, average 2011-15. Data are for central cities (not metro areas).

TNC usage closely parallels public transportation ridership. Figure 5 shows TNC trips per person in selected cities where data is available together with the percentage of residents in these cities who commute by public transportation (based on Census data).

As can be seen, cities with higher transit commute shares also have relatively high rates of TNC use. This is further indication of an overlapping TNC and transit customer base. This relationship is not surprisingly since TNCs and transit draw from the same well of people who do not exclusively use their own vehicle to get around. (Note that the graph shows correlation between TNC and transit use. Whether this correlation translates into TNCs being competitive with or complementary to transit is addressed in section 5.)

4. Who Uses

From their early days in San Francisco, Lyft and Uber have rapidly gained ridership by offering quick, convenient ride service in major U.S. cities. Closely associated with the popularity of urban lifestyles, their ridership skews urban, young, educated and affluent. Newly released data from the National Household Travel Survey (NHTS) paint a detailed picture of the demographic and trip characteristics of TNC users.

The data presented here are for adults age 18 and over, for TNC and taxi trips in their home area. The relatively small number (about 10 percent) of TNC trips undertaken while out of town all day are not included in these data.

Trip rates shown here are somewhat lower than in the previous section. This reflects in part differences in timing; most of the NHTS data was collected in 2016 whereas trip volumes in the previous section are for 2017. It also reflects underreporting of trips that is common for travel surveys that do not use GPS to track respondents on their travel day.

AGE, EDUCATION, INCOME AND OTHER CHARACTERISTICS

Figures 6 to 8 show rates of TNC use by age, education and income. This section shows results for the following three geographic areas:

- "Urban 9 metros" is for urban census tracts (over 4,000 persons per square mile) in the nine large, densely-populated and multi-modal U.S. metro areas identified earlier. (Urban census tracts are both in and outside the central city of each metro area.)
- "Other urban" are census tracts with over 4,000 persons per square mile outside the nine large metros. This group combines the 11 large, less-dense metro areas discussed in section 3 with all other urban-density census tracts as the two groups show similar characteristics in the NTHS data.
- "Suburban and rural" are all census tracts with fewer than 4,000 persons per square mile. These include suburban and rural areas within metro areas and in non-metropolitan areas.

These three categories illustrate differences across key variables of city size and density, and urban versus suburban/rural.

Figures 6 to 8 show that TNC usage is generally higher among younger, more educated and higher income residents. In the "urban – 9 metros" census tracts, TNC usage is highest among:

- 25 to 34 year-olds, followed by those age 18-24 and 35-54;
- Residents with a college degree
- Residents living in households with incomes of \$50,000 or more.

Older persons, those with less than a college degree and households with incomes under \$50,000 show the lowest rates of TNC use in the nine large metros.

Overall trip rates are lower in other urban census tracts and suburban/rural areas as compared with urban residents in the 9 large/dense metros. However, the same patterns hold for age, education and income groups. TNC trip rates are highest among younger, more educated and more affluent residents.

In addition, residents of very low-income households (income under \$15,000) use TNCs somewhat more frequently than middle-income residents in these areas. This reflects lower rates of car ownership in this group.

Figure 9 to 11 show TNC usage rates by gender, car ownership and access to smartphones:

- Across geographic groups, men are somewhat heavier users of TNCs than women, but the differences are modest.
- Not owning a car is highly related to TNC use in all geographic areas. Those without a car in their household use TNCs 2.5 times more often than car owners in the "urban 9 metros" group; 3.6 times more often in the "other urban" census tracts; and 6.6 times more often in suburban and rural areas.
- Another major factor, not surprisingly, is access to a smartphone, which is generally necessary to use TNC services. Figure 11 shows that very few TNC trips are reported by households without a smartphone. (The small number shown may be situations in which a person rode with someone who has a smartphone.) People without a smartphone do, however, use taxicabs at a somewhat higher

Figure 6. TNC trip rates by age

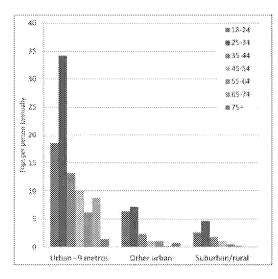


Figure 7. TNC trip rates by educational level

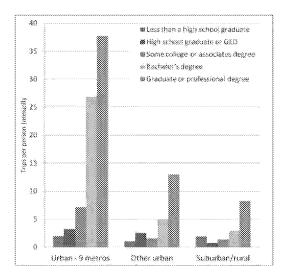


Figure 8. TNC trip rates by household income

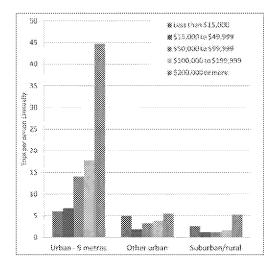


Figure 9. TNC trip rates by gender

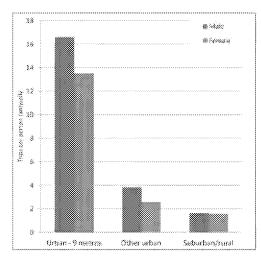
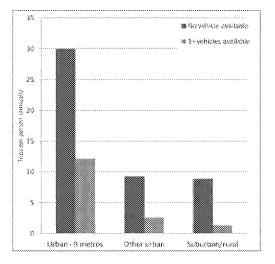
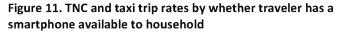
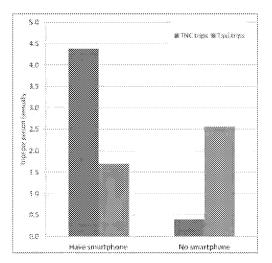


Figure 10. TNC trip rates by whether vehicle is available to the household







Figures 6 to 12 show annual TNC trips per person, adults age 18 and over, for local travel (not out of town all day)

rate than smartphone owners. The lack of a smartphone likely accounts for higher reliance on taxicabs among non-smartphone owners.

TNC AND TAXI RIDERSHIP

Although TNCs have largely displaced taxis as the main provider of for-hire service in the United States, some areas see more of an even split in ridership between TNCs and cabs.

Figure 12 shows that:

- TNCs account for 90 percent of for-hire (TNC and taxi) trips in the eight large metros outside the New York area;
- In other urban census tracts TNCs account for 80 percent of for-hire trips.
- In suburban and rural areas, trip volumes are about the same for taxicabs as for TNCs.
- There is also a nearly even split in urban census tracts in the New York area (most of which are in New York City).

PEOPLE WITH DISABILITIES

People with disabilities are more reliant on for-hire services, in particular taxicabs, than non-disabled persons. While non-disabled people make 4.1 for-hire trips annually, people with disabilities make twice as many trips (8.2 per year). (National data only; sample size too small for geographic detail.)

People with disabilities are also more reliant on taxicabs than the general population. People with disabilities take 5.9 taxi trips annually, twice their use of TNCs (2.3 trips per year).

TRIP CHARACTERISTICS

TNC trips include a mix of trip purposes that typify travel by other modes. Work trips are about 20 percent of all trips, typical of personal auto use. The other major trip purposes are social and recreational trips and going home. Social and recreational trips are somewhat more frequent in urban areas while work trips are somewhat more frequent in suburban/rural areas. See Table 4.

TNC trips typically travel 6.1 miles with a duration of 23 minutes, implying an average speed of 16 mph. Trips in large, densely-populated metro areas tend to be somewhat shorter (4.9 miles) and slower (13 mph). Trips in suburban and rural areas tend to be somewhat longer in distance (8.7 miles) and faster in speed (20 mph). Table 5 show average TNC trip distance, duration and speed.



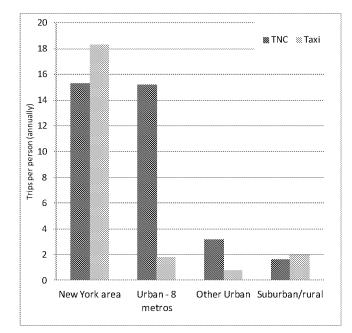


Table 4. Trip purpose for TNC trips

	Urban cens	sus tracts		
	Boston,			
	Chicago, DC,			
	LA, Miami,			
	NY, Phil., SF,	Other		
	Seattle	urban	Suburban	
	metros	tracts	and rural	Total
Home	41%	41%	37%	40%
Work	15%	20%	23%	18%
Social/recreational	20%	20%	12%	18%
Meals	7%	5%	6%	6%
Shopping/errands	4%	5%	4%	4%
School/daycare/ religious activity	3%	1%	2%	2%
Medical	2%	3%	4%	2%
Transport someone	1%	0%	3%	1%
Something else	8%	6%	9%	8%
Total	100%	100%	100%	100%

Table 5. Trip characteristics for TNC trips

	Distance	Duration	Speed
	(miles)	(min.)	(mph)
Urban - 9 metros	4.9	23	13
Other urban	6.1	20	18
Suburban/rural	8.7	26	20
Total	6.1	23	16

These results are consistent with trip data from several other cities and states. Statewide data for Massachusetts shows trips averaging 4.5 miles and lasting 15.4 minutes, for an average speed of 18 miles per hour. In New York City, the average TNC trip is about 5.5 miles in distance and 24 minutes in duration, reflecting relatively lower traffic speeds.

FOR-HIRE RIDERSHIP AMONG ALL MODES

Although at the national level the vast majority of trips are by personal motor vehicle, TNCs and taxis have an important role, particularly for non-car owning households.

Table 6 shows modal shares broken out for households with no car available, and with one or more cars available. In urban census tracts in the nine large, densely-populated metros, 5 percent of all trips are taken by for-hire modes (TNC and taxi). Notably, the percentage is the same in New York as the other 8 metro areas in this group. A similar mode share is also seen in other urban census tracts across the country.

These figures show that persons living in no-car households rely on a mix of travel modes. Although they do not own a car, about one-quarter of their travel involves an automobile, whether getting a ride from a friend, TNCs or taxis. Among no-car households, TNCs and taxis account for about one-half of auto travel in the urban New York area; one-third in urban census tracts in the other eight large, densely-populated metros, and one in eight auto trips elsewhere in the country.

As would be expected, the picture is quite different among people living in households with one or more motor vehicles available to them. In the urban New York area census tracts, the for-hire share is just 3 percent, dropping to 2 percent in other large metro areas (urban census tracts) and less than one percent in the rest of the United States. Walk and transit use also drop among these households, particularly in suburban and rural areas, where autos account for 88 percent of all trips.

Table 6. Modal shares by whether household has motor vehicle available

	Urb	an census tra	cts		
		Boston,			
		Chicago,			
		DC, LA,			
		Miami,			
		Phil., SF,	Other		
	NY metro	Seattle	urban	Suburban	
Mode	area	metros	tracts	and rural	Total
	HOUSEHOL	DS WITH NO	VEHICLE A	AILABLE	
Auto	4.6%	12.0%	26.9%	35.5%	21.6%
Bus	7.7%	16.3%	18.2%	10.1%	11.8%
Rail	22.7%	9.4%	2.5%	0.3%	8.3%
Taxi/TNC	5.1%	5.2%	3.7%	5.4%	5.0%
Walk	54.4%	50.8%	38.0%	33.1%	42.8%
Other	5.5%	6.4%	10.6%	15.7%	10.5%
Total	100.0%	100.0%	100.0%	100.0%	100.0%
	HOUSEHOL	DS WITH 1+	VEHICLES A	VAILABLE	
Auto	62.1%	74.4%	83.6%	88.1%	85.3%
Bus	2.0%	1.5%	0.9%	0.3%	0.6%
Rail	7.4%	2.8%	0.4%	0.2%	0.8%
Taxi/TNC	3.3%	1.7%	0.6%	0.3%	0.6%
Walk	22.2%	15.8%	10.6%	6.9%	8.8%
Other	3.0%	3.9%	3.9%	4.2%	4.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Sources: National Household Transportation Survey, 2016-17. Ridership for bus, rail and taxi/TNC are adjusted to match administratively-derived ridership for each mode. Auto, rental car, walk and other are adjusted by factor of 1.16 from NHTS based on average adjustment for bus, rail and taxi/TNC.

Notes: "Urban" defined as census tracts with 4,000 persons/sq. mile or more. Rail includes subway, light rail, streetcar, commuter rail and Amtrak. Transit trips are unlinked trips (e.g., bus-to-Metro counts as two trips).

5. Better for Cities?

The previous two sections of this report profiled trip volumes and user and trip characteristics. This section and the next two sections address three questions about the role of TNCs in American cities. First, are TNCs good for cities in the ways that TNCs currently assert? Second, what benefits do they bring to cities that public policy should consider supporting financially or otherwise? Third, what public policies should be considered to address traffic and transit trends related to TNC growth?

The last section of this report then discusses implications for a future world of self-driving vehicles.

TNCS' GOOD-NEWS STORY

TNCs tell a good-news story about how TNCs benefit urban America. They declare that their competition is the personal auto, not public transit. They say their services will strengthen urban transportation systems and their mission is to make car ownership obsolete. They hope to help usher in a new era of multi-modality where most trips are taken in shared and environmentally sustainable modes including shared TNC trips, buses and subways.

However, prominent reports and news articles published over the last 18 months have led to concerns about the relationship between TNC growth, worsening traffic congestion (see box at right) and nearly across-the-board drops in transit ridership in major American cities.

TNCs have pushed back against the narrative that they promote automobility and unsustainably increase traffic congestion while also weakening public transportation. Each of the goodnews claims thus deserve careful consideration.

COMPETING WITH THE PERSONAL AUTO?

TNC impacts on auto usage can be assessed through recent research that has focused on large, densely-populated metro areas where traffic and transit issues are most often raised.

First, as has been widely publicized, surveys of TNC users have consistently found greater impacts on public transit than personal vehicle use. The research summary on the next page shows results from studies conducted by academic and governmental researchers. Although the results vary somewhat by locality, the overall picture is clearly that most TNC users

ISBN BASICHISUNAMARY

TRAFFIC IMPACTS

TNCs added 976 million miles of driving to New York City streets from 2013 to 2017. [Schaller Consulting 2018]

"Ride-hailing is likely adding vehicle miles traveled in [seven] major cities." [Clewlow 2018]

TNC usage increased vehicle miles traveled by 85% in the Denver area. (Henao 2017)

TNCs account for 20-26% of trips in the [S.F.] downtown and South of Market areas at peak, "likely exacerbating existing peak period congestion." [SFCTA 2017]

"Ride-hailing is adding new auto trips ... [and] exacerbating congestion on the [Boston] region's roadways." [MAPC 2017]

Sources: see page 17.

would have taken public transportation (15-50 percent), walked or biked (12-24 percent), or not made the trip (2-22 percent) had TNCs not been an option. Consistently across surveys, about 40 percent would have used a personal vehicle or taxi, with surveys generally showing about an even split between the two.

Thus, the overall results show about 60 percent would go by transit, walking, biking (or not make the trip) while about 20 percent would have used their own car and 20 percent a taxi.

These results clearly show that instead of "replacing the personal auto," TNCs in large cities are primarily supplanting more space-efficient modes such as bus, subway, biking and walking.

Survey results also detailed on the next page show the limited appeal of TNCs as compared with personal auto travel. The main reasons to choose TNCs over personal auto are to avoid the cost or hassle of parking and to avoid drinking and driving. These motivations are consistent with trip data showing that

RESEARCH SUMIVARY

MODE TO USE IF NOT TNC

Results from asking what mode survey respondents would have used had ride-hailing service not been available.

UC Davis study of 7 large metros (4,094 residents of Boston, Chicago, Los Angeles, New York, San Francisco, Seattle and Washington DC areas)

- 39% drive alone, carpool, taxi
- 15% rail
- 17% walk
- 7% bike
- 22% not made the trip

[Clewlow 2017]

Boston area (survey of 919 Boston area residents)

- 18% personal vehicle
- 23% taxi
- 42% public transportation
- 12% walk or bike
- 5% would not have made the trip

[MAPC 2018]

New York City (616 NYC residents; multiple responses)

- 12% personal vehicle
- 43% taxi or car service
- 50% public transportation
- 13% walk
- 3% bike
- 2% would not make trip

[NYCDOT 2018]

Denver area (300 Denver-area Uber and Lyft users)

- 26% personal vehicle
- 10% taxi
- 5% other TNC
- 11% ride with someone else
- 22% public transportation
- 12% walk or bike

• 12% would not have made the trip

[Henao 2017]

California: (208 California residents age 18-50 who use Uber or Lyft at least once a month; multiple responses):

- 35% personal vehicle
- 22% ride with someone else
- 51% taxi
- 33% public transportation
- 19% walk or bike
- 4% van or shuttle
- 9% not made trip

[Circella 2018]

RESEARCH SUMMARY

REASONS TO USE

Results from asking why TNC patrons use ride-hailing services instead of other modes (personal vehicle or transit).

UC Davis study of 7 large metros (4,094 residents of Boston, Chicago, Los Angeles, New York, San Francisco, Seattle and Washington DC areas)

Use TNC instead of personal auto:

- Avoid DUI
- Parking is difficult to find
- Parking is expensive
- Often going to airport

Use TNC instead of transit:

- Transit too slow
- Not available/too few stops or stations
- Transit unreliable

[Clewlow 2016]

Boston area (919 Boston area residents; multiple responses) Use TNC instead of other options:

- 61% quicker than transit
- 35% no car available
- 23% parking difficult/expensive
- 19% weather
- 18% no available transit
- 12% cannot drive
- 9% multitasking options

[MAPC 2018]

Denver area (survey of 300 Uber and Lyft users) Use TNC instead of other options:

- 37% going out/drinking
- 20% parking is difficult/expensive
- 17% do not have car available
- 9% cost
- 4% do something while I am riding
- 2% time (e.g. in a rush)
- 2% weather

[Henao 2017]

Sources: see next page.

TNC trips are concentrated in dense urban centers where parking is most likely to be scarce and expensive, and show heavy trip volumes in the late evening when the bars let out.

Notably, only a few percentage of auto users choose TNCs due to convenience or speed of travel. TNCs are thus not attracting drivers on the core mode choice attributes of speed, reliability or comfort. By contrast, the main reasons that people switch from transit to TNCs involve these core attributes: transit too slow, unavailable or unreliable.

In sum, TNCs mainly draw from sustainable and space-efficient modes. They show little appeal for the vast majority of auto trips which do not involve significant parking cost or the desire to avoid driving while under the influence.

SUPPORTING MULTI-MODAL TRAVEL?

There are clearly instances in which the availability of TNC service results in additional public transportation, walking or biking trips. One might take the train or bus to work in the morning, for example, then use a TNC for the late-evening trip home. TNCs can help people use a combination of public transportation and TNCs rather than renting a car when traveling out of town. They also provide valuable access to transit service, as when people take a TNC to a major rail station. People can also combine TNCs, transit, walking and bike share for different portions of a day's itinerary, as they are not tethered to where their car is parked.

Sources used on previous two pages:

[*Circello 2018*] Giovanni Circella, Farzad Alemi, Kate Tiedeman, Susan Handy, Patricia Mokhtarian, "The Adoption of Shared Mobility in California and Its Relationship with Other Components of Travel Behavior," Institute of Transportation Studies, University of California, Davis, March 2018.

[*Clewlow 2017*] Regina R. Clewlow and Gouri Shankar Mishra, "Disruptive Transportation: The Adoption, Utilization and Impacts of Ride-Hailing in the United States," Institute of Transportation Studies, University of California, Davis, October 2017.

[*Henao*] Alejandro Henao, "Impacts of Ridesourcing–Lyft and Uber –on Transportation including VMT, Mode Replacement, Parking, and Travel Behavior," Doctoral Dissertation Defense, January 2017.

[*MAPC*] Metropolitan Area Planning Council, "Fare Choices: A Survey of Ride-Hailing Passengers in Metro Boston," February 2018.

[NAS 2018] National Academies of Sciences, Engineering, and Medicine, Legal Considerations in Relationships Between Transit Agencies and Ridesourcing Service Providers, The National Academies Press, 2018;

[*NYCDOT 2018*] New York City Department of Transportation, "NYC Mobility Report," June 2018.

[Schaller 2018] Schaller Consulting, "Making Congestion Pricing Work for Traffic and Transit in NYC," March 2018

[SFCTA 2017] San Francisco County Transportation Authority, "TNCs Today," June 2017.

These examples show that TNCs support a multi-modal network for some trips, enabling travelers to leave their car at home for the day.

But one needs to look beyond individual examples to assess whether on TNCs' overall effect is to support the goal of a multimodal system by helping shift people from personal auto to more space-efficient and environmentally sustainable modes, or the opposite. The answer from survey data is quite clear. Overall, TNCs contribute much more to automobility than to transit or other non-auto modes:

- As cited above, most TNC trips involve shifting from sustainable modes (transit, walking, biking) than from the personal auto. The net result is more driving mileage and less use of public transit.
- Remarkably few TNC trips are for the purpose of connecting to public transit. TNCs try to suggest the opposite by pointing to a substantial number of trips that start or end near a transit station. Yet those trips do not necessarily involve transferring to transit at that station; passengers could simply be going to local destinations near the transit stop. Research in the Boston area found that 9 percent of home-based TNC trips were used to reach a transit connection and 4 percent of trips returning home were from a transit connection.⁸ A New York City survey found that 0.4 percent of transit trips used a for-hire vehicle to connect to transit and 0.9 percent used a for-hire service to connect from transit.⁹ A national survey found that only 7 percent of TNC users combine TNC trips with public transit on at least a weekly basis, while 35 percent do so at least occasionally.¹⁰

Overall, then, while TNCs can be a useful part of a multimodal system, just as taxis have been for many years, their growth has clearly subtracted rather than added to the use of transit, walking and biking which are the cornerstones of a healthy multi-modal system.

REDUCING TRAFFIC WITH SHARED RIDES?

A now-defunct company named Sidecar was the first to offer door-to-door service using nonprofessional drivers. Sidecar called its service "rideshare" because its goal was to enable smartphone users to "hitch a ride" with people already driving for their own purposes between two locations.¹¹

When this new form of carpooling did not catch on, Sidecar – quickly followed by Lyft and Uber – switched to a service model in which drivers go where the customer wants to go, not vice versa.

This taxi-like service continues to be the bedrock of Lyft and Uber's business. Their remarkable growth has been built on offering what customers view as a better version of conventional taxicabs. But while most TNC trips continue to be private rides, Uber and Lyft are now heavily investing in improving and promoting their shared services.

Their efforts have lifted UberPOOL to 20 percent of Uber trips in the major cities where it is offered, according to the company. Lyft says that 37 percent of users in cities with a Lyft Line option request a Lyft Line trip. But the number of matched trips which results in the ride being shared is substantially lower (22 percent in New York City compared with 23 percent for Uber in February 2018, the latest month available).¹²

Uber, Lyft and others believe that increasing the number of shared rides will serve to reduce overall miles of driving. This assertion has rarely been questioned, perhaps understandably given the intuitive appeal of the idea that putting several people in a car together will economize on the overall vehicle miles.

This assertion should be examined closely. If shared rides reduce overall driving, then shared rides could be effective in reducing congestion and deserving of supporting public policy actions. Conversely, if shared rides are like private rides (e.g., UberX and Lyft), and add to congestion, then pushing more people into shared vehicles will be ineffective in offsetting the substantial increases in driving that occur with UberX and Lyft private rides.

Fortunately, there is now enough publicly available data to determine effects on overall mileage.

The starting point is to compare mileage impacts from private ride TNC service with using one's own vehicle, and then add shared rides to the equation. Table 7 shows trip characteristics for cities where data is available. The average TNC trip among these cities is 5.2 miles (similar to results from NHTS) with 3.0 miles between trips. The latter figure includes 2.1 miles while drivers wait for their next trip and 0.9 miles to drive to the pickup location. These averages are used to reflect typical TNC operations in major U.S. cities.

The baseline case is a personal auto trip in which both the traveler and vehicle travel 5.2 miles. (See Column A in Table 8 on the next page.)

Private ride TNC trips also involve 3 additional miles between passenger trips for a total of 8.2 miles from a private ride TNC trip. Assuming that the passenger is replacing a personal auto trip with the TNC trip, the switch increases total

WHAT'S BEING SAID

RIDE SHARING

"We think carpooling is very much the way of the future. Not only for our service, but we think the transformation of car ownership towards carpooling is going to be tremendously beneficial for cities, for the environment, for congestion, pollution, etc."

- Ethan Stock, Uber director of product for shared rides

"You share a car with someone else, and it kind of feels a little weird. ... and then the question of, 'when exactly am I going to get there?' are real friction points that we have had to fight, and that's why we are investing very heavily in this mode of transport."

- Uber CEO Dara Khosrowshahi

"We're making a really strong commitment about shared rides. We're making a commitment that by 2020, 50 percent of all Lyft rides will be shared.... We believe Lyft and shared rides are extremely complementary to public transit."

- Joseph Okpaku, Lyft V.P. of government relations

* * *

This report: "Even with highly optimistic assumptions about shared ride adoption, TNC growth adds substantially to traffic in major U.S. cities."

	Miles between trips				Total	Pct
		Drive to		Passen-	miles per	miles
	Waiting	pick-up	Total	gertrip	trip	with pax
New York City	2.8	0.7	3.5	5.1	8.6	59%
Chicago	2.5	0.7	3.2	4.7	7.9	59%
San Francisco	1.4	0.6	2.0	4.1	6.1	67%
Denver area	1.5	1.4	2.9	7.0	9.9	71%
Average	2.1	0.9	3.0	5.2	8.2	63%

Table 7. Passenger miles and total miles for TNC trips

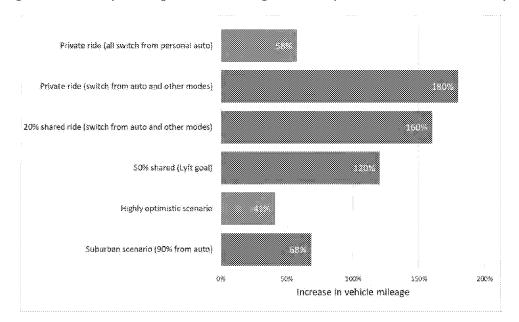
Sources: Carolyn Said, "Lyft trips in San Francisco more efficient than personal cars, study finds," *San Francisco Chronicle*, January 5, 2018; Alejandro Henao, "Impacts of Ridesourcing–Lyft and Uber –on Transportation including VMT, Mode Replacement, Parking, and Travel Behavior," Doctoral Dissertation Defense, January 2017; and author's analysis of NYC Taxi and Limousine Commission TNC trip data. Mileage with passenger of 63% is consistent with statewide California average of 61%; see Simi Rose George and Marzia Zafar, "Electrifying the Ride-Sourcing Sector in California," California Public Utilities Commission, April 2018. miles by 58 percent. (See Column B.) Even if one allows for somewhat higher mileage for personal trips from searching for parking, TNC trips clearly result in higher overall miles driven.

The next column takes account of the fact that most TNC trips do not replace personal auto trips. As shown in Table 8, TNC trips mostly replace transit, walking and biking trips; this switch creates entirely new miles on city streets. About 20 percent of TNC users in major U.S. cities would have used a personal vehicle if the TNC were not available, and 20 percent would have taken a taxicab. (This distinction is important because taxis have cruising miles between trips, which is accounted for in this analysis.)

Column:	A	В	С	D	E	F	G
		Private ride		20% shared			
		(all switch	Private ride	ride (switch			Suburban
		from	(switch from	from auto		Highly	scenario
	Personal	personal	auto and	and other	50% shared	optimistic	(90% from
	vehicle	auto)	other modes)	modes)	(Lyft goal)	scenario	auto)
Mileage							
Between passenger trips	0	3.0	3.0	3.0	3.0	1.1	4.0
Per passenger	5.2	5.2	5.2	5.2	5.2	5.2	7.0
Shared trips							
Pct of all trips		0%	0%	20%	50%	75%	10%
Amount of trip shared		0%	0%	52%	65%	75%	52%
Pct with 3+ pax		0%	0%	2%	13%	38%	1%
Amount of trip shared		0%	0%	67%	80%	80%	67%
Previous mode							
Driving		100%	20%	20%	20%	20%	90%
Taxicab		0%	20%	20%	20%	20%	0%
Transit/walk/bike/no trip		0%	60%	60%	60%	60%	10%
Total vehicle miles per passeng	er						
Using TNCs		8.20	8.20	7.62	6.46	4.14	10.61
Using previous mode	5.2	5.20	2.93	2.93	2.93	2.93	6.30
Change		3.00	5.27	4.69	3.53	1.20	4.31
Percent change in vehicle mile	s	58%	180%	160%	120%	41%	68%

Table 8. Change in overall mileage from TNC private ride and shared ride trips

Figure 13. Summary of change in overall mileage from TNC private ride and shared ride trips



SCHALLER CONSULTING

Column C shows the effect of taking account of this distribution of previous modes: a 180 percent increase in overall mileage. Put another way, before taking account of shared trips, TNC usage replaces each mile of personal motor vehicle use taken off the road with 2.8 TNC miles.

Taking account of shared trips modestly mitigates this large increase. Using typical 2017 levels of sharing (20 percent), produces a 160 percent increase in overall mileage. (Column D.) With sharing, each mile taken off the road is replaced with 2.6 TNC miles.

Applying these results to the trip volumes for large, denselypopulated metro areas and specific cities where trip counts are available yields the following estimates for additional mileage due to 2017 TNC operations. These estimates assume that 40 percent of TNC trips "replace" auto trips (split evenly between personal auto and taxi), and the mileage figures in Column D of Table 8.

Overall, TNCs are estimated to add 5.7 billion miles of driving in the 9 large metro areas. City-specific estimates range from 94 million additional miles in Seattle to 352 million miles in San Francisco and nearly 1 billion miles in New York City.

These estimates underscore the results of other recent studies finding that TNCs lead to increased miles of driving in large, dense, multi-modal cities that account for most TNC trips.

Table 9. Estimated additional mileage from TNC growth

	TNC trips (M)	Add'l mileage (M)
9 large/dense metros	1,224	5,742
City		
San Francisco	75	352
Washington DC	45	211
Boston	35	164
Seattle	20	94
New York City	159	976

Additional mileage includes miles with passengers and mileage between trips and takes account of mileage reductions from patrons switching from personal vehicle and taxi. Does not include driving at the start and end of the day between drivers' home and positioning for the first trip.

Individual cities are central cities (not metro areas).

Sources: TNC trips are from Table 1. Additional mileage is based on 4.69 additional miles per TNC trip from Column D of Table 8, except for New York City. Source for NYC is more detailed analysis and results presented in Schaller Consulting, "Making Congestion Pricing Work for Traffic and Transit in NYC," March 2018.

These large increases in miles driven come about because of the combination of several factors:

- Fewer than one-half of TNC trips take a car trip off the road, meaning that most TNC trips represent entirely new miles of driving on city streets;
- TNC drivers must drive to the pick-up location, and drive between trips, also adding to overall mileage; and
- Only part of every shared trip involves multiple passengers, since there is generally some mileage between the first and second passenger pick-ups, and between the last and second-to-last drop-offs.¹³

TNCs have said that their operations will reduce overall traffic as the use of pooling grows. Lyft recently announced a goal of 50 percent of trips being pooled by 2022. Results in Column E are based on 50 percent of trips being shared (more than double the current rate) and assume that a quarter of shared trips involve sharing among three passengers rather than just two. As shown in Column E, achieving Lyft's goals would still create a 120 percent increase in overall mileage.

It is notable that even in extremely optimistic scenarios, TNC growth produces more miles of driving. Column F shows a case that assumes a very high rate of pooling (75 percent), many fewer vacant miles between trips and much more time is spent with multiple passengers in the vehicle. The result is still a 41 percent increase in overall mileage on city streets. (Column F.)

These results make clear that even with highly optimistic assumptions about shared ride adoption, TNC growth adds to traffic in major U.S. cities, with potentially quite large implications for both traffic congestion and transit ridership.

These results do not significantly change in suburban settings, even though far more people would have taken their own vehicle for the trip instead of a TNC. The one study that looked systematically at mode shifts outside large, dense cities was conducted in California. It showed that about 90 percent of TNC users would have driven their own motor vehicle instead of taking a TNC. Shared options generally are not offered in suburban settings, but assuming that 10 percent of trips are shared, the increase in mileage would be 68 percent. (Column G.)

Figure 13 summarizes the results of this analysis. In every conceivable case, TNCs increase miles of driving on city streets as well as on suburban streets. Even with extremely optimistic assumptions about how far TNCs can take shared trips, there is more mileage.

In areas where TNCs comprise a tiny fraction of traffic volumes, these increases amount to small additional traffic. It may well be worth the trade-off for greater mobility, particularly for people who do not currently have access to a motor vehicle. For most places that TNCs operate, the added mileage may not merit attention from public policy-makers.¹⁴

Where TNC trip volumes are large, however, the increased traffic can be considerable and likely merits attention. Public policy options suitable to these areas are discussed in section 6 of this report.

MAKING THE PERSONAL AUTO OBSOLETE?

TNCs have recently begun to boldly say that their goal is to make the personal auto obsolete. Their vision for transforming the transportation system involves shared trips replacing most if not all personal auto travel. They believe this will make for a far more efficient (and with self-driving cars, safe) transportation system.

NEW AUTOMOBILITY – PERSONALLY OWNED VEHICLES

While this report focuses on increased auto usage from the rise of TNCs, there is larger and equally important picture of trends in auto use in American cities.

After leveling off or even declining earlier in this century, vehicle miles of travel (VMT) has increased nationally since 2011.¹⁵ Unfortunately, city-level VMT data are not generally available. Vehicle ownership can be used as a proxy for vehicle mileage, however, as changes in auto ownership tend to be reflected in changes to auto use.

Census data show that auto ownership has increased in nearly all large U.S. cities since 2012 and in nearly all cases exceeded population growth. Table 10 shows that the aggregate number of household vehicles increased in each of the 9 large, denselypopulated cities as well as the 11 large, less-densely populated cities discussed in earlier sections. The average increases were similar – 8 percent for the first group and 11 percent for the second group. In all but three cities (Washington DC, Seattle and San Antonio), the rate of vehicle growth exceeded the rate of population growth.

These findings are consistent with studies showing increases in vehicle registration in the Los Angeles area and in Washington DC and New York City.¹⁶

For this to occur, people who now drive themselves around town would obviously need to decide to switch over to TNCs. But while TNCs see this is producing benefits, the above analysis shows that the result would be catastrophic for cities, adding about 68 percent more mileage to suburban streets and nearly tripling mileage in large central cities.

Even if, as TNCs envision, most people used shared trips, central city traffic would still increase very substantially even under the most optimistic scenarios. The transformation assumes that people would voluntarily give up the convenience of jumping into their own cars in favor of shared trips that involve walking to a pick-up location and waiting for the vehicle to arrive. The evidence supports this assumption when they save on parking costs or avoid drinking and driving. Otherwise, few auto users make the switch to today's TNCs and are unlikely to do so in the future.

Table 10. Aggregate Household Vehicles by City, 2012-16

	Aggregate HH vehicles				
				Pct	Popn.
City	2012	2016	Change	change	change
9 large/dense citi	es				
Miami	183,041	214,068	31,027	17%	10%
Boston	218,673	252,757	34,084	16%	6%
Seattle	397,873	443,564	45,691	11%	11%
Los Angeles	2,050,488	2,233,586	183,098	9%	3%
San Francisco	362,766	395,087	32,321	9%	5%
Philadelphia	568,504	610,005	41,501	7%	1%
New York	1,842,155	1,961,602	119,447	6%	2%
Chicago	1,114,784	1,182,970	68,186	6%	0%
Washington	228,918	242,612	13,694	6%	8%
Total	6,967,202	7,536,251	569,049	8%	3%
Dallas	705,973	817,739	111,766	16%	6%
11 large/less-den		047 700	444 766	4.504	
Denver	408,493	472,271	63,778	16%	9%
Houston	1,198,358	1,383,986	185,628	15%	7%
Phoenix	838,147	951,352	113,205	14%	8%
San Jose	614,614	677,914	63,300	10%	4%
San Diego	826,760	893,725	66,965	8%	5%
San Antonio	793,972	849,515	55,543	7%	8%
Detroit	279,563	298,618	19,055	7%	-4%
Minneapolis	219,583	232,763	13,180	6%	5%
Milwaukee	293,808	304,831	11,023	4%	-1%
Baltimore	253,992	260,881	6,889	3%	-1%
Total	6,433,263	7,143,595	710,332	11%	8%

TNCs' benefits to individual users – fast, reliable and affordable taxi-like service – have fueled their popularity and rapid growth. Their mostly affluent customers feel that the service is a good value for the money and are willing to pay the full fare.

For some types of trips, however, the full fare is unaffordable but there is a public interest that supports public subsidies. This section reviews the experience with various pilot programs across the country in cities of widely varying size, where officials saw public benefits and contracted with TNCs or other private providers.

Experience with these pilots is valuable in pointing to which approaches hold the most promise for larger-scale implementation, and how they can best fit with more conventional transit services.¹⁷ As will be seen, a central takeaway is that TNCs and microtransit tend to best fit where trips are thinly dispersed over a geographic area and in cases where users need to be picked up at their doorstep.

LIFELINE TRANSPORTATION

There is a long history of taxicabs participating in Dial-A-Ride programs for seniors and persons with disabilities who lack access to a personal car or the financial means to pay for a taxi. Public subsidies are needed for patrons to obtain medical care, go shopping, socialize at senior centers, attend religious services and so forth. The policy rationale for these subsidies is the public interest in the health and well-being of seniors, persons with disabilities and other eligible participants such as nonsenior low-income persons.

TNCs have recently started to participate in these programs, sometimes alongside taxis and other companies that provide contracted transportation service, and in some cases substituting for discontinued bus services. Laguna Beach, for example, contracted with Uber to supplement transportation for senior and disabled passengers following curtailments of local bus service.

The Pinellas Suncoast Transit Authority in the Tampa and St. Petersburg, Florida area, conducted a two-year pilot with Uber, a cab company and a wheelchair van provider for on-demand trips at night to or from work to participants in an agency program for transportation-disadvantaged persons. After an initial microtransit pilot involving the now-defunct company Bridj, the Kansas City Area Transportation Authority is using taxis in its RideKC Freedom program, serving older adults and persons with disabilities with same-day service scheduled through a mobile app or by telephoning a call center. Via is developing with the city of Berlin, Germany a van service that complements existing transit service, focusing on late night and weekend travel.¹⁸

SUPPLEMENTING ADA PARATRANSIT

Somewhat similar to this historically has been taxi participation in transit agency paratransit programs that are mandated under the federal Americans With Disabilities Act (ADA). Cost savings have been the main impetus for transit agencies to contract with taxi companies to provide ADA paratransit trips. In some cases, taxis simply substitute for paratransit vans, usually at a lower per-trip cost. In other cases, taxis are used as a back-up to handle trips for which there are no paratransit vans readily available. Taxis can also be provided as an option to the regular paratransit vans and may be available for same-day trip requests rather than having to request a day or more in advance.¹⁹

TNCs have recently started to participate in these programs as well. A prime example is the pilot by the Boston area transit agency (MBTA) that involves Uber, Lyft and other companies. ADA paratransit users are offered the option of using one of these three companies instead of the regular ADA service. They can make same-day reservations instead of having to call a day or more in advance. Riders pay the same \$2 fare and any amount over \$15 (making for a subsidy of up to \$13 per trip). Lyft provides a call center under its Lyft Concierge program, while Uber addressed smartphone issues by giving away smartphones to some users.

Another example is the transit agency in Las Vegas, Nevada, which began a pilot earlier this year with Lyft to provide ondemand paratransit service.

CONNECTING TO PUBLIC TRANSIT

There has been a great deal of interest across the country in using new mobility services to complement available public transportation services. Among the most discussed are "first mile" and "last mile" services that connect the customer's starting point or final destination to transit and offering publicly subsidized transportation in areas without any conventional public transit.

The earliest pilots in this area were generally in smaller towns where a mayor or transit agency head championed the idea of piloting the use of TNCs or microtransit. Pilots included "first mile/last mile" services sponsored by city governments in Almonte Springs, Florida; Centennial, Colorado; and Summit, New Jersey; and by transit agencies in Pinellas County, Florida; Sacramento, California and Dayton, Ohio. Pilots provided subsidies that covered part of the Uber or Lyft fare for residents traveling to or from transit hubs and in some cases other local destinations.

Several larger transit agencies are exploring the feasibility and value of various microtransit service models. For example, King County Metro in the Seattle, Washington area recently began serving first mile/last mile trips between commuters' homes and transit hubs. The service was needed due to limited parking at Park & Ride facilities. Via currently operates a service in Kent, U.K., outside London, that serves mainly reverse-commuters.²⁰

PROVIDING SERVICE IN HIGHLY DISPERSED TRAVEL MARKETS

Another approach explicitly seeks to use TNCs and sometimes taxis and other contract transportation providers where trips are too geographically dispersed to be served by conventional fixed-route buses. The idea is to design the service to go only where customers want to go, in contrast to fixed-route buses that serve stops where there are often no passengers.

One of the most widely-publicized pilots is in Innisfil, Ontario, a town of 36,000 about an hour north of Toronto. The city contracted with Uber to provide subsidized rides to key destinations such as a town hall/recreational complex, employment center, and regional bus stops and train stations. Passengers pay \$3 to \$5 and the city subsidizes the remainder of the Uber fare. Subsidies average \$5.62 per trip, significantly lower than what the city estimated fixed route buses would cost.

Similarly, the City of Arlington, Texas contracted with Via to provide on-demand trips in a zone within the city. Riders pay \$3 per person. Typical trips connect a regional rail station to employment centers and a University of Texas campus.

In the San Francisco East Bay communities of Fremont and Newark, AC Transit tested a "Flex" service using its own 16 passenger vans and its contracted paratransit provider. AC Transit's overall objective was to address declining ridership, improve service quality and redesign its route structure, particularly in low-density areas that had seen a 20 percent decline in bus ridership. The Flex service picked up and dropped off passengers at select bus stops where bus service had been discontinued. Two-thirds of trips started or ended at a BART station, so the program in large part functioned as a first mile/last mile service.

The Orange County (Calif.) Transportation Authority (OCTA) planned to begin this month (July) a one-year pilot on-demand, microtransit service. The pilot is being offered in two zones, each about six square miles. Service is being provided by Keolis under contract to OCTA.²¹

Los Angeles Metro is currently conducting studies with three potential private sector partners, Transdev, RideCo and Via, to develop door-to-door microtransit service.²²

* * *

While much of the media attention has been focused on Uber, Lyft and Via providing subsidized services, there are a range of companies and service models available. Taxicabs and private transportation providers such as Transdev, Keolis, MV Transportation and First Transit can play an equally or even more useful role. TNCs may not be able to provide contracted service where federal funds are involved due to requirements for drug and alcohol testing. Taxis and private providers may have accessible vehicles where TNCs generally do not. Government agencies may want to insist on being provided detailed trip data that Uber and Lyft have often refused to provide (although, notably, Uber is providing detailed trip data to Innisfil).

Some of these arrangements also creatively split various aspects of the operation. Transloc and Via provide their software for others to operate a service. A Capital Metro pilot in Austin, Texas used Via's technology to dispatch contracted vans. Via is also working with the transit agency in Singapore to incorporate on-demand technology to enable buses to be deployed and dynamically routed on-the-fly in response to commuter demand.²³ The Contra Costa County (Calif.) Transit Authority is using a Transloc technology platform to provide connections to a BART station.

It should be noted that ridership on these services is low compared with typical fixed route bus operations. Pilots in Livermore, California and Pinellas County, Florida and the initial AC Transit pilot averaged 40 to 60 riders per day. Somewhat higher, Uber provided 200 trips per day in March 2018 in Innisfil, Ontario, and Via served 350 trips per weekday Arlington, Texas this spring (ridership is now lower while the university is in summer session).

Where a new service replaced discontinued bus routes, ridership dropped. In San Clemente, California, for example,

where the city contracted with Lyft to provide rides along two corridors previously served by buses, Lyft averaged 70 passengers per day versus 650 passengers on the bus routes. The same was true for the AC Transit Flex service. An AC Transit manager concluded that "on-demand transit carries fewer passengers per hour than even a low ridership fixed route."

In sum, TNCs and microtransit and other services like Flex in the East Bay are most clearly valuable where conventional bus service would not be operated because of some combination of low ridership levels and geographically dispersed trips. They can be valuable extensions – not replacements – for fixed route transit. This is the conclusion of AC Transit staff, which plans to use Flex to provide coverage in low-density areas and hopes to achieve savings that can be invested in high-frequency bus service elsewhere. This strategy helps reconcile sometimes competing transit agency goals for ridership growth on the one hand and providing wide geographic coverage on the other hand.

Continued testing of varied approaches will help create a better understanding of where there can be a public benefit to TNC and microtransit services.²⁴ Among the most promising are those that mirror time-honored senior and disabled services, and that reduce costs of ADA paratransit service. The use of TNCs and microtransit to provide coverage outside the bus network is also promising, particularly if it helps transit agencies focus resources on higher frequency where they can build ridership.

Many of the pilots thus far have shown modest levels of shared trips, although some have increased over time. For example, shared trips increased in Innisfil from 10 percent to 25 percent of trips between July and December 2017. The highest figure available is from Arlington, Texas, where many passengers are going between a regional TRE train station and a university or employment centers. The percentage of shared trips leveled off at about 60 percent a few months into the program – similar to Via's shared trip percentage in New York City.

As the Arlington experience suggests, there is likely the greatest opportunity for shared trips and resultant cost-efficiencies if passengers have a common origin or destination such as a transit station or park & ride stop. To the extent that shared trips lead to reasonably straight-line routes and attract growing ridership, these services may also build toward fixed route bus service.

While there are clear opportunities for public benefit, there are also caveats that should be noted.

First, making TNCs or microtransit full-fledged parts of a government-subsidized transit system will require that the service be available to all members of the public, including those without smartphones and people who use wheelchairs. Pilots have shown how this can be done. Via and Lyft have the capability to provide telephone reservations for their services; Uber plans to roll out its first telephone reservation option in Innisfil later this year.

For accessibility, several pilots use taxi companies that have accessible vehicles; the 16-passenger vans used for AC Transit's Flex service are accessible, and the City of Arlington made two vans (used in its paratransit program) available for wheelchair trips.

Second, while on-demand TNC and microtransit service has benefits in that drivers go only where the customer wants to go, the service is not necessarily more convenient or reliable than conventional bus service.

AC Transit found that Flex service ridership is 40 percent higher for trips originating at a BART station, where passengers can walk on without requesting a trip, than for trips going to the BART station.

TNC and microtransit services can be valuable extensions of – but not replacements for – fixed route transit.

In Innisfil, the trip completion rate was only 75 percent in November and December 2018, meaning that one-quarter of prospective customers did not receive service. Innisfil city staff note that the service "may not have the same predictability as a fixed route system." Residents are advised to leave extra time if they are on a tight schedule. If no driver is available, the city suggests that they request their trip again in a few minutes.

Waiting times average 8-9 minutes in Inisfil and 11 minutes in Arlington, Texas, possibly greater than bus wait times for routes that run on a reasonably frequent schedule.

As new mobility evolves, there are also other considerations. These companies continue to show financial losses. Although Uber has claimed that it is profitable in major U.S. cities, it is anyone's guess how fares will be affected when their investors insist on a return on capital invested.

MOVING TOWARD SHARED, SUBSIDIZED, STRAIGHT-LINE SERVICES

Two key developments in recent months suggest that TNC and microtransit services are rapidly evolving into two distinct service models. One is the traditional door-to-door private ride service long provided by taxicabs. The other is straight-line routes in which passengers are picked up and dropped off along the way, often subsidized by government, much like traditional buses and jitneys.

1. Straight-line routing. "Rideshare" was supposed fill TNC cars with passengers; TNC advertisements conveyed this vision with pictures of strangers happily traveling together. The service model sought to combine the convenience of door-to-door service (like taxis) with lower fares. Over time, however, Uber and Lyft found that the zig-zag routing of shared, door-to-door rides limited the appeal of UberPOOL and Lyft Line. To address this, the companies recently introduced services (Uber Express POOL and Lyft Shared Rides) meant to minimize turns and thus minimize in-vehicle time and the uncertainties experienced with pooled options. Users are instructed to walk a block or two to a designated pick up location but benefit by traveling a more direct route once in the vehicle.

Via and Chariot used this model from the beginning of their microtransit services, picking up and dropping off passengers along a route. Via assembles the routes on the fly while Chariot uses designated stops that do not change from day to day, although vehicle routing may vary depending on where customers are waiting.

This evolution toward straight-line routes that minimize turns shows the close link between sharing and routing. As the number of passengers sharing a trip moves beyond two strangers sharing part of a trip, it seems imperative to straighten out the routing.

2. Subsidized shared services. Government subsidies of TNC services began with relatively small local governments "partnering" with TNCs to provide trips to transit stops, downtown areas and so forth. Microtransit companies are also prominently involved with government contracting, as discussed earlier with Via's pilot in Arlington, Texas.

Private companies are also using these companies to subsidize commutes to office or university campuses (examples include JP Morgan Chase in Columbus, Ohio and UCLA).

In each of these cases, there are perceived to be benefits that extend beyond the person using them and thus likely beyond what users are willing to pay themselves. The external benefits can be employers' avoidance of the cost of new parking garages, or access to a downtown labor force that does not want to drive to work. Downtown businesses may subsidize circulator bus service to increase accessibility to their stores, restaurants and entertainment offerings.

The external benefits in these examples are specific to businesses who arrange and subsidize the service. But external benefits can also be quite diffuse, spread across multiple employers and other businesses. They also extend to the overall appeal of a city, helping to deliver people efficiently to walkable neighborhoods with a high density of employment, shopping, entertainment and dining opportunities.

The diffuse nature of the benefits means that fully realizing the benefits of high-efficiency modes like buses and trains requires subsidies. Users by themselves would only pay part of the cost of a transit system geared to fully exploit the benefits that come with dense urban development. The rest needs to be underwritten by public funds.

(There is also a converse side to this; external costs such as traffic congestion create the need for public policy intervention, as discussed in Section 7.)

The overall point is that on the spectrum of private to public benefits, some TNC and microtransit service is moving further toward providing clear public benefits that merit subsidies, due to the external and diffuse benefits they provide.

What all this means for the new mobility is that it fast becomes part of a "public transportation" system involving shared, subsidized, straight-line transportation. The challenge for policy-makers is to guide this evolution in ways that contribute toward building high-capacity networks that can provide maximal societal benefit.

7. Solving Big City Traffic Problems

In the six years since TNCs first set up shop in San Francisco, their rapid growth has resulted in billions of additional miles on crowded city streets. This growth is not offset by reduced car ownership; in fact, car ownership is growing across all large U.S. cities. (See page 21.) Thus, as travelers substitute TNCs for the bus or metro, travel by shared modes including transit has declined while automobility – using cars to get around – has grown.

While good for individual travelers, the result is unsustainable for big cities. Big cities thrive because of their dense concentrations of business, leisure and creative activity. Growing auto use works against the key ingredient of density to build economically and socially vital cities. The resulting tensions between the attractive benefits to individuals and the worrying overall effects on cities needs to be addressed.

This tension is most evident in cities like New York and San Francisco where both increased traffic congestion and falling transit ridership are most evident. Some combination of traffic and transit impacts are also evident, or seem to be evident, in Boston, Chicago, Washington DC and other big cities. Concerns are likely to intensify as TNCs continue their rapid growth. (TNC trips increased by 47 percent from 2016 to 2017 in Seattle and by 72 percent in New York; in Chicago, the number of active TNC drivers in Chicago tripled from March 2015 to December 2017.²⁵)

City officials grappling with this dilemma have taken or are considering a range of actions. These include incentives for shared rides, TNC trip fees, congestion pricing, dedicated lanes for buses and bikes, and traffic signal and street designs aimed at improving traffic flow.

This section discusses the potential of each of these approaches to manage the proliferation of TNCs. In addition, this section discusses a framework for reducing the overall amount of traffic on city streets with the goals of improved mobility for everyone across different modes and supporting growth in population, jobs and tourism.

STRATEGIES TO MANAGE CONGESTION

Shared trips

Uber, Lyft and some independent analysts assert that increased adoption of shared trip options will reverse the documented congestion impacts from TNC growth.

Yet in the last six years, TNC growth has added 5.7 billion miles of driving in the nine large metro areas that account for 70 percent of all TNC trips. Growth in shared trips only somewhat modifies the trendline. Overall mileage continues to increase because most riders are shifting from non-auto modes (so there is no reduction in personal vehicle mileage); the added "deadhead" miles between passenger trips adds driving even if the trip itself replaces a personal auto trip; and even then, only part of the ride is shared.

Shifting some private rides to shared rides will not change the overall picture. Even with high levels of shared trips, funneling travelers from space-efficient modes such as public transit, biking and walking, to space-hogging sedans, SUVs and minivans is not a productive strategy to speed traffic.

Some have suggested that while perhaps TNCs currently add to traffic, as they build their volume of shared trips they will attract predominantly auto users rather than predominantly people shifting from transit, walking and biking. This expectation runs counter to how shared services are developing, however. To attract customers to Uber Express POOL and Lyft Shuttle (or now Lyft's Shared Rides), TNCs are now moving toward straight-line routing to minimize travel time. This shift means that users need to walk short distances to the pick-up location. They may have to wait a few minutes to be matched to a driver, and they may also wait a few minutes for the driver to arrive at the pick-up location.

This obviously makes shared trips more and more like conventional fixed route transit service. There are valuable enhancements to TNCs like greater transparency and automatic fare payment. But it strains logic to expect that as TNC shared trips become more like conventional transit trips, this service will attract more people from their personal auto than has been the case up until now. It seems far more credible that TNCs will continue to attract predominantly non-auto users. Another argument for why the future will be different than experience thus far involves fares. The argument is that lower fares will draw motorists to TNCs, first because shared trips are cheaper than private ride trips, and eventually because of autonomous vehicle technology.

This might be the case where travelers are comparing TNC fares with the cost of parking – already a prime reason for drivers to use TNCs. Lower TNC fares might change the "breakeven point" for switching to TNCs. However, relatively few auto trips involve a parking charge (surprisingly, even in Manhattan).²⁶ Parking cost is thus unlikely to drive many more motorists into shared TNCs.

Moreover, the impact of lower fares will be mitigated by the fact that cost is only one factor in mode choice. Travelers tend to give equal or greater weight to convenience, travel time, comfort and so forth. The popularity of SUVs and pick-up trucks testifies to the secondary place of cost (both vehicle purchase and gasoline prices) in consumer transportation choices.

Finally, faith in shared trips as a solution to traffic congestion overlooks the fact that even if a fast and cheap shared ride service attracts auto users, it would also draw heavily from public transit ridership. The new users would continue to be a combination of motorists, transit users and people coming from other modes. The result would also be the same – billions more miles, many on already congested city streets.

Trip fees and congestion pricing

In the most basic terms, the problem that big cities with dense job, population, retail and entertainment activity are facing is simply that TNCs combined with other users of street space are demanding more space than is available. This is the classic "tragedy of the commons," where herdsmen keep adding cattle to the common fields until the cattle lay bare the vegetation that sustains them.

Economists have a ready answer for this problem. Economic theory holds that pricing scarce road space is the best way to address overuse of the public commons. The theory has, helpfully, been shown to work in the form of congestion pricing in London, Stockholm and Singapore, and with high occupancy lane tolls on highways in the United States. Similar plans have been proposed in New York City and discussed in other major cities. Experience with these proposals, as well as with trip fees, shows the limits to pricing strategies for addressing TNC-related traffic congestion.

The most visible form of pricing is fees or taxes on TNC rides. Chicago, Washington DC, Seattle and New York have instituted surcharges or taxes on TNC fares ranging from around 10 cents to \$2.75 per trip. These charges are valuable in producing revenue for transit or other purposes. They also start to establish the idea that TNCs are part of an overall transportation system in which cross-subsidies are required to make the overall system best serve urban mobility needs.

However, there is little expectation that trip fees or taxes will serve to combat traffic congestion. This is the case even in New York where the fee, which takes effect next January, will be \$2.75 per trip.

Fees could be effective if set at a much higher level. A previous Schaller Consulting study estimated that a fee of \$50 per hour in Midtown Manhattan, which translates to about \$10 more in the cost of an average trip, would substantially reduce the number of TNC vehicles in operation. But a fee of this magnitude is not under consideration and would face daunting political headwinds.

In advocating for pricing approaches, some analysts argue for a more holistic approach that includes charges on all vehicle travel including personal autos, TNCs, trucks and so forth, paired with large investments to improve public transit.²⁷ This is certainly an attractive vision for the future of cities and should continue to be pursued. But cordon pricing on the model of London and Stockholm has never gone very far in American cities. Vehicle mile charges have been tested in several states, but implementation seems even further from reach.

In sum, pricing can have an important role in addressing traffic congestion, but obtaining public support is difficult, and in any case, it is not a panacea.

Street management

Over the past decade, major U.S. cities have made major strides in implementing dedicated lanes for buses and bikes and using traffic signal strategies and street designs to improve traffic flow, increase safety and prioritize public transportation. Another response to the pressures created by TNC growth is to redouble these efforts, especially with dedicated street space for buses and bikes.

Both of these space-efficient modes greatly benefit from being separated from the flow of general traffic. Bus lanes improve bus speeds, eliminate the friction that normally occurs as buses pull out of bus stops and help raise the visibility and "readability" of bus service. Bike lanes improve safety and comfort for bike riders. Where physical separation is not feasible, distinctive markings and camera enforcement improves motorist compliance with bus lane restrictions. Traffic signals and street designs can help speed buses and bikes safely through intersections. Strategies such as queue jumps for buses and holding back right turns across bike lanes serve these goals.

More broadly, traffic signal strategies such as adaptive signal control can ease overall traffic congestion by tweaking traffic signal timing in response to current traffic conditions.

Trip fees, congestion pricing, bus lanes and traffic signal timing can help alleviate growing pressures on the fixed amount of street space. But....

While these are proven strategies to reduce congestion, they also have limits that should be recognized. Bus lanes work best where they can occupy a lane free from cross-traffic. Thus, they are ideal on limited access highways and along parks and waterfronts. In downtowns filled with storefronts, offices and cross-streets, bus lane design needs to allow for turns by general traffic and for access to land uses.

Another response to TNC growth receiving increasing attention focuses on busy pick-up and drop-off areas, most notably at downtown entertainment and sometimes office districts. Growth in TNC trips has affected traffic where drivers block moving lanes and bus stops. The goal of designated pick-up and drop-off locations is to make efficient use of curb space, keep vehicles out of adjacent traffic lanes, and to minimize localized traffic impacts from TNC and/or microtransit vehicles.

Washington DC is piloting this approach in DuPont Circle, dedicating formerly on-street parking to TNC pick up and drop offs. The District set aside 60 spaces on Connecticut Avenue between Thursday night and Sunday morning to reduce double and triple parking as bar patrons use TNCs and taxis to go home. San Francisco, Boston and New York are among other cities considering similar zones.²⁸ In addition, San Francisco designated areas where Chariot can pick up and drop off riders, in part to ensure that vans move out of traffic lanes to do so, and in part to ensure they do not block bus stops.

These accommodations align with public policy goals for efficient use of roadway and curb space, efficient bus operations, and to help people avoid drinking and driving. Pilots will help to show how well they improve traffic flow and safety, and how much space is required for successful implementation.

Policies for accommodating TNC and microtransit operations can also be integrated with a broader set of goals. Airports, for example, have paired allowing TNCs to enter their property to pick up passengers with trip fees, to defray their landside costs, and in some cases more stringent checks on drivers or vehicles to protect public safety.

Although these pilots are in their infancy, cities might also look toward leveraging their value to TNCs to minimize the number of empty vehicles in the congested "hot spots," by limiting the number of unoccupied TNCs on these streets. In

... if traffic congestion remains unacceptable, policy makers should look toward a more far-reaching goal: less traffic.

addition, cities could require that companies using designated street space serve all potential patrons. Wherever space on public streets is reserved to accommodate TNC or microtransit operations, these services should be expected to accommodate all members of the public, including people using wheelchairs and people who do not have a smartphone available to request a ride.

STRATEGIES FOR LESS TRAFFIC

The above strategies seek to relieve the pressures that arise from TNC growth and myriad other demands on a fixed amount of real estate on big city streets. Each strategy has value and is worth pursuing, but it is also important to recognize the limits to the amount of traffic relief they can provide.

In some cities, the strategies may suffice to support city goals of mobility, safety, equity and sustainability. Others may find that they need to do more. In the latter case, policy makers should adopt the more far-reaching goal of less traffic. Rather than trying assorted techniques to wedge more vehicles into city streets, the goal should shift to reducing the number of vehicles. This means making space-efficient modes such as buses and bikes the preferred means of transportation on the core attributes that most affect mode choice, namely, speed, reliability, comfort and cost.

Currently, TNCs are highly attractive to their affluent and generally well-educated customers for perfectly rational reasons. Aside from cost, the individual traveler has every incentive to use the least space-efficient means of transportation – TNCs are most often faster and more reliable and provide a higher level of comfort and privacy.

The solution is to flip the incentives by making space-efficient modes more attractive than personal autos or cars-for-hire.

With less traffic, streets and intersections can be designed to provide turn lanes, areas for picking up and dropping off passengers and for freight deliveries that improve safety and traffic flow. Less traffic also creates room to make cycling feel safe and comfortable, as with separated bike lanes. Less traffic also alleviates conflicts between through bus movements and access to adjacent land uses for other vehicles, a key design issue for bus lanes.

The result is a street network in which all users – personal autos, buses, TNCs, microtransit, bicyclists and perhaps even people on electric scooters – can move safely and at a reasonable speed.

Getting to this can seem like a daunting task. But the rapid growth of TNCs is in a sense an opportunity. The resulting clogging of traffic has become an increasingly visible problem, putting in sharp relief the fact that crowded streets do not have room for everyone to move about with their own car and driver and the need to make buses in particular compete with TNCs.

The problem, to be sure, stems not simply from TNC growth. But the issue is not "who causes" (it is obviously a combination of TNCs and growth in deliveries, construction, population, jobs, tourism and so forth). The issue is what to do about it.

Three strategies can move cities toward the goal of less traffic, addressing use of personal motor vehicles, growth of TNCs and commercial vehicles, and the essential role of highcapacity transit.

1) Discourage personal vehicle use in congested areas.

This can be perhaps the most difficult of the three steps discussed here. The public has a very strong aversion to government limiting their option to drive into even the most traffic-clogged downtown. This aversion is not necessarily because they will choose to do so (although some obviously will), but because they want to reserve the choice of doing so when the benefits of driving outweigh the inconveniences of traffic and parking cost and hassle.

There are two demonstrated solutions to this issue.

The first involves parking supply. New York City eliminated parking requirements for new residential construction in the Manhattan business district in 1982 and limited the amount of other parking that could be built. The number of public parking spaces decreased from approximately 127,000 in 1978 to 102,000 in 2010.

Constraints on parking supply combined with population and employment growth pushed up the cost of off-street parking. One survey found that the average daily cost for offstreet parking is \$42 in New York City, well above the figures of \$34 in Boston, \$30 in Chicago and \$28 in San Francisco. Monthly parking rates are also significantly higher in New York (\$616) than in these other cities, which range from \$265 to \$425 per month.²⁹

Due to the high cost of parking, only 11 percent of people entering the Manhattan business district during the morning peak travel by car, while 89 percent travel by public transportation.³⁰ Notably, many drivers entering the CBD either are driving through (and are unlikely to pay for parking at their destination), or avoid personally paying for parking because they park on-street, find free off-street spaces, or use employer-paid parking spaces.³¹

A proposal for a \$20 or \$30 tax to park in Manhattan would face even steeper odds against adoption than congestion pricing. But a policy to limit parking, which has had the same effect, has met with no opposition.

A second solution is to limit or even ban low-occupancy vehicles from certain streets at designated times of the day. Cars are banned from 16 Street in downtown Denver and Fulton Street in downtown Brooklyn, for example, making both into transit-only streets. Cars use parallel streets as an alternative.

A related approach is to allow drivers to use a street to access local stores, offices and the like, but not allow through movements. Seattle, which is nearly the only U.S. city to show recent transit ridership growth, limits Third Avenue to buses and cars that are then required to turn at the next intersection during the morning and afternoon peak period. In Manhattan, this approach is also planned for 14th Street during the shutdown for repairs of the L line subway. It has also worked on Broadway, where drivers are forced to turn as they approach plazas installed in the late 2000s in Times Square and Herald, Madison and Union Squares. There is thus some auto and truck traffic on Broadway between these turn-off points, but it is very light throughout the day.

Either of these approaches, or some combination, can be used to limit (while not charging directly or eliminating) the number of personal motor vehicles in major congested areas. These steps can be tailored to specific goals and local circumstances – applying to short street segments or entire areas, throughout the day or for selected times of the day.

Over time, even limited steps to contain auto use are productive, yielding less traffic and opening up another opportunity to take further actions. Several European cities including Paris, Copenhagen and Amsterdam, have produced large drops in vehicle volumes through a long series of actions – none of which, notably, involved congestion pricing.

2) Set space-efficiency requirements for fleetoperated vehicles (e.g., TNCs, taxis and commercial vehicles)

The goal of space-efficiency requirements is to keep the number of vehicles within the capacity of the street for freeflow operation. Offering high-capacity transit, buses should have priority. As discussed above, personal autos need to be limited. Remaining capacity could then be used by fleets which would be limited through caps or some type of spaceefficiency standards.

TNCs and taxis represent a low-hanging opportunity since they spend approximately 40 percent of their time between trips. In congested areas such as the Manhattan business district, this means there are an unnecessarily large number of empty vehicles clogging traffic, far more than needed to ensure satisfactory wait times for the next customer to request a ride.³² Similarly, commercial vehicles often double park while making deliveries or plumbing, electrical or other repairs, also clogging traffic even when there may be curbside parking spaces nearby.

The result, like the "tragedy of the commons," is that TNC and taxi drivers, delivery drivers and everyone else gets one thing they want at the moment (quick pickup, park across from the premise entrance), but at the increasing cost for everyone of how long it takes to move around town. Public policy has long tried to address these issues for taxicabs. Vehicle caps have been used for taxicabs for decades in major cities across the country. They have been applied to overall fleet size, however. Rather than reducing traffic in the most congested part of town, the result has been that cab drivers tend to concentrate in congested downtown areas where trip demand is most intense.

A better approach is to limit the number of vehicles in the congested area (e.g., downtown, or an entertainment district) at any one time.

The limit would apply to all phases of drivers' operations – transporting passengers and time between trips. TNCs would have strong incentive to reduce time between trips and maximize time transporting passengers, as well as to encourage shared trips. Companies might alter dispatch procedures to discourage drivers from deadheading into congested areas when they are not needed. They might provide faster pick-ups to pooled than private-ride customers.

Another approach is to mandate passenger occupancy levels. TNCs typically have an average of 1.1 passengers at any one time, taking into account the size of the typical traveling party (estimated at 1.5), rate of pooling (assumed to be 20 percent) and amount of time with passenger versus between trips (approximately 60 percent versus 40 percent, respectively). Cities could mandate that TNCs average a higher occupancy rate. The goal would be to reduce vacant time between trips (now around 40 percent) and reach much higher vehicle occupancy rates.

Commercial vehicles could also be subject to efficiency standards tailored to their operations. Much of the traffic impacts from commercial vehicles arises from doubleparking to make deliveries and while repair or installation personnel are inside nearby premises. Cities could use invehicle GPS technology to track where commercial vehicles are during the day and impose fines or other sanctions for vehicles that do not use designated curb space for deliveries and other activities. It would be incumbent on the city to also make sure there are adequate delivery zones for this purpose.

3) Provide frequent bus service (and rail service where available)

High-capacity transit is clearly the backbone of any big-city transportation system. Only high-capacity vehicles create efficiencies in the use of street space that make possible dense urban centers with lively, walkable downtowns; a rich selection of jobs, restaurants, entertainment and other activities; diversity of population; and intensive and

The overall vision is for less traffic and greater ease of movement for everyone regardless of mode for a given trip.

inventive face-to-face interactions that make cities fertile grounds for business and artistic innovation. If everyone drives their own car to the city center, the need for parking to accommodate the cars would make impossible this density of jobs and activities.

Less traffic on city streets makes buses far more attractive than they are today – faster trips, more reliable, and greater frequency even with the same number of buses on the street. Attractive bus service creates a virtuous circle since the more people ride the bus, the more service a transit agency will likely put on the street. It also becomes far easier to transfer between buses since the main impediment to transferring is uncertainty about wait times before the next bus arrives. Easier transfers allow for simpler route structures, since transit planners have less need to connect disparate trip ends. Simplicity itself is valuable in making it easier for potential patrons to find their way.

* * *

The overall vision is thus for less traffic and greater ease of movement for everyone regardless of mode for a given trip. Ideally, a combination of these steps would be implemented as a package in large geographic areas. Change does not come easily, of course, so it is valuable that these steps can be taken on a small scale as well. They could be put in place along a few blocks during select hours for special events (which is already often the case) or at peak nighttime entertainment hours, or during the morning rush hour. Officials can experiment, learn what works, show success, and create another virtuous cycle that supports expansion of these steps.

8. Implications for Autonomous Vehicles

After years of development and testing, several companies are operating truly autonomous vehicles in passenger service – vehicles without a "safety manager" who can intervene in case something goes wrong. Many of the early implementations involve shuttles that run short distances on fixed routes that can be mapped in detail, providing an opportunity for real-world testing and for the general public to experience autonomous technology.³³

Beyond shuttles, Waymo is transporting passengers in the Phoenix area in fully autonomous vehicles that pick-up passengers who request a trip using a smartphone app. General Motors has indicated it plans a similar roll-out in one or more major cities, likely including San Francisco in 2019. Other companies are also likely to enter the mix such as Daimler/Mercedes Benz, Aptiv and others.³⁴

Whether working with Uber or Lyft or setting up their own shared ride services, these companies are expected to use a TNC service model. They are also expected to deploy the service in dense urban centers where constant use will spread the cost of AV technology across many trips.³⁵

A critical and much-discussed issue is whether this path leads to a "heaven" or "hell" outcome, to use the dichotomy coined by Robin Chase. In the "heaven" scenario, people rely on shared autonomous vehicles and expanded public transit; electric vehicles replace gasoline power thus reducing greenhouse gas emissions; and acres of surface parking are replaced with parks, affordable housing and other active land uses. In the "hell" scenario, autonomous vehicles induce sprawl as people are less concerned about long commutes; miles driven and traffic congestion increase in both cities and suburbs; empty cars cruise city streets instead of paying for parking; and public support for bus and rail service erodes, leaving lower-income people stranded.

Whether self-driving vehicles lead to heaven or hell depends in large part on whether people want to use shared autonomous services. A widely-cited travel model for Lisbon, Portugal, for example, found that traffic could increase by approximately 50 percent if travelers favored autonomous "regular taxis" that are not shared. On the other hand, the model showed a 37 percent decline in vehiclekilometers, and total elimination of congestion, under a shared-taxi scenario. The latter, more heavenly, scenario envisioned six-seat vehicles providing on-demand, door-todoor shared rides; eight-person and 16-person mini-buses that serve pop-up stops on demand and provide transfer-free rides; and rail and subway services continuing to operate as currently.³⁶

Other travel models have found either large increases in vehicle mileage or large reductions, depending on assumptions about which types of services – shared or private – prove most popular.³⁷

Based on today's TNC experience, the service model of sixseat, on-demand, door-to-door shared rides does not appear viable. Even in the nation's densest urban areas, the large majority of Uber and Lyft rides are private rides – one traveling party per trip. Few door-to-door shared rides involve more than two traveling parties. Moreover, many customers who select the shared option are not matched to anyone else; they thus have the benefit of both the lower shared-ride fare and direct door-to-door service.

To try to put more passengers into their vehicles, Uber and Lyft are expending substantial resources promoting walk-tothe-stop services like Uber Express POOL and Lyft Shared Rides. They hope that straightening out the route will attract more passengers, even with walking to a pick-up location. (See discussion in box on page 26.) Whether this will substantially increase average vehicle occupancy remains to be seen. Already using relatively straight-line routing, Via (using mostly minivans) is averaging less than two-person occupancy in both Manhattan's high-density environment and in its Arlington, Texas pilot.

On the other hand, TNC experience has proven the appeal of private ride TNC service, e.g., the "regular taxis" in the Lisbon model that lead to large increases in traffic congestion. If autonomous technology reduces costs and lowers fares, growth of private ride (autonomous) TNCs would certainly accelerate. The result would be further increases in driving, whether patrons were converting from their own car or from public transit, walking, biking or not making the trip.

In sum, given current TNC experience, it is unlikely that shared, door-to-door services will become a major component of urban transportation systems in the autonomous future. What seems far more likely is the continued centrality of two time-honored modes: door-to-door private ride taxis, and fixed-route transit. Both modes can be enhanced by technologies now in use by TNCs and microtransit to provide greater transparency and manage operations in real-time, and by autonomous technologies that promise to dramatically improve safety and reduce costs. But these two service models seem likely to be the mainstays of the autonomous future.

There are many benefits to public transit in this scenario. By eliminating labor costs, autonomous fixed-route transit can likely be operated at much higher frequencies and thus with smaller vehicles that make fewer pick-ups and drop-offs, further speeding service. They might be programmed like modern elevators, where customers indicate where they want to go and a smartphone app tells them which vehicle to take (not necessarily the next one) to further optimize efficiency. It may also become far easier to transfer between buses (or minibuses) since the main impediment to transferring is long and uncertain wait times for the next bus. Easier transfers mean that far more origin and destination trip pairs can be accessed readily, further strengthening transit offerings.

Without public policy intervention, however, the first steps into an autonomous future are almost certain to greatly exacerbate big-city traffic congestion. Cheaper, better taxi service may draw patrons from both personal auto and transit, but in either case will add mileage to city streets. Straight-line shared minivans, vans and minibuses will also add to vehicle mileage as people move to these services from high-capacity buses and trains. Add in induced trips and the effects of additional density from less need for parking, and the demand on urban streets intensifies further.

There are many issues beyond the scope of this report involved with planning for the self-driving future. But the issue of traffic, by itself, clearly highlights the central role that public policy must play in planning and implementation of self-driving services.

As with today's mix of personal autos, TNCs, taxis, commercial vehicles and buses, the central goal should be to reduce traffic and emissions and improve safety while ensuring quick and reliable mobility to the entire population. As is the case today, this will mean aligning individual incentives with societal goals to make high-efficiency modes the preferred means of transportation, particularly in dense urban centers. Buses and trains need to be the fastest, most convenient and reliable and most comfortable way to get around town.

The labor savings from AVs can be quite helpful in realizing this future, both in improving safety and increasing frequency and reliability. But unless there are public policy interventions (see discussion on pages 28-31), the likelihood is that the future mirrors today's reality: more automobility, more traffic, less transit, and less equity and environmental sustainability.

> Without public policy intervention, however, the first steps into an autonomous future are almost certain to greatly exacerbate big-city traffic congestion.

The challenge for policy makers is to steer development of AV services away from this future. The good news is that policy makers need not wait until AVs arrive. Officials can start today with TNCs and personally driven autos. And in fact, it is critical that they do so. Officials must set public policy on the right path to reach goals of mobility, safety, equity and sustainability today, before auto makers, tech companies and TNCs – all of whom will have invested billions of dollars in autonomous technologies and will be competing fiercely for market share – arrive at their doorstep pressing AVs onto city streets.

9. Conclusion

Cities across the United States are seeing increased TNC ridership, car ownership, driving miles and traffic congestion. Increased access to auto modes brings notable benefits to individual users. Benefits are most compelling outside city centers where public transportation is less available or less frequent and many residents endure long commutes and difficulty getting around town.

As one moves toward the core of major U.S. cities, however, these trends become clearly problematic. The short-term risks are traffic-clogged streets that slow those in cars and buses, endanger pedestrians and cyclists and erode urban quality of life.

The new automobility's longer-term risk is that neighborhoods are simply overwhelmed by traffic volumes and become less desirable places to live, work and do business. The outcome could eventually be to decongest cities by de-densifying their cores. This has happened before – traffic flowed remarkably freely in Midtown Manhattan after New York City's severe employment and population declines of the mid-1970s.

Policy-makers can respond in several different ways. They can do their best navigating the tradeoffs between better individual mobility and more traffic and slower (and likely reduced levels) of transit service. Alternatively, policymakers can intervene more decisively toward the goal of less traffic. As discussed in section 7, cities have the means (although public support is another matter) to limit auto use, control TNC operations and add frequent transit service.

The tensions between these choices are most evident today in New York City and San Francisco and to some extent in other large cities. As TNC ridership grows at double-digit rates, more cities are likely to feel pressures to formulate public policy responses.

The pressures are likely to accelerate when autonomous technology comes to large, dense urban environments. At that point, the clash between fundamental opposing forces will come fully into play – between cities' need for density of population, jobs and activities and individuals' preference for their own car and driver, or at least their nimble van or minibus a short walk away.

In addition to the risk for cities, there may also be far-reaching risks for companies providing autonomous vehicle services. The companies span quite a range, from TNCs that are now scooping up carshare, bikeshare and scooter companies in hopes of becoming one-stop transportation portals, to legacy automakers who see their future in "mobility as a service," with tech companies also in the mix.

The risk to these companies is that their vision becomes associated in the public mind with traffic-clogged streets, social inequity for those left behind in this transportation transformation – those without smartphones, disabled persons and TNC drivers whose profession will slowly disappear.

Recent history suggests that this is likely a blind spot for corporate leaders who deeply believe that their companies' missions and value propositions have broad societal benefits. Airbnb's goal was to help apartment dwellers make some money renting out a spare bedroom but was eventually perceived to fuel higher rents and gentrification. Similarly, Facebook's goal of connecting people around the globe eventually led to its use by a foreign government seeking to interfere with an American presidential election.

But just as herdsmen cannot by individual action fix the problem of overgrazing on the town commons, TNCs and prospective AV companies can do little to stem movement toward a traffic-clogged future. The task thus goes to city officials who will have to decide whether to control the proliferation of smaller vehicles and make public transit competitive with "your own car and driver."

For cities, the stakes are quite high. In a highly competitive global economy, cities thrive only if they create the conditions for innovation and excellence. Density and diversity of firms, talent, culture and entertainment are the essential ingredients.

For that, cities need less driving, not more. Cities that figure out the path toward that goal will emerge the winners.

Appendix. Commuting and Vehicle Ownership in 20 Large Cities

Characteristics of selected large cities discussed in Section 2. Except for the first column (2015 city population), data are for urban zip codes within each city, defined as zip codes with 4,000 or more persons per square mile. Data shown are from the American Community Survey for 2011 to 2015 (5-year average).

			Urban zip codes only						
City 9 large/densely-	2015 city popn	Pct of popn. in urban zip codes es	2011-15 popn	Popn density	Pct commute by public transit	Pct walk to work	Pct of HH with no vehicle	Aggregate vehicles per household	
New York	8,550,405	96%	8,206,846	27,655	56%	10%	55%	0.6	
Los Angeles	3,971,896	82%	3,239,225	10,083	12%	4%	14%	1.5	
Chicago	2,720,556	100%	2,714,734	11,333	27%	7%	27%	1.1	
Philadelphia	1,567,442	95%	1,489,299	12,060	27%	9%	34%	1.0	
San Francisco	864,816	94%	817,031	17,229	33%	10%	30%	1.1	
Boston	669,469	93%	624,550	12,813	33%	15%	36%	0.9	
Washington	672,228	92%	618,846	10,143	38%	12%	37%	0.9	
Seattle	684,443	85%	581,968	7,407	20%	9%	16%	1.4	
Miami	440,989	77%	341,612	10,658	11%	4%	19%	1.2	
11 large/less der	nsely-populate	d cities							
Houston	2,298,628	53%	1,208,147	5,463	5%	2%	12%	1.4	
Detroit	677,124	100%	730,918	5,179	9%	3%	24%	1.1	
Dallas	1,300,082	51%	658,194	4,725	4%	2%	10%	1.4	
San Diego	1,394,907	46%	645,475	5,957	5%	4%	10%	1.6	
Baltimore	621,849	98%	607,972	7,164	17%	7%	29%	1.1	
San Jose	1,026,919	55%	561,839	8,441	4%	2%	6%	1.9	
Denver	682,545	69%	470,745	5,453	7%	5%	13%	1.5	
Phoenix	1,563,001	30%	466,055	3,504	5%	3%	15%	1.4	
Milwaukee	600,154	75%	452,234	7,392	10%	5%	20%	1.2	
San Antonio	1,469,824	29%	429,453	3,736	6%	4%	14%	1.4	
Minneapolis	410,935	93%	384,130	6,606	13%	7%	18%	1.3	

Endnotes

² Metropolitan Area Planning Council, "Fare Choices: A Survey of Ride-Hailing Passengers in Metro Boston," February 2018. Author's analysis of National Household Travel Survey data. The 1.5 passengers per trip is for trips under 30 miles.

³ Transportation Research Board, Between Public and Private Mobility: Examining the Rise of Technology-Enabled Transportation Services, TRB Special Report 319, December 2015

⁴ Jeremy Kolko, "How Suburban are Big American Cities?" blog post on FiveThirtyEight website, May 22, 2015.

⁵ Revenue increased by 21 percent for taxi companies from 2007 to 2012. U.S. Department of Commerce, *Economic Census*, 2007 and 2012.

⁶ Winnie Hu, "Uber, Surging Outside Manhattan, Tops Taxis in New York City," New York Times, October 12, 2017.

⁷ Marco della Cava, "Blacks face longer wait times on Uber, Lyft than other races – worse for taxis, study says," USA Today, June 28, 2018.

⁸ Metropolitan Area Planning Council, "Fare Choices: A Survey of Ride-Hailing Passengers in Metro Boston," February 2018.
⁹ New York City Department of Transportation, "NYC Mobility Report," June 2018.

¹⁰ Masabi, "New Mobility Survey Finds Over One-third of Americans are Combining Public Transit with Ridesharing," press release, May 8, 2018.

¹¹ Sidecar's goal was not just transportation, but to create a "transportation social network" that would "bring back a sense of community and connection to our cities." Sunil Paul, CEO of Sidecar, quoted in "Need a Ride? SideCar helps you catch rides with fellow drivers in San Francisco," June 26, 2012.

¹² Source: New York City Taxi and Limousine Commission data provided to author pursuant to Freedom of Information request.

¹³ Data from New York City show that 52 percent of shared trips overlap, e.g., just over one-half of an individual's trip is shared with the second or third passenger.

¹⁴ Requirements for low-emission vehicles could address remaining concerns about vehicle emissions in areas where traffic congestion is not a public policy focus.

¹⁵ Federal Highway Administration, "U.S. Driving Increases for Sixth Straight Year, New Federal Data Show," August 29, 2017. U.S. vehicle miles traveled increased 8 percent increase from 2010 to 2017.

¹⁶ Michael Manville, Brian Taylor, Evelyn Blumenberg, "Falling Transit Ridership: California and Southern California," Institute of Transportation Studies, UCLA, January 2018 ; Schaller Consulting, "Making Congestion Pricing Work for Traffic and Transit in NYC," March 2018; Metropolitan Washington Council of Governments, "Vehicle census shows what's on our region's roads," TPB News, March 13, 2018.

¹⁷ Sources used throughout this section are: National Academies of Sciences, Engineering, and Medicine, *Legal Considerations in Relationships Between Transit Agencies and Ridesourcing Service Providers*, The National Academies Press, 2018; Craig Lader and Naomi Klein, "Westchester County Bee-Line System First and Last Mile Connections Mobility Study," Westchester County Department of Public Works and Transportation, February 2018; Tim Cane, "Innisfil Transit – Launch of Stage 2," Staff Report, Town of Innisfil (Ontario), March 7, 2018; John Urgo, "Flex V. Fixed: An Experiment in On-Demand Transit," Transit Center Connections blog, May 15, 2018.

¹⁸ Personal interview with Alex Lavoie, Via General Manager, United States and Andrei Greenawalt, Vice President for Public Policy, May 25, 2018.

¹⁹ See Elizabeth Ellis, Use of Taxis in Public Transportation for People with Disabilities and Older Adults, Transit Cooperative Research Program Synthesis 199, Transportation Research Board, 2016. Nelson\Nygaard Consulting Associates, Local and State Partnerships with Taxicab Companies, National Cooperative Highway Research Program Research Results Digest 366, Transportation Research Board, 2012.

²⁰ Personal interview with Alex Lavoie, Via General Manager, United States and Andrei Greenawalt, Vice President for Public Policy, May 25, 2018.

²¹ Businesswire.com, "Keolis Awarded Contract to Operate On-Demand Microtransit Pilot for the Orange County Transportation Authority," April 18, 2018.

²² Skip Descant, "L.A. Metro Contracts for Feasibility Study," Techwire, May 4, 2018.

²³ Personal interview with Alex Lavoie, Via General Manager, United States and Andrei Greenawalt, Vice President for Public Policy, May 25, 2018.

²⁴ This was a frequent theme in interviews with both company representatives and city personnel. For example, Chariot's CEO, Dan Grossman, has commented that Chariot is working with cities very closely to "understand the business and how it fits into cities and transit" systems. Telephone interview, July 24, 2018.

¹ Becky Peterson, "Lyft is getting a big boost from Uber's struggles," Business Insider, Jun. 21, 2017.

²⁵ Mary Wisniewski, "Ride-sharing surges in Chicago, raising congestion worries," Chicago Tribune, February 2, 2018.

²⁶ New York City Department of Transportation, "NYC Mobility Report," June 2018.

²⁷ Lew Fulton, Jacob Mason and Dominique Meroux, "Three Revolutions in Urban Transportation," Institute of Transportation Studies, University of California, Davis, May 2017.

²⁸ Benjamin Schneider, "In a popular bar area, the District wants to see what happens when it removes parking spaces to make room for ride-hailing services," *CityLab*, October 25, 2017.

²⁹ Parking Property Advisors and Parkopedia, "Top 40 U.S. Cities Parking Index, 2018," March 2018.

³⁰ New York Metropolitan Transportation Council, "Hubbound Travel Data, 2016," December 2017.

³¹ New York Metropolitan Transportation Council, 2010/2011 Regional Household Travel Survey

³² Schaller Consulting, "Empty Seats, Full Streets," December 2017.

³³ Jason Plautz, "Autonomous shuttles launch in Detroit," *SmartCitiesDive*, July 3, 2018. Esther Fung, "City Planners, Property Developers Fuel Push for Driverless Vehicles," *Wall Street Journal*, May 29, 2018.

³⁴ David Welch and Elisabeth Behrmann, "Who's Winning the Self-Driving Car Race?" *Bloomberg News*, May 7, 2018.
 ³⁵ Ibid.

³⁶ International Transport Forum, "Shared Mobility: Innovation for Livable Cities," Corporate Partnership Board Report, 2016.

³⁷ For recent summary of relevant research, see Caroline Rodier, "Travel Effects and Associated Greenhouse Gas Emissions of Automated Vehicles," University of California at Davis, April 2018. See also Daniel Fagnant and Kara Kockleman, "The travel and environmental implications of shared autonomous vehicles, using agent-based model scenarios," *Transportation Research Part C*, 40 (2014), pp. 1-13; Daniel Fagnant and Kara Kockleman, "Dynamic Ride-Sharing and Optimal Fleet Sizing for a System of Shared Autonomous Vehicles," *Proceedings of the 94th Annual Meeting of the Transportation Research Board*, Washington, DC, January 2015.

Attachment B

Gibson Transportation Consulting, Inc. Qualifications and Resumes



Gibson Transportation Consulting, Inc. was formed in 2009 to provide the highest quality traffic engineering, transportation planning, and parking consulting services to both public and private sector clients. We offer over 200 years of collective transportation analysis experience, most of which has been gained on projects located in Southern California and across the western United States. We specialize in the preparation of the transportation and parking sections of environmental documents for large and small development projects, general and specific plans, and regional and local transportation projects. We work collaboratively with multi-disciplinary teams to produce clear, logical, and readable technical reports, and we excel in interaction with the public and with decision-makers to explain the analyses and the mitigation programs contained in those reports. We work on a wide variety of projects that vary in both size and scope, and our primary goal is to effectively serve all of our clients.

Gibson Transportation Consulting prepared transportation studies for some of the largest and most controversial development projects in Southern California including Century City Center, Playa Vista, the NBCUniversal Evolution Plan, Bakersfield Commons, and Wilshire Grand Center.

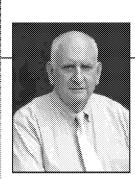
Gibson Transportation Consulting is currently conducting transportation analyses for Dodger Stadium, Disneyland, the AMPAS Academy Museum of Motion Pictures, The Citadel Outlets, and the Los Angeles County Museum of Art. We are also conducting studies for the Master Plans for Paramount Pictures Studios and the University of Southern California, as well as studies for multiple residential and mixed-use projects in Hollywood and Downtown Los Angeles. Gibson Transportation Consulting led the transportation studies for the award-winning Memphis Aerotropolis: Airport City Master Plan in Memphis, Tennessee and we recently completed studies for the University of Redlands, Cal Poly Pomona, The Huntington Library Education and Visitors Center Project, the LAX Northside Plan Update, a proposed minor league professional baseball stadium in the Central Valley, a renewable energy center in Rialto and for Disney | ABC at its Golden Oak Ranch in the unincorporated Santa Clarita Valley area of Los Angeles County.

We are preparing, or have prepared, traffic and parking studies for Westfield LLC at its regional shopping centers at Carlsbad, Culver City, Eastland, MainPlace, North County, Promenade, Santa Anita, Topanga, University Towne Centre, Valencia Town Center, The Village at Westfield Topanga, and West Covina; for The Irvine Company at its regional shopping centers at Fashion Island, Irvine Spectrum Centre, and Tustin Marketplace, as well as its entire neighborhood shopping center portfolio; for RREEF/Jones Lang LaSalle at Manhattan Village and Villa Marina Marketplace; for Macerich at Fashion Outlets, Lakewood Center, Los Cerritos Center, Panorama Mall, Santa Monica Place, and the Westside Pavilion; for General Growth Properties at Stonestown Galleria in San Francisco and Fallbrook Center in Los Angeles; and for The Original Farmers Market in Los Angeles.

Gibson Transportation Consulting staff members have extensive experience in event center and stadium planning, and have conducted traffic and parking studies, prepared parking lot designs, and developed parking management plans for Levi's Stadium (San Francisco 49ers) in Santa Clara; Dodger Stadium, STAPLES Center, and the Los Angeles Memorial Coliseum in Los Angeles; the Rose Bowl in Pasadena; StubHub Center in Carson; The Gardens Casino in Hawaiian Gardens; Angel Stadium and the Honda Center in Anaheim; LEGOLAND California theme park in Carlsbad, California; Skypark at Santa's Village in Skyforest, California; University of Phoenix Stadium (Arizona Cardinals) and Gila River Arena (Phoenix Coyotes) in Glendale, Arizona; Arizona Stadium in Tempe, Arizona; Huangguoshu Falls in Guizhou Province, China; and the Dubailand Theme Parks in Dubai, United Arab Emirates.

We prepared the shared parking element of the award-winning Fullerton Transportation Center (FTC) Specific Plan for the City of Fullerton, and we worked with the City of Buena Park planning the traffic and parking requirements for its growing E-Zone entertainment district. Other recent projects include parking and traffic studies for the Cities of Anaheim, Arcadia, Brea, Burbank, Culver City, Downey, Monrovia, Pomona, San Marino, Santa Monica, and Whittier, California; the City of Fairfax, Virginia; the Port of Los Angeles; and the California Department of Transportation. Our financial pro forma analyses have supported the sale of parking revenue bonds for the Aquarium of the Pacific garage in Long Beach and the PETCO Park garage in downtown San Diego.

Gibson Transportation Consulting is a certified Small (Micro) Business Enterprise with the State of California, a Local Small Business Enterprise with the County of Los Angeles, and a certified Small Local Business with the City of Los Angeles.



EXPERIENCE

49 Years

EDUCATION

Master of Science, Transportation Engineering, Northwestern University

Bachelor of Science, Engineering Science, Oakland University

CERTIFICATIONS

Civil Engineer, States of California, Arizona, Illinois, and Nevada

Traffic Engineer, State of California

Professional Traffic Operations Engineer, National Registration

AFFILIATIONS

Institute of Transportation Engineers, Fellow, Life Member

Committee Member on Design of Regional Shopping Centers

PUBLICATIONS

Shared Parking, 1st and 2nd Editions, Urban Land Institute and International Council of Shopping Centers

Parking Requirements for Shopping Centers, 2nd Edition Urban Land Institute and International Council of Shopping Centers

Fast Food Restaurant with Drive-Through Pass-by Travel Survey Presented at Institute of Transportation Engineers Intermountain Section Meeting, May 2011

Patrick A. Gibson, P.E., PTOE President

Pat Gibson has nearly 50 years of experience in preparing traffic and parking analyses for both public and private sector projects, including event centers and stadia, theme parks, movie studios, schools and universities, hospitals and medical centers, office buildings, shopping centers, residential projects, and industrial uses.

Current and recent projects include Angel Stadium, Century City Center, The Disneyland Resort[®], Dodger Stadium, Dubailand Theme Parks, The Huntington Library, LAX Northside Plan Update, Levi's Stadium, Lucas Museum of Narrative Art, Paramount Pictures Studios, The Village at Westfield Topanga, Universal Studios Hollywood, University of Southern California, the Veterans Administration Long Beach Healthcare System, and Wilshire Grand Center. Pat also currently serves as the City Traffic Engineer for the City of Monrovia, California.

Other current projects include The Citadel, Santa Clara Square, Sportsmen's Lodge, Terminal Annex, Tustin Marketplace, and Union Station, as well as numerous projects in Burbank, Commerce, Glendale, Los Angeles, Newport Beach, Pasadena, and Temecula. Pat recently completed studies for ABC's Golden Oak Ranch, California Polytechnic University, Pomona, Irvine Spectrum Center, Los Angeles Memorial Coliseum, Los Angeles Streetcar, Millenia Town Center, University of Redlands, Westfield Santa Anita, and theme parks in China and Dubai, UAE.

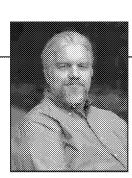
Pat has directed parking needs, feasibility, and functional design studies, as well as numerous shared parking and parking financial analyses, throughout the United States, including over 50 downtown parking studies, such as the Downtown San Jose Parking Management Plan, Downtown Pomona Parking Management Plan, and downtown parking studies for Beverly Hills, Brea, Buena Park, Fullerton, Long Beach, Los Gatos, Monrovia, Pasadena, San Diego, Temecula, and Whittier, California.

Pat began his career in Chicago, where he specialized in studies for regional shopping centers across the United States, new town transportation planning for towns in the Midwest and Canada, and large-scale traffic safety studies for the federal government. Pat came to California, first to San Jose and then to Southern California, to run his company's traffic engineering and transportation planning practice.

Pat co-authored both editions of Shared Parking as well as Parking Requirements for Shopping Centers, 2nd Edition for the Urban Land Institute and International Council of Shopping Centers.

Pat was named Outstanding Transportation Educator by the Institute of Transportation Engineers Western District and was twice named Civil and Environmental Engineering Department Lecturer of the Year at the University of California, Los Angeles.





EXPERIENCE

27 Years

EDUCATION

Bachelor of Arts, Theatre University of California, Riverside

Brian Hartshorn Senior Associate

Brian Hartshorn has 27 years of experience in large and small scale transportation impact reports, including new development, redevelopment, land use modifications, general plan amendments, parking, access and circulation review studies throughout Southern California. Brian specializes in complex network analyses, coordinated systems analyses, large data collection projects, specific plans, and micro-simulation for planning, operational, and presentation needs.

Brian recently created micro-simulations and circulation studies for NBCUniversal to demonstrate the effect of freeway ramp alternatives and driver travel times, and toll plaza discharge rates. He built a micro-simulation for the Downtown Los Angeles Streetcar alignment to test travel speeds and delays within the corridor which required application of advanced detection and priority signal phasing. Other micro-simulations have been calibrated to test pedestrian movement through busy intersections, including "scramble" type operations and/or grade separated crossings, as well as public transit stops, fixed rail systems, and bicycle corridors. He is currently involved in several circulation improvement projects for area schools with complex pick-up and drop-off activities, as well as managing large scale data collection efforts for projects requiring annual reporting of trip caps. Ongoing projects include traffic impact studies for large transit oriented developments and mixed-use projects throughout the area, including the Jefferson & La Cienega and College Station projects, among other similar uses in Chinatown, Downtown, and those clustered near high-volume transit corridors, and continues to work on redevelopment projects from San Diego to Los Angeles.

After graduating from the University of California, Riverside with a degree in Theatre, Brian worked as a theatre director and stage manager in Southern California and New York City before joining the world of transportation engineering in San Diego.

EXHIBIT 3



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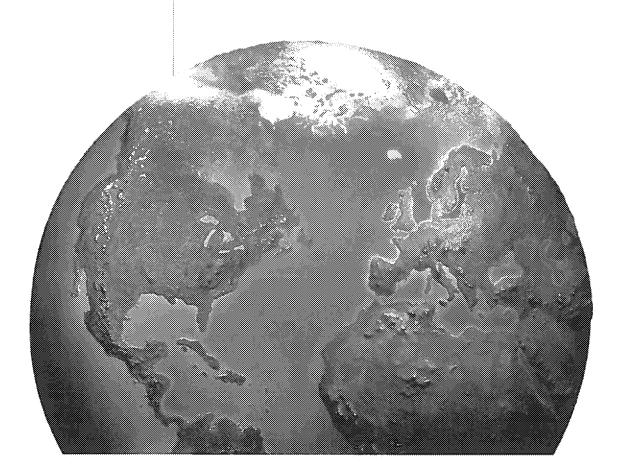
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Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects

HEI Panel on the Health Effects of Traffic-Related Air Pollution



Traffic-Related Air Pollution

A Critical Review of the Literature on Emissions, Exposure, and Health Effects

HEI Panel on the Health Effects of Traffic-Related Air Pollution

Special Report 17 Health Effects Institute Boston, Massachusetts

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ABOUT HEI

The Health Effects Institute is a nonprofit corporation chartered in 1980 as an independent research organization to provide high-quality, impartial, and relevant science on the effects of air pollution on health. To accomplish its mission, the institute

- Identifies the highest-priority areas for health effects research;
- Competitively funds and oversees research projects;
- Provides intensive independent review of HEI-supported studies and related research;
- Integrates HEI's research results with those of other institutions into broader evaluations; and
- Communicates the results of HEI research and analyses to public and private decision makers.

HEI receives half of its core funds from the U.S. Environmental Protection Agency and half from the worldwide motor vehicle industry. Frequently, other public and private organizations in the United States and around the world also support major projects or certain research programs. Additional work for this report was funded by the U.S. Federal Highway Administration.

HEI has funded more than 280 research projects in North America, Europe, Asia, and Latin America, the results of which have informed decisions regarding carbon monoxide, air toxics, nitrogen oxides, diesel exhaust, ozone, particulate matter, and other pollutants. These results have appeared in the peer-reviewed literature and in more than 200 comprehensive reports published by HEI.

HEI's independent Board of Directors consists of leaders in science and policy who are committed to fostering the public-private partnership that is central to the organization. The Health Research Committee solicits input from HEI sponsors and other stakeholders and works with scientific staff to develop a Five-Year Strategic Plan, select research projects for funding, and oversee their conduct. The Health Review Committee, which has no role in selecting or overseeing studies, works with staff to evaluate and interpret the results of funded studies and related research.

All project results and accompanying comments by the Health Review Committee are widely disseminated through HEI's Web site (*www.healtheffects.org*), printed reports, newsletters, and other publications, annual conferences, and presentations to legislative bodies and public agencies.

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EXECUTIVE SUMMARY

INTRODUCTION

Motor vehicles are a significant source of urban air pollution and are increasingly important contributors of anthropogenic carbon dioxide and other greenhouse gases. As awareness of the potential health effects of air pollutants has grown, many countries have implemented more stringent emissions controls and made steady progress in reducing the emissions from motor vehicles and improving air quality. However, the rapid growth of the world's motor-vehicle fleet due to population growth and economic improvement, the expansion of metropolitan areas, and the increasing dependence on motor vehicles because of changes in land use has resulted in an increase in the fraction of the population living and working in close proximity to busy highways and roads -- counteracting to some extent the expected benefits of pollution-control regulations and technologies.

This Special Report, developed by the Health Effects Institute (HEI) Panel on the Health Effects of Traffic-Related Air Pollution, summarizes and synthesizes information linking emissions from, exposures to, and health effects of traffic sources (i.e., motor vehicles). The term *traffic-related exposure* is used in this report to refer to exposure to primary emissions from motor vehicles, not to the more broadly dispersed secondary pollutants such as ozone $\{O_3\}$ that are derived from these emissions. The report focuses on specific scenarios with a high aggregation of motor vehicles and people — that is, urban settings and residences in proximity to busy roadways.

EMISSIONS FROM MOTOR VEHICLES

Motor vehicles emit large quantities of carbon dioxide (CO₂), carbon monoxide (CO), hydrocarbons (HC), nitrogen oxides (NO_x), particulate matter (PM), and substances known as mobilesource air toxics (MSATs), such as benzene, formaldehyde, acetaldehyde, 1,3-butadiene, and lead (where leaded gasoline is still in use). Each of

these, along with secondary by-products, such as ozone and secondary aerosols (e.g., nitrates and inorganic and organic acids), can cause adverse effects on health and the environment. Pollutants from vehicle emissions are related to vehicle type (e.g., light- or heavy-duty vehicles) and age, operating and maintenance conditions, exhaust treatment, type and quality of fuel, wear of parts (e.g., tires and brakes), and engine lubricants used. Concerns about the health effects of motor-vehicle combustion emissions have led to the introduction of regulations and innovative pollution-control approaches throughout the world that have resulted in a considerable reduction of exhaust emissions, particularly in developed countries. These reductions have been achieved through a comprehensive strategy that typically involves emissions standards, cleaner fuels, and vehicleinspection programs. Recognizing the likely continued growth in the vehicle fleet and the remaining problems in traffic-related air quality, the United States, European countries, Japan, and other countries are continuing to push for even stricter emissions controls in coming years.

Resuspended road dust, tire wear, and brake wear are sources of noncombustion PM emissions from motor vehicles. As emissions controls for exhaust PM become more widespread, emissions from noncombustion sources will make up a larger proportion of vehicle emissions. Noncombustion emissions contain chemical compounds, such as trace metals and organics, that might contribute to human health effects. However, current estimates of these emissions are highly uncertain. Thus, although they are not regulated in the way exhaust emissions are, noncombustion emissions will need to be considered more closely in future assessments of the impact of motor vehicles on human health.

The quantification of motor-vehicle emissions is critical in estimating their impact on local air quality and traffic-related exposures and requires the collection of travel-activity data over space and time and the development of emissions inventories. Emissions inventories are developed based on complex emissions models (of which the U.S. Environmental Protection Agency's MOBILE6 has been the most widely used) that provide exhaust and evaporative emissions rates for total HC, CO, NO_x , PM, sulfur dioxide (SO₂), ammonia (NH₃), selected air toxics, and green house gases (GHGs) for specific vehicle types and fuels. The quality of the travel-activity data (such as vehicle-miles traveled, number of trips, and types of vehicles) and the complex algorithms used to derive the emissions factors suggest the presence of substantial uncertainties and limitations in the resulting emissions estimates (NARSTO 2005). It should be noted that estimates of PM emissions have had very limited field valuation and verification.

The actual measurement of motor-vehicle emissions is critically important for validating the emissions models. Studies that have sampled the exhaust of moving vehicles in real-world situations (specifically, in tunnels or on roadways) have contributed very useful information about the emissions rates of the current motor-vehicle fleet and also have allowed the evaluation of the impact of new emissioncontrol technologies and fuels on emissions.

Receptor models have been used to estimate the contributions of various types of sources, including motor vehicles, to ambient air pollution. Some of the models (those defined as chemical mass balance models) require the knowledge of the chemical profile of both the emissions of all the area sources and the air at the receptor (that is, the impacted location). Other models (referred to as principal components and factors analyses) do not require a priori knowledge of the source profiles. The application of these models has yielded a wide range of results on the contribution of motor vehicles to ambient pollution, depending on the model, the location of the monitoring sites, and the other sources present. In U.S. cities, the results show that motorvehicle contributions range from 5% in Pittsburgh, Pa., under conditions with very high secondary aerosol, to 49% in Phoenix, Ariz., and 55% in Los Angeles, Calif. Outside the United States, estimates of the motor-vehicle contribution to $PM_{2.5}$ (PM $\leq 2.5 \,\mu$ m in aerodynamic diameter) range from 6% in Beijing, China, to 53% in Barcelona, Spain.

Ultimately, an important goal of emissions-characterization studies is to improve our ability to quantify human exposure to emissions from motor vehicles, especially in locations with high concentrations of vehicles and people. Such characterization requires improving emissions inventories and a more complete understanding of the chemical and physical transformations on and near roadways that can produce toxic gaseous, semivolatile, and particlephase chemical constituents.

ASSESSMENT OF EXPOSURE TO TRAFFIC-RELATED AIR POLLUTION

Traffic-related emissions contribute to primary and secondary local, urban, and regional (background) pollutant concentrations against a background of similar contaminants emitted from other sources. Traffic emissions are the principal source of intra-urban variation in the concentrations of air pollutants in many cities; thus, population-oriented central monitors cannot by themselves capture this spatial variability. Studies that have examined gradients in pollutants as a function of distance from busy roadways have indicated exposure zones for traffic-related air pollution in the range of 50 to 1500 m from highways and major roads, depending on the pollutant and the meteorologic conditions.

Because it is not practical or feasible to measure all the components of the traffic-pollutant mix, surrogates of trafficrelated pollution have been used as a reasonable compromise for assessing the contribution of traffic emissions to ambient air pollution and for estimating traffic exposure. Surrogates can also help in the assessment of spatial and temporal distributions of ambient pollution related to motor vehicles and of traffic-mitigation control strategies.

Two broad categories of surrogates have been used in epidemiology studies to estimate traffic exposure: (1) measured or modeled concentrations of pollutant surrogates and (2) direct measures of traffic itself (such as proximity, or distance, of the residence to the nearest road and traffic volume within buffers). The most commonly used trafficpollutant surrogates include CO, NO2, elemental carbon (EC; or black carbon [BC] or black smoke [BS]), PM, benzene, and ultrafine particles (UFP). Exposure models include geostatistical interpolation, land-use regression, dispersion, and hybrid models (the latter combine timeactivity data, personal measurements, and models). They incorporate numerous parameters (such as meteorologic variables, data on land use, traffic data, and monitoring data or emissions rates depending on the model) and can improve the spatial representation of the local impact of traffic against a background of regional and urban concentrations. However, the accuracy of the inputs is critical to the usefulness of any given model.

None of the pollutant surrogates considered in the report met all the criteria for an ideal surrogate. Data are not available to assess the ratios of the surrogates to emissions from all sources over time. CO, benzene, and NO_x (in this case NO_2), found in on-road vehicle emissions, are components of emissions from all sources, making it difficult to disentangle the contributions from motor vehicles from other sources (including some in indoor environments). Primary, on-road vehicle emissions of PM ($PM_{2.5}$ or PM_{10} [$PM \leq 10 \mu m$ in aerodynamic diameter]) represent only a small contribution to emissions from all sources, typically around 3%. EC has been used as a surrogate, primarily for diesel exhaust, although it is not a specific marker, unless other sources are ruled out. UFP concentrations are very high in vehicle-exhaust plumes but decrease rapidly with distance from the source, which poses a significant challenge for characterization of the spatial and temporal concentration gradients of UFP from roadway traffic.

With regard to exposure models, the Panel noted that, although proximity models (direct measures of traffic) are the easiest to implement, they are error prone because they ignore the parameters that affect the dispersion and physicochemical activity of the pollutants. Moreover, estimates based on proximity can be confounded by factors such as socioeconomic status and noise. Geostatistical interpolation models are best implemented in conjunction with dense, well-distributed monitoring networks; their chief limitations are the size of the network and the number of measurements needed over time to estimate the spatial distribution of pollution surrogates accurately. Land-use regression is appealing in that it can account for the diversity of sources that contribute to a surrogate; however, the true contribution (in terms of associated variance) of traffic to the regression is not always known or reported. Dispersion models utilize motor-vehicle-emissions and air-quality data and incorporate meteorologic data, but must be calibrated correctly to realize their advantages. These models are very data- and computation-intensive and depend on the validity of the model assumptions. Hybrid models that combine measurements of personal exposure to traffic surrogates or time-activity data with exposure models come closest to a logistically feasible "best" estimate of human exposure.

Factors influencing ambient concentrations of a trafficpollutant surrogate are related to time—activity patterns, meteorologic conditions, vehicle volume and type, driving patterns, land-use patterns, the rate at which chemical transformations take place, and the degree to which the temporal and spatial distribution of the surrogate reflects the traffic source.

To improve assessment of exposure to traffic-related pollution, a potential solution is the deployment of a large number of monitors in places where concentrations of air pollutants are expected to be highly variable and the population density is high. The use of models that incorporate numerous spatial factors in order to estimate exposures that are more relevant to the individual's exposure situation can also be helpful. The Panel concluded that the impact of vehicle emissions extends beyond the local scale to the urban and regional scales. What people are exposed to is influenced by their proximity to the sources, the presence of other ambient or microenvironmental sources, and time-activity patterns. If, as the evidence suggests, groups of lower socioeconomic status experience higher exposures than groups of higher socioeconomic status, this merits consideration in the interpretation of epidemiologic findings and in future regulatory actions.

Based on a synthesis of the best available evidence, the Panel identified an exposure zone within a range of up to 300 to 500 m from a highway or a major road as the area most highly affected by traffic emissions (the range reflects the variable influence of background pollution concentrations, meteorologic conditions, and season) and estimated that 30% to 45% of people living in large North American cities live within such zones.

HEALTH EFFECTS OF TRAFFIC-RELATED AIR POLLUTION: EPIDEMIOLOGY AND TOXICOLOGY

In reviewing the epidemiologic literature on the association between exposure to traffic-related air pollution and health outcomes, the Panel developed criteria for the inclusion of studies based on the characterization of traffic exposure. The Panel decided to include only studies that investigated associations between primary emissions from traffic and human health and that provided specific documentation of a traffic source and estimates of exposure on a local scale. Thus, studies that relied exclusively on measurements from a central monitoring site were not included unless the site was in proximity to traffic. The Panel also developed criteria for inferring whether associations between exposure and health outcome were causal by adapting the criteria used by the U.S. Surgeon General in the report The Health Consequences of Smoking: A Report of the Surgeon General (U.S. Department of Health and Human Services 2004). In order to deem the evidence sufficient to conclude that association between a metric of traffic exposure and an outcome was causal, it was necessary for the magnitude and direction of the effect estimates to be consistent across different populations and times and to rule out with reasonable confidence chance, bias in subject selection, and confounding (in particular, socioeconomic status). The four inference criteria applied to this review are listed in Table 1. To these criteria the Panel added a traffic-specific coherence criterion (also included in Table 1) to account for the degree of validity of the traffic-specific exposure metrics. As noted earlier, the Panel concluded that

not all traffic-exposure measures have equivalent validity and considered simple measures of proximity to roads or road length and of pollutant surrogates without specific traffic data to be the least specific. The proximity measures are also likely to introduce confounding.

Modeled estimates of exposure to traffic pollution were thought to be, a priori, more valid than traffic density estimates alone because they account for other factors that affect the exposure, such as geography, land use, and meteorology, when making estimates for particular locations. In addition, the validity of estimates can be enhanced by modeling strategies that separately estimate the contribution of traffic and background pollution to personal exposure.

The Panel developed qualitative and quantitative summaries (in tables and figures) for the estimates of the associations between traffic-related exposure and various health outcomes for the studies reviewed, but did not derive meta-analytic summaries by pooling associations estimates because of the lack of equivalence among the exposure measures and populations studied.

The Panel also reviewed the literature on the toxicology of traffic-related pollution. This included studies of direct exposures to traffic emissions (though there were very few in this category), studies that utilized laboratory atmospheres that replicate aspects of the traffic mix (such as concentrated ambient particles, or gasoline or diesel exhaust), and studies of specific components of emissions from motor vehicles. The aim was to identify possible mechanisms by which exposure to traffic pollutants may cause effects and provide an understanding of the role of traffic emissions in the effects being observed in epidemiology studies. While toxicology studies are limited in their ability to capture the full complexity of human exposure — because of the small number of subjects and, in animal studies, the relevance of the results to humans --- they offer the opportunity to explore hypotheses on specific pathophysiologic mechanisms of action.

The Panel evaluated whether oxidative stress might be the underlying mechanism of action by which exposure to pollutants from traffic may lead to adverse health effects. Oxidative stress results from events occurring in any tissue in the body when the prooxidant—antioxidant balance is disturbed. This imbalance can happen when the generation of reactive oxygen species, or *free radicals*, exceeds the available antioxidant defenses and is characterized by the presence of increased cellular concentrations of oxidized lipids, proteins, and DNA. Oxidative stress can trigger inflammatory reactions, which lead to an increased production of oxidants by activated phagocytes recruited to the airways, perpetuating the cycle of oxidative injury.

The Panel concluded that, although the evidence supported the hypothesis that oxidative stress is an important determinant of health effects associated with ambient air pollution in general, the extent to which primary trafficrelated pollutants contribute to the burden of reactive oxygen species experienced by humans near roadways remains undefined.

The Panel's main conclusions regarding the epidemiologic associations between exposure to traffic-related air pollution and health outcomes and the toxicologic evidence (when available) are presented below for each health outcome. A discussion of the extent to which toxicology studies do or do not provide general mechanistic support for the observations and inferences contributed by epidemiology studies is also provided.

ALL-CAUSE AND CARDIOVASCULAR MORTALITY

Epidemiology

Very few studies of all-cause mortality or cardiovascular mortality and long-term exposure met the criteria for inclusion in the report. Mostly because of the small number of studies, the evidence for an association of allcause mortality with long-term exposure was classified as "suggestive but not sufficient" to infer a causal association. Additional factors that led to this classification were the substantial differences among populations, time periods, and confounders across studies.

Only four time-series studies of all-cause mortality associated with short-term exposure met the Panel's criteria; these, too, were classified as "suggestive but not sufficient," largely on the strength of one well-done study (Maynard et al. 2007). Two time-series studies based on source-apportionment models were found to have a number of limitations that prevented a stronger statement about inferred causality.

Many of the issues that applied to studies of all-cause mortality applied as well to studies of cardiovascular mortality associated with long-term exposure and led, similarly, to a classification of "suggestive but not sufficient." Only two time-series studies of cardiovascular mortality met the inclusion criteria, and although they both show positive associations, the Panel concluded that, given the overall paucity of studies, the evidence for effects of shortterm exposure was "inadequate and insufficient."

CARDIOVASCULAR MORBIDITY

Epidemiology

Studies that documented changes in cardiac physiology (such as heart-rate variability) after short-term exposure to traffic-related pollution (which was assessed using surrogates, **Executive Summary Table 1.** Criteria for Assessing the Presence or Absence of Causal Associations in Studies of the Health Effects of Traffic-Related Air Pollution^{a,b}

A. Sufficient Evidence to Infer the Presence of a Causal Association

The evidence was deemed sufficient to conclude that an association observed between a metric of traffic exposure and a disease (or biomarker of disease) risk was causal in studies where chance, bias, and confounding could be ruled out with reasonable confidence, and the effect estimates were consistent in magnitude and direction.

Traffic-specific criterion. Classification A was applied:

When all studies were of the appropriate quality, at least one study measured traffic density or modeled traffic exposure^c, measures of socioeconomic status were taken into account in distance-only studies, and the studies' results were consistent.

B. Suggestive but Not Sufficient Evidence to Infer the Presence of a Causal Association

The evidence was deemed suggestive but not sufficient to conclude that an association between a metric of traffic exposure and a specific disease (or biomarker of disease) risk was causal in studies where chance, bias, and confounding could not be ruled out with reasonable confidence.

Traffic-specific criterion. Classification B was applied:

When all the criteria for Classification A were met except that only studies that used distance-based metrics were available

OR

When all the criteria for Classification A were met except that not all the studies that used distance-only metrics took into account measures of socioeconomic status or the studies took into account measures of socioeconomic status but the results were not consistent.

C. Inadequate and Insufficient Evidence to Infer the Presence or Absence of a Causal Association

The evidence was deemed inadequate and insufficient when the available studies were of insufficient quality, consistency, or statistical power to conclude whether a causal association was present or absent.

Traffic-specific criterion. Classification C was applied:

When the results from studies that used distance-only metrics were not consistent

OR

When the results of all studies using distance-only metrics were consistent but all those studies failed to include measures of socioeconomic status

OR

When the results from at least one study based on traffic density or modeled traffic exposure were inconsistent with those from distance-only studies

OR

When the number of distance-only studies was too small.

D. Evidence Suggestive of No Causal Association

The evidence was deemed suggestive of no causal association when there were several adequate studies, covering the full range of human exposure levels, that were consistent in not showing a positive association, at any level of exposure, between exposure to a metric of traffic exposure and a disease outcome. (Of course, a conclusion of "no association" is inevitably limited to the conditions, level of exposure, and length of observation covered by the available studies. In addition, the possibility of a very small elevation in risk at the levels of exposure studied cannot be excluded.)

Traffic-specific criterion. Classification D was applied:

When studies were of adequate quality (using distance-only metrics or at least some measures of traffic density or modeled traffic exposure) and were consistent in failing to find an association.

^a The Panel did not use exposure–response gradations as a criterion because, in virtually all epidemiologic studies, it is difficult to infer meaningful exposure–response gradations from the types of exposure metrics used or the forms of data presented.

^b This table was adapted from Tables 4.2a and 4.2.b in Chapter 4.

^{*} In some cases, this criterion was met when modeling or source-apportionment data were cited to show that a pollution surrogate in the study was reasonably accurate in representing the traffic sources in the study area.

source apportionment, or pseudo-personal monitoring) provided strong evidence for a causal association with the exposure. However, the failure of some studies to consider stress and noise as potential confounders led the Panel to classify them as "suggestive but not sufficient" to infer a casual association. Among the studies that evaluated cardiovascular morbidity, two well-executed studies on hospitalization for acute myocardial infarction were identified (Rosenlund et al. 2006; Tonne et al. 2007). In addition, a prospective study in a German cohort reported an association between living near a major road and coronary-artery calcification as well as higher prevalence of coronary heart disease (Hoffmann et al. 2006, 2007). Collectively, these studies made a very strong case for an association between exposure to traffic-related pollutants and atherosclerosis. However, because of the small number of studies, the Panel classified them as "suggestive but not sufficient" to infer a causal association.

Toxicology

There have been a few toxicology studies that examined the cardiovascular effects of traffic emissions specifically. However, the Panel concluded that the recent toxicology literature provides suggestive evidence that exposure to pollutants that are components of traffic emissions, including ambient and laboratory-generated PM and exhaust from diesel and gasoline-fueled engines, alters cardiovascular function. There is also evidence, albeit inconsistent, for acute effects on vascular homeostasis and suggestive evidence in animal models that repeated exposures to ambient PM in general enhance the development of atherosclerosis. Some studies support the involvement of oxidative stress. Although the evidence from toxicology studies in isolation is not sufficient in terms of a causal association between traffic emissions and the incidence or progression of cardiovascular disease, when viewed together with the epidemiologic evidence, a stronger case could be made for a potential causal role for traffic-related pollutants in cardiovascular-disease morbidity and mortality. The extent to which these associations apply to individuals without underlying cardiovascular disease cannot be determined from the evidence available at this time.

ASTHMA AND RESPIRATORY SYMPTOMS

Asthma is an inflammatory disease of the lung airways characterized by episodic obstruction of the airways, which can lead to chronic obstructive lung disease. The most prevalent form of asthma in children and young adults is allergic asthma, which develops as an immune response to inhaled allergens. Individuals with asthma and other allergic conditions who have an increased tendency to develop immediate and localized reactions to allergens (such as pollens) that are mediated by immunoglobulin E (IgE) are referred to as "atopic."

Epidemiology

In epidemiology studies, asthma is most frequently identified by means of responses to questionnaires that do not make use of a single, universally accepted set of questions, alone or in combination with other criteria. This is further complicated by the challenges of distinguishing factors that affect its onset from those (often the same factors) that lead to its episodic worsening. A history of asthma symptoms (such a wheezing) often is used in epidemiology studies as part of the definition both of asthma's onset (incidence) and of its prevalence and exacerbation.

Respiratory Health Problems in Children: Asthma

Incidence and Prevalence Seven studies conducted in four separate cohorts and one case-control study qualified as studies of asthma incidence in children. Eleven studies qualified as studies of asthma prevalence in children. From these studies, the Panel concluded that living close to busy roads appears to be an independent risk factor for the onset of childhood asthma. The Panel considered the evidence for a causal relation to be in a gray zone between "sufficient" and "suggestive but not sufficient." The results found across the studies followed a pattern that would be expected under the plausible assumption that the pollutants really are causally associated with asthma development, if only among a subset of children with some accompanying pattern of endogenous or exogenous susceptibility factors. The conditions that underlie an increased risk for asthma development among children exposed to traffic-related pollutants are not known.

Exacerbation of Symptoms in Children with and without Asthma and Health-Care Utilization for Respiratory

Problems Among the more than 20 cohort and cross-sectional studies reviewed that examined the association between exposure to traffic-related pollution and wheezing (an important symptom in the expression and diagnosis of asthma) in children, there was a high degree of consistency in finding positive associations, many of which reached statistical significance (i.e., had reasonably precise point estimates of associations). This was true particularly for the large majority of studies that used models to assign estimates of local concentrations of pollutants, such as NO₂ or soot (the carbonaceous component of PM), to the place of residence of the study participants. Studies based on proximity or traffic density also indicated an association between exposure and wheezing. In addition, exacerbation

of other asthma-related symptoms, such as cough or dry cough, was consistently associated with exposure across a variety of exposure measures. Although most studies were not restricted to children with asthma, all these symptoms were more prevalent among those with asthma, and it is very likely that the observed associations were driven by exacerbations of asthma in mixed groups of participants. The Panel concluded that the evidence is "sufficient" to infer a causal association between traffic exposure and exacerbations of asthma but that it is "inadequate and insufficient" to infer a causal association between exposure and respiratory symptoms in children without asthma.

Nine studies assessed the association between exposure to traffic-related pollution and the use of health-care services to treat respiratory problems in children. Most of the studies reported positive associations between exposure and hospital-admission rates, but the majority had methodologic problems that hampered their interpretation. The panel concluded that there is "inadequate and insufficient" evidence to infer a causal association.

Respiratory Health Problems in Adults: Asthma Onset

and Respiratory Symptoms The Panel noted that the evidence between exposure to traffic-related pollution and new adult asthma was "inadequate and insufficient" as this was investigated in only one study (Modig et al. 2006). The Panel reviewed 17 studies on respiratory symptoms, of which all but one relied on proximity to roads or trafficdensity measures, and concluded that the evidence for a causal association is "suggestive but not sufficient."

Toxicology

The few human studies in which subjects were exposed to realistic traffic conditions (a road tunnel or busy street) are supportive of the possibility that persons with asthma may be more susceptible to adverse health effects (such as decrements in lung function and enhanced responses to allergens) related to such exposure. The Panel's evaluation of the toxicologic data on the respiratory system regarding the effects of components of traffic-related air pollution was that such exposures result in mild acute inflammatory responses in healthy individuals and enhanced allergic responses in allergic asthmatics and animal models.

When the epidemiologic and toxicologic data were viewed together, the Panel noted that a case could be made that there are likely to be causal associations related to exposure to traffic-related air pollution and asthma exacerbation and some other respiratory symptoms. However, given the lack of a large body of toxicologic data based on human and animal exposures to real-world traffic scenarios, the Panel noted that it was hazardous to conclude that causality has been established at this time for all respiratory symptoms at all ages.

LUNG FUNCTION AND CHRONIC OBSTRUCTIVE PULMONARY DISEASE

Changes in lung function are considered reliable markers of health that reflect the effects of endogenous and cumulative exposure to exogenous factors that might have adverse health consequences. Reduced lung function is strongly associated with future morbidity from a variety of causes and is a predictor of life expectancy (Hole et al. 1996); however, the relevance to health of small, short-term changes has not been assessed. The Panel considered lung function and chronic obstructive pulmonary disease (COPD) together in this review, because the principal criterion for the diagnosis of COPD is based on lung-function measures.

Epidemiology

Lung Function in Children and Adults The studies reviewed were heterogeneous in their design, approach to exposure assessment, and lung-function measures. Given their limited comparability, the Panel concluded that the evidence is "suggestive but not sufficient" to infer a causal association between short- and long-term exposure to traffic-related pollution and decrements in lung function. However, in the case of long-term exposure, there was some coherence in the data, suggesting that (1) long-term exposure is associated with changes in lung function in adolescents and young adults; (2) lung-function measures are lower in people who live in more polluted areas; and (3) changing residence to a less-polluted area in one study is associated with improvements in lung function (Burr et al. 2004). The first and second points are consistent with longer-lasting effects on lung structure and/or function. The third point can be interpreted to indicate that some component of the apparent effects on lung function is reversible or is more the result of short-term exposure.

Chronic Obstructive Pulmonary Disease Because only two of the COPD studies fulfilled the criteria for inclusion in the review and their results were not consistent, the Panel concluded that there is "inadequate and insufficient" evidence for causal associations between exposure to traffic pollution and COPD.

Toxicology

A very limited database of controlled human exposure has shown short-term reductions in forced expiratory volume in 1 second (FEV_1) and increases in inflammation with exposure to traffic-related air pollution. However, the two end points have not been associated with each other. Virtually no data are available from animal models. There are no studies of traffic-related air pollution and COPD.

While the epidemiology studies do provide suggestive evidence for chronic exposure effects on lung function in adolescents and young adults, there are too few toxicologic data to indicate what mechanisms underlie these observations. The aggregate epidemiologic and toxicologic evidence on chronic exposure to traffic-related air pollution and altered lung function in older adults and the occurrence of COPD is too sparse to permit any inference with respect to causal association.

ALLERGY

Epidemiology

The 16 epidemiology studies on this outcome included in the review not only had to meet criteria for the quality of their exposure data but also had to report at least one of the following: (1) positive skin-prick testing for common aeroallergens; (2) serum-specific IgE to common aeroallergens; (3) a physician's diagnosis of eczema or allergic rhinitis; or (4) use of questionnaires on the history of symptoms of hay fever, seasonal runny nose, rhinitis or conjunctivitis, or itchy eyes. With a few inconsistent exceptions, results based on the skin-prick test reactivity or allergen-specific IgE failed to show associations with any of the traffic-exposure surrogates. Inconsistent results with self-reported symptoms were also noted. The Panel concluded that there is "inadequate and insufficient" evidence to infer a causal association, or even a noncausal association, between exposure to traffic-related pollution and IgE-mediated allergies. Overall, the lack of consistency across epidemiology studies might have reflected a failure to identify susceptible subgroups.

Toxicology

The Panel noted that the toxicology data provide strong mechanistic evidence with respect to the diesel particle component of traffic-generated pollution and IgE-mediated allergic reactions and some evidence for NO_2 and latephase response to allergen. However, the epidemiology studies were inconsistent. The relevance of the toxicology studies (often by nasal instillation with diesel exhaust particles) to the actual manifestations of non-asthmatic allergic phenotypes (e.g., allergic rhinitis or conjunctivitis, eczema, serum-specific IgE, and evidence of sensitization to aeroallergens) could not be determined.

BIRTH OUTCOMES

Epidemiology

Although a considerable body of data from around the world has identified consistent associations between exposure to ambient air pollution in general and various birthoutcome measures (low birth weight, small for gestational age, and perinatal mortality), only four studies of exposure to traffic-related pollution met the criteria for inclusion in this review. The small number of studies and their limited geographic coverage led the Panel to conclude that there is "inadequate and insufficient" evidence to infer causality.

Toxicology

The toxicology studies reported effects on reproductive organs and sperm functionality in animals, but these outcomes were not evaluated in the epidemiology studies. Among the challenges in interpreting these results are the data limitations and the almost-universal use of very high exposure concentrations that have questionable relevance to actual ambient concentrations. Due to their lack of overlap, the epidemiology and toxicology studies on reproductive health and birth outcomes do not lend themselves to any overall synthesis.

CANCER

Epidemiology

The Panel focused on general-population exposure studies and did not review the extensive epidemiologic literature on cancer from occupational exposure to traffic emission constituents (e.g., benzene and diesel exhaust). Among the studies reviewed, five were of childhood cancers (mainly leukemias, lymphomas, and cancers of the central nervous system), and four of adult cancers (two of lung cancer, one of female breast cancer, and one of several cancers combined). Data on childhood cancers were inconclusive in terms of overall consistency and of specific cancers. Too few data were available in adults. Overall the Panel concluded that the evidence was "inadequate and insufficient" to make inferences for causality between exposure to traffic pollution and cancer.

Toxicology

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The toxicologic research summarized included in vitro mutagenicity studies of exposure of cells to PM from traffic pollution, diesel or biodiesel exhaust, and organic components of some of these mixtures, as well as animal carcinogenicity studies after exposure to exhaust from diesel and gasoline-fueled engines. Although studies in cells demonstrating the capacity of DEP to induce DNA-strand breaks, base oxidation, and mutagenicity provide a possible mechanism for the induction of carcinogenicity by traffic-related pollution, the applicability of in vitro mutagenicity studies to human risk assessment has been questioned. Animal studies have demonstrated the ability of high concentrations of exhaust components in both diesel and gasolinefueled engines to cause tumors in animals. However, caution must be exercised in extrapolating these data to people exposed to much lower concentrations of pollutants, as seen in the epidemiology studies. Therefore, the Panel concluded that any statement that tries to relate the toxicologic to the epidemiologic data is premature at this time.

OVERALL CONCLUSIONS

Studies have shown that traffic-related emissions affect ambient air quality on a wide range of spatial scales, from local roadsides and urban scales to broadly regional background scales. Based on a synthesis of the best available evidence, the Panel identified an exposure zone within a range of up to 300 to 500 m from a major road as the area most highly affected by traffic emissions (the range reflects the variable influence of background pollution concentrations, meteorologic conditions, and season).

Surrogates for traffic-related exposure have played, and are likely to continue to play, a preeminent role in exposure assessments in epidemiology studies. The optimal selection of relevant surrogates (especially surrogates that are single chemicals) depends on accurate knowledge of the degree to which they represent the chemical and physical properties of the actual primary traffic-pollution mixtures to which humans are exposed, which, in turn, depends on accurate knowledge of motor-vehicle-emissions composition and near-source transformation and dispersion. The Panel concluded that none of the pollutant surrogates (CO, NO2, UFP, EC, and benzene) is unique to emissions from motor vehicles. Among the surrogates based on traffic-exposure models, the question remains as to the extent to which the proximity model (i.e., the simple distance-to-road measures) should be employed in future epidemiology studies because it is particularly prone to yielding measures potentially containing extraneous information that can lead to the confounding of associations between health effects and exposure. In the Panel's view, the hybrid model is the current optimal method of assigning exposures to primary traffic-related pollution.

Many aspects of the epidemiologic and toxicologic evidence relating adverse human health effects to exposure to primary traffic-generated air pollution remain incomplete. However, the Panel concluded that the evidence is sufficient to support a causal relationship between exposure to traffic-related air pollution and exacerbation of asthma. It also found suggestive evidence of a causal relationship with onset of childhood asthma, nonasthma respiratory symptoms, impaired lung function, total and cardiovascular mortality, and cardiovascular morbidity, although the data are not sufficient to fully support causality. For a number of other health outcomes, there was limited evidence of associations, but the data were either inadequate or insufficient to draw firmer conclusions. The Panel's conclusions have to be considered in the context of the progress made to reduce emissions from motor vehicles. Since the epidemiology studies are based on past estimates of exposure from older vehicles, they may not provide an accurate guide to estimating health associations in the future.

In light of the large number of people residing within 300 to 500 m of major roads, the Panel concludes that the sufficient and suggestive evidence for these health outcomes indicates that exposures to traffic-related pollution are likely to be of public health concern and deserve public attention. Although policy recommendations based on these conclusions are beyond the scope of this report, the Panel has tried to organize, summarize, and discuss the primary evidence in ways that will facilitate its usefulness to policy makers in the years ahead.

REFERENCES

Burr ML, Karani G, Davies B, Holmes BA, Williams KL. 2004. Effects on respiratory health of a reduction in air pollution from vehicle exhaust emissions. Occup Environ Med 61:212–218.

Hoffmann B, Moebus S, Möhlenkamp S, Stang A, Lehmann N, Dragano N, Schmermund A, Memmesheimer M, Mann K, Erbel R, Jöckel K-H. 2007. Residential exposure to traffic is associated with coronary atherosclerosis. Circulation 116:489–496.

Hoffmann B, Moebus S, Stang A, Beck EM, Dragano N, Möhlenkamp S, Schmermund A, Memmesheimer M, Mann K, Erbel R, Jöckel KH. 2006. Residence close to high traffic and prevalence of coronary heart disease. Eur Heart J 27:2696–2702.

Hole D, Watt G, Davey-Smith G, Hart C, Gillis C, Hawthorne V. 1996. Impaired lung function and mortality risk in men and women: Findings from the Renfrew and Paisley prospective population. Br Med J (Clin Res Ed) 313:711–715.

Maynard D, Coull BA, Gryparis A, Schwartz J. 2007. Mortality risk associated with short-term exposure to traffic particles and sulfates. Environ Health Perspect 115:751– 755.

Modig L, Järvholm B, Rönnmark E, Nyström L, Lundbäck B, Andersson C, Forsberg B. 2006. Vehicle exhaust exposure in an incident case-control study of adult asthma. Eur Respir J 28:75–81.

NARSTO. 2005. Improving emission inventories for effective air quality management across North America. NARSTO 05-001. Pasco, Washington. Available from ftp://narsto.esd.ornl.gov/pub/EI_Assessment/Improving_ Emission_Index.pdf. Rosenlund M, Berglind N, Pershagen G, Hallqvist J, Jonson T, Bellander T. 2006. Long-term exposure to urban air pollution and myocardial infarction. Epidemiology 17:383– 390.

Tonne C, Melly S, Mittleman M, Coull BA, Goldberg R, Schwartz J. 2007. A case-control analysis of exposure to traffic and acute myocardial infarcion. Environ Health Perspect 115:53–57.

U.S. Department of Health and Human Services. 2004. The Health Consequences of Smoking: A Report of the Surgeon General. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health. Atlanta, GA.

EXHIBIT 4



CITY OF INGLEWOOD OFFICE OF THE CITY MANAGER



DATE:	April 10, 2018
TO:	Mayor and Council Members
FROM:	Economic and Community Development Department
SUBJECT:	Amendment to Professional Services Agreements with Environmental Science Associates and Trifiletti Consulting for Services Associated with the Environmental Review of a National Basketball Association Arena and Associated Facilities (Proposed Project) near the Intersection of Prairie Avenue and Century Boulevard

RECOMMENDATION:

It is recommended that the Mayor and City Council take the following actions:

- 1) Amend Agreement No. 18-056 with ESA (Environmental Science Associates) to modify the scope of services to include the Phase 2 Scope of Work with a cost of \$2,228,032; and,
- 2) Amend Agreement No. 18-057 with Trifiletti Consulting to modify the scope of services to include Phase 2 Scope of Work with a cost of \$354,701.10 for Phase II; and,
- 3) Adopt a resolution amending the FY 2017-2018 Budget.

BACKGROUND:

On August 15, 2017, the City Council, the City of Inglewood as Successor Agency to the Former Redevelopment Agency, and the Inglewood Parking Authority approved an Amended and Restated Exclusive Negotiating Agreement (ENA) with Murphy's Bowl LLC. In connection with its obligations under the ENA, the City is required to perform certain implementation activities including, but not limited to, the preparation of certain environmental documents required by CEQA, for the purpose of assessing any potential environmental impacts the Proposed Project may have.

On December 19, 2017, the City Council approved agreements with ESA and Trifiletti Consulting to provide certain environmental consulting services necessary for the preparation of an Environmental Impact Report on the Proposed Project.

DISCUSSION:

The environmental scope of services to be provided by ESA and Trifiletti Consulting for Phase 2 Scope of Work are as follows:

ESA: Performance of Phase 2 Scope of Work as more particularly described in Exhibit A to First Amendment to Professional Services Agreement No. 18-056 between the City and ESA (\$2,228,032).

Mayor and City Council Professional Services Agreement with ESA April 10, 2018

Trifiletti: Performance of Phase 2 Scope of Work is more particularly described in Exhibit A to First Amendment to Professional Services Agreement No. 18-057 between the City and Trifiletti Consulting (\$354,701.10).

FINANCIAL/FUNDING ISSUES AND SOURCES:

Upon adoption of the attached resolution amending the Fiscal Year 2017-2018 budget, funds in the amount of \$2,582,733.10 will be transferred from Account Code No. 001.51000 (General Fund Reserves) to Account Code No. 300.100.A002.

LEGAL REVIEW VERIFICATION:

Administrative staff has verified that this report, in its entirety, has been submitted to, reviewed and approved by the Office of the City Attorney,

FINANCE REVIEW VERIFICATION

Administrative staff has verified that this report, in its entirety, has been submitted to, reviewed and approved by the Finance Department.

DESCRIPTION OF ANY ATTACHMENTS

Attachment 1: Amendment to Professional Services Agreement with ESA for Environmental Services

Attachment 2: Amendment to Professional Services Agreement with Trifiletti Consulting Attachment 3: Resolution

Mayor and City Council Professional Services Agreement with ESA April 10, 2018

APPROVAL VERIFICATION SHEET

PREPARED BY:

Christopher E. Jackson, Sr., Economic and Community Development Director Mindy Wilcox, AICP, Planning Manager

COUNCIL PRESENTER: Mindy Wilcox, AICP, Planning Manager

DEPARTMENT HEAD APPROVAL:

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Chris støpher E. Jackson, Sr. D Director

CITY MANAGER APPROVAL:

Artie Fields, City Manager

EXHIBIT B PHASE 2 PROPOSAL

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Trifiletti Consulting, Inc. 1541 Wilshire Boulevard, Ste 560 Los Angeles, CA 90017 213 315-2121 www.trifiletticonsulting.com



Project Management, Environmental Clearance, and Interagency Coordination Services

Trifiletti Consulting will perform professional services on behalf of the City of Inglewood (City) to provide project management, strategic environmental consulting and coordination services for the Inglewood Basketball and Entertainment Center, on behalf of the City's Economic and Community Development Department.

Firm Profile

Trifiletti Consulting provides strategic counsel in areas of land use, environmental, entitlement, public outreach and project management to leaders in public agencies and elected officials, private sector developers, infrastructure dElResigners, and business and civic organizations. Grounded in decades of experience in government, we develop innovative, transparent and consensus building approaches to securing multi-jurisdictional approvals for complex development and infrastructure projects. Our success is based on a foundation of knowledge, experience, and stakeholder participation.

We are uniquely qualified to manage multi-stakeholder processes to address complex public policy issues, and we have a demonstrated ability to implement major master planned governmental and private sector development projects. Our achievements rest on building broad coalitions, while efficiently managing critical legal and environmental requirements and schedules. Trifiletti Consulting specializes in leading complex planning processes and designing environmental clearance strategies that embrace sustainability as project design features and minimizes environmental impacts.

Prior to launching Trifiletti Consulting, Lisa Trifiletti served as Deputy Executive Director of Environmental Programs and Chief Sustainability Officer for Los Angeles World Airports (LAWA). As Deputy Executive Director, she directed all activities of the Environmental Performance, Environmental Regulatory Compliance, Environmental Planning and Engineering, and Environmental Commitment Management divisions, and led all Entitlements and Environmental Clearances for LAWA's three airports (LAX, Van Nuys, Ontario) and Palmdale land holdings. Most notably, during her tenure at LAWA, she led the update of entitlements and environmental clearances for all major LAX Modernization Projects including the LAX Landside Access Modernization Program, and the LAX Northside Plan Update which consisted of 2.3 million square feet of development on 340 acres of airport property with widespread community support. Ms. Trifiletti also led the coordination efforts with the Los Angeles County Metropolitan Transportation Authority (Metro) to select the locally preferred alternative for the Airport Metro Connector's 96th Street Transit Station and its connection to LAX. Additionally, Trifiletti served as Chief Planning Deputy for all discretionary planning and environmental clearance applications, and all housing, transportation and land use issues in the City of Los Angeles to Councilmembers Jack Weiss and Paul Koretz for Council District 5.

Trifiletti Consulting, Inc.



Trifiletti Consulting has earned a strong reputation as a trusted consensus builder and public outreach leader. Lisa Trifiletti was instrumental in helping secure historic settlement agreements on long standing contentious airport conflicts, including with the Alliance for Regional Solution against Airport Congestion (ARSAC) and adjacent jurisdictions, including the City of Inglewood. Her planning work has also been recognized by several organizations, as she has the Association of Environmental Professional's California Chapter Public Education and Outreach Award, and the Award of Excellence for the America Planning Association's Neighborhood Planning Award, and her projects have been featured in numerous positive media articles.

Background: City of Inglewood Planning Efforts

Today is a new era in the City of Inglewood as it becomes "The City of Champions" and redefines itself as a regional center in the greater Los Angeles region. As of August 2017, sales tax revenue increase has outpaced the Los Angeles County average, and property values are up more than 100% since 2012. These accomplishments have been driven by a number of completed and on-going projects in the City including the construction of the Metro Crenshaw/LAX Line, The Forum's revitalization which now actively hosts the largest entertainment acts in the Country, the redevelopment of approximately 238 acres in Hollywood Park with new land uses including residential, commercial and recreational, the relocation and construction of the Los Angeles Rams and Los Angeles Chargers new National Football League (NFL) stadium, and the City has currently entered into an exclusive negotiation agreement (ENA) for the potential relocation of the Los Angeles Clippers National Basketball Association (NBA) to the City of Inglewood.

As the City of Inglewood is actively transforming into a major regional activity center, the number of trips or vehicle miles traveled (VMT) in and around the City are anticipated to increase. Since 2010, traffic has increased by 128,066 (11%) vehicles per day within the City of Inglewood based on latest ADT studies. That is approximately an increase of 18,295 (1.57%) daily vehicles per year. The existing transportation infrastructure and circulation system is outdated, capacity should be increased as major arterials street and highways are highly congested, and there remains no direct connection from the Countywide Metro Rail System to the newly completed, under constructed, and future activity centers. Moreover, the City's Circulation Element from the City's General Plan has not been updated since 1992. To address these critical issues, the City of Inglewood is now in the studying the development of a major mass transit project connecting the Metro Rail System to the proposed activity centers and is preparing a comprehensive mobility plan to identify policy recommendations, infrastructure improvements and the program requirements necessary to move people across a multimodal transportation environment, and best prepare for the future development in the City.