



METROPOLITAN  
TRANSPORTATION  
COMMISSION

ATTACHMENT 2

Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105  
TEL 415.778.6700  
WEB [www.mtc.ca.gov](http://www.mtc.ca.gov)

## Memorandum

**To:**

Relevant Working Groups & Committees  
(comprised of MTC, Transit Operator, County Transportation Agency, Local Jurisdiction, and Caltrans District 4 staff)

**From:**

Britt Tanner, Transit Priority Principal, Regional Network Management (MTC)  
Joel Shaffer, Transit Priority Program Coordinator, Regional Network Management (MTC)  
Mika Miyasato, Principal Planner / Transit Priority Planner (AC Transit)

**Date:**

April 28, 2025

**Regarding:**

**Bay Area Transit Priority Policy for Roadways  
Stakeholder Feedback Summary on Preliminary Draft Policy Memo (Winter 2025)**

In February and March 2025, Regional Network Management (RNM) staff conducted stakeholder outreach and issued a Preliminary Draft Policy Memo that identified proposed contents and requirements of the Bay Area Transit Priority Policy for Roadways (TPPR). This Stakeholder Feedback Summary Memo summarizes the stakeholder comments received and how they are proposed to be addressed. A Revised Draft Policy Memo reflecting these changes is expected to be released in late April to coincide with the next round of stakeholder engagement.

### TPPR Stakeholder Engagement

RNM staff are engaging extensively with agency stakeholders to inform the development of the TPPR. Stakeholders include transit agencies, local jurisdictions (cities and counties), county transportation agencies, Caltrans, transit advocacy organizations, and other departments within MTC. The table below identifies past and planned outreach activities.

<i>Transit Priority Workshop</i> <i>(December 2023)</i>	Interactive, interagency Transit Priority Workshop in Oakland to introduce stakeholders to the new regional transit priority policy effort and lay a foundation for the development of a policy framework, including defining Transit Priority and discussing policy vision and purpose.
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<i>Policy Approach/ Framework (2024)</i>	Ad-hoc Policy Development Working Group (PDWG) created with stakeholder agencies from throughout the region. In conjunction with the PDWG, Transit Priority Working Group (transit agency staff), and other staff working groups, RNM staff crafted a policy approach over the course of 2024 and presented a recommended policy framework to the RNM advisory bodies (RNM Customer Advisory Group, RNM Council, and RNM Committee) in late 2024.
<i>Preliminary Draft Policy Memo* (Winter 2025)</i>	<p>A Preliminary Draft Policy Memo was distributed to stakeholders and outreach was conducted on a rolling basis from mid-February through mid-March. The memo detailed proposed policy content/requirements. Outreach consisted of presentations at various agency stakeholder groups to solicit feedback:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Active Transportation Working Group (ATWG)</li> <li><input type="checkbox"/> Bay Area County Transportation Agencies (BACTA) Planning Directors</li> <li><input type="checkbox"/> Bay Area Partnership Accessibility Committee (BAPAC)</li> <li><input type="checkbox"/> Caltrans District 4</li> <li><input type="checkbox"/> Local Streets and Roads Programming and Delivery Working Group (LSRPDWG)</li> <li><input type="checkbox"/> Policy Development Working Group (PDWG)</li> <li><input type="checkbox"/> Transit Finance Working Group (TFWG)</li> <li><input type="checkbox"/> Transit Priority Working Group (TPWG)</li> </ul> <p><i>*This memo summarizes the agency feedback received on the Preliminary Draft Policy Memo.</i></p>
<i>Revised Draft Policy Memo (Spring 2025)</i>	A Revised Draft Policy Memo reflecting updated recommendations is anticipated to be distributed to stakeholders in late April, coinciding with the next round of outreach to stakeholder agencies in the spring. Outreach will consist of presentations at committees and working groups organized by each of the Bay Area county transportation agencies (CTAs).

**Summary of Feedback Received on the Preliminary Draft Policy Memo:**

Nearly 350 unique comments/questions were received from approximately 50 agencies and organizations throughout the Bay Area. The most frequently heard themes of comments were:

- **Transit “Review” Versus “Approval” as part of the Complete Streets (CS)**  
**Checklist:** Wording indicated transit agencies would “approve” roadway projects along a transit route as part of the proposed CS Checklist process. Further, the wording was unclear how transit agency “approval” differed for projects along the Transit Priority Network (TPN) and those not on the TPN.

**Response:** Draft policy would propose that transit agencies would “review” (not approve) roadway projects along a transit route as part of the proposed CS Checklist process. The wording would be clarified to indicate that projects along a transit route not on the TPN would focus only on potential project impacts to transit, whereas projects along a transit route on the TPN would focus on potential project impacts to transit as

*well as working to integrate best practice transit-supportive design elements into the project design. Details would also be added to explain potential exceptions.*

- **Potential Schedule and Cost impacts:** There were concerns about the proposed review process requiring more time to prepare funding applications, and that adding transit-supportive design elements would increase project cost.

***Response:** Additional text would be added to the draft policy to explain that involving transit agencies earlier in the planning process would allow agencies to design the best multi-modal project. Further, identifying the full cost early would allow agencies to request the appropriate amount of funding. MTC would review its discretionary funding programs that fund roadway projects on public right-of-way and explore ways to provide support to agencies implementing multimodal projects.*

- **Limited Right-of-Way and Modal Priority Conflicts:** Commenters shared concerns about different ways to allocate/prioritize roadway space in constrained locations with limited right-of-way (ROW) and asked questions about how a decision would be made to determine the appropriate design.

***Response:** Additional text would be added to the draft policy clarifying that it would not dictate specific roadway modal hierarchy, allocation of space, or transit priority treatments. The intent of the TPPR is to ensure that potential transit-supportive design elements are considered in the design process for roadway projects and potential impacts to transit operations are mitigated, through early coordination between project sponsors and transit agencies. RNM staff would explore potential ways to provide support in these situations to help agencies come to a resolution.*

- **NACTO Transit Street Design Guide:** There was feedback regarding using the NACTO Transit Street Design Guide as the proposed reference for review, and concerns that NACTO provides design guidance and not design standards.

***Response:** Draft policy would propose that best practice transit-supportive design principles be considered, with the NACTO Transit Street Design Guide as one best practice design guide, along with locally-adopted design guidance and other national or local design resources. Following transit design principles (e.g., dedicated bus lanes, optimizing bus stop placement, utilizing transit signal priority) can be achieved while still maintaining compliance with the California Manual on Uniform Traffic Control Devices (MUTCD), Caltrans design standards, or AASHTO design standards.*

- **Implementation:** Commenters expressed interest in increasing education and access to best practice transit-supportive design resources to make the policy more effective, indicating a need for technical assistance.

***Response:** MTC plans to facilitate technical assistance, including trainings and access to design resources. Further, the Regional Transit Assessment (RTA) would include a task*

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*to develop a near-term implementation strategy, including short-term actions to enhance local capacity to effective delivery transit priority projects.*

The above list highlights only the most frequently heard details; a summary of all the comments received is included in Attachment 1.

### Next Steps

This spring, a Revised Draft Policy Memo will be shared with stakeholder committees and working groups to seek additional input (including local jurisdiction input) on updated proposed policy contents and requirements.

Presentations are tentatively scheduled for:

- Policy Development Working Group (PDWG)
- Transit Priority Working Group (TPWG)

There will also be extensive outreach by County (meetings tentative and subject to change):

County	Body	Date
<b>Alameda</b>	ACTC Technical Advisory Committee	May 8, 2025
<b>Contra Costa</b>	West Contra Costa Transportation Commission (WCCTC)	May 8, 2025
	East County Transportation Planning Committee (TRANSPLAN)	May 20, 2025
	Southwest Area Transportation Committee (SWAT)	May 21, 2025
	Transportation Partnership and Cooperation (TRANSPAC)	May 29, 2025
<b>Marin</b>	TAM Technical Advisory Working Group	June 12, 2025
<b>Napa</b>	NVTA Technical Advisory Committee	May 1, 2025
	NVTA Citizen Advisory Committee	May 7, 2025
<b>Santa Clara</b>	VTA System Operations and Asset Management Working Group	April 23, 2025
	VTA Technical Advisory Committee	June 11, 2025
<b>San Francisco</b>	<i>TBD</i>	<i>TBD</i>
<b>San Mateo</b>	C/CAG Congestion Management Technical Advisory Committee	May 15, 2025
<b>Sonoma</b>	SCTA Technical Advisory Committee	April 24, 2025
	SCTA Planning Advisory Committee	May 15, 2025
<b>Solano</b>	STA Technical Advisory Committee	April 30, 2025

After spring outreach to committees and working groups, RNM staff will develop a first draft of the TPPR policy text and present to select staff working groups and the RNM advisory bodies for feedback in the summer.

In fall 2025, RNM staff will finalize the draft TPPR policy based on summer feedback, present to the RNM advisory bodies one final time, and take it to the Metropolitan Transportation Commission for policy adoption.

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### ATTACHMENT 1. Comments Received on Preliminary Draft Policy Memo:

RNM staff received 350 comments from approximately 50 different agencies or groups from throughout the region, either in writing or during meetings. The following is a list of the agencies that provided input.

#### State/Regional

Caltrans District 4  
Caltrans Headquarters  
MTC

#### County Transportation Agencies:

Alameda CTC  
C/CAG  
CCTA  
STA  
SCTA  
TAM  
VTA (also Transit Agency)  
NVTa (also Transit Agency)

#### Transit Agencies:

AC Transit  
BART  
County Connection  
Golden Gate Transit  
Marin Transit  
NVTa (Vine, also County agency)  
Petaluma Transit  
SamTrans  
SFMTA  
Tri-Delta Transit  
VTA (also County agency)  
Wheels (LAVTA)

#### Cities/Counties

City of Alameda  
City of Albany  
City of Emeryville  
City of Fremont  
City of Hayward  
City of Mountain View  
City of Oakland  
City of Palo Alto  
City of Petaluma (also Transit Agency)  
City of San Bruno  
City of San Mateo  
City of San Jose  
City of San Leandro  
City of San Rafael  
City of Santa Clara  
City of Santa Rosa (also Transit Agency)  
City of Union City (also Transit Agency)  
City of Vallejo  
Contra Costa County  
Marin County  
San Mateo County  
Solano County  
West Contra Costa Transportation  
Commission

#### Advocacy Groups

Seamless Bay Area  
Bike East Bay

#### Other Agencies/Groups

Santa Clara Valley Urban Runoff Pollution  
Prevention Program  
Ministry of Velocity (Cal-ITP vendor)

Each comment was reviewed and considered in full, then categorized by theme. Below is a summary of feedback, with the staff response for each theme detailing how the comments will be considered and/or incorporated into the draft TPPR. Note that many comments could have been classified into multiple categories, but were assigned to the most prominent category for the sake of tracking purposes.

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**1) Complete Streets Checklist (105 comments)**

- a) **Proposed Review Process** – There were numerous, varied comments about the proposed process, which are summarized in the table below.

<b>Theme</b>	<b>Response</b>
Transit coordination is already included in the regional Complete Streets (CS) Policy/Checklist for projects requesting over \$250,000; what does additional coordination accomplish.	<i>The existing CS Policy only requires project applicants to notify transit agencies. Project applicants are not required to do comprehensive coordination with transit agencies.</i>
Transit agency director-level staff may not be able to respond.	<i>Propose that “Senior-level staff or an authorized delegate” would respond instead of “director-level” staff.</i>
Transit staff do not have time to prepare response letters for each project.	<i>Propose to develop a streamlined Transit Review that would simplify the review process.</i>
Transit agencies may not respond or support a project	<i>Draft policy would address process if a transit agency does not respond or cannot support a project.</i>
Unclear what transit agencies should be reviewing, or why transit agencies need to coordinate	<i>The proposed Transit Review would provide guidance on elements to consider in review (e.g., confirming bus stop locations, turning radii, etc.)</i>
Unclear what the difference would be if there is a project on the Transit Priority Network (TPN) versus a project that is only along a transit route.	<i>Draft policy would explain what level of review/coordination is needed for projects on TPN versus projects on non-TPN.</i>
The 30 days given to transit agencies to respond is too long (it will delay projects) or too short (transit agencies will need more time to review projects).	<i>The proposed Transit Review would simplify and accelerate review. CS Checklist process is not prescribed in the draft TPPR, and would be reviewed and updated as needed.</i>

- b) **Transit agency jurisdiction over local streets:** Commenters had concerns that requiring an “approval” letter from a transit agency projects as part of the Complete Streets Checklist would give transit agencies authority over roadway decisions.

**Staff Response:** *Draft policy would require transit agency support, not approval.*

- c) **Schedule Impacts:** Commenters had concerns about the TPPR making the Complete Streets Checklist process take longer to complete, and suggested providing more time for grant applicants to submit applications.

**Staff Response:** *The draft TPPR would not have purview over the administration of grant applications, but MTC staff would account for the additional time required when developing the funding calls and setting grant deadlines.*

- d) **Exemptions/Exceptions:** Many comments requested additional details regarding what types of projects would be exempt from the checklist process. There were also suggestions to add exemptions for specific types of projects and ways to streamline the approval process. Ideas included exemptions for agencies that commit to certain design requirements, projects along certain road types (evacuation routes, one-lane roads), certain types of projects (pre-approved treatments, station area treatments, on-route charging stations, bus stop improvements), or projects with limited right-of-way limiting design options. One comment asked if the policy intended to have projects apply for “Exceptions” not “Exemptions”.

**Staff Response:** *Draft policy would include more detail on valid project exceptions. Language would be changed from “exemptions” to “exceptions” throughout.*

- e) **Bicycle Pedestrian Advisory Committee (BPAC):** Commenters had concerns that BPACs don’t have the right expertise to review transit issues. There were suggestions to add additional seats to BPACs to have transit representation/expertise, or use alternative committees to review projects. The remaining comments regarding BPACs noted that not all jurisdictions have a BPAC, questioned what to do if a project covers multiple jurisdictions, suggested that BPACs have a standing agenda item to review the Complete Streets (CS) Checklist for projects over \$250,000, and asked how BPAC bylaws could/should be modified to address the policy.

**Staff Response:** *The current CS Policy requires that all projects in the public right-of-way, regardless of project type, requesting \$250,000 in discretionary funding or MTC’s endorsement be reviewed by BPACs. Some jurisdictions have broader transportation- or mobility-focused committees that fulfill BPAC duties as it relates to funding. Moving forward, MTC will evaluate potential changes to BPAC member composition to more effectively review multimodal project applications, rather than projects being reviewed by multiple, specialized committees.*

- f) **Suggested Edits and Clarifying Questions:** Several commenters indicated the proposed wording “the TPPR applies to projects along fixed-route transit” was awkward. There were also several comments asking for more details about the existing Complete Streets Checklist process and suggesting the TPPR explicitly only apply to new projects receiving over \$250,000 in discretionary funding. Commenters pointed out the inconsistent use of “should” and “must” for the requirement of following the NACTO *Transit Street Design Guide*. One commenter expressed concern that there are “no teeth” behind the requirement to incorporate transit-supportive design elements. There were questions about how the TPPR would apply for corridors with multiple transit agencies, development applications, and access-controlled highways.

**Staff Response:** Draft policy would clearly define “fixed-route transit”, and explicitly state that the TPPR would only apply to new projects seeking MTC funding or endorsements, upon adoption. It would also state that projects “should” (not “must”) follow the NACTO Transit Street Design Guide or similar best practices.

- g) **Other:** There were several comments regarding the existing Complete Streets (CS) Checklist process, including:
- i) Be consistent with applicable countywide bicycle and pedestrian plans
  - ii) Consider identifying impacts and benefits to fixed-route transit, demand-responsive transit, and paratransit.
  - iii) Consider indicating which relevant zoning and land use actions have been completed
  - iv) Consider how the CS Checklist will address SB 922-eligible projects.

**Staff Response:** As these comments are related to the broader Complete Streets process and will be shared with the MTC Complete Streets staff.

## 2) Modal Priority/Conflicts (40 comments)

- a) **Limited Right-of-Way:** Commenters shared concerns about different ways to allocate/prioritize roadway space in constrained locations with limited right-of-way (ROW). In addition to transit, potential space priorities highlighted include active transportation infrastructure, safety needs, emergency/disaster egress, and private vehicle throughput/parking. Commenters requested guidance and/or a process on how to navigate competing priorities. There were also comments about flexible roadway space allocation, such as a parking lane which serves as a transit lane during peak hours, or utilizing less space-intensive transit priority treatments (e.g., transit signal priority) to preserve space for other roadway uses.

**Staff Response:** The draft policy would not dictate roadway modal hierarchy, allocation of space, or specific transit priority treatments. Some modal conflict in limited ROW can be avoided outright by considering a project corridor as part of the greater network of adjacent streets, and assigning competing transportation modes to separate, parallel streets. If this approach isn’t feasible, roadway space allocation decisions should be made at the local level through regular coordination between local agencies.

The intent of the TPPR is to encourage early coordination between project sponsors and transit agencies to evaluate the potential to incorporate transit priority elements into roadway projects and/or mitigate any potential adverse impacts to transit operations. MTC proposes that a third-party agency (e.g., county transportation agency or MTC) could help to mediate the conversation as needed. The draft TPPR would include exceptions when it is not possible to incorporate transit priority elements or mitigate impacts to transit operations.

The draft policy would explicitly call out potential competing roadway uses and tradeoffs and provide more guidance on the local coordination/decision-making process.



- b) **How to Resolve Conflicting Priorities:** Commenters shared concerns about interagency coordination and conflict resolution, notably: balancing the needs of and impacts to different transportation modes when allocating roadway space; balancing the needs of multiple local jurisdictions and/or multiple transit agencies on projects spanning different jurisdictions or in overlapping service areas; and encouraging interagency coordination earlier in project delivery (i.e., during planning or preliminary design).

Commenters expressed interest in best practices for the conflict resolution process between different agencies and additional detail on the roles and responsibilities of MTC and county transportation agencies in the process. There was also some interest in alternatives to support letters from transit agencies, such as local jurisdictions documenting collaboration with transit agencies and/or demonstrating what transit priority elements were considered during planning and design.

***Staff Response:** The draft policy would provide more detail on proposed interagency coordination and conflict resolution processes, as well as specify agency roles and responsibilities. The Complete Streets Checklist would be updated to ask project sponsors to document estimated impacts of projects on transit operations and/or access to transit.*

- c) **Safety:** Commenters highlighted potential conflict between safety efforts and transit priority efforts – at the project level (e.g., roadway safety needs/impacts versus transit needs/impacts) and network level (i.e., high injury networks versus transit priority networks) – asking how to balance these two competing priorities.

***Staff Response:** Both roadway safety and transit operations needs should be considered during coordination between project sponsors and transit agencies. The draft policy would encourage good faith efforts to address competing needs. A third-party (e.g., county transportation agency or MTC) could help mediate as needed.*

- d) **Parking/Deliveries:** Commenters identified on-street parking as a common barrier to transit priority and active transportation improvements. Commenters suggested adding a statement indicating that space-efficient modes of transportation should be prioritized above on-street parking and expressed interest in technical and funding assistance with parking studies and public outreach needed for on-street parking changes/removal. Commenters also highlighted other curbside uses, such as deliveries.

***Staff Response:** Draft policy would acknowledge private vehicle parking and other curbside uses as potential competing roadway uses/needs. MTC currently provides resources on [Parking and Curb Management](#) and could consider future activities to provide further support.*

- e) **Planning Process:** Commenters indicated that consideration of competing corridor uses/needs should occur earlier during the planning process, not during project implementation. Commenters also indicated that the Transit Priority Network (TPN) should be developed with other regional networks and planned projects in mind, and in close coordination with public works and active transportation staff at local jurisdictions.

The TPN should be limited to locations where it is desired to prioritize transit over other modes.

**Staff Response:** *The draft policy would explicitly indicate that transit needs should be considered during planning and preliminary design to avoid conflicts during project implementation. In the event this does not occur, the draft TPPR would encourage incorporating elements beneficial to transit operations into the project. The TPN would be developed as part of the Regional Transit Assessment (RTA) and MTC would engage with stakeholder partners when developing the TPN. More information about the TPN can be found in responses to comment #3, Transit Priority Network.*

### 3) Transit Priority Network (TPN) (29 comments):

- a) **Criteria:** Commenters expressed interest in the TPPR applying to corridors with proposed/planned fixed-route transit service, in addition to those with existing fixed-route transit service. Commenters asked how the policy will adapt over time, given changes in transit service. There were also questions on how transit characteristics like service levels and route ridership will be factored in, as well as whether private shuttle services will be included. Commenters expressed interest in TPN development, mentioning that TPN criteria should be context-sensitive, requesting that the TPN aligns with other state/local definitions, recommending particular TPN criteria, and asking whether the TPN will be tiered.

**Staff Response:** *The draft policy would apply to locations with existing and/or planned (approved or budgeted) fixed-route transit service, excluding private shuttle services, special event services, and demand-responsive/paratransit services.*

*The TPN would be developed as part of the data-driven Regional Transit Assessment (RTA), which is anticipated to kick-off mid-2025. The RTA team would engage with stakeholder partners when developing the TPN and criteria. The TPN would be updated regularly to reflect changing transit services (the Transit Priority Implementation Strategy, to be developed as part of the RTA, would recommend how frequently the TPN should be updated).*

- b) **Existing Networks:** Commenters mentioned networks produced as part of the Bay Area Transit Plan (Caltrans), Plan Bay Area 2050+ (MTC), countywide transportation plans, and transit operator frequent networks should inform the development of the Transit Priority Network (TPN).

**Staff Response:** *The RTA team would engage with stakeholder partners when developing the TPN and criteria, and would take into consideration other related planning efforts.*

### 4) Funding (29 comments)

- a) **Cost Impacts:** Commenters had questions about how the policy would impact project costs and if additional funding would be allotted. There were also concerns that adding transit-supportive design elements would increase project costs. There were specific concerns about costs related to adding and maintaining transit signal priority, which can

require signal infrastructure upgrades to poles and conduits and ongoing subscription fees.

**Staff Response:** *The draft policy would not dictate that specific treatments be included, but rather that the transit agency be consulted during project development to ensure that the project design does not negatively impact transit.*

*For projects that are on the Transit Priority Network (TPN), the transit agency may also provide feedback on measures that should be considered. In some cases, this could increase the cost of a project. For example, if the proposed project is to add a protected bike lane along a transit route, the transit agency may request that passenger boarding islands at all bus stops be included in the design to avoid bus-bike safety conflicts and bus delays.*

*While adding transit-supportive design elements may increase project costs in certain situations, the goal of the TPPR is to result in better, more complete projects that consider all modes. Identifying multimodal needs such as these earlier in the project development phase can inform project cost estimates, so that funding requests are made for the appropriate amount.*

- b) **Fund Source Suggestions and Clarifying Questions:** Commenters had questions about which projects the policy would apply to, with specific questions about if it would apply to paving projects and OBAG 4. There were also suggestions to increase the funding for projects to account for the additional capital cost and timeline that transit elements added to projects may necessitate.

**Staff Response:** *The TPPR would apply to new projects that apply for more than \$250,000 of MTC discretionary funding<sup>1</sup> or request an MTC endorsement after the policy is adopted. If the policy is adopted prior to the release of OBAG 4, it would apply to projects over \$250,000 that receive OBAG 4 funding, since OBAG 4 is discretionary funding. MTC would consider how best to accommodate additional time required for project coordination with transit agencies in its grant funding programs.*

- c) **Incentives:** Commenters had suggestions and questions about how MTC grants may be scored to incentivize adopting local transit priority policies or incorporating transit improvements into projects. There was concern that the policy had “no teeth” and did not provide adequate incentives or additional funding for transit infrastructure.

**Staff Response:** *The draft TPPR would develop a structure for integrating transit into projects, but it does not have purview over specific funding grant programs. However, these comments will be passed on to the appropriate MTC staff.*

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<sup>1</sup> MTC Discretionary funding sources include Surface Transportation Block Grant Program (STBGP) funding, Congestion Mitigation and Air Quality Improvement Program (CMAQ) funding, Carbon Reduction Program (CRP), Transportation Alternatives (TA) set-aside/Active Transportation Program (ATP) funding, regional bridge tolls, and Regional Transportation Improvement Program (RTIP) funding.

## 5) Transit-Supportive Design Principles (24 comments)

- a) **Use of NACTO *Transit Street Design Guide*:** Commenters shared concerns about NACTO as the sole design reference, as there are other best practice design guidelines available. There were also concerns that NACTO guidance is not consistent with MUTCD standards, thus may be less defensible from a legal standpoint. There were questions and concerns about what design standards to use on Caltrans right-of-way or where a local agency has adopted their own guidelines (e.g., AC Transit's *Transit Supportive Design Guidelines*). There were also questions about what reference to use if there are conflicting standards/guidelines.

**Staff Response:** *The draft policy would propose the NACTO Transit Street Design Guide as one possible best practice design guide, but other locally adopted design guides could also be used. Following transit-supportive design principles (e.g., dedicated bus lanes, optimizing bus stop placement, utilizing transit signal priority) can be achieved while still maintaining compliance with the California Manual on Uniform Traffic Control Devices (CA MUTCD), Caltrans standards, or AASHTO standards. If necessary, a Caltrans Design Standard Decision Document can be completed to incorporate a design that is more consistent with transit-supportive design principles but does not follow Caltrans standards, for example, if a design requires narrowing lane widths from the standard 12-foot width.*

- b) **Transit Priority Project Examples and Local Context:** There were concerns about using the NACTO guide as a design reference since it focuses on urban settings and may not be appropriate for all contexts. Several commenters suggested adding examples of transit priority projects, particularly from suburban and rural settings, on two-lane roads. There were also comments suggesting that there be more flexibility to consider local context.

**Staff Response:** *Additional case studies would be added in the guidance that accompanies the modified Complete Streets Checklist. As mentioned in comment 5a, transit design principles can be accommodated and still maintain compliance with Caltrans and AASHTO standards.*

- c) **Transit Signal Priority (TSP):** There were suggestions to specifically add transit signal priority to the TPPR to ensure that signal timing is evaluated as part of projects, and to standardize the equipment used for better coordination during mutual-aid events or on corridors used by multiple transit agencies. There was also a concern about adding transit signal priority (TSP) at signals due to the infrastructure upgrades required.

**Staff Response:** *TSP is one element of transit streets design that should be considered as part of the Complete Streets Checklist, but specific design elements are not within the purview of the TPPR. These comments will be shared with the relevant teams at MTC to consider in their programs.*

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- d) **Suggested Edits:** There were text edits proposed regarding the use of “guidelines” versus “standards”, and suggested that “local guidance” be specific to “local transit agency guidance”.

***Staff Response:** These changes will be considered and implemented where deemed appropriate.*

**6) Implementation (24 comments)**

- a) **Training:** Commenters expressed interest in increasing education among all agencies to make the policy more effective, indicating a need for technical assistance and more forums for these conversations (e.g., workshops, when grants are released, etc.). Topics could include transit-supportive design guidance, modal priority/conflicts, coordination best practices, etc.

***Staff Response:** Technical assistance language would be amplified in the draft policy. Further, the Regional Transit Assessment (RTA) would include a task to develop a near-term implementation strategy, including short-term actions to enhance local capacity to effective delivery transit priority projects (i.e., technical assistance).*

- b) **Agency Resources:** Commenters highlighted a lack of dedicated transit staff and financial resources, especially at smaller local jurisdictions, as a challenge. Comments also expressed a need for access to NACTO and other transit-supportive design guidance, as the NACTO Transit Streets Design Guide must be purchased as it is not available in its entirety online. Additional funding, technical assistance, and engagement from MTC were mentioned as potential solutions.

***Staff Response:** Technical assistance language would be amplified in the draft policy. Further, the Regional Transit Assessment (RTA) would include a task to develop a near-term implementation strategy, including short-term actions to enhance local capacity to effective delivery transit priority projects (i.e., technical assistance). MTC will explore providing access to transit-supportive design guidance.*

- c) **Timeline and Interim Steps:** There were multiple comments that the policy will be adopted prior to a finalized Transit Priority Network (TPN), which has implications on policy implementation. Further, updates to the Complete Streets Checklist must be completed by the end of the 2025 calendar year in order to be incorporated into OBAG 4, but the TPN likely won’t be completed by then. There was also a suggestion to pilot the policy on select projects/grants to start, before wider implementation.

***Staff Response:** Staff notes that initial policy implementation would be impacted by the lack of an identified TPN. Staff would add language to the draft policy clarifying that there would be an interim phase prior to TPN identification and adoption, including expectations/requirements during this period.*

- d) **Evaluation:** Commenters noted that the Transit Priority Network (TPN) should be periodically re-evaluated and updated to reflect changing transit services and roadway conditions.

**Staff Response:** Staff would add language to the draft policy clarifying that the TPPR, TPN, and Complete Streets Policy/Checklist would be periodically reviewed and updated, per the recommendations from the Regional Transit Assessment near-term implementation strategy.

## 7) Local Resolution (14 comments)

- a) **Clarifying Requirements:** Commenters asked for MTC to provide a sample resolution and clarify the required policy elements in order to maintain regional consistency. Three comments asked whether local jurisdictions with an existing complete streets policy or limited transit policy can amend their existing policies to achieve the intent of a local transit priority policy.

**Staff Response:** A local policy can take several different forms, such as amending a Complete Streets policy, incorporating transit priority into a general plan, a standalone transit priority policy, or a resolution in support of the TPPR. Staff would add language to the draft policy clarifying how local jurisdictions may adopt a local transit priority policy. In addition, MTC would provide a sample template for a standalone transit priority policy, for agency consideration.

- b) **Incentives and Prioritization:** Commenters asked for clarification of how incentives and prioritization worked. There were also comments that non-adoption should not penalize high-merit projects or transit agency-sponsored projects.

**Staff Response:** Staff would add language to the draft policy clarifying how MTC may use incentives. Incentives would be dependent on the specific funding program. MTC would not penalize transit agencies where local jurisdictions do not adopt a transit priority policy.

## 8) Engagement (13 comments)

- a) **Suggestions/Requests:** Commenters suggested engaging with county transportation agency (CTA) bodies earlier and more often for all transit priority efforts, so that local jurisdictions are better informed. MTC support/attendance at local jurisdiction meetings, as needed, is also desired. For the policy, commenters requested that MTC provide additional review time to agency stakeholders after spring CTA outreach and before taking a draft policy to the RNM bodies in the summer. There was also a request to take the draft policy text to CTA bodies before the policy is finalized/adopted. Finally, commenters suggested additional methods of engagement and education to agencies and the public, namely a map/dashboard of the Transit Priority Network, status of projects being implemented, and rider-focused project impacts (data visualization/KPIs).

**Staff Response:** MTC will provide more regular updates on transit priority efforts at CTA bodies for better engagement with local jurisdictions. MTC will make an effort to support/attend local jurisdiction meetings, as needed. MTC will discuss and re-evaluate its policy engagement plan and comment timelines. MTC makes continuous updates to the [Transit Priority webpage](#) to report on transit priority project progress and other efforts.

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- b) **Clarifications:** Commenters asked about future forums for engaging stakeholders and expressed interest in additional outreach to local jurisdictions.

***Staff Response:** This spring, to continue engagement with local jurisdiction staff, MTC staff will present on the draft policy at committees and working groups organized by each of the Bay Area county transportation agencies (CTAs). The [Transit Priority webpage](#) lists CTA meetings open to the public at which MTC staff plans to present this spring. After that, staff will present draft policy text at the RNM bodies over the summer.*

**9) Interagency Coordination (12 comments)**

- a) **Caltrans:** Commenters noted a list of Caltrans-led efforts for policy alignment, including those related to SB 960 (e.g., Director’s Policy on Public Transit (in development), design guidance for transit priority facilities) and the Bay Area Transit Plan (in development). Commenters asked for clarifications on Caltrans’s role and how the TPPR would apply to the State Transportation Network (STN).

***Staff Response:** Staff regularly coordinates with Caltrans staff to ensure consistency between state and regional efforts. The draft policy would be updated to clarify Caltrans’s role related to the TPPR.*

- b) **Project Development/Coordination/Maintenance:** Commenters stated early and frequent coordination is key to developing better projects that both local jurisdictions/right-of-way agencies and transit agencies support. Some commenters noted that they have a local mechanism for coordination, and required agency coordination per TPPR would not add any benefits. Commenters expressed a challenge of working with multiple stakeholder agencies (i.e., a city’s roadway project with frequent transit routes crossing a county-operated roadway) and how the TPPR could foster better interagency coordination. Another comment mentioned the need to maintain transit infrastructure.

***Staff Response:** Language encouraging better interagency coordination earlier in the project process would be added to the draft policy in order to deliver stronger projects. MTC or another third-party agency may provide support for resolving conflicts among stakeholder agencies.*

**10) Roles/Responsibilities (8 comments):**

- a) Commenters asked to clarify the roles of Caltrans, county transportation agencies (CTAs), and MTC. CTAs can support conflict resolution and/or coordination of local transportation priorities through countywide transportation planning.

***Staff Response:** The draft policy text would clarify agency roles and requirements.*

**11) Supportive Comments (15 comments)**

- a) Commenters expressed general support for the policy and its proposed requirements, especially that it fosters increased coordination between right-of-way owners/operators and transit agencies, proposes funding incentives for right-of-way agencies adopting a local resolution of support or a local policy, and works within the existing Complete Streets Checklist process.

**12) Other (37 comments)** These are topics that received five or fewer comments each.

- a) **Purpose/Goals:** Several suggestions focused on wording changes to the TPPR purpose and goals.

***Staff Response:** The goals would be updated to clarify that the TPPR does not identify locations for transit priority improvements. The TPPR focuses on transit travel time and reliability, so goals would not be expanded to include other aspects of transit operations.*

- b) **Paratransit/Microtransit:** Paratransit and micro-transit need access to the curb, and some complete streets projects block access to the curb.

***Staff Response:** This concern will be shared with MTC planning staff for potential updates in the Complete Streets Checklist to identify impacts to paratransit and micro-transit operations.*

- c) **Unintended Consequences:** Comments suggested the draft policy could create potential unintended consequences, such as impacts to local circulation, traffic congestion, and/or traffic diversion.

***Staff Response:** MTC staff would produce reports periodically, in coordination with regular Complete Streets Policy reports, to summarize funded projects, report changes in transit performance, and update the TPPR and TPN, as needed.*

- d) **Equity:** Commenters asked for clarification on how equity is applied in evaluating funding applications and provided specific suggestions for how equity should be applied.

***Staff Response:** Application of equity principles is unique to each funding program, and details are specified in a program's call for projects.*

- e) **Clarifying Questions:** There were several questions related to the existing Complete Streets (CS) Policy and Checklist.

***Staff Response:** Approximately 75% of local jurisdictions have a Bicycle Pedestrian Advisory Committee (BPAC) or equivalent committee. Where a local jurisdiction does not have a BPAC or equivalent committee, CS Checklists are reviewed by county BPACs.*

*The existing CS Policy requires "implementation of complete streets as recommended in recently adopted local or countywide plans, such as bicycle, pedestrian, active transportation, Vision Zero or other systemic safety plan, Community Based Transportation Plans or transit plan." Thus, project applicants must consider all applicable plans available in contrast to a specific CS plan.*

- f) **Specific Jurisdiction Comments:** Several comments shared their local goals related to their respective jurisdictions. One comment asked to minimize potential actions that require local jurisdictions to take a resolution or other type of documents to their elected bodies for approval.

***Staff Response:** Noted – no change.*



- g) **Out of Scope:** There were a total of 12 comments that will not be addressed in the TPPR as they are out of scope. Those topics include: transfers, curb cuts, utility coordination, green infrastructure, funding for developing transit, or operating funds for shuttle/neighborhood circulator routes and on-demand transit.

***Staff Response:*** *Out of scope – no change.*