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October 14, 2016

Steve Heminger, Executive Director, Metropolitan Transportation Commission Brad Paul, Deputy Executive Director, Association of Bay Area Governments 375 Beale Street

510.208.7400

San Francisco, CA 94105

Subject: Alameda CTC Comments on Plan Bay Area 2040 Draft Preferred Scenario

Dear Mr. Heminger and Mr. Paul,

Thank you for the opportunity to comment on the draft Preferred Scenario for Plan Bay Area 2040 (Plan). Alameda CTC has worked closely with your staff throughout the Plan process and appreciates the effort they have made to be available and responsive, and to meet in person with the planning directors from the county's jurisdictions. The approval of the Preferred Scenario is a major milestone in development of the Plan, and we offer the following comments on the transportation investments, land use forecasts, and policies included in the Draft Preferred Scenario.

Transportation Investments

• Goods Movement: Alameda CTC is very pleased to see the emphasis on goods movement projects and programs in the draft investment scenario. Coming out of the 2013 Plan Bay Area, MTC and Alameda CTC worked extensively to develop regional and countywide goods movement plans to better understand the critical role goods movement plays in our economy, identify challenges and opportunities, and build a collaborative to advocate for funding and policies to advance regional and county priorities. The draft investment scenario contemplates a sizable investment in goods movement projects including improvements at the Port of Oakland and strategic highway operational investments which will improve the efficiency and velocity of freight in the region, supporting economic diversity in the region and serving the region's businesses and residents.

In addition to investing in transportation infrastructure projects, it is critically important that the region invest in reducing emissions and community impacts related to the movement of goods. Alameda CTC is pleased to see MTC include the Goods Movement Clean Fuels and Impact Reduction Program, and the Goods Movement Technology Program in the draft investment strategy. Alameda CTC strongly supports advancing these

programs immediately to provide tangible health and air quality benefits to neighborhoods that are disproportionately impacted by freight as soon as possible. Ongoing coordination with the Bay Area Air Quality Management District, the California Air Resources Board, and public health agencies will be needed to build and maintain momentum to develop and deliver the program. Thankfully, MTC's work in developing the Freight Emissions Reduction Plan can provide a solid starting point for this effort, as all partners were involved in the development of that plan, which identified priority projects to advance in the near-term.

Alameda CTC looks forward to partnering with MTC to make these investments and programs a reality by jointly prioritizing goods movement projects for competitive federal, state, and regional funding programs. A coordinated and sustained effort to advance goods movement projects and advocate for ongoing funding is critical to realizing the goals included in both the regional and countywide goods movement plans.

- **Transportation Projects:** Alameda CTC thanks MTC staff for being collaborative in developing the draft investment strategy. We appreciate the complexity of the regional call for projects and the challenges inherent in identifying a preferred transportation investment strategy. Overall Alameda CTC believes the investment strategy reflects the projects and priorities submitted by our county and transit operators. There are, however, a small number of specific additions or revisions we request:
 - o I-680 Northbound Express Lanes from SR 237 to SR 84 appears to be missing from the draft transportation investment strategy. The project is scheduled to begin construction next year and will relieve congestion on one of the region's top 10 mostcongested corridors. The project has over \$315 million in local and committed funding already secured. Alameda CTC requests the project be included in the preferred investment strategy.
 - Express Lanes project development and environmental phase: Alameda CTC also submitted two additional Express Lanes projects that were not included in the draft transportation investment strategy: I-680 Express lanes both directions between SR 84 and Alcosta Blvd., and I-580 Express Lanes both directions between Greenville and the San Joaquin County line. Given that these projects are not actively in the planning stage, we request they be included in the Plan as Project Development/Environmental Phase only, with a limited amount of funding of \$10 million and \$15 million respectively. This allows the projects to advance into planning if desired over the course of the Plan period, and the projects can be reconsidered for the next Plan Bay Area.
 - O The draft transportation investment scenario includes nearly \$1 billion in Bay Area Forward and \$500 million in Transportation Management Systems. The extremely brief description of the Bay Area Forward program includes a number of initiatives that county congestion management agencies (CMAs) throughout the region are actively working on, yet we have not been involved in development of this program. Alameda CTC requests that MTC provide additional detail regarding these programs and actively work with the CMAs and transit agencies to implement the programs planned within counties.

o The draft transportation investment scenario includes a Project Development/Construction reserve item for the BART to Livermore/ACE project which is expected to have a preferred alternative defined early next year. If the preferred project approval occurs prior to the next Plan update, Alameda CTC would like to see a pathway noted in the plan for access to federal funding opportunities.

Land Use Forecasts

Alameda CTC is continuing to work with our jurisdictions to identify any concerns they have regarding the housing and jobs forecasts. We encourage MTC and ABAG to continue to actively reach out to the cities to discuss the forecasts and provide the jurisdictions with sufficient time to comment on the forecasts. Alameda CTC will continue to facilitate the conversation as needed and will provide MTC with any additional feedback as the jurisdictions continue to review the data provided by MTC.

Policy Issues

• Transportation Funding: Although the Plan includes \$309 billion in anticipated revenues for transportation between now and 2040, additional funding is needed to operate, maintain, modernize, and strategically expand our transportation system. Alameda CTC appreciates the continued focus MTC has placed on maintaining and operating our existing transportation infrastructure. Consistent funding for maintaining our local streets and roads and keeping our transit systems operating and in a state of good repair is essential for the economic vibrancy and quality of life in the region. Even with the major investments contemplated in the draft scenario, the region moves in the right direction but does not meet the road or transit maintenance targets, or the mode shift target, and current congestion levels are increasing significantly throughout the region, as highlighted by MTC's recent "Top 10 Congested Corridors" release.

All partners in the region will continue to need to work together to advocate for increased and more stable funding for transportation. A significant amount of the funding assumed in the Plan requires the region to successfully compete for limited sources of highly sought after funding, or assumes new revenue measures being approved by voters. This will require coordinated efforts and sustained advocacy at all levels of government for the region to be successful. Alameda CTC encourages MTC to have the Plan identify specific priorities and set the stage for ongoing collaboration to ensure the region presents itself in a unified fashion. While counties, transit agencies, and the region have been extremely successful in securing public support for local transportation funding initiatives, we must continue to secure additional funding from state, federal, and private sector partners to make the revenues assumed in the Plan a reality and to leverage local funding.

• **Affordability:** As is apparent to all of us living in the Bay Area, and borne out in the performance analysis, the region is facing a major affordability crisis. The crisis is painfully acute in many parts of the region, including parts of Alameda County. The draft preferred scenario contemplates a robust set of policies to test the ability to increase affordable housing production and protection the region, yet we still fall short. While the Plan contemplates many big policy issues including economic development, housing affordability, and public health, as we look toward implementation of the Plan, it is important to also consider our agency mandates, areas of expertise, and authority.

Alameda CTC encourages MTC to focus on advancing transportation investments that can improve transportation choices and options and can reduce the costs of transportation, particularly for low and middle-income residents. Alameda CTC has focused our equity and affordability work on advancing initiatives and making tangible investments in programs that provide transportation options and access to jobs and education, and reduce the pressure on the transportation side of the housing and transportation affordability equation for all residents of our county. Simultaneously, we have continued to support growth in locally designated priority development areas including those jurisdictions that are actively working to reduce displacement pressures and increase affordability as most appropriate for their individual jurisdiction. In addition, by focusing staff effort and agency resources on advancing goods movement in the county, we have sought to support middle-income jobs that are under pressure in the region. Below are examples of specific projects and programs Alameda CTC has focused on to improve affordability in the county and how we would like to work further with MTC on advancing these programs.

- Affordable Student Transit Pass Program: Alameda CTC recently launched year one of a three-year Affordable Student Transit Pass pilot program. Funded by the 2014 Alameda County transportation sales tax (Measure BB), the program is currently being tested in 11 schools throughout the county and will be evaluated in spring 2017. Its purpose is to test and evaluate different pilot program designs over a three-year horizon to identify successful model programs that could be expanded and sustained with additional funding sources after the pilot program period. The program provides students with access to education, job opportunities, and afterschool activities, while reducing the cost burden on families. The program also exposes more children to transit, encouraging them to learn how to use the transit system and supporting more sustainable modes of transportation. Additional funding will be needed if the pilot program is to be continued and expanded in the future. Alameda CTC would like to partner with MTC to explore opportunities to expand the successful elements of the pilot and share lessons learned as the pilot is evaluated through the Means Based Fare Study implementation program or other regional funding programs.
- Transit Operations and Maintenance: Measure BB dedicates over \$2 billion to transit operators to provide a consistent funding source for maintaining, restoring, and improving transit services in Alameda County, in addition to transit capital investments. A robust and reliable transit system is an absolute lifeline for many low-income and middle-income residents in Alameda County, providing access to jobs, education, and community. While the draft investment scenario includes funding for today's level of transit operations, as we look forward as a region, continued investment in our transit systems should be a key strategy for transportation agencies seeking to advance equity goals. Alameda CTC would like to partner closely with MTC on funding opportunities to support transit investments for reliable, frequent, safe, and affordable transit improvements that can leverage our local investments.
- o **Seniors and Persons with Disabilities:** Measure BB also dedicates 10 percent of sales tax revenues, over \$774 million, to the growing transportation needs of older adults and people with disabilities. Alameda CTC would like to partner with MTC as

programs such as the Lifeline program, Community Based Transportation Plans, and other funding programs are developed to identify opportunities to leverage local funds to have meaningful impacts on the lives of seniors and persons with disabilities.

• New Funding for Housing: While investments such as those listed previously can help provide affordable transportation options for low and middle-income residents, substantial new funding sources are needed to help the region grapple with the current affordable housing crisis. Alameda CTC encourages a broad coalition of public sector agencies, advocacy groups, and the private sector to work together to advocate for new and dedicated funding programs for affordable housing and displacement protections at the state and federal level and not use transportation funding for housing. Current transportation funding is not sufficient to fund current and future critical transportation needs, much less also fund housing. New, substantial and dedicated funding sources are necessary that do not reduce funding for transportation.

We look forward to continuing to work with MTC and ABAG as you move closer to final Plan approval. Should you have any questions, please contact me or Tess Lengyel, Deputy Executive Director of Planning and Policy (tlengyel@alamedactc.org; 510.208.7428), of my staff.

Sincerely,

ARTHUR L. DAO Executive Director

cc: Ken Kirkey, MTC Miriam Chion, ABAG Matt Maloney, MTC