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July 20, 2021

Ms. Therese McMillan, Executive Director
Metropolitan Transportation Commission (MTC)
375 Beale Street
San Francisco, CA 94105

RE: Draft Plan Bay Area 2050

Dear Ms. McMillan:

The Alameda County Transportation Commission (Alameda CTC) appreciates the opportunity to continue to collaborate with you and your staff on the development of Plan Bay Area 2050 (PBA 2050). This letter includes our comments on Draft Plan Bay Area 2050 and the supplemental reports. Alameda CTC supports approval of the Draft Plan and preferred alternative evaluated in the Draft Environmental Impact Report. PBA 2050 is the culmination of an extensive, multi-year effort working extensively with partners throughout the region.

We have organized our comments into the following categories:

- Comments on Strategies, Implementation Plan and Actions
- Comments on Draft Plan and Project List

Comments on Strategies, Implementation Plan and Actions

PBA 2050 identifies a wide range of major strategies to help the region meet its ambitious goals. Alameda CTC appreciates the discussions to date with MTC staff to start articulating the next steps for advancing the strategies and we look forward to continued partnerships. Below are comments on specific strategies:

- *Strategy T2: Support community-led transportation enhancements in Equity Priority Communities.* Alameda CTC recently completed the 2020 update to our Community Based Transportation Plan (CBTP). We encourage MTC to work with the county transportation agencies (CTA) to discuss lessons from past cycles of CBTPs and other recent planning efforts to maximize the effectiveness of future cycles, in particular regarding how efforts at the regional scale can support and leverage local initiatives. Alameda CTC looks forward to working with MTC to also identify new strategies to support the full participation of historically marginalized communities in identifying transportation needs and developing solutions.

- *Strategy T5: Implement per-mile tolling on congested freeways with transit alternatives.* Alameda CTC looks forward to working with MTC to explore opportunities for next-generation freeways, including all-road tolling complemented with strong transit elements. We are already partnering with MTC on the I-80 Design Alternatives Assessment, where many of these strategies could be tested given the high levels of congestion and existing and potential transit service in the corridor. Alameda CTC also completed the I-580 Design Alternatives Assessment with MTC, and we are in the process of working in partnership with MTC/BATA to deliver improvements identified in the I-580 DAA and also advancing a new I-580 Sustainable Corridor Strategy. We encourage MTC to continue to advance more near-term improvements, such as the Bay Bridge Forward program of projects, while advancing the bold pricing studies proposed in PBA 2050. Engaging CTAs, local jurisdictions, and the public in these major policy discussions will be a massive effort, and it is important we continue to advance projects and policies that can improve person throughput and transit efficiency while we study the more transformative policies in parallel. Alameda CTC looks forward to being an active partner in this strategy.
- *Strategy T8: Build a Complete Streets network.* Alameda CTC strongly supports this strategy, and is investing a significant amount of our county discretionary funding to complete streets and active transportation projects. When considering complete streets, transit also needs to be a key consideration, as buses and bikes are often competing for the same space on key arterial corridors. While transit is included in many other strategies, we request that MTC add an acknowledgement of the importance of transit to complete streets as part of this strategy, even if you defer core transit enhancement strategies to later strategies. In regards to the Regional Active Transportation Plan, we respectfully request that MTC coordinate closely with Alameda CTC and other CTAs to ensure alignment of recommendations with local network planning and ensure planning efficiencies.
- *Strategy T9: Advance regional Vision Zero policy through street design and reduced speeds.* Alameda CTC, as well as a number of cities within the county, are advancing Vision Zero or Vision Zero-consistent policies and projects. We support MTC's focus on improving safety for all and focusing on street design and reduced speeds. The Alameda CTC Commission, similar to MTC, has included support for legislation that allows local jurisdictions flexibility to set appropriate speed limits and allow for additional speeding enforcement strategies. Advocacy for changes in legislation to advance these strategies is critical, and we encourage MTC to help support and build coalitions to advance such legislation.
- *Strategy T10: Enhance local transit frequency, capacity and reliability.* Alameda CTC and our transit agency partners are working actively to improve transit reliability on major corridors throughout the county. We appreciate MTC's focus on improving the quality and availability of transit service, particularly with a focus on lower-cost initiatives that improve person-throughput, both on local roads, arterials and the highway system.
- *Strategy T11: Expand and modernize the regional rail network.* Alameda CTC is strongly supportive of this strategy, and agrees that new revenues are needed to support the region's goals for a robust, integrated and effective rail system that better connects communities, which is critical to reaching local, regional and state goals. We look forward to working with MTC and transit and intercity rail operators to advance the projects included in PBA2050. There is also a major need to address safety around the existing rail network, particularly as we seek to encourage more growth near existing transportation infrastructure.
- *Strategy T12: Build an integrated regional express lanes and express bus network.* Alameda CTC strongly supports advocacy for legislation that will facilitate piloting the conversion of general-purpose lanes and part-time travel lanes to priced facilities and/or transit lanes. Reimagining our existing

infrastructure to identify ways to move the most people, most efficiently and sustainably will be critical to the region meeting its transportation, environmental and economic goals. Alameda CTC is committed to exploring general lane conversions for future Express Lanes, and is eager to partner closely with MTC and transit agencies in the region to develop a robust and implementable express bus service element to incorporate. The existing I-80 Design Alternatives Assessment is a first step in evaluating a range of alternatives for one of the region's most heavily-congested corridors. In addition, work is underway on I-680 to explore express bus options on that multi-county corridor, and Alameda CTC is kicking off a Sustainable Corridor Strategy for I-580. Alameda CTC supports adding reference to transit on I-680 in the PBA Transportation Chapter on Map 4.2 to reflect the multi-county coordination efforts to ensure express bus services in the I-680 corridor where the I-680 express lanes are located. We look forward to partnering with MTC to advance both policies and projects to make these corridors multimodal, sustainable and equitable.

- *Strategy EN7: Expand commute trip reduction programs at major employers, and Strategy EN: Expand transportation demand management initiatives.* Transit agencies are a core partner to include in transportation demand management (TDM) discussions. Transit agency bulk pass programs, such as AC Transit's Easy Pass, are a critical tool for supporting commute trip reduction programs at major employers, and can be a key tool to support new housing and commercial development. Alameda CTC encourages MTC to include discussion of existing transit agency pass programs as part of the strategy for advancing EN7 and EN9. As noted in EN9, the TDM space is fragmented, and having a more coherent and consistent framework and strategy is critical to advance both regional and county goals and ensure effective programs.
- *Strategy EN8: Expand clean vehicle initiatives.* There is significant interest in Alameda County to advance clean vehicles, including passenger, transit and goods movement vehicles. As noted when MTC presented on PBA 2050 to the Alameda CTC Commission, clean vehicle strategies should include not just electric vehicles and chargers but also hydrogen vehicles and infrastructure. AC Transit has a successful hydrogen fuel cell program, and MTC has been a critical partner in supporting that project, and there is continued interest in exploring hydrogen opportunities as well as electric technologies, particularly for transit and goods movement. While MTC's focus under Senate Bill 375 is on passenger and light-duty vehicles, the emissions from goods movement have heavily impacted low-income communities and communities of color in the region, and in particular in Alameda County in West Oakland and along the I-880 corridor. Alameda CTC encourages MTC to play a more active role in supporting and advancing programs and projects that invest in reducing the emissions burden to these communities and supports zero and near-zero emissions goods movement.

In addition, given the extensive interest at all levels of government in advancing clean vehicles, it is important that there is a coordinated effort to ensure all parties coordinate to maximize impact and minimize redundancy. Community Choice Aggregators, such as East Bay Community Energy, have investing significant effort and resources in clean vehicle initiatives and should be considered another important partner for advancing clean vehicle strategies.

Specific Comments on Draft Project List

Alameda CTC commends MTC staff for the major effort that went into developing the Draft Project List. MTC staff have been responsive and clear in their communication throughout development of the Draft Project List. In addition to the overall comments on strategies noted above, we have a few specific minor comments on the Draft Project List:

- There are a few interchange projects that we request be categorized under a different RTP ID number. These projects all include major elements for active transportation, but from a TIP/RTP standpoint,

are more appropriately categorized under their respective corridors. The following projects should be moved from 21-T09-061 “Regional Vision Zero Policy through Street Design and Reduced Speeds | Regional” to:

- 21-T06-021 Corridor & Interchange Improvements | I-680 | Alameda County
 - Sunol Blvd.
 - Total: \$50 million
- 21-T06-019 Corridor & Interchange Improvements | I-580 | Alameda County
 - Greenville Road, Isabel Ave/SR-84, First Street, and Vasco Road
 - Total: \$260 million
- We submitted a Programmatic Category called Climate Program: TDM and Emission Reduction Technology for \$124 million that is currently associated with 21-T07-057 “Technology Improvements | Regional”. The projects in this category would be better classified under the following two regional programs:
 - 21-EN08-131 Clean Vehicle Initiatives | Regional
 - 21-EN09-132 Regional Transportation Demand Management Initiatives | Regional
- Quarry Lakes Parkway is listed as a location under 21-T07-056 “Minor Roadway Improvements | Regional”. This project has historically been called the East-West Connector. We request that MTC adjust the project title listed in the program list of projects to read: “Quarry Lakes Parkway (also known as East-West Connector)” for clarity.

Again, congratulations on nearing the major milestone of adopting PBA 2050. Alameda CTC appreciates the ongoing partnership with MTC and we look forward to continuing to work with you to implement this visionary plan. Please contact Carolyn Clevenger, cclevenger@alamedactc.org, if you have any questions.

Sincerely,



Tess Lengyel
Executive Director, Alameda County Transportation Commission