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Dear Ms. McMillan,

On behalf of the San Francisco Bay Area Rapid Transit District (BART), I'd like to extend my congratulations to MTC and ABAG for the release of the Draft Plan Bay Area 2050 and the Draft Plan's Draft Environmental Impact Report (State Clearinghouse #2020090519). BART appreciates the opportunity, over the last three years, to have participated closely in collaboration with Bay Area residents, businesses, jurisdictions, and agencies through the Horizon and Plan Bay Area processes to arrive at a plan that seeks to advance the Plan's Vision and Guiding Principles. The Draft Plan Bay Area 2050 (Plan) is in alignment with the BART's adopted Strategic Plan, which includes goals for Equity, Economy, and Environment and prioritizes strategies to manage demand, expand capacity, and fix, maintain, and modernize the system. It is also consistent with BART's TOD Policy in promoting housing near transit and supporting affordable housing development, and BART's Station Access policy in supporting multimodal travel and promoting non-auto trips.

BART supports the general direction of the Plan and its equity-first approach to creating a Bay Area where everyone can live, work, and find success. We especially support the inclusion of significant investments in transit (including giving first priority to state of good repair investments on the existing transit system), policies to encourage development near transit-rich areas, and the efforts undertaken to meet the California Air Resource Board's 19% per-capita reduction in GHG emission target by 2035. BART also appreciates the inclusion of the full set of the District's submitted projects and programmatic improvements, including the explicit inclusion of Link21 as an anchor of the Plan.

Thank you for the opportunity to comment on these documents. The following Attachment A provides BART's comments on the Plan Bay Area 2050 Draft Plan and the Draft Environmental Impact Report. Please contact Hannah Lindelof, Strategic Planning Group Manager, at 510-464-6426 or hlindel@bart.gov if you have any additional questions.

Val Joseph Menotti
Chief Planning and Development Officer

Attachment A:

BART Comments on Plan Bay Area 2050 Draft Plan & Draft Environmental Impact Report

BART appreciates having had the opportunity to participate in the multiphase planning process for Plan Bay Area 2050, starting with the ‘Horizons’ development process, which was an innovative approach to scenario planning and the need to plan for uncertainty. The resulting Draft Plan is a long-range regional plan that outlines 35 integrated strategies across four key issues—housing, the economy, transportation, and the environment—to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges, while also achieving regional greenhouse gas emissions reduction targets established by the California Air Resources Board pursuant to the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill (SB) 375, Statutes of 2008). We have reviewed the Draft Plan and the Draft Environmental Impact Report and offer the following comments for your consideration.

Comments on Plan Bay Area 2050 Draft Plan

1. Transportation:

- a. BART supports the range transit-supportive strategies included in the Draft Plan, both for optimizing the existing system and building a next-generation transit network. BART also supports efforts to create healthy and safe streets, particularly for active transportation, which are also important first/last mile improvements.
- b. BART strongly supports State of Good Repair/Fix-It-First focused strategies, in particular strategy T1. We also suggest adding investments in Regional Rail infrastructure, which are listed in the Next Generation Transit Network theme under T11, to T1 as well. As the region grows and becomes more integrated with the Megaregion, this network stands to serve an even more critical role.
- c. Strategy T1 also specifies funding to increase transit service to 2019 levels. Please provide clarity about the proposed length of this funding commitment. Many transit agencies in the Bay Area are facing a multi-year and structural deficits that will require long-term, sustainable strategies.
- d. BART strongly supports strategy T2, focused on implementation of community-led transportation enhancements in Equity Priority Communities. As we have been hearing from our Equity-focused Co-Creation process as part of Link21, it is important when setting up locally based programs to incorporate input from these communities to recognize that the transportation needs of those communities may be regional in nature, not just local, especially for access to jobs.
- e. BART supports strategy T4: Reform Regional Transit Fare Policy with the understanding that adequate funding will be made available to support the program overall and ensure sustainable funding for transit service (i.e., addressing any potential fare revenue losses that individual operators may realize and may not currently be captured in 21-T04-011). Many operators, including BART, have historically relied on fare revenue as a large portion of the operating budget, and reductions in total operating revenue would be at odds with the restoration of service identified in T1.

- f. BART Supports the creation of a network of streets that serve all users better in T8 and T9, with protected bike lanes and other features to encourage all active transportation modes. This can be most challenging to accomplish in the urban core of the region due to limited street rights-of-way, but the benefits are potentially greatest in the core due to higher densities and higher levels of transit use. The text mentions specific infrastructure in the outer suburban portions of the region, and we encourage commensurate attention to developing such facilities in the older, more urban parts of the region.
 - g. BART appreciates this explicit inclusion of Link21 in strategy T11, and as an anchor of the Plan. BART and CCJPA look forward to continuing to work closely with MTC and other regional partners to move this important program towards implementation while ensuring that the benefits of the project demonstrated in the plan are delivered, with a particular focus towards delivering benefits to Equity Priority Communities.
2. Housing & Land Use
- a. Many strategies have been carried forward from previous versions of Plan Bay Area. Inclusion of an assessment of how well these strategies have worked to date, or what barriers have been found in their implementation, would bolster continued support for these strategies.
 - b. BART supports the four identified growth areas in the Draft Plan. The plan should identify strategies to balance encouraging more affordable housing in high resource areas with utilizing affordable housing production as a key anti-displacement strategy in lower income transit rich areas – often identified as Equity Priority Communities in the Plan. We request that MTC reinforce that transit proximity inherently provides high opportunity for jobs, and support efforts to ensure that transit rich areas should be prioritized equally with high resource areas for affordable housing funds (most notably, California Debt Limit Allocation Committee (CDLAC)).
 - c. Strategy H4 in the Draft Plan should be explicitly coordinated with the Regional Impact Council’s Regional Action Plan to Address Homelessness, and should include additional emphasis on the unique service and funding needs of people experiencing homelessness and regional coordination of services.
 - d. Strategy H5 in the Draft Plan should stress that in-lieu fees are not a sufficient replacement for integration of affordable units. Delivery of units via in-lieu has proved challenging given rapidly escalating costs and separate approvals processes.
3. Economy
- a. Strategy EC4 may be targeted at the wrong barrier. The challenges to commercial growth in many areas are market and economic, rather than zoning limitations – for example, the Warm Springs Innovation District would allow unlimited height. Please provide more details as to how implementation of EC4 will work towards addressing the real economic barriers or commit to exploring strategies that will draw jobs to transit rich locations in areas that have a better jobs-housing balance. High regional commercial linkage fees to build in areas that are currently jobs rich but not transit rich, for example, could be a more effective strategy that could be implemented by the Bay Area Housing Finance Authority (BAHFA).

- b. BART strongly supports Strategy EC5 to provide incentives to locate jobs in housing rich areas near regional rail transit. In addition to the benefits to jobs/housing balance, this type of growth may also be focused in areas that allow BART to capture multi-directional commutes and support additional all-day service for all types of trips.
4. Environment
- a. On October 22, 2020, the BART Board of Directors adopted Resolution 5458, which registered opposition to EN7 as it appeared in the Final Blueprint. In the Final Blueprint, EN7 was written to require remote work for 60% of the workforce of major office employers on any given day regardless of commute mode. BART appreciates the revisions to EN7 found in the Draft Plan which refocus the strategy towards explicitly targeting the reduction of auto trips through any number of employer-selected transportation demand management tools. BART supports the inclusion of transit-based tools, such as employer-provided fare subsidies and passes, which will help maximize the utilization of the significant investment in transit that the Draft Plan proposes, while ensuring that the region's transit network remains viable for all types of trips.
 - b. Please correct the Senate Bill 375 author on page 83, the reference should be Steinberg not DeSaulnier.
5. Implementation Plan:
- a. BART appreciates the recognition in the Draft Plan that achieving the goals and targets of the plan requires coordinated implementation of all strategies, and we would also underscore the importance thereof. We look forward to continuing to work at a staff level with MTC and others to identify low cost/high reward investments, including those focused around racial and socioeconomic equity, that can be advanced to implementation in the next one to five years.
 - b. Similarly, we look forward to refining the details of proposed in the implementation plan further, particularly with respect to roles and responsibilities. It is likely that the culmination of the Blue Ribbon Transit Recovery Task Force and next steps of the Business Case development will also help to inform this refinement, particularly with respect to responsibilities around implementation of T1, restoring, operating, and maintaining the existing system.
 - c. We suggest that focus be placed on addressing skyrocketing construction costs in both the Housing & Economy strategies. Construction cost escalation is a major impediment to implementation of most of the strategies identified in the Draft Plan and the region should take a lead role in supporting strategies to lower construction costs. Some potential efforts include adding job training in construction trades specifically to expand workforce (add to EC2) and supporting innovations in the construction industry through technical support for building codes, low-cost financing for high-risk innovative development, business startups in fields with a shortage of firms (electrical/plumbing). This could have the dual benefit of addressing worker shortages in transportation and other fields (e.g. electricians, elevator/escalator technicians) while expanding opportunities for good paying jobs.
 - d. It appears that Strategy H8, which includes use of public lands for creation of housing, is the highest-ranking strategy. BART would like to discuss with MTC what additional incentives could be provided, as all state policy efforts to support public land

development have been in the form of additional regulations rather than assistance to public agencies. BART could benefit from regional support for upfront planning, outreach, and investment in transportation infrastructure (to create more buildable space and ensure safe passenger movement at stations) to support TOD on our 250 acres of developable, publicly owned land.

- e. Under strategy EC5, focused on providing incentives to employers to locate jobs in Transit Rich Areas, MTC's role is listed as "support" but we would like to discuss what more could be done using BAHFA authority to create regional housing funding streams that capture value from jobs rich areas to support affordable housing. Measures such as a regional linkage fee could also serve to incentivize employers and developers to locate in other areas that are not charged such a fee, while generating much needed funds to be directed to affordable housing.
- f. Equitable implementation of TDM-based strategies is critical to achieving the goals of the Plan and the region. TDM-based strategies throughout the plan should be cognizant that many TDM programs leave low-income workers behind - they are simply not offered commute incentives. In the Frick/Barajas study of BART usage by residents of TODs, they found that low-income residents are less likely to take BART, in part because they are not offered commuter incentives by their employers. Please call this inequity out and identify ways to address this deficiency in employer based TDM programs, in parallel to how the plan also discusses incentives to allow low-income households to access electric vehicles.

Comments on Plan Bay Area 2050 Draft Environmental Impact Report

1. BART strongly supports the attributes of the proposed Plan and the TRA Focus Alternative 1, that seek to invest in the maintenance and expansion of regional and local transit, encourage development in transit-rich geographies, and reduce vehicle miles traveled and related greenhouse gas and other emissions.
2. BART is concerned that the HRA Focus Alternative 2 would remove investment in regional and interregional rail projects, as increased transit ridership is central to reducing vehicle miles traveled and corresponding greenhouse gas emissions.