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Alameda-Contra Costa Transit District

June 2, 2017

Ken Kirkey  
Planning Director  
Metropolitan Transportation Commission  
(for MTC and the Association of Bay Area Governments)  
375 Beale Street  
San Francisco, Ca. 94105

**Subject: Plan Bay Area 2040—Draft Plan and Environmental Impact Report—Plan Bay Area 2040.**

Dear Mr. Kirkey:

Thank you for the opportunity to comment on the draft Plan and Environmental Impact Report (EIR) for **Plan Bay Area 2040**. AC Transit is pleased that the Plan continues the focus of the 2013 Plan Bay Area on compact growth-- in Priority Development Areas (PDAs), Transit Priority Areas (TPAs), and in the region's three big cities (San Francisco, San Jose, and Oakland). We also support the Plan's use and evaluation of policy targets in addition to numerical indicators. AC Transit has appreciated the opportunity to participate in discussing and reviewing the Plan at the Regional Advisory Working Group (RAWG) and in other forums. The Plan comes at a time when years of economic growth and population growth have resulted in heavy pressure on the Bay Area transportation system. Our comments concern the overall mode share of travel, the Transbay corridors, projected transit operating funding, and transit capital funding.

**Plan Bay Area 2040** represents the nine County Bay Area's long term strategy for housing and employment growth, and for transportation facilities to serve that growth. It updates **Plan Bay Area**, which was approved in 2013. As the long term strategy, **Plan Bay Area 2040** is the broadest land use and transportation planning document for the region. The Plan is prepared by regional agencies: the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). The document is both the Sustainable Communities Strategy (SCS) required by SB 375 and the federally required Regional Transportation Plan (RTP). The RTP/SCS, and the Environmental Impact Report (EIR) on the document is prepared every four year.

Auto and Other Modes' Share of Bay Area Travel

AC Transit is very concerned with a fundamental overall parameter of the Plan. The Plan projects essentially no change in the overall pattern of Bay Area transportation. It projects (see Table 2.1-15 in the EIR) that drive alone trips in 2040 will still represent 46.6% of daily person

trips in the 9 County Bay Area, down almost imperceptibly from the current 47.6%. The absolute number of drive alone trips daily on the region's roadways would increase by a disturbing 2.5 million trips daily. Transit's share of trips would increase minimally (by .5%), the walking share would be absolutely static, and the bike share would—in the face of ever-increasing bicycle activity—tick downward.

The Plan therefore misses its own transportation target: *Reducing the auto share of trips by at least 10%*. The Plan's static result is particularly distressing in a period when the state of California and many California cities are playing an increasingly active role in the global discussion of strategies to reduce greenhouse gas emissions and climate change.

**Recommendation:** MTC and ABAG should review the Plan structure and funding and modify the Plan to support greater share for sustainable non-auto modes: transit, walking, and biking.

#### The Transbay Corridors

The Transbay corridors between East Bay cities and West Bay centers--San Francisco and Silicon Valley—are among the most stressed elements of the Bay Area transportation system. Transbay bridges, BART, and a number of AC Transit Transbay bus lines are carrying loads which are at or above their designed capacity. As a result, bridge congestion is increasing, BART delays are growing more common, and the quality of the commute is degrading. Because of the current commute pattern, Transbay transit service is very peaked in the commute direction, making it unusually expensive to operate.

There is an existing and worsening mismatch between jobs and housing on the two sides of the corridor which drives transit need. On the west side, San Francisco and Silicon Valley are rapidly adding jobs, but not (particularly in Silicon Valley) adding commensurate levels of housing. Overall, East Bay cities have been more willing to allow housing development, but have been less able to attract jobs than West Bay cities, especially in the core of our district. While the Bay Area will always have Transbay commuting, more balanced additions of jobs and housing would give more people the opportunity to live and work on one side of the Bay. This mismatch is particularly visible to AC Transit as major operators of Bay Bridge service, and as participants in the Dumbarton Bridge transit corridor study.

As a region-wide planning document, **Plan Bay Area 2040** is uniquely positioned to respond to this issue. The Plan does propose various transit improvements in the Transbay corridor, such as those in the Core Capacity Transit Study. However, the Plan does not recommend an overall approach to reduce travel and transit demand there. Growth in demand, and the concomitant need for costly new facilities, could be reduced, or at least slowed, if there was increased employment growth in the East Bay and/or housing growth in the West Bay.

**Transbay Corridors Recommendation:** The Plan should incorporate strategies to increase housing in the West Bay and to increase jobs in the East Bay, in order to reduce Transbay demand and the cost of meeting that demand.

#### Transit Operating Funds

The Plan projects that funding for transit operations will keep pace with operating costs over the next 24 years. This assumption is drawn partially from data provided by AC Transit. To bridge the funding gap that AC Transit projected, MTC assumes that AC Transit will receive \$1.3 billion in AB 1107 and \$2.1 billion in TDA funds over the 24 years. However, TDA funds in particular have been unstable in recent years. These funds will need to be closely monitored to assure that funding continues to match need.

The Plan anticipates only a modest overall increase in transit service (hours)—8% over the 24 year life of the plan. The Plan does not indicate where specifically these hours would be added. Regional population is anticipated to increase 27% over the period. If these projections prove out, there will be 15% *less* transit service hours per capita in 2040 than there are today. It is therefore not surprising that only minimal mode shift occurs.

In most of the region, transit service levels today are inadequate and should be improved, not maintained. There has been truncated night and weekend service, infrequent service, and areas that are simply not served at all. In San Francisco, MTA operated the highest level of (diesel and trolley) bus service per capita in the country, and has among the highest ridership in the country. But AC Transit operated less than half as much per capita, and VTA's per capita bus service was barely half of AC Transit's. Service in many suburban areas is lower still. Transit-reliant people, particularly the large low income populations in Oakland and Richmond, are impeded in their access to jobs, goods and services by these differences. These spatial and temporal gaps must be addressed both to address inequities and to shift regional travel patterns.

**Recommendation:** The Plan should be reviewed and modified to increase transit operating hours. If necessary, funding should be shifted from capital projects and/or roadway projects.

#### Transit Capital Funds

AC Transit appreciates the inclusion of a potential AC Transit Bus Rapid Transit (BRT) line on San Pablo Avenue between Oakland and Richmond in the Plan. In our Major Corridors Study we identified Adeline Street, East 14<sup>th</sup> Street/Mission Blvd. and Macarthur Blvd./Grand Ave. (Oakland) as additional potential year 2040 BRT corridors. We also identified Telegraph Avenue (Berkeley/Oakland) as a potential BRT or light rail corridor. These are long term planning projects—at this time we are only working on the East Bay (International Blvd.) BRT. We note

that San Francisco MTA and Santa Clara County VTA have BRT projects in the Plan. We believe that BRT is likely to be a relatively efficient, cost effective investment transit mode for all the transit agencies which operate it. Given that capital need outstrips resources, all capital projects should demonstrate cost effectiveness.

**Recommendation:** Add the Adeline, East 14<sup>th</sup>/Mission, Grand/Macarthur, and Telegraph BRT projects as potential projects in the Plan.

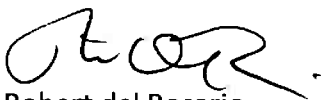
Conclusion

There is little consensus about the ultimate shape of American metropolitan transportation systems, but broad agreement that this is a period of change and upheaval. The places people live, the modes by which they travel, the agencies and companies which provide transportation services, and the technologies used on those trips are all changing. Some regions, such as Seattle, are aggressively implementing major changes to their transit system. Change in Los Angeles is so profound that many commentators speak of a transition from "Los Angeles 2.0" to "Los Angeles 3.0." In some regions, such as Washington, D.C., transit-oriented development has become the norm, not the exception.

**Plan Bay Area 2040** could represent an opportunity to reshape the Bay Area land use and transportation system. It could show that the era of suburbanization, sprawl, and auto dependency has ended decisively here. Unfortunately, to date the Plan does not provide an adequate counterweight to these forces. We hope that can be improved.

Thank you for your attention to our comments.

Yours Sincerely,



Robert del Rosario  
Director of Service Development and Planning