May 31, 2017

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Brad Paul, Acting Executive Director
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Re: BART Comments on Draft Plan Bay Area 2040

Dear Mr. Heminger and Mr. Paul:

The San Francisco Bay Area Rapid Transit District (BART) appreciates the opportunity to comment on the Plan Bay Area 2040 (PBA) - Draft Plan. We are grateful for your consideration of input that BART has provided on the Draft Preferred scenario, and were pleased with several of the updates particularly the inclusion of the Housing Action Plan and adoption of more aggressive greenhouse gas reduction targets. BART offers these additional comments, which are consistent with the BART's vision, as articulated in the BART Board adopted Strategic Plan Framework. BART supports a sustainable and prosperous Bay Area by connecting communities with seamless mobility.

Key Transportation Strategies and Investments

1) Operate and Maintain. BART supports the regional plan's priority to adequately operate and maintain the Bay Area's legacy transportation system. In Nov. 2016, voters in the BART District supported this "fix-it-first" approach by approving BART's Measure RR for $3.5 B, which dedicates 90% of funding repair, replace and modernize BART's critical safety infrastructure.

2) Expand - BART Core Capacity + BART Metro. Frequent and reliable trunk route transit service will be the backbone of Plan Bay Area. The region's commitment to the BART Transbay Core Capacity Project + BART Metro Program are critical investments. Between FY10 and FY16, BART weekday ridership increased by 30%, with nearly 100,000 additional riders. This surge put a severe strain on peak Transbay service, and made travel uncomfortable for many riders. The BART Transbay Core Capacity Project positions BART to substantially increase the number of peak period 10-car BART trains. These investments could allow BART to operate up to 25% more trains through the Transbay tube, providing service to up to 40% additional Transbay passengers, and will be critical to absorbing the additional core transit demand projected by PBA.
We will continue to work with MTC and other funding partners to fully fund, and implement, this Project.

3) **Clipper.** BART supports the region’s investments to modernize Clipper, and move towards more seamless mobility.

### Action Plan Comments

4) **Undersupply of Housing.** Plan Bay Area correctly points out that our region faces a significant housing crisis, and there are limited regional policy tools with which to reduce the burden on families. Recent national analysis indicates that constrained housing development, most notable in the Bay Area, has a significant negative impact on the productivity of the national economy.

5) **Value of Housing Near Transit.** In the Housing Action Plan, we encourage MTC to consider revising the actions to focus on housing production near transit hubs specifically. While any new housing is beneficial, transit-oriented housing can deliver significantly more regional benefits than other types of housing. BART is committed to doing its part by producing 20,000 housing units, 7,000 of which are affordable, on land we own at 27 stations. In its Public Lands Study, MTC has recently identified BART as the largest landowner in the four-county core of the San Francisco Bay Area, with 57 acres, most of which is available for transit-oriented development. In addition, transit oriented housing can contribute to at least 7 regional targets identified by MTC including adequate housing, climate protection, open space preservation, non-auto mode shift, healthy and safe communities, access to jobs, and housing + transportation affordability.

6) **New Funds for Housing and Transportation.** During the upcoming CASA process, we encourage MTC to consider new funds for both transportation and affordable housing. Transportation investments are an important part of solving the housing crisis, and improve PBA performance when considering combined transportation and housing affordability. If considered, a commercial Vehicle Miles Travelled fee could have the added benefit of incentivizing focused job growth near transit stations.

7) **Middle Wage Job Career Paths for Transit.** While the Economic Development Action Plan emphasizes creating middle wage job career paths for goods movement, the transit industry in the Bay Area is also facing a workforce shortage for critical middle wage positions. By 2020, 31% of BART’s Automatic Fare Control Electronic Technicians, 24% of Transit Vehicle Electronic Technicians, and 14% of Train Control Electronic Technicians are forecast to retire. BART actively recruits for these positions but must compete with other companies seeking to hire from the scarce labor pool that is trained in electrical maintenance. To address this issue, BART is working with local community colleges to develop a Transit Career Ladders training program to develop our own skilled labor pool in this field. The program was funded through a Department of Labor grant, and BART is seeking additional funds to continue it. If MTC is pursuing actions to strengthen middle wage career paths, supporting technical training programs could help local transit agencies and potentially lower regional construction costs by expanding the pool of qualified workers.
Additional Comments

8) Mega-Region / Regional Edge. Due to housing affordability challenges, the region continues to experience in-commuting from adjacent counties. Plan Bay Area calls for creating enough affordable housing within the region so that there is no growth of in-commuting. How should this affect our transportation investment policies at the regional edge? We would appreciate more clarity regarding the need for transit investments at the regional edge given the Plan Bay Area vision for eliminating the growth of in-commuting.

9) Mobility - Approaching an Inflection Point. Transportation technologies are rapidly changing the transportation landscape, and are impacting travel markets, including transit ridership. For example, BART’s FY17 Q1 revenue projection at the San Francisco Airport was about 10 percent below target, while Uber/Lyft trips from SFO increased six-fold between 2014 and 2016. Additionally, BART’s off-peak ridership traditionally tracks closely with peak ridership trends, but starting in summer 2016, off-peak ridership has fallen dramatically. This trend significantly impacts transit financial sustainability. BART wants to continue to work with MTC (and others) to better understand these dynamics, and formulate policy responses.

10) Regional Measure 3. BART’s prioritized candidate project list for Regional Measure 3, adopted by the BART Board in February, 2017, builds upon PBA’s strong emphasis on improving and maintaining the core regional transit system in the Bay Area. BART’s highest priority project for RM3 is the acquisition of 306 additional train cars which would maximize the investment foreseen by PBA in advancing BART’s Transbay Core Capacity Project.

Thank you for the opportunity to comment on this document, and BART appreciates your staff’s hard work to adopt the Plan by July, 2017. Please contact Ellen Smith, Group Manager - Strategic Planning (510.287.4758) with any questions.

Sincerely,

Robert M. Powers
Deputy General Manager

cc: Board Appointed Officers
Executive Staff
Chief Planning & Development Officer
Strategic Planning Department Manager