



Livermore Amador Valley Transit Authority

May 30, 2017

Association of Bay Area Governments
Metropolitan Transportation Commission
Attn: Miriam Chion and Kenneth Kirkey
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

**RE: Livermore Amador Valley Transit Authority (LAVTA) Comments on Draft
Plan Bay Area 2040**

Dear Ms. Chion and Mr. Kirkey:

The Livermore Amador Valley Transit Authority (LAVTA) is pleased to submit comments on the Draft Plan Bay Area 2040 released by MTC and ABAG in April 2017. LAVTA's Wheels fixed-route bus and Dial-a-Ride paratransit services provide more than 1.6 million passenger trips annually in the Tri-Valley area, serving the cities of Dublin, Pleasanton, and Livermore, as well as parts of eastern Alameda County.

While the Tri-Valley is located at the eastern edge of Plan Bay Area's nine-county regional planning area, it is very much at the heart of the Bay Area-San Joaquin megaregion, through which tens of thousands of commuters pass daily between their homes in the San Joaquin Valley and employment and other destinations within the Bay Area. In addition to the in-commuters entering the region via Interstate 580, the Tri-Valley is also a key link in a vital goods-movement corridor between the Port of Oakland and virtually all inland destinations, carrying an average of 15,000 to 37,000 trucks a day on I-580 according to MTC's 2016 Regional Goods Movement Study. That there exists today a major congestion bottleneck between these two regional planning areas gives pause when considering how our current relatively sparse public transportation resources and connectivity in the Tri-Valley will support the region's and the state's near- and long-term sustainable growth, equity, and climate protection goals.

With these facts in mind, LAVTA respectfully submits the following comments for your consideration as MTC and ABAG develop the final Plan Bay Area 2040:

- LAVTA fully supports and applauds MTC and ABAG for including full operating funding for transit operators through FY2039-40 as part of its robust "Fix It First" funding strategy. Simply put, there is no way for the region to meet its current and future greenhouse gas reduction goals without fully funding the operational needs of our existing transit system at a pure minimum.
- MTC should ensure a "level playing field" in the administration of competitive regional programs such as Bay Area Forward for large and small transit operators alike. Many of the small and non-fixed-guideway operators have greater short-term flexibility to

innovate and experiment, but often find ourselves at a disadvantage in terms of competing for discretionary funding sources against much larger agencies with far greater staffing resources; this has been increasingly the case for many small operators at the federal and state level. MTC should recognize the potential small operators have in the region to be laboratories of innovation and ensure some regional discretionary program funds for these purposes are accessible to small operators.

- The Plan's growth forecasts indicate *the three Tri-Valley cities of Dublin, Pleasanton, and Livermore combined will see 40% household growth by 2040, which is almost as high as rate of growth of the Big Three Cities (47%)*, and far greater than the 26% average household growth for the Bayside subregion. However, the distribution of major public transit investments in the Plan very clearly favors the Big Three Cities and Bayside regions, despite the fact that today, for example, the population of the Tri-Valley subregion is more than half the size of the city of Oakland, and larger than the city of Fremont, but has nowhere near the robust public transit network and connectivity that many the Big Three Cities and Bayside communities enjoy today. The Draft Plan should more fully acknowledge the differences in the present-day public transportation landscape in terms of their capacity to help all parts of the region grow sustainably and equitably in order to help meet the region's and state's long-range climate-protection goals.
- With the understanding that Plan Bay Area 2040 must meaningfully account for jobs-housing balance within the region, it is nevertheless vital to the region's and state's greenhouse gas reduction requirements to acknowledge the worsening reality of the regional in-commute, especially from the San Joaquin Valley, and the externalities these in-commuters create as well as the resulting inequities. Focusing on housing production within the region as a key component of the draft Plan's Action Plan is a good first start, but as long as households and families desire relatively affordable single-family homes, commuters, especially those in the middle- and lower-wage classes of workers, will continue to seek employment in the Bay Area while choosing to reside outside of the nine-county region. Express Lane improvements on Interstate 580 in Alameda County acknowledge this reality in terms of improving our highway capacity, but for a more sustainable and equitable long-term strategy, this and future Plans should fully acknowledge the importance of inter-regional rail connections. One such connection between BART and the Altamont Corridor Express (ACE) in the Tri-Valley was identified in the 2007 Regional Rail Plan, which is currently being explored by the Altamont Regional Rail Working Group, of which LAVTA is a member. This project is highlighted on page 18 of the Draft Investment Strategy Report as the "BART to Livermore/ACE Project," and LAVTA and its inter-regional partners look forward to helping advance this project and its funding needs in future regional planning and programming efforts, as LAVTA anticipates playing a principal role in providing local transit connections to this vital inter-regional transit linkage.

MTC/ABAG

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Thank you for providing LAVTA the opportunity to review and comment on the Draft Plan Bay Area 2040. We look forward to continuing to work with MTC and other local and regional partners to maintain the region's vital public transportation network while supporting sustainable and equitable growth to aid in meeting the region's and state's climate protection goals. If you have any questions about the information in this letter, please contact Ms. Christy Wegener, Director of Planning and Operations, at (925) 455-7560 or cwegener@lavta.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael S. Tree". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Tree".

Michael S. Tree
Executive Director

MT/jy