



Alameda-Contra Costa Transit District

Ramakrishna Pochiraju, P.E.,  
Executive Director of Planning &  
Engineering

July 20, 2021

Therese McMillan  
Executive Director  
Association of Bay Area Governments and Metropolitan Transportation Commission  
375 Beale St.  
San Francisco, Ca.

**Re: Plan Bay Area 2050 and Plan Bay Area 2050 Environmental Impact Report (EIR)**

Dear Ms. McMillan:

AC Transit appreciates the opportunity to provide comments on the draft **Plan Bay Area 2050** and the **Plan Bay Area 2050 Environmental Impact Report (EIR)**. This Plan replaces **Plan Bay Area 2040**. The new documents will serve as the federally required Regional Transportation Plan and the state mandated Sustainable Community Strategy. We hope that these documents will be important in shaping the future of the Bay Area. We appreciate the major effort of the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) in preparing and developing these ambitious and forward-thinking documents.

Transportation is one of four subject areas in the Plan, along with housing, economy, and the environment. The transportation element of the Plan focuses on three broad strategies. These strategies are designed to make Bay Area transportation more environmentally sustainable with fewer greenhouse gas emissions, make transportation more affordable and equitable to Bay Area residents at all income levels, and improve the regional interconnection and legibility of Bay Area transit. The strategies are:

1. Maintain and optimize the existing transportation system;
2. Create healthy and safe streets;
3. Build a next generation transit network.

To achieve these goals, the Plan proposes a series of transportation programs and projects, listed as strategies. The projects in the AC Transit area are:

- Bus Rapid Transit lines on San Pablo Avenue and 23rd St. in Richmond/San Pablo
- Rapid Bus level improvements on East 14th St./Mission Blvd./Fremont Blvd., as well as six additional corridors (routes 18, 20/21, 40, 57, 97, and NL)

The Plan also supports \$3.76 billion of frequency and other improvements over 30 years for 12 AC Transit corridors. AC Transit's Bay Bridge corridor would be newly served by "Rex" (Regional Express service) between Oakland and Redwood City, and between Vallejo and SFO Airport. There is a regionwide program to operate and maintain existing transit, restored to 2019 levels by 2035.

The plan creates a regional set-aside for enhancements in any mode in equity priority (low income) communities. Portions of Richmond, Oakland, and Hayward are the largest equity priority communities in the AC Transit district. Other programs would benefit AC Transit, particularly the implementation and expansion of express lanes on I-80 and I-580. Other Plan elements which would affect AC Transit include Seamless Mobility Enhancements and a Regional Fare Policy. The Plan includes \$81 billion for regional rail projects such as a second transbay rail line, and the Valley Link project from the San Joaquin Valley.

AC Transit supports the Plan's goal of restoring local transit service. However, we believe that 2035, fourteen years from now, is too long a timeframe for restoring transit. Over that period, AC Transit would permanently lose many transit riders. We would also note that, in many parts of the Bay Area, transit service in 2019 was inadequate.

One of the largest allocations in the Plan is for various regional rail projects. We understand that strategic, cost-effective expansion of the Bay Area's regional network could be useful. However, we do not think that the case has been made for all of the rail proposals in the Plan. Some funding could be reallocated to buses and other services which could come into service more quickly.

We are particularly concerned about the proposal for "Group Rapid Transit" across the Dumbarton Bridge corridor. Group Rapid Transit (sometimes called Personal Rapid Transit) is still an untested mode, which has not been implemented despite decades of consideration in the U.S. Group Rapid Transit provides neither the point-to-point flexibility of buses nor the high capacity capability of well targeted rail. The Dumbarton corridor was experiencing severe congestion before the pandemic and it is likely to experience that congestion again. There are many agencies working in the Dumbarton corridor and a well-coordinated, multi-county program of transit improvements is urgently needed there.

Capitol Corridor staff has suggested that the project for an inline bus station on State Route 84 at the Ardenwood park and ride be made a separate project from South Bay Connect. They have also suggested that MTC, Capitol Corridor, and AC Transit be listed as joint sponsors for the new project. We agree with these proposals.

We have been participating in MTC's projects for improved transit connectivity (seamlessness) and fare integration. We certainly support these efforts. Our consistent concern has been that regional seamlessness could come at the expense of lost local service (or connectivity). We believe this is a serious concern, since much of the advocacy around seamless transit has been supporting long regional trips. Local losses of service would be particularly ironic given MTC's



Alameda-Contra Costa Transit District

Ramakrishna Pochiraju, P.E.,  
Executive Director of Planning &  
Engineering

renewed equity efforts; the losers would most likely be the 70% of AC Transit riders who are low income.

Similarly, it is hard to be against fare integration and simplification. The question is: how fare revenue would be reallocated, and which agencies would gain and lose revenue? Will transit agencies be held harmless for their fare revenues? Will agencies that largely carry low income riders lose revenue and be forced to cut service? Again, the potential for unintended consequences looms large.

We support the plan's effort to take the Vision Zero pedestrian and bicycle safety to regional scale. AC Transit's passengers overwhelmingly walk to their bus. The ability to walk, cross, and wait safely is fundamental for AC Transit's ridership. Vision Zero planning must be done in coordination with transit planning. We have experienced cities seeking to implement well-meaning bicycle projects that impede and delay bus service. This outcome can be avoided with close coordination.

Regarding the EIR, the inclusion of alternatives reallocating expected development to transit-rich and resource-rich areas was positive. However, the minimal difference between these alternatives and the baseline plan was disappointing. Could the alternatives not be sharpened to create a stronger contrast?

**Plan Bay Area 2050** does not itself create funding, nor implement projects. MTC expects that 80% of needed transportation funding will be available over the life of the Plan. While this is more than in other subject areas, it still means that some projects will not have funding, and others will be unduly delayed. AC Transit hopes that priority can be placed on low-cost, high-benefit projects that can be implement for bus transit.

Thank you for your efforts. Please feel free to contact Senior Transportation Planner – Nathan Landau at [nlandau@actransit.org](mailto:nlandau@actransit.org) if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads 'Pochiraju'.

Ramakrishna Pochiraju, P.E.  
Executive Director of Planning and Engineering