May 16, 2013

Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: BART District Comments on the Draft Plan Bay Area and the Draft Environmental Impact Report for Plan Bay Area (State Clearinghouse No. 2012062029)

Dear Mr. Heminger:

On behalf of the San Francisco Bay Area Rapid Transit District (BART), we wanted to extend our congratulations to MTC and ABAG for advancing the Draft Plan Bay Area, the region’s first Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) crafted under SB375. The Plan seeks not only to house all of the region’s population, but also to meet our challenge to reduce greenhouse gas emissions while sustaining the region’s economic prosperity.

We have reviewed the Draft Plan Bay Area and the Draft Environmental Impact Report for Plan Bay Area (State Clearinghouse No. 2012062029) and offer the following comments for your consideration. We support the general direction of the Plan, and believe BART will be instrumental in helping the region achieve its goals.

1. Ridership - BART is concerned that the ridership modeling done for Plan Bay Area (PBA) underestimates BART ridership, and the impacts crowding would have on customers. We appreciate the fact that MTC staff has worked with BART to include an evaluation of peak period transit ridership in this RTP, which is the first time the peak has been looked at separately. MTC staff shared with BART staff the projections for future ridership by operating agency, and MTC projects BART ridership at approximately 537,000 daily riders in 2040, which includes the Silicon Valley Rapid Transit (SVRT) extensions to Berryessa (Phase 1) and Santa Clara (Phase 2). BART’s in-house modeling for 2040 estimates approximately 684,000 daily riders, which is significantly higher. During the past two years, BART’s ridership has risen at the rate of 6% annually, and is expected to average over 400,000 daily riders for FY2013. Attachment A shows BART’s ridership growth using several different growth scenarios. Historically, BART average weekday ridership has grown at approximately 2.9% annually since system opening, and total ridership has grown at approximately 3.1% annually over the last 10 years. Therefore, even with the lower growth rate assumed in the SRT (1.8%), BART would expect to be between 650,000 and 700,000 daily riders by 2040, in line with BART’s modeling work. With the

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higher rate actually experienced over the last 10 years, BART would expect ridership to reach approximately 850,000 daily riders by 2040. MTC's growth rate is much lower, at approximately 1.5% annually.

2. **BART Metro** - BART is pleased that BART Metro scored very well in the evaluation of projects, and BART expects that implementation of BART Metro will significantly support MTC's goals and objectives as expressed in Plan Bay Area. Since this project was submitted to MTC in 2011, BART has continued to refine the project and to perform additional technical work to define the overall BART Metro program and the component projects. It is clear to us that the keys to making BART Metro work for the region are many of the additional crossovers, turnbacks, and other improvements submitted in the original package, however these improvements do not add significant capacity to the BART system, but rather allow a given level of capacity to be provided most efficiently. To meet the actual capacity needs of the 500,000 plus riders projected in the PBA, three large project investments are absolutely essential. These three projects are the railcar purchase of a fleet of 1000 vehicles, the train control system modernization project, and the expansion of Hayward Maintenance Complex (HMC). We look forward to the opportunity to brief you more fully on BART Metro, and how these three projects are critical to the success of BART Metro and the region.

3. **State-of-Good Repair funding** - We are concerned that PBA does not fully fund state-of-good-repair (SOGR) needs over the life of the plan. As you know, SOGR is a focus area for the federal government, and we recognize it as an absolute necessity as a basis for moving forward on system improvements such as BART Metro. Our concern with the low ridership projections for BART also lead us to be concerned that MTC’s estimate of the state-of-good-repair needs may be too low, as more train miles and hours would be needed to serve the larger ridership that we anticipate, and this may not be reflected in your calculations. One way to make the SOGR funds go further and cover more of the regional need would be to establish level-of-use requirements for some assets in the regional Transit Capital Priorities Program. In the past, MTC has considered conditioning replacement rates for some assets to be based on numbers of hours or miles of service, or some other condition factor other than simply age. This would be one way to address the shortfall, although there are undoubtedly other ways to address the issue.

4. **Regional Edge** - This has been an ongoing issue in the Bay Area, as in many regions. It is unclear from PBA how the regional edge should be treated. PBA states that 100% of the region's growth in population is housed in the region, yet it is unclear how individual agencies should respond to this policy mandate. We seek regional policy leadership to work with adjacent regions.

5. **Regional Job Centers/Reverse Commute** - BART has existing capacity to serve the reverse commute markets to regional job centers, such as Oakland, Berkeley, Fremont and Walnut Creek. In Plan Bay Area, and future SCS’s, the region should focus more on how to promote and encourage the use of our existing transportation infrastructure, to reduce per capita vehicle miles traveled.

Thank you for the opportunity to comment on this document. Please call Val Menotti, Planning Department Manager (510.287.4794) if you have any questions.

Sincerely,

Grace Crunican  
General Manager
Attachment A
Projected BART Ridership Growth

Note 1 – assumes WSX opens 2016, SVBX opens 2018.