



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**

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September 14, 2009

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Chairman Mike McKeever and Members  
Regional Targets Advisory Committee (RTAC)  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Comments on Discussion Draft Performance Indicators

Dear Mr. McKeever and RTAC Members:

**DIRECTORS**

Gail Murray  
1ST DISTRICT

Joel Keller  
2ND DISTRICT

Bob Franklin  
3RD DISTRICT

Carole Ward Allen  
4TH DISTRICT

John McPartland  
5TH DISTRICT

Thomas M. Blalock  
6TH DISTRICT

Lynette Sweet  
7TH DISTRICT

James Fang  
8TH DISTRICT

Tom Radulovich  
9TH DISTRICT

Thank you for the opportunity to provide comments on the Regional Target Advisory Committee's (RTAC) Working Draft Report (version Sept. 9, 2009). We appreciate your substantial and thoughtful efforts to provide the California Air Resources Board (CARB) with recommendations on the factors and methods to be considered in the regional greenhouse gas (GHG) target setting process.

The BART Strategic Plan envisions BART as a "high-quality transit services that supports a sustainable region" and contributes to "reduce vehicles miles traveled (VMT) per capita in the Bay Area." In that spirit, listed below are comments from BART staff.

**1) Transit State of Good Repair.** Thank for including all of the discussion about transit funding shortfall. Where possible, consider that keeping transit in a "state of good repair" (replacement of buses and trains, and upkeep of infrastructure) as eligible for any future (or existing) revenue sources. Service reliability is very important for transit riders, and keeping infrastructure properly maintained is fundamental to meeting this challenge. Here are some FTA links in case you want more info:

[http://www.fta.dot.gov/index\\_8986.html](http://www.fta.dot.gov/index_8986.html)

[http://www.fta.dot.gov/documents/Rail\\_Mod\\_Final\\_Report\\_4-27-09.pdf](http://www.fta.dot.gov/documents/Rail_Mod_Final_Report_4-27-09.pdf)

**2) pp. 17-19, Model Recommendations - Transit Capacity.** The third paragraph on p. 18 mentions highway capacity as one variable considered in most regional models. However, a small shift in mode share from autos to transit would increase transit demand and challenge (and potentially overwhelm) the already constrained supply of transit. Currently, most regional models do not take transit capacity constraints into consideration, and the Sustainable Community Strategies (SCS) should not assume that patrons need to ride on overcrowded buses and trains. As part of the San Francisco Transbay Terminal study, a post-processing model was developed with MTC so that the transit capacity limitations were evaluated. For the large regions, the model improvement program (p. 19) should consider transit capacity constraints on trunk routes as there is a direct relationship to the amount of transit service, and transit capital and operating funding levels.

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This would be consistent with the Governor's Office of Planning and Research's (OPR) (and the Natural Resources Agency's) Proposed California Environmental Quality Act (CEQA) Guideline Amendments for Greenhouse Gas Emissions (SB97), which recommends the consideration of mass transit capacity in the CEQA checklist.

XVI. Transportation / Traffic. Would the project: Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

**3) P. 44, matrix - Destination Accessibility.** Thank you for including Destination Accessibility under the Policies column. Under Performance Indicators however, no corresponding metric is identified. There are several metrics for housing, but something needs to be included on the job / destination side of the trip. In the Bay Area, MTC reports that 40% of household VMT is journey-to-work, so the work trip is a critical trip for which to provide viable, low-carbon alternatives (as well as by reducing the trip length through land use). In a letter BART sent in July, we had suggested a version of a Destination Accessibility metric based on what ABAG uses.


**4) P. 44, matrix - Land Use / Job-Housing.** Best to provide regions with flexibility in how the address jobs-housing balance. The scale of analysis is important. There are so many small cities (in some cases surrounding very large cities) in the state, that to get a jobs-housing balance at the city-level may not lead to optimal transport GHG reductions - given projected real estate job-market conditions and transportation infrastructure. Perhaps the corridor-level (or larger-scale) would lead to more optimal GHG reductions. As written, the draft does provide flexibility for the regions on this topic.

**5) Evolution of Monitoring / Timeline.** It would be helpful to include a simple timeline graphic that shows how key performance indicators may change, starting with the first SB375-influenced RTP and evolving for RTP's prepared in years beyond 2013. For example, there has been much discussion about allowing the option of "BMP-only" for the first SB375-influenced RTP cycle (2013), but having model-based metrics for all subsequent RTP's. There is also a need to show a transition towards empirically-based GHG performance measures (i.e., not just modeled results), for example in 2020 and 2035. As noted, MPO size may also be a variable.

**6) P. 21, BMP Development.** Transit operators should be consulted as part of BMP development.

Your consideration is appreciated. If you have any questions, please contact me at 510.287.4794 or by email at [vmenott@bart.gov](mailto:vmenott@bart.gov).

Best Regards,

  
Val Menotti  
Deputy Planning Manager