



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**

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2015

July 27, 2015

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Attn: Brett Bollinger

Re: BART District Comments on the Draft Subsequent Environmental Impact Report (DSEIR) for the Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 (OCII Case No. ER 2014-919-97)

Dear Director Bohee,

The San Francisco Bay Area Rapid Transit District (BART) has reviewed the Draft Subsequent Environmental Impact Report (DSEIR) for the Event Center and Mixed-Use Development at Mission Bay Blocks 29-32. BART appreciates the coordination with the City and County of San Francisco on this important project, and supports many of the transit-first actions proposed to encourage multi-modal access to the site.

For context, BART's Transbay service began in 1974, and the original planning horizon has been surpassed by more than a decade. Given strong job expansion in San Francisco, BART has experienced unprecedented ridership growth (~25% over the last four years), which creates a number of peak period capacity challenges. BART is in the process of replacing the existing rail car fleet, modernizing the train control system, and expanding train storage, which will allow BART to carry more San Francisco-bound patrons. However, as the Bay Area concentrates more growth around the region's rail systems, BART anticipates substantial ridership increases — beyond what the current system can safely and comfortably accommodate. The Metropolitan Transportation Commission's (MTC's) Plan Bay Area (2013) and Core Capacity Challenge Grant does partially fund several of BART's most important capacity projects serving San Francisco, but BART looks forward to partnering with the City to address cumulative impacts and funding solutions.

We understand that the development proposal is for a mixed-use project that features an 18,500-seat multi-purpose event center, along with open space, parking and retail uses in the Mission Bay South Redevelopment Area. BART submitted Scoping Comments in a letter dated January 23, 2013 based on the Notice of Preparation (NOP) issued by the City of San Francisco for the project (at the former location). We are submitting the following comments based on our review of the DSEIR to the City and County of San Francisco for your consideration in proceeding with the document.

1. System capacity improvements (i.e., rail car fleet expansion, stations, train control modernization, and additional shop & yard facilities) are needed to alleviate peak period constraints from projected ridership, but are unfunded. The BART Fleet Management Plan (FMP) (2010) service levels shared with the City in our January 23, 2013 Scoping Comments on the NOP are based on projected demand. The BART FMP indicates that BART will need to increase base service frequency from 15- to 12-minute headways, and have approximately 1,100 vehicles by 2025 in order to adequately serve the demand generated in San Francisco. BART's current funding, however, leaves us more than 300 rail cars short of this total. The DEIR should take this information into account in analyzing projected transit capacity and crowding.
2. BART should be represented on the Ballpark/Mission Bay Transportation Coordinating Committee. BART looks forward to working with the City to identify appropriate short-term and long-term mitigation strategies and operational actions to address identified transportation shortcomings.
3. The proposed Transportation Management Plan's (TMP) objective is to mitigate surface traffic impacts by shifting trips from personal vehicles to other modes. Given the significant traffic impact of the project under all scenarios analyzed and the subsequent need for a successful implementation of the TMP, the impacts of the target mode shift to transit on BART capacity should be anticipated, quantified and closely monitored.
4. The DSEIR analysis does not sufficiently detail its methodology and assumptions to enable the reader to interpret the analysis and the extent of impact for both BART operations and station capacity. For all scenarios, assumptions should be documented, including numbers of trains, train capacity, transfer (station) locations and directions of travel, average travel times to each station (to better understand passenger arrival times at the stations and their impact on station and operation capacity), etc.
5. Timing of Central Subway Service: Currently, the arena is scheduled to open prior to commencement of Central Subway service. If that sequence holds, Warriors fans taking BART will rely almost solely upon the Embarcadero Station - with nearly 38,000 daily boardings, the most heavily patronized station in the BART system. BART currently experiences heavy congestion at both Embarcadero and Montgomery Stations (and is working with the City to develop capacity improvements to these stations). Embarcadero Station also has the narrowest platform width of the Market Street stations. To ensure that BART can safely deliver patrons to events (in addition to accommodating peak commute loads), the City should work with BART to mitigate the short-term impact to ridership at these stations. BART seeks mitigation measures in the both short and long term to divert trip generation at Montgomery and Embarcadero stations.
6. The project sponsor should work with regional transit providers to encourage inbound event patrons to consider AC Transit Transbay service during the Inbound PM Peak. In general, all transit information should be seamlessly integrated with proposed dissemination of parking information so patrons understand all travel options simultaneously, including transit.

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*BART Comments on the DSEIR for the Event Center and Mixed-Use Development at Mission Bay Blocks 29-32*

7. BART is concerned about Transbay operating capacity in the eastern direction during the late evenings after events, especially after simultaneous events throughout the city on Friday and Saturday nights. Analysis for this scenario (OUTBOUND from project site) was not included in the DSEIR. Given the timing of the ends of basketball games and large events, and the time required to travel to BART stations, event patrons may be using the last trains of the evening when stations and trains are already crowded. For this scenario, the DSEIR needs a broader definition of “simultaneous events” that are known to significantly increase BART ridership. This includes other events occurring and ending simultaneously throughout the city and along the Market Street Corridor (i.e. concert venues), as well as the “ambient” increase in ridership on weekend late evenings. At a minimum, the project should call for monitoring transit capacity during this condition (late evening OUTBOUND to East Bay on Fridays and Saturdays).
8. Station Capacity: BART’s NOP comment letter stated that the City needs to work with BART to analyze the impacts of the proposed Project on peak period travel for station capacity as well as line haul capacity to ensure that BART can safely deliver patrons to and from events. However, there was no station level ridership forecast, or analysis, to determine the impacts to individual stations.
9. 16th Street Station: BART is particularly aware of station loading capacity constraints at the 16th St. station. It is unclear from the analysis how many patrons would need to transfer to Muni service at this station, or what impacts that could have at the station plazas. This station does not have faregates on the concourse level nearest the entrance on the north-east corner of Mission St. and 16th St. To accommodate passengers that will be dropped off at this entrance from either MUNI #22 buses or supplementary shuttles, a new fare area may need to be added, including faregates, station booth and support infrastructure such as CCTV. Staffing needs include a station agent, police and possibly staff to meter passengers at the concourse and platform level.

Thank you for the opportunity to comment on this Draft SEIR. Please call me if you have any questions.

Sincerely,



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