



**METROPOLITAN
TRANSPORTATION
COMMISSION**

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
TEL 510.817.5700
TTY/TDD 510.817.5769
FAX 510.817.5848
EMAIL info@mtc.ca.gov
WEB www.mtc.ca.gov

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October 30, 2015

Tiffany Bohee, Executive Director
Office of Community Investment and Infrastructure
One South Van Ness Avenue, 5th Floor
San Francisco, CA 94103

Re: Mission Bay Event Center - Transportation Mitigation Measures

Dear Ms. Bohee,

Metropolitan Transportation Commission ("MTC") staff have reviewed the Subsequent Environmental Impact Report (SEIR) and related Transportation Mitigation Measures for the proposed Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 (Project).

In particular, staff has considered the assumptions and approaches outlined in the SEIR relative to mode choice and the analysis of project-serving transportation projects as well as the relationship of transportation projects identified in the SEIR relative to transportation projects included in the Regional Transportation Plan/Sustainable Communities Strategy adopted in 2013, Plan Bay Area (PBA). We believe that the assumptions encompassed in the SEIR are sound and appropriately conservative and the transportation project analysis considers the relevant transportation projects for analysis. From a regional perspective, this location is well-served by transit and would likely experience a high percentage of non-auto mode trips in comparison to most Bay Area locations. Our detailed comments are outlined below.

Plan Bay Area & Priority Development Areas

As discussed in Plan Bay Area, the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area, prepared by MTC and the Association of Bay Area Governments (ABAG), Mission Bay is included within one of San Francisco's Priority Development Areas (PDAs). PDAs are, in short, "transit-oriented, infill development opportunity areas." (Plan Bay Area, p. 77.) The Plan Bay Area anticipates that the majority of future development within the San Francisco Bay Area, including 78 percent of new housing and 62 percent of new jobs, will occur within the region's PDAs. (Plan Bay Area, pp. 26, 57.) Development of the Project within Mission Bay is consistent with Plan Bay Area's goal to promote infill development and the creation of jobs within the region's PDAs.

To encourage more development near high-quality transit and reward jurisdictions that produce housing and jobs, Plan Bay Area proposes to target transportation investments in

PDAs and to support planning efforts for transit-oriented development in PDAs. For example, in May 2012, MTC approved a new funding approach that directs specific federal funds to support more focused growth in the Bay Area. MTC committed \$320 million through 2017 (and \$14.6 billion through 2040 - the life of the plan), from federal surface transportation legislation currently known as MAP-21 (Moving Ahead for Progress in the 21st Century) towards the One Bay Area Grant (OBAG) program. (Plan Bay Area, p. 76.) The OBAG program allows communities flexibility to invest in transportation infrastructure that supports infill development by providing funding for bicycle and pedestrian improvements, local street repair, and planning activities. Within San Francisco, at least 70 percent of OBAG investments must be directed to the City's PDAs. In short, Plan Bay Area is designed to provide the transportation investments necessary to allow PDAs to accommodate the dense land use development envisioned by the Plan.

User Mode Choice

The approach to estimating mode choice relies on observed data from AT&T Park/the San Francisco Giants and the Moscone Center, combined with conservative assumptions regarding transit, pedestrian, and bicycle use. The presence of analogous developments in the vicinity of the Mission Bay location with observed data on travelers is a very useful asset to the Mission Bay project and the analysis wisely leverages this information. MTC believes the mode split described for the project is reasonable and achievable.

Regional Transportation Infrastructure

The baseline transportation network for the Project is adequately described in the SEIR. Relative to transportation impacts the information cited regarding the Central Subway and Muni Forward projects is correct. Expanded Muni boarding islands to accommodate passenger demand is a beneficial infrastructure investment that will increase transit capacity during peak usage periods. Therefore, improvements to the Muni UCSF/Mission Bay Station Platform, both under the proposed project and the Muni UCSF/Mission Bay Station Variant, will benefit not only the Project but also Muni transit riders within Mission Bay generally.

The SEIR describes Muni shuttle routes that are not specifically included in Plan Bay Area. This type of flexible, relatively low cost operational effort does not have to be included in Plan Bay Area. However, it should be noted that similar service boosts were included in PBA related to two major, multi-phase neighborhood development projects in San Francisco, Treasure Island & Hunters Point/Candlestick Point. Similar to Mission Bay, both of these neighborhoods are Priority Development Areas (PDAs) and will be incorporating a large share of Plan Bay Area's growth allocation of housing and jobs for the City and County of San Francisco through 2040.

The SEIR includes a cumulative impact analysis that is appropriately comprehensive and reflects nearby planned development in the Mission Bay neighborhood as well development that is envisioned in the Central SOMA neighborhood plan. Infrastructure investments analyzed in the cumulative impact analysis include: Interstate 280 ramp changes; the extension of the MUNI 22-Fillmore trolley bus to Mission Bay; the Central Subway; the Muni Forward service and capacity improvement project; the addition of the new, expanded Transbay Terminal; Caltrain Electrification; the Downtown Extension that will link Caltrain from its current terminus at 4th and King to the Transbay Terminal; and, unspecified capacity upgrades for other regional transit operators. Regional improvements like those addressed in the cumulative impact analysis are funded through MTC, its \$293 billion regional transportation plan budget through 2035, encompassing reasonably anticipated regional, state and federal fundings sources. Moreover, it should be noted that a number of the regional improvements addressed in the SEIR including the Central Subway are already under construction.

Conclusion

In summary, the SEIR reflects key regional projects serving the arena vicinity including the Central Subway and Muni Forward projects (as the project would be directly served by both). Improvements to other systems – like BART and Caltrain – that do not provide direct service but would be accessible from the proposed arena and provide service to the vicinity from the East Bay and the Peninsula are also described in the SEIR. Both BART and Caltrain have projects included in Plan Bay Area that will provide for expanded service and capacity of those systems. These projects and their connectivity to local-serving transit projects such as the Central Subway and MUNI Forward further support the mode choice assumptions outlined in the EIR.

Please let us know if you have any questions related to MTC's analysis of the Mission Bay Event Center SEIR.

Sincerely,



Ken Kirkey
Director, Planning