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October 12, 2015

Mr. Scott Weiner, Chair
Metropolitan Transportation Commission
Programming and Allocations Committee
101 Eighth Street
Oakland, CA 94607

RE: Cap and Trade Funding Framework

Dear Chair Weiner:

We appreciate this opportunity to comment on Agenda Item 3a on the October 14, 2015 Programming and Allocations Committee agenda. Napa County Transportation & Planning Agency serves as the congestion management agency and transit provider (Vine Transit) for the County of Napa.

As part of Agenda Item 3A, the Committee will receive two proposals for revising the Low Carbon Transit Operations Program (LCTOP) formula established in MTC Resolution 4130. MTC staff presented this proposal to the Partnership Board for the first time just this past Friday which left little time for a thoughtful discussion or developing alternative proposals. That said, it was suggested that other alternatives be developed that would balance the needs of the larger transit operators (core capacity) and the North Counties/Small Operators.

NCTPA recognizes that the demand for services in the central Bay Area carried by our partners at AC Transit, BART, and Muni far outweighs the demand for services from smaller systems in the east and north bay but the latter remain a critical component for relieving congestion on Bay Area freeways and serve as essential feeder systems to the large central Bay Area operators. Feeder services have become a fundamental necessity for getting riders to BART, Ferry, and other systems since parking facilities are at capacity. In that vein, a number of the North Bay operators have launched or are planning on launching new express bus studies that improve coordination between transit operators and increase express bus service to feed central transit hubs including BART Stations, Ferry Stations, and Park & Ride lots.

The MTC staff proposals would also divert significant amounts of the LCTOP funds to the regional coordination program. NCTPA believes that a number of these programs have improved coordination and rider services throughout the Bay Area. Nevertheless, the proposal provides few details about why

these funds are needed. MTC already diverts millions of dollars annually from the population share of the Transportation Development Act and State Transit Assistance programs for regional coordination programs. Such a significant increase in funding for regional programs needs to be publically vetted encompassing an explanation for why additional revenues are needed.

NCTPA appreciates the efforts of MTC staff but believes a more thoughtful process working through the MTC Partnership Committee structure will result in a better alternative that will work for both the larger and small transit operators.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Miller', with a stylized flourish at the end.

Kate Miller
Executive Director

cc: NCTPA Board
Steve Heminger/MTC Executive Director