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Alameda-Contra Costa Transit District Board of Directors
1600 Franklin St
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April 11, 2023

RE: Ashby Service Restoration and Staff Report – Item 6.D. 4/12/23 – Report 23-123a

Dear Members of the AC Transit Board of Directors and AC Transit staff,
I was deeply disappointed to read the [report prepared by staff](#) subsequent to the Board's vote in March. The proposed pilot to extend Line 7 would restore crosstown service to a highly urbanized and transit-dependent area that currently does not meet AC Transit's line spacing/access policies. The staff report fails to provide essential context and instead offers questionable justifications for prioritizing other pilot projects while ignoring Ashby service. In this letter I will systematically respond to staff's reasoning for deprioritizing Ashby service.

"This [Line 78] overlay also provides critical additional capacity along the 51A corridor."

By the staff report's own admission, Line 78 underperforms relative to other crosstown AC Transit service. Line 78 generates a mere 21 daily trips to the ferry itself; this means up to 87 percent of Line 78's 157 daily trips are essentially poached from 51A and/or 96 ridership. The 51A already runs at 10-12 minute headways throughout the day with approximately 80 trips overlapping the Line 78 service window. This equates to average capacity relief of only 2 riders per 51A trip. Additionally, the 157 daily trips on Line 78 are equivalent to a mere 1.8% of the 51A's pre-pandemic ridership (according to the 2018 ridership report). Given that overall AC Transit ridership appears to remain down relative to pre-pandemic levels, it is unclear why this marginal increase in capacity on the 51A (which has excellent service) would be higher priority than service restoration on Ashby (which currently has no service).

"...the City of Alameda is implementing paid parking at the ferry terminal in Spring 2023, starting at a rate of \$3.00 per day. Staff expects that the forthcoming implementation of paid parking at the ferry terminal will yield ridership improvements."

In the context of other costs/tradeoffs is it unclear (absent other compelling data) that a \$3 per day charge would lead to a significant mode shift. Many BART parking facilities with

similar charges nevertheless experienced full occupancy prior to the pandemic. It is also not clear whether these charges will actually be implemented on a quick, Spring 2023 timeline.

Moreover, the staff report indicates that Ashby service could be expected to generate an estimated 317 daily rides. Therefore, even if ferry-related ridership increased 10-fold in response to a \$3/day parking charge, this portion of Line 78 would still provide service for fewer riders than restoration of Ashby service.

“Of the 43 local routes ranked in the priorities that are not operating at pre-pandemic levels, Line 60 and Line 80 (serving Ashby) ranked number 25 and 40, respectively. When looking only at the Ashby portion of the pilot, the service ranks in the low teens on the priority list based on the pre-pandemic productivity on Ashby segment.[sic] Line 78 was created in 2021 and is therefore not included in the Service Recovery Priorities, which focused on pre-pandemic service. However, the performance of Line 78 ranks low compared to the performance of other local routes.”

This suggests that with respect to service restoration priorities, an Ashby service restoration by extending Line 7 would actually rank higher (low teens) than Line 60 restoration (ranked 25) and significantly higher than Line 78, which performs poorly compared to other crosstown lines. Furthermore, the chart on page 4 of the staff report indicates that a Line 7 extension could be expected to have 59 percent better performance than the Line 78 pilot.

“For Line 78, staff has long looked at Line 96 as an option for Seaplane Lagoon service, but the ferry riders in Alameda are primarily east of Webster Street and Line 96 would not serve them at all, so a cross-town option was needed.”

Line 96 connects to the 51A, which has very high service frequencies and serves areas to the east of Webster. Staff do not explain why providing direct (rather than transfer-enabled) crosstown service for riders via Line 78 is more important than providing crosstown service along Ashby where crosstown service was historically provided but none currently exists.

Given these statistics and the complete absence of Ashby service, it seems difficult to justify the notion that Line 7 extension should be considered a lower priority pilot than Line 78 or possibly even Line 60. But a Line 7 extension does not necessarily conflict with these other pilots. Rather, these data demonstrate that if service impacts to other lines are justified to operate the 60 and 78 pilots, then similar service impacts to other lines should likewise be justified for restoration of Ashby service via a Line 7 extension pilot.

***“The advantages of extending the pilots on lines 60 and 78 are three-fold:
1. The proposals respond to needs previously identified by the communities we serve.”***

It is unclear why 60 and 78 service are regarded as responding to “needs previously identified by the communities we serve,” while restoring historically extant service along Ashby is not. Given that ridership for Line 80 existed and was particularly high along Ashby, it is clear that service in this area was responding to a need. Since Ashby Avenue continues to

feature a BART station, medium to high density housing, multiple groceries, several schools, a major hospital, theaters, and access to West Berkeley employment centers, staff does not adequately justify the idea that service along Ashby does not respond to a community need.

2. The existing pilots were subjected to recent public hearing processes.

The fact that service along Ashby was eliminated with significantly less community input than normal means that this justification is not merely poorly reasoned, but also adds insult to injury. Given the suddenness and severity of the onset of the pandemic, it is understandable why AC Transit had to respond quickly with rapid service cuts and uncharacteristically limited public input. But the fact that the Line 7 extension specifically has not yet been granted a public hearing is not remotely a valid justification for deprioritizing Ashby service restoration.

Moreover, the staff report specifically indicates that Board Policy 110 would exempt this pilot from the requirement for a public hearing because it would represent neither "New service on streets... not previously used by any route" nor a Major Adjustment of Transit Service. The idea that Ashby service restoration should be deprioritized because of a policy designed to expedite the restoration of previously existing service creates a bizarre and unnecessary Catch-22. If staff feel that a holding public hearing would contribute to the justification for restoring Ashby service, then the board should plan for and schedule such a public hearing.

3. Extending the evaluation period for lines 60 and 78 will allow staff to better understand how they will integrate into the rest of the transit network as the region continues to emerge from pandemic market trends. For Line 78 in particular, extending the evaluation period will allow staff to get a better picture of ridership impacts as the City of Alameda implements paid parking at the Seaplane Lagoon Ferry Terminal.

As discussed above, awaiting charges for parking would, on its own, seem a poor justification for continuing underperforming service. As also discussed above, a pilot Line 7 extension need not be in direct competition with continuation of the Line 60 and 78 pilots. Rather, the anticipated performance of restored Ashby service justifies similar service adjustments elsewhere to what existence of Lines 60 and 78 necessitate.

Indeed, the Board of Directors already approved pursuing a pilot to restore Ashby service when it [voted in 2021](#) to support a Line 79 extension alongside the Line 78 and Line 60 pilots. No justification is provided for why pilot Ashby service, which was approved at the same time as these other pilots, would suddenly no longer be considered on equal footing.

"When compared to other routes currently suspended due to the pandemic, Line 60 ranks higher than all but one of them in the Service Recovery Priorities. On the contrary, all but one of the suspended routes ranks higher than Line 80. Note that proximity to other transit lines is included in the service restoration principles."

This analysis errs by using the entire Line 80 route to evaluate relative priority, rather than limiting consideration to the restored Ashby segment proposed under Line 7 extension. As indicated earlier in the staff report, limiting consideration to just the Ashby segment would push the prioritization ranking significantly higher.

With respect to transit line proximity in service restoration principles, it is not clear that this proximity fully accounts for the direction of travel. Although most areas along Ashby have good access to AC Transit trunk routes, access to crosstown routes does not meet the standards set in AC Transit Board Policy 545, which says that crosstown routes in dense areas like Berkeley should have $\frac{1}{4}$ to $\frac{1}{2}$ mile spacing. The spacing between the crosstown routes to the north and south of Ashby ranges from approximately 1.6 to 2 miles. This spacing is actually worse than the route spacing recommended even for low-density areas.

"Deferring pilot service on Ashby will allow the District to use those resources toward improving service reliability. In addition, staff can thoroughly evaluate the appropriate level of service for the corridor under the network realignment process that will be data-driven, customer-focused and wholistically [sic] planned and vetted."

It is unclear why these same objections are not equally applicable to the pilots that AC Transit has already begun to implement. Although I would not argue for immediate elimination of the 60 or 78 pilots, the same overall resource reallocation arguments would arguably apply to them. Similarly, it is unclear why restoration of historically extant service on Ashby should be deferred for longer-term planning purposes while preservation of new services should not be subject to similar considerations.

For all of these reasons, I request you offer the Line 7 Extension pilot the same level of deference and consideration you've given to lines 60 and 78 and move forward with implementation ahead of the August 2023 services changes. And if necessary, schedule and hold a public hearing as soon as possible to enable the community to once again express why restoration of this crucial service is needed.

Respectfully,



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Terry Taplin, Berkeley City Councilmember, District 2

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