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Memorandum

TO: Air Quality Conformity Task Force

DATE: June 9, 2011

FR: Srikalyani Srinivasan and Ted Matley

W. I.

RE: Defining Minor Fleet Expansion (40 CFR 93.126) Discussion

Per the request of Federal Transit Administration and AQCTF, staff has prepared this memorandum to help define thresholds for project changes that would qualify as “minor fleet expansions” for the Bay Area. This definition will serve as a guideline to project sponsors for determining what kinds of expansions qualify as a minor fleet expansion. All replacements are exempt under 40 CFR 93.126 - Mass Transit – Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet.

Background:

Preliminary research regarding the number of existing transit vehicles in the region shows that the Bay Area has a sizeable transit fleet consisting of a variety of vehicle types including buses, cable cars, ferries, rail cars etc. Table 1 shows the detailed breakdown by operator.

While staff considered looking at the transit system as whole, the variety in vehicle types makes it very difficult to do so, especially when it comes to exemption from conformity. Staff is proposing to address the issue on a vehicle type basis and, based on the feedback for some of the following questions, staff will present proposals for bus service increases.

1. How will the expansion of electrified rail cars, cable cars, trolley coaches be addressed?

Conformity: Any expansion of these vehicle types should be exempt because electrified vehicles have no emissions.

TIP Amendment: The previously agreed upon TIP amendment threshold of 25% is no longer applicable as it has been replaced with a 40% threshold. Staff is proposing that all the rail cars, cable cars and trolley coaches in the Bay Area be considered as a set and staff’s proposals for TIP amendment thresholds are shown in Table 2. Three other scenarios are also presented to the task force for the purpose of discussion. Attachment 1 is a list of sample projects to help explain the scenarios.

2. How will the changes to the non-revenue vehicles, such as tow trucks, be addressed?

Staff suggests that the purchase of non-revenue vehicles is exempt under the category 40 CFR 93.126 - Mass Transit – Purchase of support vehicles.

Table 1: Transit Vehicles in the Bay Area by Mode								
Operator	Bus	Cable Car	Ferry	Rail	Systemwide	Trolley Coach	Van/Auto	Grand Total
AC Transit	720				155			875
ACE				34	3			37
AOFS/WETA			4					4
BART				669	428			1097
Benicia	3				1		10	14
Caltrain				147	79			226
CCCTA	121				15		63	199
ECCTA	69				9		24	102
Fairfield	49						7	56
GGBHTD	248		8		88		16	360
LAVTA	75				13		18	106
Marin Transit	6						64	70
Napa	29				3		35	67
Petaluma	8				1		15	24
SamTrans	322				77		66	465
Santa Rosa	40				5		13	58
SFMTA	494	42		246	943	333	22	2080
Sonoma County	45				12		32	89
Vacaville	15						6	21
Vallejo	64		4		12		12	92
VTA	492			100	280		208	1080
Westcat	43				3		12	58
WETA			6					6
Grand Total	2843	42	22	1196	2127	333	623	7186

Notes

Systemwide means non-revenue vehicles, i.e., service vehicles like towtrucks, rail geometry cars and administrative autos.

AOFS is Alameda-Oakland Ferry; vehicles should be combined with WETA's.

Benicia's assets are listed separately in RTCI, but their transit capital needs are combined with Vallejo's in the projections.

Vallejo's ferry assets are currently listed under Vallejo, but will be transferred to WETA.

SMART and Rio Vista vehicles not included; will be added.

Totals include some vehicles that are not yet in service but are fully funded and scheduled to be in service within five years, e.g., WETA ferries for Berkeley/Richmond service.

Table 2: Scenarios for Addressing Cable Cars, Rail and Trolley Coaches			
1. Bay Area Total is considered Baseline			
	Total number of Vehicles	25% of Total (Minimum)	40% of Total (Staff Proposal)
Bay Area Total	1,571	393	628
2. Bay Area Total by Vehicle type is considered Baseline			
Vehicle Type:			
Cable Cars	42	11	17
Rail Cars	1,196	299	478
Trolley Coaches	333	83	133
3. Baseline is defined by the size of the Operator (accounting only for the three vehicles types above)			
Operator Size:			
<50	50	13	20
50-150	150	38	60
150-500	500	125	200
500 and above	1,000	250	300
4. Baseline by Operator Total			
Operator:			
ACE	34	9	14
BART	669	167	268
Caltrain	147	37	59
SFMTA	621	155	248
VTA	100	25	40

Staff requests guidance on what constitutes minor fleet expansions for the following:

3. How will the feeder buses to the rail operators be handled?

Feeder buses are normally run by the other transit agencies (e.g. AC Transit and LAVTA run feeder buses to BART) and changes to feeder buses will be accounted as being part of AC Transit and LAVTA respectively.

4. How should Ferries be addressed?

Staff is looking to the Task Force for guidance before determining thresholds.

5. How should vans and automobiles that are used for paratransit services be addressed?

Staff is looking to the Task Force for advice before determining thresholds.

Attachment 1: Sample projects

1. Bay Area Total is considered Baseline

Scenario 1: 25% of Bay Area Cable car, trolley coach and rail car fleet is 393			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>393
SFMTA: Procure an additional 200 Trolley Coaches, 30 cable cars and 70 rail cars	Admin. Mod	None	<393
VTA: Buy 200 rail cars	Admin. Mod	None	<393

Scenario 1:40% of Bay Area Cable car, trolley coach and rail car fleet is 628			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Admin. Mod	None	<698
SFMTA: Procure an additional 200 Trolley Coaches, 30 cable cars and 70 rail cars	Admin. Mod	None	<698
VTA: Buy 200 rail cars	Admin. Mod	None	<698

2. Bay Area Total by Vehicle type is considered Baseline

Scenario 2: 25% of Bay Area Cable Cars is 11, Trolley coaches are 83 and Rail Cars is 299			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>299
SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Amendment	None	Cable cars>11
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Admin. Mod	None	<299,<11,<83
VTA: Buy 200 rail cars	Admin. Mod	None	<299

Scenario 2: 40% of Bay Area Cable Cars is 17, Trolley coaches are 133 and Rail Cars is 478			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Admin. Mod	None	<478
SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Amendment	None	Cable cars>17
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Admin. Mod	None	<478,<17,<133
VTA: Buy 200 rail cars	Admin. Mod	None	<478

3. Baseline is defined by the size of the Operator (accounting only for the three vehicles types above)

Scenario 3			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>250

SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Amendment	None	>250
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Amendment	None	>250
CALTRAIN: Procure 50 rail cars	Amendment	None	>38
VTA: Buy 200 rail cars	Admin. Mod	None	<250

Scenario 3			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>250
SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Admin. Mod	None	=300
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Admin. Mod	None	<300
CALTRAIN: Procure 50 rail cars	Admin. Mod	None	<60
VTA: Buy 200 rail cars	Admin. Mod	None	<300

4. Baseline by Operator Total

Scenario 4			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>167
SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Amendment	None	>155
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Amendment	None	>155
CALTRAIN: Procure 50 rail cars	Amendment	None	>37
VTA: Buy 200 rail cars	Amendment	None	>25

Scenario 4			
Project	Type of Revision	AQ issues	Other notes
BART: Add 400 Rail Cars	Amendment	None	>268
SFMTA: Procure an additional 200 Rail , 30 cable cars and 70 Trolley Coaches	Amendment	None	>248
SFMTA: Procure an additional 200 Rail , 10 cable cars and 70 Trolley Coaches	Amendment	None	>248
CALTRAIN: Procure 50 rail cars	Admin. Mod	None	<60
VTA: Buy 200 rail cars	Amendment	None	>40