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16 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 BAYVIEW HUNTERS POINT COMMUNITY ) Case No. C-01-0750 TEH  
19 ADVOCATES, COMMUNITIES FOR A BETTER )  
ENVIRONMENT, LATINO ISSUES FORUM, )  
20 OUR CHILDREN'S EARTH FOUNDATION, )  
SIERRA CLUB, TRANSPORTATION ) **DECLARATION OF TINA**  
21 SOLUTIONS DEFENSE AND EDUCATION ) **KONVALINKA IN SUPPORT OF**  
FUND, and URBAN HABITAT PROGRAM, a ) **PLAINTIFFS' MOTION FOR**  
22 project of the TIDES CENTER, ) **SUMMARY JUDGMENT ON**  
Plaintiffs, ) **REMEDIES**  
vs. )  
23 )  
24 METROPOLITAN TRANSPORTATION )  
COMMISSION, SAN FRANCISCO MUNICIPAL )  
25 RAILWAY, and ALAMEDA-CONTRA COSTA )  
TRANSIT DISTRICT, )  
26 Defendants. )

1 I, TINA KONVALINKA, declare as follows:

2 1. I have been an employee in the Planning and Service Development department of the  
3 Alameda-Contra Costa Transit District (the District) since 1989. I was an Associate Planner for  
4 three years, a Senior Planner for six years and have held the position of Manager of Long Range  
5 Planning for the past three years.

6 2. Since 1992, I have been responsible for the preparation of the District's Short Range  
7 Transit Plan (SRTP) and prepared the SRTPs that the District has submitted to the Metropolitan  
8 Transportation Commission (MTC) over the past ten years. I am familiar with the criteria  
9 established by MTC for the content of these plans.

10 3. The MTC has not established one standard methodology for transit providers to  
11 determine ridership projections used in the SRTP. As a result, AC Transit has developed their own  
12 method of projecting near term ridership based on their professional understanding of the service  
13 area and ridership characteristics. Although not based on one particular model, the District uses a  
14 method that results in ridership numbers that are generally accurate, albeit conservative.

15 4. I have reviewed the Declaration of Christopher P. Brittle In Opposition To Plaintiffs' Motion For Permanent Injunction and Declaratory Relief, particularly ¶¶18-19. Brittle claims that  
16 many of AC Transit's proposed enhanced bus and rapid bus improvements in AC Transit's Strategic  
17 Vision "are still in the concept stage." Brittle ¶18. Contrary to Mr. Brittle's declaration, and much  
18 like many of the projects in both the Regional Transportation Plan (RTP) and the Regional Transit  
19 Expansion Policy (RTEP), the corridor projects have actually been through several stages of study.  
20

21 5. In 1992, the heaviest corridors in AC Transit's service area were studied in the  
22 *Alternative Modes Analysis*, conducted for AC Transit by DKS Associates. The study included  
23 ridership projections, cost/benefit analysis, land use analysis, development of alternatives, operation  
24 and maintenance analysis, and travel demand forecasts for the seven corridors. The study was aimed  
25 at helping the District determine priorities for increasing transit use in the District while improving  
26 cost efficiency. Prior to that, these corridors were studied as part of the *Corridor Assessment Project*  
27 conducted in 1986. Finally, as part of our *Service Deployment Policies Report* conducted in 2000,  
28

1 the corridors were again studied to determine priority for service and capital investment.

2 6. While the majority of the corridor projects presented in the District's Strategic Vision  
3 were studied in both the 1992 *Alternative Modes Analysis* as well as the 1986 *Corridor Assessment*  
4 *Project*, additional corridors were added to reflect the demand caused by development not  
5 anticipated in either the 1992 or 1986 study. As such, the projects in the Strategic Vision are no  
6 more "conceptual" than some of the other projects currently in the RTEP. While additional work  
7 would be required to implement the corridor projects, the District could anticipate construction and  
8 implementation within the next two to five years if funds were made available.

9 7. With regard to Brittle ¶ 19, I agree that there are no "common assumptions and  
10 methodologies" that have been established and "AC Transit does not operate a regional forecasting  
11 model". However, the purpose of the regional forecasting model used by MTC is to determine  
12 macro-level, region-wide impacts of the entire transportation system within the entire nine county  
13 bay region. It is not the best tool to project the local impacts of local projects. Consequently, the  
14 travel forecasting model used by MTC is not more accurate in projecting use of local projects than  
15 the methodology used by AC Transit to predict ridership for our projects.

16 8. As part of the settlement of this litigation against AC Transit, it was agreed that the  
17 District's SRTP would contain projects and programs that will enable the District to increase  
18 ridership. The Strategic Vision accomplishes that requirement and, in our opinion, complies with  
19 TCM 2's obligation for the formation of a plan for submittal to MTC that identifies strategies which,  
20 if funded, would increase ridership in AC Transit's portion of the region.

21  
22 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
23 knowledge.

24 Executed this \_\_\_\_ day of May 2002 in Oakland, California.

25  
26 \_\_\_\_\_  
27 TINA KONVALINKA