



October 14, 2016

Dave Cortese, Chair
Metropolitan Transportation Commission
Julie Pierce, President
Association of Bay Area Governments
Submitted via email: info@PlanBayArea.org; leahz@abag.ca.gov

RE: Integration of the San Francisco Bay Area Goods Movement Plan into the Plan Bay Area 2040

Dear MTC Chair Cortese, ABAG President Pierce, and Commissioners:

Thank you for the opportunity to comment on Plan Bay Area 2040.

The Ditching Dirty Diesel Collaborative (DDDC) was an active participant in the development of the San Francisco Bay Area Goods Movement Plan adopted by the Metropolitan Transportation Commission (MTC) in February 2016, and conducted a Health Impact Assessment of the associated Alameda County Goods Movement Plan adopted by the Alameda County Transportation Commission (ACTC) in February 2016. DDDC also supported the creation of MTC Resolution 4225 adopted in April 2016 that expressed MTC's commitment to address environmental and community impacts resulting from freight transportation in regional goods movement planning and policy. Several DDDC members are also active participants in MTC's Freight Emissions Reduction Action Plan Task Force.

Since all of these freight-related efforts are connected to and/or incorporated into the Plan Bay Area 2040 (PBA), the undersigned members of the DDDC would like to see the following fully integrated into the final Preferred Scenario and Investment Strategy:

- Committing to robust community engagement
- Reducing freight-related impacts on already overburden communities, and
- Providing full funding for the programs, plans and polices to implement these first two goals.

DDDC is concerned the PBA and Investment Strategy come up short in meeting these important goals.

1. The Preferred Scenario Underfunds Implementation of the Strategies Identified in the Regional Goods Movement Plan

On October 5, 2016, DDDC members met with staff from MTC, ACTC and the Bay Area Air Quality Management District (BAAQMD) to discuss this issue and were provided with a handout that showed that approximately \$5 billion dollars of the expenditures in the Investment Strategy are for goods movement issues identified in the San Francisco Bay Area Goods Movement Plan. Approximately \$4.35 billion of this funding is designated for infrastructure projects for the Port of Oakland, highways and rail,

and ITS technology. The remaining \$650 million was split between two catch-all categories of Goods Movement Technology Programs (\$300 million) and Goods Movement Clean Fuels and Impact Reduction Programs (\$350 million). The specific strategies of the San Francisco Bay Area Goods Movement Plan that are to be funded through each of these two categories were not completely identified. There is also not enough flexibility provided by the description of the categories to account for emerging concerns, such as the lack of a Greenhouse Gas Reduction Plan for the City of Oakland and the Port of Oakland's new developments.

Unfortunately, a large number of the strategies contained in the San Francisco Bay Area Goods Movement Plan (see Appendix A) are left without specific funding identified for them in the Investment Strategy. In the San Francisco Bay Area Goods Movement Plan, funding for impact reduction programs was estimated at \$877 million and technology programs at \$377 million. These two categories address roughly the same strategies that the two catch-all categories in the PBA 2040 Draft Preferred Scenario could fund, plus the Integrated Corridor Management category (\$161 million). Presuming some Goods Movement Plan strategies, including the recommendations in the Freight Emission Reduction Action Plan, would be funded through these two catch-all categories in PBA 2040 mentioned above, these strategies are still underfunded by approximately \$443 million. Including and funding more strategies from the San Francisco Bay Goods Movement Plan, particularly the ones that mitigate the adverse health impacts of land use decisions and infrastructure projects, could help MTC achieve better Performance Target and Equity Measure results. DDDC would like to see all the strategies in the San Francisco Bay Area Goods Movement Plan specifically and fully funded in the final PBA 2040.

2. The Plan Bay Area 2040 Draft Preferred Scenario does not clearly lay out a process for engaging the community in implementing the strategies identified in the San Francisco Bay Area Goods Movement Plan.

DDDC appreciates the commitment MTC has made to working directly with stakeholders to implement the details of the Impact Reduction program category of Goods Movement funding in the PBA 2040 Draft Preferred Scenario, but the details of this implementation plan need to be included in the final PBA 2040 Preferred Scenario. Given the shortfall in funding described above, the lack of specificity for what the two catch-all categories will fund, and the lack of community input into the development of the funding priorities for goods movement strategies in the PBA 2040 draft Preferred Scenario, a meaningful community engagement strategy for implementing all of the strategies in the San Francisco Bay Area Goods Movement is absolutely necessary. Many of the strategies not specifically funded in the PBA 2040 Draft Preferred Scenario were those that addressed Environmental Justice and health concerns raised during the Goods Movement Plan development. DDDC has advocated for strong community engagement since the beginning of this process and this is the clear intent of Resolution 4225. In order to realize the promise of Resolution 4225, a mandated set of equity guidelines must be integrated into the project review process. DDDC and its allies have created just such a set of guidelines, which have been made a policy of the city of Oakland for the purposes of priority conservation area project review. A robust, community-led engagement process, like that being developed by other DDDC allies in the regional Resilient Communities Initiative, will help ensure that funding is directed towards the programs, plans and policies that best protect the health and safety of residents of neighborhoods most overburdened by the impacts of goods movement.

The Ditching Dirty Diesel Collaborative looks forward to working with staff from MTC, ACTC and the BAAQMD to implement the San Francisco Bay Area Goods Movement Plan and carry out the intent of Resolution 4225, and hopes that these recommendations to strengthen and clarify the integration of the

San Francisco Bay Area Goods Movement Plan into the final Plan Bay Area 2040 will help lead to this successful implementation.

Sincerely,

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Appendix A – Strategies Contained in the San Francisco Bay Area Goods Movement Plan not Specifically Funded in the Plan Bay Area 2040 Draft Preferred Scenario

Opportunity Package 1: Building Sustainable Global Competitiveness

- Truck Services at Oakland Army Base
- Replacing Adeline Overpass at Third Street
- Rail Quiet Zone Program
- Demonstration Project to adopt Zero and Near Zero Emissions Truck Technology for Port Drayage
- Freight Corridors Community and Impact Reduction Initiative
- Develop/support Workforce Training Programs for Goods Movement-related Jobs
- A Program of Rail Crossing Improvements

Opportunity Package 2: Smart Deliveries and Operations

- Off-Peak and Novel Delivery Policy Guidance and Demonstration Program
- Freight Guidelines for Complete Street Initiatives
- Strategies to Improve Port Operations Including Night Gates and Weekend Operations
- Clean Truck Policy and Program Collaborative

Opportunity Package 3: Modernizing Infrastructure

- Land Use Guidelines and incentive Programs to Cities that Reduce Land Use Conflicts
- Local Road and County Road Access and Safety Program on Truck Routes
- Truck Route Coordination Planning/Guidance
- Development of Public or Public-Private Truck Parking and Full-Service Truck Services Facilities
- Develop/Support Workforce Training Programs for Goods Movement Related Jobs
- Region-wide Freight Signage Program
- At-Grade Crossing Safety and Grade Separation Policy And Program
- Industrial Rail Access Program