



# SIERRA CLUB

19 July 2021

MTC Public Information  
Attn: Draft Plan/Draft EIR Comments  
375 Beale Street, Suite 800  
San Francisco, CA 94105

via email to: [eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov)

**re: Sierra Club Comments Regarding Draft Environmental Impact Report (DEIR)  
for Plan Bay Area 2050**

To Whom It May Concern:

On behalf of our nearly 60,000 members in the nine-county Bay Area region, the Sierra Club submits these comments regarding the Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050, (hereinafter PBA or PBA 2050), intended to address the requirements of Senate Bill (SB) 375 (Statutes of 2008) for a Regional Transportation Plan and Sustainable Communities Strategy (SCS). We acknowledge that this is a programmatic DEIR and does not serve as an analysis for any individual project(s) contained within PBA.

Our Sierra Club volunteer transportation experts believe that the “least worst” alternative for the environmental document would be a modification to Alternative 1 (Transit-Rich Area Focus, TRA). We recognize that Alternative 1 has been determined by MTC/ABAG analysts to be the Environmentally Superior Alternative, but we believe that it can be further improved. At a minimum, the recommended modifications would be to:

- \* Maintain urban growth boundaries;
- \* Re-focus funding removed from highway widening to enhance affordable housing in the corridor;
- \* Add funding for the Complete Streets Network from Alternative 2; and
- \* Remove Interregional Rail extensions, per Alternative 2.

We would appreciate your consideration of these suggestions as part of the DEIR analysis, and believe that they would help to provide an improved outcome for regional residents.

Several of our members have expressed concern about what has become known as “Reverse CEQA,” the concept that, while the California Environmental Quality Act applies to the effect of a “project” such as PBA 2050 on the environment, it does not

apply to the impact of the environment itself on a project, or on humans and communities. This notion, as articulated by the Courts in cases such as *California Building Industry Association v Bay Area Air Quality Management District* and more recently *Newtown Preservation Society v County of El Dorado*, would appear to apply to such natural phenomena as climate change or wildfire issues from Wildland–Urban Interface (WUI) areas. Although these court decisions may form a rationale within MTC/ABAG to not conduct CEQA analysis, common sense should dictate that the prospective climate–change–induced threat to billions of dollars in current and future infrastructure and housing should not escape reckoning by the Bay Area's premier planning agency. Since MTC/ABAG lack any real enforcement authority over such matters, they will need to greatly increase their “powers of persuasion” if the non-statutory elements of PBA 2050 are to be successful.

The Sierra Club appreciates your attention to our comments regarding these important regional issues. If you have any questions or desire any further clarification, please contact us via Matt Williams, Chair of the SF Bay Chapter's Transportation & Compact Growth Committee, at [mwillia@mac.com](mailto:mwillia@mac.com) .

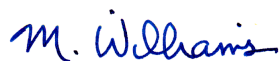
Sincerely,



Mike Ferreira, Member  
Executive Committee  
Loma Prieta Chapter



Victoria Brandon, Chair  
Redwood Chapter



Matt Williams, Chair  
Transportation & Compact Growth Committee  
San Francisco Bay Chapter

cc: California Air Resources Board  
Sierra Club California