August 10, 2020

Association of Bay Area Governments & Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

info@planbayarea.org

commens on draft Blueprint, Plan Bay Area 2050

Dear MTC,

Thank you for your informative workshops and for offering this opportunity to comment on the Blueprint for Plan Bay Area (PBA) 2050.

In general, we support the plan with its 25 resilient and equitable strategies including promoting seamless transit and increasing affordable housing with higher density near transit and in innovation districts near jobs. And we support serious efforts to avoid displacement and provide reduced fares for low-income residents.

There is one big area that we would like to express our concern. The blueprint states that, if it succeeds in concentrating all new growth in priority development areas with good transit, it will only result in a 12% per capita reduction in greenhouse gases. This is well below the goal of 19% GHG reduction set by the California Air Resources Board (CARB) for MTC for 2035.

We thank you for being honest in admitting that you feel that this 12% reduction is the best you can do with Plan Bay Area’s land use planning, public transit improvements, and support for pedestrians and bicyclists. But clearly this is not an acceptable endpoint.

The Intergovernmental Panel on Climate Change has made it clear that we need a global reduction of 50% in GHGs by 2030 and 100% by 2050. It is not acceptable for MTC to ignore the climate crisis and leave this up to the State. 25 Bay Area cities and 5 counties have recognized that we are in a climate emergency and are working to speed up their climate action efforts. MTC needs to be part of this effort.
We urge MTC to work with the CARB to support its programs to implement full electrification of all vehicles. We recognize that this would be a significant increase compared to past MTC programs, but the climate crisis calls for drastic action. The Bay Area Air Quality Management District (BAAQMD) has expanded it role to support many projects to electrify transportation; there is every reason that MTC should provide even more leadership in this endeavor. This expansion of MTC’s role should include projects such as:

- Education of the public
- Working with cities to streamline building codes
- Training for contractors and building inspectors
- Funding for installation of charging stations in homes, apartments, garages, and on-street (e.g., using light pole wiring) prioritizing low-income areas and people.
- Support for EV car sharing for low-income and other neighborhoods
- Support for EV purchases with low-cost loans, especially for low-income residents
- Support for grid improvements with local utilities and CCAs, including microgrids, to accommodate increased demand overall and high-speed chargers in particular
- Support for bus and truck electrification
- Monitoring the pace of installations and adoption of EVs in conjunction with ARB and local jurisdictions.

Each city and county should have an EV roadmap (e.g. following San Anselmo and Berkeley) and MTC should provide funding to help develop and implement these roadmaps.

Plan Bay Area 2050 should set a goal of 100% elimination of GHGs from transportation by 2050. Our lives depend on it!
We also support the recommendations and comments made by the Sierra Club in their letter to MTC dated August 5, 2020. These include:

- Ensuring equity in the $463 billion Plan Bay Area--e.g. the “Housing Strategies” set out in the draft are a first step, but as noted in it, they are inadequate to achieving equity. We need to:
  - Increase efforts to prevent dislocation and gentrification
  - Increase renter protections
  - Increase the goal of 10%-20% of new housing to be affordable
  - Increase transit access to Priority Development Areas

- Opposing any freeway widenings or efforts to increase road capacity and redirecting funding from reducing traffic congestion to reducing transit overcrowding

- Expressing concern about the Valley Link proposed passenger rail project from San Joaquin County to the BART station in Dublin. The amount shown in the draft is from $1 billion to $2.5 billion.

- Building affordable housing for people to stay in the Bay Area would be a better option than encouraging mega-commuting.

- Calling for a coordinated planning effort to address sea-level rise.

There is one additional recommendation we have--MTC should join BAAQMD in promoting telecommuting as an opportunity to clean our air and reduce vehicle miles traveled. We recognize that not everyone can work from home, so there is an equity concern here, but we feel that everyone does benefit from those who do telecommute, in terms of cleaner air, reduced GHGs, and less traffic congestion. MTC could even consider supporting low-income residents with computers and wifi access to promote equity in working from home. The blueprint plan does include a modest increase in telecommuting, but this goal should be significantly increased-- e.g. from 6% pre-COVID to at least the BAAQMD goal of 25%, and preferably higher. If achieved, this could make it possible for MTC to meet the CARB goal of 19% GHG reduction.

But as noted above, 19% is only a beginning. MTC must take responsibility for transportation problems as a whole--especially GHG emissions--and not ignore the IPCC warnings. To do this MTC needs to support and enhance the CARB efforts to electrify transportation.
Thanks again for your very good work. We are eager to work with you to achieve the elimination of carbon pollution from transportation.

Note that this letter does not imply universal agreement with all of its points by the 350 Bay Area Transportation Campaign team.

Sincerely,

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