



Dear Plan Bay Area,

Re: Comments on Plan Bay Area 2050 Blueprint

Urban Environmentalists is a group of urbanists and environmentalists working to reduce carbon emissions and create more livable communities. Our mission is to address the climate and inequality crises by transforming cities and towns into inclusive communities designed around people rather than cars.

We note with concern that the Blueprint scenario for Plan Bay Area achieves less than half of the state-mandated reduction in carbon emissions of 19% from 2005 levels, achieving a reduction of only 9%. It is critical that this is rectified before the plan is finalized for the region to do its part in preventing catastrophic climate change. While we support the Transportation Strategies designed to increase the mode share of transit, cycling, and walking, it is clear that this action is insufficient to achieve the required reduction in emissions.

In order to achieve this target, we believe that Plan Bay Area must consider projects that reduce demand for auto trips as well as increase demand for alternatives to auto travel. We support implementing per-mile tolling on congested freeways with transit alternatives, and we support downtown San Francisco congestion pricing. However, we believe that these projects do not go far enough in reducing demand for auto travel.

In addition to per-mile tolling on congested freeways, we support conversion of existing freeway lanes to HOV/HOT lanes on freeways that are not considered for tolling across all general traffic lanes. HOV/HOT lanes may also be a more equitable solution for widespread use, as they allow price-sensitive drivers to carpool rather than paying a toll. We do not support the addition of freeway lanes for HOV/HOT, or for any other reason. We also recommend considering increasing bridge tolls, and adding tolls at other freeway bottlenecks such as the Caldecott Tunnel.

Beyond more appropriately pricing driving, parking should also be priced to account for the true costs of providing that parking, including externalities and opportunity cost. Some of the costs that could be considered include: health and safety impacts, carbon emissions, policing, street maintenance, opportunity cost related to alternative street uses, congestion impacts (including on public transit), and environmental impacts (e.g., stormwater runoff and urban heat island effects). This would result in higher fees for residential parking permits, parking meters, and public parking garages, further discouraging auto ownership and use. Systems to ensure equity and affordability for low-income,

car-dependent individuals should also be introduced in concert with increased fees, such as easily accessible discounts, cash payments, or phase-in periods.

In addition to pricing roadway capacity, reduction of roadway capacity is also necessary to achieve the required reduction in emissions. We support the city and county projects planned to reduce transit travel time and increase the safety of cycling and walking by removing general traffic lanes to create bus lanes and protected bike lanes, but we note that freeway capacity reduction has not yet been considered by Plan Bay Area.

As well as reducing demand for car trips to urban areas by increasing auto travel times and thus making transit trips more competitive by comparison, freeway capacity reduction creates significant additional benefits to the communities that freeways currently pass through, which are frequently also disadvantaged communities. Examples of these are reducing particulate matter emissions in the vicinity of the freeway, and reducing transit travel times and increasing the safety of biking and walking by reducing the number of vehicles exiting the freeway onto residential streets. These benefits will incentivize a shift to low carbon modes and further reduce carbon emissions.

Proposed Projects

Specific projects we would like to see considered are listed below.

Removal of the Central Freeway

Removing this freeway section would realize the following benefits:

- **Confinement of traffic to existing arterials.** Assuming the exit/entrance to the north-south US-101 and I-80 freeways is instead touched down in the vicinity of the Division & Potrero intersection, US-101 traffic could be confined largely to existing arterials. US-101 northbound traffic could be routed west along Division to Van Ness, then north on Van Ness to Lombard; southbound traffic would follow the same route in reverse.
- **Removal of traffic from Hayes Valley and west Soma.** US-101 traffic should be discouraged from cutting through the Hayes Valley neighborhood, by two-waying the Franklin/Gough one-way street pair. Combined with additional freeway ramp removal, traffic could be discouraged from cutting through west Soma by two-waying 9th & 10th streets. Bollards placed at one or two key intersections would also block cross-town traffic along these residential and commercial corridors.
- **Reconnecting west Soma to north Mission.** By removing the freeway blight and reconnecting the street grid across Division, these vibrant and diverse neighborhoods would be reconnected, and additional opportunities for housing development and local economic opportunity would be opened up.

Removal of I-280 east of the interchange with US-101

While removing I-280 north of Mariposa was considered in SF Planning's Railyard Alignments and Benefits study, we believe that a much greater truncation should be considered, as this freeway section parallels and is largely redundant to US-101. Removing this section would realize the following benefits:

- **Additional alignment options for Caltrain.** The I-280 truncation proposal was separated from the Caltrain alignment component in the Railyard Alignments and Benefits study. This study determined that the cheapest option for grade separating Caltrain at 16th St and Mission Bay Dr without depressing those streets - trenching Caltrain from Mariposa St to the Downtown Extension portal - was infeasible, as Caltrain could not be kept operational during construction.¹ With I-280 removed, a much greater right-of-way would become available for the creation of shoo-fly tracks around the construction site, and this alignment may become feasible. To achieve this benefit, I-280 removal would need to be completed before the Caltrain alignment work is begun; the process should therefore begin immediately.
- **Improvement of conditions at 22nd St station.** Removing I-280 would allow this station to be upgraded to modern standards, with full-length platforms and ADA compliant access, without the expense of station relocation.
- **Reconnection of Potrero Hill to the Dogpatch neighborhood.** With the freeway removed, the street grid could be reconnected, opening up additional land for housing developments, green space, and small businesses.
- **Removal of freeway blight impacting the Bayview neighborhood.** With the freeway removed, noise and particulate matter impacts to the housing and schools east of the freeway would be reduced. Additional land would be opened up for housing, small businesses, and public open space within walking distance of the proposed Oakdale Caltrain station.
- **Removal of the Portola/Silver Terrace freeway ramps.** While US-101 is trenched through these neighborhoods, a double decker freeway ramp enables connections from US-101 northbound to I-280 in both directions, and from I-280 in both directions to US-101 southbound. This freeway ramp blights the surrounding neighborhoods and creates significant additional visual and noise impacts over that created by the freeway itself.² Removal of I-280 east of this intersection would allow for the elimination of this ramp, as two of the four vehicle movements would no longer be needed. The other two movements - US-101 northbound to I-280 westbound, and I-280 eastbound to US-101 southbound - are low traffic movements that can instead be accomplished via Alemany Blvd.

¹ The Executive Summary Report of the Draft Rail Alignment and Benefits study states “The Tunnel Under Existing Caltrain Tracks alignment option would require Caltrain to be taken out of service north of the 22nd Street Caltrain station for two or more years, and it would also require significant structural work to I-280.” This report also states “As shown in the Final Consultant Technical Report, I-280 did not conflict with any of the alignments under further consideration.” Regarding this alignment alternative, the Technical Report states “This rail alignment was removed from further consideration in Phase I due to it being infeasible for construction given the location of supporting structures for I-280 not having sufficient room to accommodate a tunnel between them.”

While the infeasibility of operating Caltrain during construction of this alignment alternative is noted in the Technical Report, it is not explained why this is the case, and the report focuses on the constraints posed by I-280 as justification for removing this alternative from further consideration. The statements in the Executive Summary and Technical Report appear to be contradictory, and we would like to understand why it would not be possible to keep Caltrain operational during construction of this alternative if I-280 was first removed.

² For more information on the health impacts of noise pollution due to road traffic, see WHO, “Environmental Noise Guidelines for the European Region”, <https://www.euro.who.int/en/health-topics/environment-and-health/noise/environmental-noise-guidelines-for-the-european-region>

Off-ramp reduction in San Francisco

Freeway exits along US-101 and I-80 in San Francisco are spaced far closer than modern freeway standards and several can be removed. As a rule, freeway ramps exits should not touch down traffic into residential or neighborhood commercial areas, and we suggest the following exits/entrances for elimination:

- **I-80 to/from 9th/10th streets in South of Market.** This exit helps create freeway-like conditions along the 9th/10th St one-way pair in the low income west Soma neighborhood.
- **I-80 to/from 7th/8th streets in South of Market.** As above for the 7th/8th St one-way pair.
- **US-101 to Mariposa in Potrero Hill.** This exit drops traffic into the Potrero Hill neighborhood, creating a dangerous intersection near a high school.
- **US-101 to/from Silver Ave in Portola/Silver Terrace.** This exit drops traffic directly onto San Bruno Ave, the main commercial street of the low-income Portola neighborhood.

Removal of I-980

I-980 was originally built to support the planned San Francisco Bay Southern Crossing, which was never constructed. Presently, I-980 is underutilized and primarily serves to divide low-income West Oakland from rapidly-growing Downtown Oakland. Removing I-980 south of 27th St would realize the following benefits:

- **Reconnecting West and Downtown Oakland.** By removing freeway blight, narrowing the existing frontage roads, (Brush St. and Castro St.), and removing the flyovers to I-880, 20 blocks of West Oakland's street grid would be reconnected to downtown, and additional opportunities for housing development and local economic opportunity would be opened up. Pollution levels along the corridor would also be reduced dramatically.
- **Transbay Crossing 2 Connection.** Currently, BART resides within the median of I-980 until turning southeast and heading underground around 25th St. With I-980 removed, the existing freeway trench could be repurposed to serve the new Transbay Rail Crossing. This would enable a new BART station in the western portion of the Jack London Square neighborhood, which is identified as a high-growth neighborhood in Oakland's Downtown Plan. This neighborhood also contains Howard Terminal, the proposed location for the new A's stadium. The new Transbay Crossing would achieve what I-980 failed to do, while prioritizing Oakland residents over suburban drivers.
- **Integration with and undergrounding of existing standard-gauge rail through Jack London Square.** Currently, the Capitol Corridor and San Joaquin Amtrak lines travel at-grade through the Jack London Square neighborhood. Freight trains often frequent this line as well. By placing the new Transbay Crossing alignment along the existing I-980 corridor, a seamless rail connection between the Crossing and existing standard-gauge rail can be realized, enabling Caltrain and High Speed Rail to terminate in Oakland or beyond, and Amtrak trains to reach San Francisco's Transbay Terminal. By undergrounding the lines through Jack London, noise and pollution reduction can be achieved, safety can be improved, and train travel times can be reduced.

Widespread, quick-build implementation of superblocks

- Superblocks have been successfully implemented in Europe³, and can be implemented much faster than other measures like congestion pricing because they are extremely low-tech and do not require drivers to pay anything.
- Superblocks feature bollards, planters, or other physical barriers that do not prevent any particular location from being accessed by auto, but do prevent through traffic and may require cars to take a slightly more circuitous route. By making it harder to drive through residential or mixed-use/commercial neighborhoods, superblocks discourage driving through these areas. Superblocks also prevent speeding by eliminating straightaways, increase safety for individuals who are walking and biking, and provide an opportunity to reclaim street space for public enjoyment.
- Superblocks can be viewed as an expansion of slow streets, but they need not expressly forbid non-local traffic.

Widespread on-street, secure bicycle parking

- While on-street car parking is available on nearly all streets in the Bay Area, many residents of multifamily dwellings do not have a secure and accessible location to store their bicycle, particularly if it is too heavy for them to carry up stairs. Many individuals also fear that their bicycle may be stolen if it is left parked in commercial locations. The result is a disincentive to bicycle and an incentive to drive.
- Secure bike parking should be placed not just at BART or Amtrak stations but also along all commercial corridors and on every block in areas with multifamily residences. One example system from the UK that municipalities could adopt here is Cyclehoop Rentals,
<https://www.cyclehoop.rentals/>

Support for bicycle shops in low income communities and communities of color

- Many disadvantaged communities have insufficient density of local bike stores for sales and repairs. Individuals in such communities are thus less exposed to bicycling as a possible mode and more burdened by having to travel farther for repairs in the event of breakdowns.
- Bay Area municipalities should therefore partner with bicycle shops in disadvantaged communities to support their work and should partner with community leaders to support the opening of additional bicycle shops.

Thank you for your consideration of these proposals. We look forward to reading your response.

Regards,
Urban Environmentalists
<https://www.urbanenvironmentalists.org/>

³ For more information on Superblocks, see Bloomberg, “The ‘Superblock’ Revolution Is Making Cities Safer and Cleaner”,
<https://www.bloomberg.com/news/features/2019-10-29/the-superblock-revolution-is-making-cities-safer-and-cleaner>