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Dear Ms. Griffin and Ms. Zippert,

Thank you for the opportunity to review and provide comments on the Plan Bay Area 2040 Draft Plan (“the Plan”). Please extend our thanks to staff for all the effort expended to provide the supporting technical information and context for action. Without all the very hard work that went into this document and its public presentations, we and other members of the public would not have been able to comment as meaningfully or participate as fully in the policy process. You will find attached a copy of this letter.

350 Bay Area is a climate action organization that works to reduce greenhouse gas (GHG) emissions regionally and statewide, with the goal of conserving a stable and healthy future for the Bay Area’s children and grandchildren. With this mission in mind, we offer the following high-level comments and suggestions toward reframing and strengthening the broad vision put forth in the Plan and ensuring that the Bay Area truly becomes a more sustainable region. These comments are based on MTC’s May 18, 2017 presentation to the Bay Area Air Quality Management District’s (BAAQMD’s) Climate Protection Committee; MTC and ABAG’s joint May 12, 2017 public hearing on the Plan in San Francisco; MTC and ABAG’s joint open house and presentation in Mill Valley on May 20, 2017; and the documents available online at 2040.planbayarea.org. We were also in attendance at workshops on May 10, 2017 in Walnut Creek and May 17, 2017 in San Francisco.

I. MTC Must Participate Fully in Regional Climate Planning

Our primary concern is that the Plan must lead the region to do its part in reducing GHG emissions from the transportation sector sufficiently to keep warming below 2° Celsius, and it falls well short of doing so.

The Plan states that it will lower per-capita GHG emissions 15% by 2035 and will reduce mobile source GHG emissions 35% by 2040 (with the bulk of this 35% figure proposed to come from the California Air Resources Board’s Clean Car Standards and similar legislation, and not from land use and transit decisions by MTC). The Plan does not indicate, however, where mobile source GHG emissions actually need to be by 2040 in order to meet established state climate targets. This requirement should be the basis of the Plan. The failure to frame the scale of the challenge with respect to GHGs, much less to solve it, is the primary shortcoming in MTC and ABAG’s planning efforts. Without the correct long-range target in mind, it’s impossible to plan your way there.

As it turns out, GHG emissions from the transportation sector will need to be 60% below 1990 levels by 2040 in order to be on target to meet the critical 2050 goal, as is clearly stated on page 2.5-43 of the Plan’s Draft EIR. Needless to say, a 35% reduction from current levels, as the Plan proposes to achieve, falls staggeringly short of where the region needs to be to do its part. All future iterations of Plan Bay Area will fall similarly short of directing planning toward what the region actually needs to achieve until MTC adopts the state’s 2050 GHG emission reduction targets (i.e., 40% below 1990 levels by 2030, and 80% below 1990 levels by 2050) as agency policy, [as BAAQMD did in 2013](#), and commits to developing a program to achieve them, in concert with BAAQMD’s [Clean Air Plan/Regional Climate Protection Strategy](#) (CAP).

BAAQMD's Board of Directors adopted a Climate Protection Resolution in 2013, which integrated state GHG targets directly into agency planning efforts and led to the adoption in April 2017 of a first-in-the-nation, multi-sectoral, metropolitan-scale plan to decarbonize industry and transportation and eliminate fossil fuel combustion. The transportation sector makes up approximately 40% of regional GHG emissions—the largest single component—and the CAP's 23 Transportation Control Measures, developed with the participation of MTC, will require MTC to act with the full measure of its power, responsibility, and authority, as BAAQMD cannot implement these measures alone. The region needs MTC to get serious about reducing GHGs.

MTC's Commissioners need to adopt state climate targets as agency policy, as BAAQMD did, in order to properly frame Plan Bay Area planning efforts going forward. An enabling resolution should be introduced and passed by the end of this calendar year. Integration of long-range GHG emission reduction mandates into MTC planning efforts will ensure the agency's robust participation as quickly as possible in the decarbonization and electrification of the transportation sector that is necessary in order for regional emission reduction to be successful. As the entity with primary authority over regional transportation emissions, it is MTC's responsibility to lead.

For example, full electrification of Bay Area transit systems will be required to reach the carbon-free 2050 that's necessary to do our part to preserve a stable climate. The Plan's Investments going forward need to be focused on expanding, streamlining, and electrifying transit, in conjunction with the BAAQMD CAP's Control Strategy. Supporting electrification of public vehicle fleets should also be a priority.

The Plan's Draft EIR states, "There are no additional land use strategies available to feasibly bridge the gap between the proposed Plan GHG emissions and 2030 (and beyond) targets," and we understand that most GHG reductions from transportation will need to come from cleaner vehicles. Nonetheless, MTC should voice its strong support for the 80% reduction goal and pledge to do its utmost to ensure its achievement. MTC should be a leader in the state and the nation in pledging to make transportation carbon-free.

II. The EEJ Alternative Is the Right Direction for the Region

We were intrigued to see the Alternatives to the Proposed Plan, and we favor Alternative 4: EEJ. In addition to what is provided in the Proposed Plan, the EEJ Alternative "emphasizes investment in local bus operations in suburban high-opportunity areas to serve lower-income residents, and reduces funding for highway expansion and modernization." Compared to the Proposed Plan, the EEJ Alternative includes the expansion of transit service to "provide access to increasingly dispersed job centers," eliminates roadway expansion funding, increases roadway and transit maintenance funding, and pursues innovative GHG reduction strategies, using funding from a two-cent-per-mile VMT tax on higher-income travelers. These priorities are central to what is actually needed in a strategic transportation and housing plan for the whole Bay Area. Pigeonholing them into an "environment and equity" box and setting them aside does a disservice to the whole region, nearly all of which is impacted by congestion, inadequate public transit, and insufficient and astonishingly expensive housing.

In looking at the 13 Performance Targets used to judge the Plan Alternatives, your analysis shows that the EEJ Alternative performs equivalently to the Proposed Plan in six out of 13 of them (46%) and *better than the Proposed Plan* in four out of 13 (31%), underperforming the Proposed Plan on only three measures (23%). Two of the EEJ Alternative's three shortcomings compared with the Proposed Plan are relatively insignificant in scale, between 1-4% off the target. The one shortcoming worthy of note is on the ease of goods movement, where the EEJ Alternative did not provide benefits as significant, "due to increased congestion related to greater suburb-to-suburb commuting and elimination of all highway expansion projects." That being said, the Comparative Impact Analysis of Alternatives states for the EEJ Alternative that "the impacts associated with

goods movement would be less than significant because the thresholds for goods movement would not be exceeded.”

All policy choices involve trade-offs. We believe the EEJ Alternative’s focus on GHG reduction, affordability, and increasing mode share are the right path forward for the region to become a truly “Sustainable Community.”

III. The Proposed Plan Perpetuates and Worsens Unhealthy Transportation Patterns

The Plan’s top-line numbers are incredibly grim. With all the great data that we have at our disposal, with all the unparalleled economic prosperity of our region, with all the best and brightest minds working on this planning exercise, housing and transportation costs for low-income households are nonetheless projected to rise from an already unlivable 54% of household income up to an unthinkable 67% of household income. This cannot be the best that our region can do. This cannot be our preferred Strategy to becoming a “Sustainable Community.” If so, we are failing.

Part of the problem appears to be the way the Plan allocates housing units and jobs around the region, which simply locks in, or even *worsens*, the current unsustainable norm of people traveling to a distant location in the region and back every weekday—from Contra Costa or Sonoma to Marin, or from Marin or Alameda to San Francisco, or from San Francisco to San Mateo or Santa Clara, and so forth, as your Vital Signs dataset illustrates clearly—instead of working actively to rectify it. The Plan envisions further conversion of our vibrant cities into bedroom communities for commuters to distant jobs rather than the creation of complete, diverse, walkable communities. If, according to Vital Signs data, one-third of Bay Area residents currently work outside the county they live in, regional planning should be working to reduce that daily churn, which is responsible for GHG and air pollution emissions as well as strain on transportation and transit infrastructure. Unfortunately, the Plan may only exacerbate our transportation woes.

The Plan shows that just one unit of housing was built in the region for every eight jobs created from 2011-2015. This figure represents an inhumane and unwinnable game of “musical chairs” for housing, a grotesque failure to meet a basic human need. This reality puts our region into the world’s newspapers as a poster child for stark displacement, income inequality, and unsustainable living. And Plan data shows that the situation in the Bayside Cities and Towns is truly egregious—just one housing unit was built for every *15 jobs* created during the same period. One much-decried consequence of this severe imbalance has been the extremely rapid cultural, economic, and demographic changes in San Francisco and Oakland, where the placement of corporate shuttles headed to jobs down the Peninsula is closely tied in city and stakeholder analyses to rent spikes and also to evictions, while congestion on thoroughfares connecting these cities to Silicon Valley jobs reaches epic proportions.

Yet despite sustained international attention to the metropolitan growth challenges that have savaged our cities and our region, the Plan proposes that the proportion of regional jobs in the Bayside Cities and Towns remain the same in 2040 that it was in 2010 (41%), while the proportion of regional housing in that subregion actually *declines*, from 40% to 38%. Increases in congested delay and average commute time in the region are heavily correlated with the current boom of the Silicon Valley tech industry. Therefore, if reducing vehicle-miles-traveled (VMT), time spent commuting, and strain on transportation and transit infrastructure are goals of regional planning, it is simply not defensible to place 46% of new households through 2040 in the Big 3 Cities and just 33% in the Bayside Cities and Towns while keeping the distribution of jobs the same. This will only *worsen* our already-infamous Big City-to-Bayside VMT, commute, and congestion problems.

Regional housing must be built where regional jobs are—it is fundamentally unsustainable to count on a few communities carrying such a disproportionate share of the region’s housing and congestion burden, and it is

fundamentally unsustainable to shuttle an increasing number of millions of residents over increasing distances between home and work using a finite transportation and transit infrastructure. This is particularly the case given that only 10% of the Plan's Investments are dedicated to expanding roadway and transit networks: We will largely only have the infrastructure that we have now to handle an increasing population. Yet if we're planning for 45% of the 1.3 million new jobs added through 2040—a full 585,000 jobs—to be added outside of priority development areas (PDAs), it's not as though we are keeping those areas pristine and undeveloped. More housing and transit needs to be added near job centers to prevent needless and senseless driving to and from these jobs. If that means more such areas need to be designated as PDAs, MTC should aggressively pursue that change.

The region needs a true strategic transportation plan that addresses both our currently overloaded transportation infrastructure as well as the expected 1.3 million new residents who will be here by 2040. The Proposed Plan's allocation of growth around the region does not amount to one.

IV. A "Transit First" Orientation and Other Innovative Transit Improvements Are Needed

The Plan foresees adding 1.3 million new jobs to the region through 2040—a 17% increase in population—yet only 10% of the Plan's Investments are dedicated to expanding transportation infrastructure, which is already at or beyond capacity in many cases. How is this feasibly going to happen, much less create a more "Sustainable Community"?

Certainly, as we add such a large number of new residents to the region through 2040, we need to be ensuring that as many trips as possible are getting people out of private cars and using alternative modes of transportation: foot, bicycle, or transit. We note that approximately 60% of the very limited infrastructure expansion budget is dedicated to transit. Given the emergent need to reduce emissions of GHG and fine particulate matter (PM) from the transportation sector, and the enormous economic benefits (through avoided health costs) which result from doing so, this allocation needs to be much higher. We support the elimination of roadway expansion funding entirely, with all funding for infrastructure expansion going to transit, as included in Alternative 4 to the Proposed Plan—Environment, Equity, and Jobs (EEJ). This balance of funding represents a reasonable commitment to a sustainable, transit-focused future.

In MTC's presentation of the Plan to BAAQMD, staff noted the difficulty of doing comprehensive and effective regional transit planning when the region has 27 separate transit agencies operating with their own prerogatives, purviews, and pay scales. We echo the comments of several members of BAAQMD's Board of Directors: There is a clear need for some level of integration of the Bay Area's transit agencies into a regional body or agency, which incorporates fair practices and livable wages for all transit employees. An action plan based around this integration should be an element of the region's strategic transportation plan. To the extent state legislation is needed to achieve this, any number of governmental and community stakeholders stand ready to join with you to achieve a sustainable vision for the Bay Area.

Additionally, one of BAAQMD's Directors noted that the very successful Portland, Oregon transit system is funded largely through a 0.73% employer tax, rather than the sales tax that is commonly used for funding in the Bay Area. Employers in the Bay Area are generating their capital thanks to the resources and connectivity of the region, and they should be contributing correspondingly to their surrounding community. The Plan should envision and propose an employer tax to fund Bay Area public transit needs and perhaps to support desperately needed investments in housing as well. This policy could be implemented through a nine-county ballot measure. Again, a plethora of stakeholders stands ready to support you in providing for a robust future for the region.

V. Conclusion

We at 350 Bay Area look forward to working together with MTC and ABAG to achieve the region's critical climate and public health needs. To that end, we recommend:

- 1) Adopting the state GHG emission reduction targets of 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050 as your regulatory mandate.
- 2) Prioritizing the full electrification of transit networks and public vehicle fleets.
- 3) Moving forward with implementing the EEJ Alternative in lieu of the Proposed Plan.
- 4) Reallocating housing and jobs around the region to reduce, rather than worsen, extant geographical imbalances that engender private vehicle use, congestion, air pollution, and climate disruption.
- 5) Devoting all infrastructure expansion funds to transit.
- 6) Integrating the region's transit agencies into an effective, streamlined regional body.
- 7) Proposing an employer tax to provide increased funding for transit and housing improvements around the region.

Together, we must ensure a stable and healthy future for Bay Area residents.

Sincere regards, on behalf of 22,000 members of 350 Bay Area,

Jed Holtzman
Senior Policy Analyst