



June 1, 2017

MTC-ABAG

Plan Bay Area 2040 Public Comment

Bay Area Metro Center

375 Beale Street, Suite 800, San Francisco, CA 94105

Re: Plan Bay Area Action Plan

Dear MTC Commissioners and ABAG Board Members,

The Ditching Dirty Diesel Collaborative writes to comment on the Plan Bay Area Action Plan. Ditching Dirty Diesel urges the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) to prioritize freight in their Action Plan. As our region grows and our economy continues to thrive, our freight industry will continue to play a major role both in our economy and our air pollution challenges. Communities near freight facilities and infrastructure are overwhelmingly communities of color or low-income communities, who are already facing severe pressures economically due to rising housing costs in the Bay Area in addition to the stresses of living in areas where the air is not safe to breathe. This Action Plan can help reduce some of those stresses by prioritizing vulnerable populations and protecting them from the impacts of freight pollution.

### ACTION PLAN: RESILIENCE

Ditching Dirty Diesel members support a focus on resilience in the Plan Bay Area Action Plan, and want to ensure that the Action Plan accounts for the ways the freight sector impacts community-level resilience. The Action Plan items focused on resilience should be edited to demonstrate how MTC, ABAG, and partner agencies can protect the public from the air quality impacts of freight.

#### RESILIENCE ACTION #1: DEVELOP A REGIONAL GOVERNANCE STRATEGY FOR CLIMATE ADAPTATION PROJECTS

Any changes considered to the goods movement system to adapt to sea level rise must be evaluated for changes in the distribution of impacts from the movement of goods (air pollution, noise, congestion, safety etc.). Communities that are already overburdened by impacts from the goods movement system should not have their burden increased due to projects aimed at adapting to sea level rise.

MTC, ABAG, and partner agencies must consider impacts to the regional goods movement system when projects are developed to adapt sea level rise. Lands currently used to support goods movement activities such as warehousing and distribution, maintenance, and fueling that are rendered unusable for those activities due to sea level rise adaptation measures must be adequately replaced. When changes to transportation modes (rail, highway, pipeline or air) are proposed because of sea level rise, the implications to the movement of goods must be addressed, and funding for replacement modes developed. Also, measures must be taken to prevent short-term disruptions to the goods movement systems that could occur from the combination of sea level rise and flooding events.

The Bay Area Air Quality Management District (BAAQMD) should be added to the agencies listed as partners for this Action Item to help analyze and develop mitigation measures for the air pollution impacts of proposed projects.

#### RESILIENCE ACTION #2: PROVIDE STRONGER POLICY LEADERSHIP ON RESILIENT HOUSING AND INFRASTRUCTURE

MTC and ABAG should strengthen this action to reflect the need for housing and infrastructure that protects residents from air pollution. Resilient housing and infrastructure are critical in times of crisis, but are also essential for the more chronic challenges associated with the “emerging and increasingly pressing threats to the Bay Area’s communities, ecosystem and economy.”<sup>1</sup> These threats include warmer temperatures which can increase ozone pollution, as well as a growing population and a growing economy that can result in increased diesel emissions at ports, warehouses, and other facilities associated with freight.

Ditching Dirty Diesel recommends that MTC and ABAG include a focus on reducing and mitigating freight’s impacts on communities. This work could result in additional vegetative barriers between communities and polluting facilities, or the cleanest air filtration systems possible in new and existing homes in highly polluted areas, for example. MTC and ABAG should also include the BAAQMD as one of its partners in implementing this action. BAAQMD has experience in addressing the threat that air pollution poses when developing safe housing.<sup>2</sup> Their experience in this area would be useful.

#### RESILIENCE ACTION #3: CREATE NEW FUNDING SOURCES FOR ADAPTATION AND RESILIENCE

---

<sup>1</sup> Metropolitan Transportation Commission and Association of Bay Area Governments. March 2017. Plan Bay Area 2040: Draft Plan, p. 77.

<sup>2</sup> See Bay Area Air Quality Management District. “Planning Healthy Places.” Available at <http://www.baaqmd.gov/plans-and-climate/planning-healthy-places> (accessed May 25, 2017).

This Resilience Action takes on particular importance because, despite a projected modest reduction in adverse impacts, Plan Bay Area’s projected performance falls far below the Healthy and Safe Communities target of reducing adverse health impacts associated with air quality, road safety, and physical activity by 10%. In light of the significant air quality and health impacts still experienced in communities near goods movement infrastructure, and in light of the key role assigned to strengthening middle-wage career paths for goods movement in the economic development section of the Action Plan, funding infrastructure that reduces environmental health risks from goods movement is vital to Plan Bay Area’s ultimate success. To that end, more specificity should be provided in Plan Bay Area documents regarding the anticipated sources and uses of the \$350,000,000 targeted for the clean fuel and impact reduction program under the goods movement investment plan. Resilience Action #3 should be strengthened by adding BAAQMD to the list of partners. In addition, to make it clear that the action will address ongoing resilience and health challenges related to emissions from trucks, trains and other components of the freight system, the words “including pollution from freight transportation and infrastructure” should be added at the end of the draft paragraph.

#### RESILIENCE ACTION #4: ESTABLISH AND PROVIDE A RESILIENCE TECHNICAL SERVICES TEAM

This Resilience Action would be stronger in promoting environmental justice and equity if the investments were explicitly linked to the assessment of vulnerable communities and if it were broadened to include adaptation to air quality issues as well. This would elevate the role of BAAQMD as a technical services and funding partner. There would also be quantifiable co-benefits of reducing exposure of people living near pollution hotspots, which could help MTC and ABAG move closer to achieving the Healthy and Safe Communities performance target.

#### RESILIENCE ACTION #5: EXPAND THE REGION’S NETWORK OF NATURAL INFRASTRUCTURE

Given that Plan Bay Area reduces health impacts by a mere 1% – well short of the Plan’s 10% target – it is imperative that investments in the expansion of the region’s natural infrastructure prioritize those interventions with strong health outcomes. Given air pollution’s clear and well-established connections to health, efforts to improve air quality should be at the top of any investment plan.

As noted in the Equity Analysis, Plan Bay Area’s health outcomes are the same for households earning less than \$30,000 per year as for those households earning more than \$100,000 per year. Given that low-income households have generally poorer health

outcomes as compared to higher-income households, it is imperative that natural infrastructure expansion target low-income and other disadvantaged communities in order to close the disparity between the two groups.

## CONCLUSION

Ditching Dirty Diesel applauds the amount of work that went into creating Plan Bay Area, while recognizing that much more work is needed to take action that makes the Bay Area a healthier, safer, and more equitable region. We encourage MTC and ABAG to adopt the recommendations described above, and we look forward to working with you to implement this Action Plan in a way that makes our region more equitable and protects the most vulnerable.

Sincerely,

Ditching Dirty Diesel Collaborative