

CALIFORNIA COASTAL COMMISSION

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**By Electronic Mail**

July 20, 2021

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

Subject: Draft EIR for Plan Bay Area 2050

Dear Members of the Metropolitan Transportation Commission and the Association of Bay Area Governments:

Thank you for the opportunity to provide comments on your draft EIR for Plan Bay Area 2050. I write on behalf of staff in the Coastal Transportation Program of the California Coastal Commission. As you likely know, the Coastal Commission is an independent state agency that regulates development along California's coastline to protect natural coastal resources and to maximize coastal access and recreation for all. Our statewide transportation program works generally on sea level rise planning, climate change adaptation, and multi-modal improvements related to our critical coastal transportation infrastructure, as well as other issues related to the California Coastal Act – the protection of marine and coastal biological resources, social equity, and maximizing public access on the California Coast.

I would like to direct these comments to the Bay Area Plan 2050 itself, and hope the feedback can be applied to the EIR. Overall, we want to applaud this document and the important direction it sets on multiple policy issues, including reducing transportation air pollution and GHGs, improving multi-modal transportation, addressing the need for greater equity in the region, and enhancing the resiliency of our infrastructure in the face of sea level rise. Primarily, we want to offer ourselves as a partner in this important work to carry forward the.

Additionally, in this letter, I would like to offer a few broad comments. First, it appears the coastal areas and resources of the Bay Area counties are largely overlooked in this plan. We understand the emphasis for ABAG and the MTC is on the urban core of the Bay Region, centered around the San Francisco Bay. However, the plan does state that it covers the nine counties, and the coastal areas of these counties are among the most valuable resources for the residents of those nine counties. As an example, page 81 of the plan includes a photo of a scenic coastal view, but the plan has no discussions of, and even almost no mentions of, coastal issues. This is particularly evident in the map of SLR vulnerabilities on page 95 of the report, which

does not include any coastal areas at all even though numerous resources document the great vulnerability of our coastal areas. The lack of discussion of coastal issues also makes one question if the proposed funding allocated for different strategies only goes to areas along the bay shoreline and in the inner urban core of the Bay Region, given those areas are the only ones discussed and displayed in the various maps and figures. For example, EN1 on page 98 proposes \$19 Billion for SLR adaptation, but does that funding only go to areas of bay shoreline or also to vulnerable coastal areas greatly in need of SLR adaptation efforts?

If the intent of the Bay Area Plan is only to focus on the inner urban core, the plan should specify that up front and include a discussion of why coastal areas are being largely excluded at this time. Otherwise, we offer a few more specific comments on this larger point. The plan's discussions of SLR vulnerabilities and adaptation should include references to coastal SLR, particularly Highway 1, which serves as critical transportation infrastructure for our coastal communities and visitors. At the very least, the plan could reference recently developed vulnerability assessments prepared by the coastal counties, or the vulnerability assessments of Caltrans District 4. Discussions of equity in the plan should reference the critical role of free or low-cost coastal recreation at our beaches and open spaces, the need to maintain access for all residents of the nine counties to those areas, and the need to maintain free or low-cost access to the coast, including free/affordable parking. (Positively, the plan does note that "improving access to the Bay Area's open spaces on the periphery of urban areas is key to ensuring equitable access to our region's natural riches (P.80)." Further such discussion, however, is necessary.) Discussions of transportation in Chapter 4 should reference the need to expand affordable transit to and along the coast, which can bring improvements for a more equitable transportation system and help reduce air pollution and GHG emissions from automobile transportation related to our coastal economies. Chapter 5 Environment does reference the importance of our coastal recreational open spaces, but the plan should more specifically call out the need to preserve and expand these coastal areas, including the California Coastal Trail. Overall, it should also be made clear that EN4, EN5, and EN6 include coastal recreation. Touching on both equity and environment concerns, the plan also lacks any discussion of how to protect our coastal beach and recreational areas from the threat of SLR and ideas to adapt and preserve coastal recreation.

A second overall comment is that the plan has a disconnect between transportation and environmental/resiliency chapters. Progress on these two broad topics is critically related and the cross-linkages between the two should be specifically addressed in the document. For example, Chapter 4 Transportation does not include any mention of specific strategies related to the need to address SLR or climate change. The chapter includes a strategy to maintain existing transportation infrastructure but how can those systems be maintained if they are not made resilient? Granted, Chapter 5 Environment does include an important discussion of those topics and laudable planning goals. We think, however, that Chapter 4 Transportation could be strengthened by including cross-references to chapter 5 or its own more substantive discussion of strategies.

In this regard, a fuller discussion of the interlinkages between transportation and the environmental goals of the plan could help improve the discussion of SLR adaptation, which needs a more detailed discussion. We do want to express our support for the plan's discussion and preference for living shorelines and marsh restoration. However, EN1 proposes \$19 billion to "[p]rotect shoreline communities affected by sea level rise, prioritizing low-cost, high-benefit solutions...." How will these "low-cost" solutions be identified and do they consider the long-term costs of maintenance and potential harm to environmental resources? For instance, a sea wall may be a low-cost solution, but the long-term maintenance costs of the seawall, the environmental harms, and, in many cases, the long-term futility of that approach should be considered in any cost/benefit analysis. Numerous studies indicate that investments made now to accommodate future projected climate change impacts are frequently less expensive in the long-run than short-term low-cost solutions that defer critical decisions. Likewise, the map figure 5.1 on page 95, intermixes various adaptation solutions including seawalls, elevation, and ecotones/levees, all depicted in one green line, leaving it to future local planning efforts to sort out those solutions. At the same time, the plan proports to protect 98% of all homes regionwide and our regional transportation infrastructure. The green line seems a vast oversimplification and it is unclear what priorities or general policies can support decision making amongst the different solutions offered, and how the goals can be met without an over-reliance on seawalls. We understand the plan covers through 2050, but the plan would benefit from discussing how in some cases in longer-time frames managed retreat may be the best, or only feasible, alternative, and therefore investments now should support that longer duration viewpoint.

A third overall comment goes to the Active Transportation elements. We appreciate that the plan advocates for complete streets and proposes funding to build out such active transportation. However, the plan overall does not sketch out an overall vision for active transportation in the region, and the Bay Area Plan 2050 seems like exactly the place for such a vision, which is necessary to guide more specific complete street and separated bike trail investments. For active transportation such as cycling to replace a significant share of our regional transportation needs, ABAG and the MTC should advance an implementable vision for a regional transportation system that is not dependent on the automobile. The plan includes regional mapping visions for transit (p.76), highway investments (p.60), and urban growth (p.20), but there is no regional vision for a network of bike highways to support non-vehicular transit for work commuting or other daily transit needs. It is particular disappointing to see plans for highway widening not accompanied by a vision for non-automotive transit that could reduce the need for that widening.

As a related note, the plan's discussion of highway widening and new highway interchanges should acknowledge that such developments can encourage new commercial strip developments because of the improved traffic access. The plan should discuss how such highway improvements can avoid promoting such land-use developments in favor of housing or open space preservation. We also want to highlight that the draft 2050 plan lacks any discussion of cycling access along Highway 1 or the coast. Multi-modal trails can also provide a critical active

transportation resource in the more rural areas of the coast that can experience heavy transportation demand due to a high density of visitor destinations, which is often the case along our coast in areas such as Marin, Sonoma, and San Mateo counties. Pedestrian and bicycle routes are a critical component of traffic demand management in these destination-rich rural locations because they provide ways for the public to travel between multiple visitor destinations without having to repeatedly drive and park at each individual site, improving road conditions for residents and visitors alike.

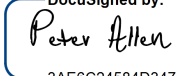
As a fourth comment, the plan advocates the laudable goal of reducing climate emissions from vehicles. Again, however, the plan seems to be lacking a specific and implementable vision besides increase the number of chargers. There's no vision for a regional network of chargers, and the plan lacks proposed answers to fundamental problems for clean transit, such as the problem of charging needs of apartment dwellers; or how does an EV charging network tie into equity concerns and the needs to ensure low-cost charging; how will the bay region support clean trucking with infrastructure improvements, or how does the clean transportation infrastructure tie into larger concerns such as improving our clean energy system and general power system resilience? For instance, solar-powered supported battery storage in support of EV charging can provide clean electrical power more resilient to demand spikes or outages.

Especially given that the plan discusses highway land widening and other highway improvements, the Bay Area Plan 2050 could include a discussion of mitigation for VMTs from transportation and other infrastructure projects. As reflected in the plan, California's goal is not to maintain our current GHG emissions, but to reduce them. It is increasingly clear that, along with strategies to reduce our transportation sector GHG emissions, GHG mitigation projects can play an important role to sequester carbon. VMT mitigation mechanisms could support the plan's strong goals for wetland and marsh habitat that can help reduce GHGs overall.

Conclusion

Once again, overall, we support the plan and vision therein. These are just some general suggested refinements going forward as this plan is finalized and implementation of its recommended policies can begin. We look forward to any opportunities to work with ABAG, MTC, or the county governments in undertaking this important work. Please contact me if you have any questions or comments on any issues raised in this letter. I can best be contacted at peter.allen@coastal.ca.gov. Many thanks again for the opportunity to provide comments.

Sincerely,

DocuSigned by:

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Peter Allen

Northern California Coastal Program Transportation Manager
California Coastal Commission