MTC Public Information
info@planbayarea.org
Attn: Draft Plan Comments
375 Beale Street, Suite 800
San Francisco, CA 94105

RE: Comments Regarding Draft Plan Bay Area 2050 and related reports

To Whom It May Concern:

This letter is based on substantial solutions that MTC can implement using existing technologies to meet public goals for reductions in greenhouse gases, road crashes, and vehicle miles travelled. MTC is supposed to look for feasible solutions to attaining the goals of SB32 via SB 375 and SB743 via a SCS. However the process threatens to devolve into business as usual with rising VMT and greenhouse gases. Plan Bay Area 2050 like the One Bay Area Plan will end up as just another exercise in "paper" thinking without teeth and be mostly ignored unless you can clearly connect funding to it and enforce the funding criteria.

PB2050 has a commendable focus on equity, displacement, tenant protection, and inclusion, and a solid emphasis on outcomes. However Plan Bay Are 2050\(^1\) is a day late strategy, for example, by 2035 the plan calls for a 22% per capita decrease in emission, but according to science [https://www.nature.com/articles/s41586-019-1364-3](https://www.nature.com/articles/s41586-019-1364-3) this reduction is not only insufficient to meet Paris it will blow through the entire 1.5 deg carbon budget through committed emission if the remaining communities on earth irresponsibly planned like MTC. We have only one planet. We are in a climate emergency. The IPCC is saying\(^2\) we are going into dangerous feedback loops by not getting off fossil fuels now Systems around the world are failing from fires in Arctic to The Amazon forests beginning to not absorb the CO\(^2\)\(^3\) we are blithely releasing on our MTC funded roads. Additionally the plan is clearly not a dollar short toward meeting Paris, just horrendously misspent. I ask for eight “technologically feasible”\(^4\) changes with regards to:

**Measurement and reporting,**
**Extreme heat,**
**15 minute neighborhoods,**
**Decrease VMT,**
**Broadband For All Public networks,**
**Road removal,**

\(^1\) [https://www.planbayarea.org/sites/default/files/documents/2021-05/Draft_-Plan_Bay_Area_2050_May2021_0.pdf](https://www.planbayarea.org/sites/default/files/documents/2021-05/Draft_-Plan_Bay_Area_2050_May2021_0.pdf)

\(^2\) [https://wottsupwiththatblog.wordpress.com/2013/10/02/michael-mann-on-tipping-points/](https://wottsupwiththatblog.wordpress.com/2013/10/02/michael-mann-on-tipping-points/)

\(^3\) [https://www.theguardian.com/environment/2021/jul/14/amazon-rainforest-now-emitting-more-co2-than-it-absorbs](https://www.theguardian.com/environment/2021/jul/14/amazon-rainforest-now-emitting-more-co2-than-it-absorbs)

Slow streets NOW, and Biodiversity and Trees.

Measurement and reporting:
- Create an assessment report that annually reports on progress of the strategies and outcomes.
- Focus on a few measures that will achieve the largest reductions in GHG emissions.
- For each outcome section include a few easy-to-track metrics to help commissioners and the public gauge success of the plan on a defined reporting frequency.

MTC does have a complete reporting section but it has clearly not been sufficient, over the last two decades, to meet many of the goals like reduction in congestion, spare the air days, crash mortality, transit use, active transportation, and greenhouse gases. The plan’s biggest failing is a lack of an effective measurement and reporting mechanism to ensure that big strategies from the past like SB375 can be made to work. How will MTC collect data to show the outcomes in PBA2050 are being realized?

Add extreme heat and neighborhood level microgrids:
- Fund neighborhood microgrids which would allow for both grid stabilization and the ability of the community to cool themselves, a resilience strategy that adapts to the level of climate change being experienced today.

The plan provides many commendable strategies for wildfires and sea level rise. However Extreme Heat kills more people than any other weather event and climate change is making it worse. Extreme heat affects the grid resulting in blackouts that further impact health and lives like we experienced in August of last year. Cities and regions have responded by creating cooling centers. However these are open during the day only while heat effects are resulting in hotter nights when more people die. [https://www.nytimes.com/2021/07/09/upshot/record-breaking-hot-weather-at-night-deaths.html](https://www.nytimes.com/2021/07/09/upshot/record-breaking-hot-weather-at-night-deaths.html) Some areas may need to be evacuated. Given the geography of the bay area the probability exists that more inland areas will be experiencing more severe extreme heat events- moving literally on MTC funded roads from the frying pan into the fire. Microgrids allow people to safely shelter at home within PDAs that have proved to be more resilient locations to fires and floods.

15 minute neighborhoods:
- MTC should set an outcome for converting all neighborhoods into 15 minute neighborhoods as a co-beneficial strategy to achieving other objectives such as greenhouse gas reduction, Vision Zero, and reduce commuter impacts on the environment.

5 [https://www.planbayarea.org/reports](https://www.planbayarea.org/reports)
Resilient neighborhoods are a legacy of the pandemic. As people sheltered at home they reduced greenhouse gases, air pollution, and the spread of disease, allowing biodiversity to prosper—so much more than an estimate from Stanford\(^7\) said 20x more lives would be saved from decreased air pollution than lost to the pandemic. Delivery reduced the need to drive and expose oneself to disease. Some of these objectives are already in the plan such as locating 60% of new housing within PDA and within walking distance of a transit center and expanding internet access in low income communities. Here are seven strategies recommend by Strongtowns for creating 15 minute neighborhoods\(^8\). Incentivizing a comprehensive approach to 15 minute neighborhoods would be a more beneficial outcome in PBA2050 toward meeting public goals like reducing GHG.

**Decay VMT**

**Public broadband for all**
- Invest in public networks of Broadband for All like Chattanooga Tennessee\(^9\).

As the article sub-headline says, “While ISPs are struggling to bring 25 Mbps Internet to customers, the Electric Power Board of Chattanooga, a publicly owned utility, is bringing 10-gigabit internet to its customers. If they can have it, why can't we?” Rolling out equitable public broadband networks is much safer that the carnage on our roads from commutes, air and water pollution, and disease factories like our work environment. MTC needs a new strategy for addressing increasing VMT. Transit has been the most consistent failure of the last thirty years; while active transportation has remained flat. The best news in transportation has been the pandemic where work from home skyrocketed and the economy grew resulting in bumper tax revenue for the state\(^10\). Clearly the decline of transit and VMT to near zero has been beneficial to GDP. But a robust broadband for all network that equitably allowed people to participate in work, health, food access, and school would have been immensely safer, more resilient, and GDP enhancing. And will continue to meet those characteristics as variants like Delta spread.

**Priced parking**
- Give cities incentives to price and unbundle parking along with Residential Permit Parking as an alternative to parking overflow.

San Carlos put in RPP as a way of putting in less parking for a TOD at the Caltrain Station and surrounding neighborhoods asked for a similar system. Free parking like the

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\(^7\) [http://www.g-feed.com/2020/03/covid-19-reduces-economic-activity.html](http://www.g-feed.com/2020/03/covid-19-reduces-economic-activity.html)


pandemic has shown results in frivolous driving that spreads disease and increases crashes. The governor responded by closing parking lots to popular destinations like parks and beaches. Congestion pricing parking at these destinations can substantially reduces impacts of crowds and VMT while bringing in revenue for alternatives like transit and active transportation as SF has proved in funding MUNI.

**Build very low income housing**
- Incentivize cities to build more housing at the very low and low income levels.

Cities have pursued a strategy of trickle down housing. Most cities build at most 20% affordable housing. By contrast BART has built 33-100% affordable at their sites. Extremely low income and low income housing hasn’t been built in most cities to the RHNA requirement, in itself generally unmet in many cities. The result according to the LA times is the displacement through gentrification of low income people from MTC’s PDAs into distant commutes from the Central Valley. The joint center for housing at Harvard says 66% off home buyers in the Bay Area can’t afford current prices and much of the media has reported on an exodus to cities like Phoenix. This problem is worse in cities that create mostly high income jobs because according to a South Bay study every high income job creates 31 low income jobs in the service sector like dish washers, maids, and gardeners who commute from far away in vehicles according to the Chronicle that are older and more polluting.

**Jobs housing balance**
- Incentivize cities to get large employers to build housing instead of parking.

Employers like Facebook and Genentech put in large parking lots. Despite robust TDM programs they end up creating considerable pollution and congestion. MTC then responds with money for expansion of the surrounding freeway system resulting in increased VMT and GHG. If the employer had built housing this problem would have been eliminated. Google is proposing to build housing in San Jose at Diridon. Other places like schools have built workforce housing on campus. Housing along with robust TDM could be accomplished for the cost of parking. PBA2050 estimates suggest the Bay Area’s population will grow to just over 10 million residents, and that the number of jobs within the nine counties will climb to more than 5 million. Where in the region will these 2 million new people live and work? Will they be able to live conveniently near their jobs or work from home, or will they commute for hours each day? Will the children, grandchildren and great-grandchildren of today’s residents be able to raise their own children in the region, or will they be priced out? Could entire neighborhoods be displaced by the effects of climate change? The answers to these questions will depend on how the region addresses inequities as it grows. Well-crafted policies can help families stay in affordable homes, surrounded by inclusive communities, for generations.

**Road removal:**
1) **Reduce presence at the Wildland Urban Interface with restriction such the governor’s successful Covid19 closure of parking lots in parks during the pandemic and**
2) Removing roads and power lines from predicted high fire risk areas. Deputy Fire Chief Jonathan Cox at Calfire says humans may be responsible for 90% of wildfires; I would note on MTC funded roads. However if we take land use into effect he believes humans are responsible for almost 100% of wildfires. Controlled burns in this plan are part of a policy to control expanding disaster within the new normal; road and power line removal would remove the spark from the disaster zone. The main cause of fires at the Wildlands Urban Interface is not the remaining undisturbed landscape but the intrusion of human infrastructure primarily roads and power lines into the landscape as the LA Times\textsuperscript{11} and other publication\textsuperscript{12} have reported a number of times. The reason fire fighting resources are committed is not to save the landscape from the fire but to save the intruded human lives from the fire. A number of the solution are in this plan: Not developing further at the interface, hardening remaining human structures that cannot be removed, ensuring feasible evacuation routes, and implementing defensive spaces against fires (which many not be possible if one uses the state’s one acre of cleared space around every structure). Removing roads and parking lots from the WUI is a necessary next step.

**Slow streets and traffic calming NOW:**

- Safe complete streets networks should be prioritized before additional money is spent on other transportation strategies to realize equity strategies- Oakland’s Slow Streets, which was retrofitted on their bike plan network, is a good example that could be implemented across the Bay Area within the next two years for almost nothing, i.e. “cost-effective reductions\textsuperscript{13}” via paint, k-bars, and A frame signage.
- Eliminate gaps early by limiting auto use.
- Adjacent streets should be congestion priced for parking to encourage use of active mobility and the money given to area low income people toward a guaranteed basic income.

Wide roads may fail to improve congestion but in a year with less total miles of driving, those wide roads proved to be dangerously tempting to many drivers increasing fatalities 8%\textsuperscript{14}. The rise in reckless driving says more about road design in the Bay Area than it does about Americans’ skills as drivers; to paraphrase Greg Shill, associate professor at the University of Iowa College of Law and a faculty member at the National Advanced Driving Simulator. This plan makes commendable strategies and outcomes of Vision Zero, reduced speeds on roads, equity and increasing active transportation via complete networks including micro-mobility and puts $13B behind the effort in T8.

\textsuperscript{11} https://www.latimes.com/opinion/story/2021-03-24/becerra-development-fire-risk


\textsuperscript{13} https://law.justia.com/cases/california/supreme-court/2017/s223603.html

\textsuperscript{14} https://theverge.com/2021/6/4/22518496/2020-traffic-crash-death-nhtsa-pandemic-driving...
However these strategies need to be fast fair and frugal so that low greenhouse gas mobility is not roadkill over the next two decades... and comprehensively linked with safety.

According to Dangerous By Design from Smart Growth American, “People walking in lower-income neighborhoods are also killed far more often. The lower a metro area’s median household income, the more dangerous its streets are likely to be for people walking... People age 50 and up, and especially people age 75 and older, are overrepresented in these deaths... Black people were struck and killed by drivers at a 82 percent higher rate than White, non-Hispanic Americans. For American Indian and Alaska Native people, that disparity climbs to 221 percent.”
Eliminate gaps early by limiting auto use. Take El Camino Real in Millbrae for example which acts as a bottleneck between the northern and mid peninsula regions. Global warming is here to stay, but they are the typical car-centric suburb stuck in the 1950’s. The street needs to be repurposed by removing car parking and car lanes and replacing them with protected bike, micro-mobility, and bus only lanes on El Camino Real. Adjacent streets should be congestion priced for parking. In other words, ECR must prioritize transportation (movement) of all vehicle types - not prioritize cars over all else! Largely because of current MTC policy and funding mistakes we have a 2.7 mile "no man’s land" for bicyclists and pedestrians in San Bruno and Millbrae, happily sailing the global warming ship to extinction by making micromobility, bicycling and walking extremely dangerous at critical travel bottlenecks.

Biodiversity and trees.
1. Restrict Caltrans mitigation banking. It reduces the value of the entire ecosystem within a biome and creates toxic landscapes by trading away species like burrowing owls from their native ranges. A required outcome of banking should be increased range complexity and decreased desertification.
2. Stop development and redevelopment from removing established trees. The full value of carbon lost today needs to be priced into removal and redevelopment. The three 15 gallon saplings for each mature tree will never replace the carbon lost from the ecosystem with the removal of an established tree and given the scale of increasing climate change today this is an immense problem. The solution is stop.
3. Stop using pesticides like roundup and neonicotinoids across the bay area. These microhabitats on the edge of the road need to be nourished for pollinator diversity.
4. Reduce speeds with camera enforcement on biodiverse streets to eliminate reckless drivers removing trees. The solution is improved enforcement by redesigning the street to be safer- not eliminating the trees. Trees need to be sufficiently closely spaced to reduce the heat island effect\textsuperscript{15} and ensure low income communities are not excessively harmed as the climate heats up.\textsuperscript{16}

Another roadkill of MTC’s policy bias toward fast dangerous roads was biodiversity. Species decline across all areas have been a hallmark of MTC funded travel based de-

\textsuperscript{15} https://www.nytimes.com/2021/07/02/climate/trees-cities-heat-waves.html

\textsuperscript{16} https://www.latimes.com/opinion/story/2021-07-04/climate-change-deadly-heat-waves
velopment patterns. Car crashes are the leading cause of species loss from Pumas to butterflies in the Bay Area. The increased hardscape has contributed to heavy metal pollution of waterways and the Bay from tire dust, break liner, etc. extirpating species in the bay. Salmon species fertility rate decline with tire dust pollution\textsuperscript{17}. Counties, because of the Clean Water Act, have implemented many Green Street programs utilizing bio-swales to reduce and eliminate contamination from the bay. These programs need to expand faster and be linked to slow streets. The loss of species continues most recently in the near extirpation of the unique Monarch butterfly migration from the planet. The four outcomes recommend should be implemented to stop the impact of current road funding on biodiversity and it’s related fueling of climate change\textsuperscript{18}.

Regards,

\textsuperscript{17} \url{https://www.latimes.com/california/story/2020-12-03/coho-salmon-tire-chemical}
\url{https://science.sciencemag.org/content/early/2020/12/02/science.abd6951.full}

\textsuperscript{18} \url{https://www.un.org/sustainabledevelopment/blog/2021/06/tackling-biodiversity-climate-crises-together-and-their-combined-social-impacts/}