

The Yerba Buena Neighborhood Consortium  
c/o 230 Fourth St. San Francisco, CA 94103

July 19, 2021

Via Email ([eircomments@bayareametro.gov](mailto:eircomments@bayareametro.gov))

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

RE: Plan Bay Area 2050 DEIR  
SCH#2020090519

Dear MTC and ABAG commissioners and staff:

We are righteously opposed to Plan Bay Area 2050 as proposed. PBA2050 is now actually a blueprint for the annihilation of the Bay Area's lower-income/working class/minority Central City communities. It is the manifesto for their conquest by the higher-income professional Gentry of the Bay Area who will replace their displaced populations by 2050 and reap the benefits of their proximity to good transit and urban amenities. This in fact would replicate their racist zoning/lending 'red-lining' of decades past with a new racist "\$-lining" of Gentry-class homogenization as their future.

To actually provide a blueprint for Social Equity, Social Justice, Smart Growth, and Environmental Sustainability for the future of our Bay Area, PBA50 must:

- Mandate 100% Jobs/Affordable Housing Balance for all large scale future commercial development in all Bay Area counties. San Francisco's 2020 Proposition E was the first step towards this goal in the Region. It must be mandated throughout the Bay Area, starting with the upcoming Oakland Downtown Plan.
- Exempt all identified Central Cities "Communities of Concern" from Priority Development Areas and any State mandated up-zonings unless and until really affordable housing for ALL their lower-income and working class residents is already assured and in place. PBA50's mere promises of un-guaranteed and un-required affordable housing for Communities of Concern without clear land use policies that de-commodify land and do not include clear financing are not realistic.
- Transform the hundreds of wasted square miles of surface parking lots for office parks and shopping malls throughout the Region into medium-density new residential districts to meet the Bay Area's housing needs - without disrupting the neighborhood life of existing communities and ensuring sufficient amount of affordable housing.

- Mandate that no less than 50% of new housing developed on publicly owned property will be affordable for lower and middle-income households (excepting Teacher Housing).

Please also be advised for the record that the Draft Environmental Impact Report for PBA2050 is itself legally insufficient to meet the requirements of CEQA. It fails to evaluate Project Alternatives that may well be environmentally superior and would certainly be socially and ethically superior. In particular, the “Equity, Environment, and Jobs Alternative” of the PBA2040 – which was NOT adopted as the approved PBA2040 Plan – is completely omitted and discarded from any consideration in the PBA 2050 DEIR.

Sincerely,

John Elberling  
Manager

Cc: Susan Brandt-Hawley