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Subject: Plan Bay Area 2040 Comments
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The Plan Bay Area 2040 update has the same problems that the original 2013 Plan Bay Area had:

- 1) The cost effectiveness of Plan Bay Area is abysmal, with costs of implementing Plan Bay Area far surpassing any benefits achieved;
- 2) Plan Bay Area isn't needed to meet SB 375's greenhouse gas reduction requirement - The only provisions of Plan Bay Area that significantly lower green house gases are from the California Air Resources Board green house gas plan and MTC climate initiatives, which could exist without the regional plan. Moreover, new construction, which Plan Bay Area mandates, is one of the biggest contributors to greenhouse gases. The adverse climate change impacts of the plan related to the construction process are unsustainable, at a time when we need a smaller environmental footprint, a reduction in the use of building materials, electricity, and fuel. It takes up to 80 years for an urban village mixed-use building at maximum greenness to overcome climate change impacts from its own construction;
- 3) Plan Bay Area makes housing and transportation less affordable - Rather than reducing the combined housing and transportation costs for low and lower middle income households, implementation of the plan would increase these costs from 67% to 69% of low and lower-middle incomes;
- 4) Plan Bay Area displaces many lower income households;
- 5) Plan Bay Area does nothing to stop the hollowing out of the middle class. - The plan's forecast predicts; "The 'hollowing out' of the middle is projected to continue over the next 25 years. Household growth will be strongest in the highest income category, reflecting expected strength of growth in high wage sectors combined with non-wage income (interest, dividends, capital gains, transfers). Household growth will also be high in the lowest wage category, reflecting occupational shifts, wage stagnation, and retirement of seniors without pension assets";
- 6) Plan Bay Area's forecast of Jobs, Population, and Housing for Marin County is unrealistic;
- 7) Implementation of Plan Bay Area would cause multiple significant unavoidable adverse environmental impacts, resulting in increased risk of severe environmental harm and serious jeopardy of public health and safety. - The impacts would be unavoidable either because mitigations will not reduce the impacts to less-than-significant or else because the regional agencies cannot require local jurisdictions to impose the mitigation measures. Moreover, the mitigations are unfunded;
- 8) Plan Bay Area promotes unfunded mandates - Plan Bay Area does not identify or address how communities will fund the expansion of public infrastructure and services necessary to accommodate the plan's projected growth. There is no funding in place to address the significant adverse impacts that the plan will create. The local jurisdictions and tax payers are expected to pick up the tab, when they don't even have enough available funds to properly provide for the existing demands;
- 9) Plan Bay Area reduces local control (with a carrot & stick approach);
- 10) Plan Bay Area does not respect environmental constraints and limits to growth; and

11) Plan Bay Area furthers CEQA exemptions and streamlining.