



June 20, 2018

Chair Jake Mackenzie and Commissioners
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street
San Francisco 94105

Via email to Rosy Leyva rleyva@bayareametro.gov

RE: 2021 Regional Transportation Plan and Sustainable Communities Strategy

Dear Chair Mackenzie and Commissioners:

The Sierra Club has been following the first Regional Transportation Plan (RTP) containing a Sustainable Communities Strategy (SCS)—Plan Bay Area (PBA), adopted in 2013. We have also followed with interest the second RTP/SCS—Plan Bay Area 2040 (PBA 2040), adopted in 2017.

The Sierra Club also has been participating in the recently restarted Regional Advisory Working Group and, with an understanding of what is happening with Plan Bay Area and Plan Bay Area 2040, wants to provide you with comments for your consideration about the development of the next RTP and SCS, scheduled to be adopted in 2021. We want the Region to have a successful SCS and look forward to hearing back from you. We also continue to await the restart of the Regional Equity Working Group.

Too Many Automobiles

On January 24, 2018, the Sierra Club wrote to the Metropolitan Transportation Commission (MTC) about our review of “Climate Initiative” projects and programs that are in the SCS of both PBA and PBA 2040 (copy attached). We noted that

Several of the Climate Initiatives will not reduce car driving and as such do not support the Sustainable Communities Strategy of the Bay Area, which is based on urban infill development.

The draft Environmental Impact Report for PBA 2040, Table 2.1-11, shows that the number of Bay Area households will increase from 2015–2040 by 666,200 and that the average number of vehicles per household will decline from 1.74 to 1.70.

These two figures, when reviewed together, show that the Bay Area will have more than one million more cars by 2040.

The PBA 2040 SCS is based on new households going into already developed urban areas called Priority Development Areas (PDAs). A reasonable question is where will the one million additional cars be parked in the PDAs? Another is whether building parking spaces in new residential developments increases costs and makes solving the housing crisis that much more difficult. Lastly, where on already congested streets will the one million extra cars have space to drive?

As you work on developing the next RTP/SCS, the Sierra Club encourages MTC to shift its focus and work towards a goal of adding *no additional cars* in the Bay Area through the life of the Plan (presumably, to 2050).

Too Many Vehicle Miles Traveled

The draft Environmental Impact Report for PBA 2040, Table 2.1-14, shows that Vehicle Miles Traveled (VMT) will increase by 21% from 2015–2040. Another reasonable question to pose to MTC is—how will another 33,121,800 VMT per day help make the SCS a success?

The Sierra Club encourages MTC to shift its focus and work towards a goal of eliminating VMT growth in the Bay Area through the life of the next RTP/SCS.

Mode Share Split

The draft Environmental Impact Report for PBA 2040, Table 2.1-15, shows the number of Bay Area “Typical Weekday Daily Person Trips, by Mode” from 2015–2040. Driving alone will decrease slightly from 47.6% of trips to 46.6%; walking will remain unchanged at 10.4% of trips; biking trips as a percentage will decrease from 1.2% of all trips to 1.1%; and transit trips will increase from 6.4% to 6.9%.

Walking, biking and taking transit trips will add up to just 18.4% of all weekday trips in 2040, and the change will be almost unnoticeable. How will this result in a successful SCS?

The Sierra Club encourages MTC to shift its focus and work towards increasing, significantly, the mode share split for the combination of walking, biking and taking transit as it develops the next RTP/SCS. One way could be that MTC helps to reduce the cost of a monthly adult bus transit pass to \$30 (a dollar a day) to increase ridership. This also means that there needs to be more transit service and capital and operating funds.

Housing Concern

There is widespread concern that the Bay Area is caught up in a housing crisis, largely due to a severe jobs/housing imbalance. The Sierra Club asks that MTC consider what it can do to encourage jurisdictions to help get housing permits issued inside PDAs, generally in

a greater percentage than job sites, especially for the three categories of very low, low and moderate incomes. One thing for consideration would be to produce, at semi-annual intervals, a data table showing permits issued inside each PDA and the proportional progress being made towards the goals agreed to by the PDA sponsors.

Climate Change and Sea Level Rise

There is a risk of flooding inside many of the Bay Area's PDAs. The Sierra Club asks that MTC work, at a minimum, to not support the building of new, infill development and new infrastructure projects, especially for transportation purposes, in areas that will flood due to sea level rise.

Conclusion

The Sierra Club is very much interested in the Bay Area having a successful SCS. A continuation of past practices—in terms of projects and programs—will not deliver a successful SCS. We encourage MTC, as it develops the next RTP/SCS, to reduce car driving and also to support equitable infill housing in the PDAs, not only for new residents but to eliminate displacement of existing residents. Reducing Greenhouse Gas emissions is a key to supporting the state's efforts at tackling the enormous problems of climate change.

Please contact Matt Williams if you have any questions. His email address is mwillia@mac.com.

Sincerely,



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cc: California Air Resources Board
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