May 16, 2013

Amy Worth, Chair
Metropolitan Transportation Commission
and
Mark Luce, President
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

Dear MTC Chair Worth and ABAG President Luce:

We support coordinated land use and transportation planning to create more environmentally sustainable, equitable, and healthy communities in the Bay Area. Plan Bay Area’s attempt to integrate transportation and land use at the regional level in order to reduce per capita CO2 emissions from cars and light trucks and meet the region’s full housing needs for people of all incomes is a step in the right direction. We are pleased with the first-ever transportation project performance assessment that ranks projects according to their economic, environmental, and social benefits in order to get the best value from our increasingly scarce public funds. We also support focused housing and job growth in Priority Development Areas (PDA’s) in order to preserve our region’s open spaces while creating more opportunities for people to live and work in compact, mixed use, walkable communities located near high quality transit.

However; the Draft Plan falls short of 5 targets and moves in the opposite direction of 4 targets, including reducing traffic-related injuries and fatalities and reducing the share of household income spent on transportation and housing costs. Furthermore, we are concerned that the Draft Plan worsens the jobs/housing balance by placing 95% of the housing growth in 15 cities. The Plan also accepts greater potential for displacement of low income people. This is unacceptable.

Plan Bay Area features five scenarios, including the Equity, Environment, and Jobs (EEJ) Scenario which was determined to be the environmentally preferred scenario. According to Public Advocates, the EEJ Scenario will result in the following benefits over the Draft Plan:

- Nearly 3.5 million fewer miles of auto travel per day
- 1,900 fewer tons of CO2 emissions per day
- 83,500 fewer cars on the roads
- 108,000 fewer people travelling by car each day
- 568,000 fewer tons of GHG emissions per year
- 30,000 fewer residents subject to sea level flooding by 2050
- 1,570 fewer tons of carbon monoxide emissions per year
- 7,100 fewer kilograms of Toxic Air Contaminants (TACs) per year
- 250 more hours of active transportation (biking and walking) per day
- 14,400 fewer families at high risk of displacement
- $79 million a year less rent paid by low-income families
- 165,000 more transit riders each day

As a result of the inadequacies of the Draft Plan and the superiority of the EEJ alternative for many of the indicators analyzed, we recommend the following mitigations:

- **Increase funding for transit service**: Allocate more resources for transit operations so that we can expand transit service over the coming decades and provide a free bus pass for the region’s youth.

- **Abandon plans for a regional High Occupancy Toll (HOT) lane network or create a better plan**: There are too many unresolved issues with the proposed HOT lane network, including a lack of commitment to boost transportation alternatives and address the impacts to low-income...
commuters. Therefore, we urge you to scrap the plan or integrate the following mitigation measures:

Do not add sprawl and traffic-inducing highway lanes as part of the HOT lane network (phase 2 of the HOT lane plan).

Instead of using the revenues generated from the network on highway expansion, use these resources to provide better transportation options such as express bus service and vanpools.

Develop a plan to address the equity impacts of HOT lanes such as offering free transponders and subsidized HOT lane use for low income commuters.

- **Invest in carbon-light/neutral transportation infrastructure:** Increase funding for retrofitting our fossil-fuel-powered public transportation network with less carbon intensive power generation sources.

- **Further encourage Transit Oriented Development (TOD) and create stronger incentives for open space preservation:** Encourage high density development around and on top of electrically-powered transit stations, and craft stronger safeguards for sensitive wildlife habitat and farmland as recommended by Greenbelt Alliance.

- **Support more housing and affordable housing in the right places:** Develop stronger policies to encourage job-rich cities with good transit infrastructure to take on a greater share of the region’s housing needs. Smaller job-rich cities are not being asked to take on their fair share of the region’s growth in the Draft Plan. At the very least, the Plan should not worsen the region’s jobs/housing balance.

- **Investment without displacement:** Adopt stronger anti-displacement measures to ensure that we don't push out low-income and transit dependent individuals and families from their homes.

**In addition to these recommendations, we have the following questions:**

- How will smaller job-rich cities be held accountable if they do not take on their fair share of housing and affordable housing in particular?

- How will MTC/ABAG enforce the Plan in regards to discouraging the development of our open spaces?

To follow up on this letter please contact Ada E. Márquez at 408-835-1795.

Sincerely,

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