July 5, 2012

Ashley Nguyen, EIR Project Manager
Metropolitan Transportation Commission (MTC)
Joseph P. Bort MetroCenter
101 8th Street
Oakland CA 94607

Re: Formal Scoping Comments for Plan Bay Area EIR

Dear Project Manager Nguyen,

I am writing to submit TransForm’s Scoping Comments for the Plan Bay Area Environmental Impact Report (EIR).

TransForm works to create world-class public transportation and walkable communities in the Bay Area and beyond. TransForm was founded in 1997 by environmental and social justice groups. These groups came together because they recognized how the quality of life and environment in the nine-county Bay Area were at risk due to poorly planned development and a transportation system too focused on just one way of getting around: driving. In the years since, TransForm has helped to win literally billions of dollars and groundbreaking policies in support of public transportation, smart growth, affordable housing, and bicycle/pedestrian safety. We have been deeply involved in the discussions on the 1998, 2001, 2005, and 2009 Regional Transportation Plans, as well as on the current Plan Bay Area.

TransForm staff members attended one of your public Scoping meetings – held on June 21, 2012 in San Jose – where we verbally offered comments. We also had the opportunity to meet with agency staff along with some other stakeholders on June 29, 2012, where we also offered verbal comments and reviewed a draft set of “Policy Measures Under Consideration” for each of eight different policy inputs. We are pleased to submit our written comments by July 11, 2012 for consideration in the Scoping phase of the EIR.

For Plan Bay Area to succeed, we believe that it needs to test of a wide range of possible policy inputs. This will allow the final plan to be constructed from the preferred scenario adopted in May plus the best elements of other alternatives tested in the EIR process. In particular, we support construction of an Equity, Environment, and Jobs (EEJ) Alternative to test the limits of Plan Bay Area. We offer the following comments. We have comments on each of the transportation-related policy measures, including multiple comments on both the Transit Network and Road Network.

- **Road Pricing:** we are disappointed to see that the scoping meetings presented the “Project” alternative (#2) with “No Pricing.” It is unrealistic to assume no change in bridge toll revenues, and MTC’s revenue estimates already assume some revenue from New Bridge Tolls (perhaps not up to the $10 listed as Option D for Road Pricing). For the rest of the alternatives, we support testing a wide variety of pricing approaches, including several of the options listed on the staff handouts.

- **Parking Policies:** we are disappointed to see that the scoping meetings presented the “Project” alternative (#2) as having “Parking Status Quo”. That seems to contradict the PDA and focused
growth approach. We also believe it is an unrealistic view of the trends in the region. We support
testing a variety of approaches for Parking Policies.

- **Road Network:** We recommend that several of the alternatives include only HOV lane
  conversions for Express Lanes.

- **Transit Network:** For the EEJ alternative, we support testing the impact of an alternative with
  transit service, funded by shifting funds from Freeway Performance Initiatives, OBAG, and
  Regional Express Lanes Network.

- **Transit Network:** In conducting the EIR, MTC needs to develop an appropriate methodology to
  recognize that differing levels of investment in maintenance will affect regional results on a host
  of key measures. To date, we understand that MTC has not been able to model the difference
  between different levels of investment in maintenance, and we understand there are significant
  methodological difficulties in doing that modeling. But we suggest that it is unrealistic for the
  EIR to assume the same transit network regardless of how much the region invests in
  maintenance. If all the alternatives will have the same investment in maintenance, then figuring
  out this methodological problem is not as important for this EIR. But if the alternatives will have
  different levels of investment in maintenance, then this methodological problem is important.

- **Road Network & Transit Network:** We were pleased to hear from MTC staff, in the June 29
  meeting we participated in, that projects that are only included for study in the RTP/SCS
  investment package, but not for construction (e.g., SR 239, BART to Livermore), will not be
  included in the transportation networks studied in any of the EIR alternatives.

We will continue to participate in discussions over Plan Bay Area and the EIR in the following year and
look forward to seeing our comments included in the Draft EIR and later in the Final EIR.

Sincerely,

Jeff Hobson
Deputy Director