

# TRANSFORM

Metropolitan Transportation Commission  
Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105

January 21, 2025  
Re: Plan Bay Area 2050+

Dear MTC Commissioners:

Thank you for the opportunity to comment on the final blueprint of Plan Bay Area 2050+. As the Bay Area's Regional Transportation plan and the region's Sustainable Community Strategy, Plan Bay Area 2050+ will set the funding decisions and priorities in the Bay Area for transportation, housing, environment, and economy for the next 30 years. As our state contends with horrific wildfires and braces itself for the impacts of the Trump Administration, it's more important than ever to get this right.

Unfortunately, Transform has serious concerns about the final blueprint's ability to meet the California Air Resources Board's mandated target of 19% reduction in its greenhouse gas (GHG) emission reductions from passenger vehicles by 2035. Transform went through the Transportation Project List and identified over \$16 billion in highway capacity increasing projects — quadruple what MTC staff present in their materials — and another \$30 billion in modernization projects that will facilitate more driving. Additionally, much of the highway spending is front-loaded at the beginning of the plan, undercutting transit, walking, biking and infill housing investments while baking in congestion, pollution, and emissions for the next three decades.

## **\$16 Billion in Increasing Highway Capacity**

Regional greenhouse gas emissions and vehicle miles traveled are already [exceeding](#) pre-pandemic levels. However, MTC's Transportation Project List contains \$16 billion in projects that will increase highway capacity.

Item 'T7 Expand Freeways and Mitigate Impacts' contains 14 projects totaling over \$3.3 billion dollars that are primarily dedicated to widening freeways. While we appreciate this is a reduction from previous versions of Plan Bay Area, these projects have an outsized impact. According to research [from Georgetown Climate Center](#), MTC would need 10 times the investment in intercity rail to offset the emissions generated for each lane mile of highway expansion. Making matters worse, Transform has already raised concerns that two of these

highway expansion projects, [SR 37](#) and [I 680](#), will have much larger negative vehicle miles traveled and emissions impacts than MTC is projecting.

Additionally, Transform identified 38 projects in “T6 Modernize Freeways and Interchanges” and another 31 projects in “T8 Advance Other Regional Programs and Local Priorities” that include highway capacity expansions in the form of additional auxiliary lanes and roadway, interchange or ramp widening. These projects represent an additional \$13 billion in highway capacity expansion that will increase driving, air pollution, and undercut investment in sustainable transportation strategies elsewhere in the plan. Concerningly, MTC staff are not including this additional \$13B when describing capacity increasing projects in Plan Bay Area 2050+. This is due to the technicality that USEPA air conformity requirements exempt these "operational" project types from analysis based on the assumption that their capacity-increasing effects are small. However, in aggregate \$13B of these operational improvements have a large cumulative effect on increasing vehicle throughput across the system. When they are included, it would quadruple the amount of highway capacity investment in Plan Bay Area 2050+.

### **Front-loading climate destruction**

When you include all of the 115 highway and roadway modernization projects included in Plan Bay Area 2050+, the Bay Area will spend almost \$46B on highway investment over the next thirty years. While we appreciate that this is a reduction of \$5B from Plan Bay Area 2050, it still represents 9% of all spending in the plan.

Furthermore, nearly 80% of the highway widening investment and 41 out of 88 projects are slated for the early years of the plan. Choosing to widen highways at a time when Bay Area transit agencies are facing a \$919M budget shortfall in FY 26-27 is completely at odds with the goals of Plan Bay Area 2050+. Front-loading of capacity increasing projects while letting transit fail bakes emissions for the duration of the plan and undercuts any potential modeshift or ridership increases provided by transit investments later in the plan. It also influences land use development over the full life of the plan, facilitating more sprawl in the near term that undermines the land use assumptions in the plan - an impact that can't be accurately modeled to account for its contribution to the GHG target.

At the same time, some of the most effective greenhouse gas reduction strategies that will reduce driving— all-lane tolling and pricing parking — won't begin until 2035 at the earliest. We are already late to deploy these tools; we cannot and should not wait another 10 years before we take significant steps to reduce driving.

### **Now is a time to be bold**

According to MTC, Plan Bay Area 2050+ is “an opportunity to refine select plan strategies to integrate the lessons of the last three years.” Unfortunately, much of the plan could have been written for the past 30 years, as it continues highway expansion policies that worsen congestion and contribute to a warming planet while continuing to under-invest in active and public

transportation infrastructure, making the Bay Area less affordable for the average working family.

We need a better direction for the Bay Area's transportation future. Setting the wrong priorities, or front-loading funding to projects that aren't aligned with the priorities, could lead to missed funding opportunities and missed climate goals.

Transform looks forward to continuing to work with MTC and CARB to keep the Bay Area on track to meet its climate goals, with a Regional Transportation Plan and Sustainable Communities Strategy without additional highway capacity and increased transit, walking and biking.

Sincerely,  
Zack Deutsch-Gross  
Policy Director, Transform

cc: Steve Cliff, Chanell Fletcher, Jen Gress