

From: [Martha Silver](#)
To: [Martha Silver](#); [Fred Castro](#)
Subject: Agenda Item 8a: Plan Bay Area 2050 draft--request to direct staff to revise population assumptions and forecasts
Date: Thursday, November 13, 2025 1:42:48 PM

From: Sandra Bushmaker
Sent: Thursday, November 13, 2025 12:30:49 PM
To: EIR Comments <eircomments@bayareametro.gov>; MTC-ABAG Info <info@bayareametro.gov>
Subject: Plan Bay Area 2050 draft--request to direct staff to revise population assumptions and forecasts

Dear MTC Commissioners:

I am a long term resident of Marin County. I am a former mayor of Sausalito. I am writing because I am very concerned about your expansive plan called Plan Bay Area 2050+. While cities are still struggling to meet your RHNA numbers from the 6th cycle, this plan is unreachable.

With regard to Table 2-14 of the plan, the assumptions and data regarding population growth are preposterous and out of line with other agencies charged with population projections such as the California Department of Finance Demographic Research Unit (DRU).

You project a Bay Area population growth of 24.1%, nearly 10 times faster than the rest of California (2.5%) and almost 10 times greater than DRU.

I am requesting that you direct staff to revise the population projections to be more in line with the actual projections by those charged with such projections. Your failure to do so will result in a faulty plan from its inception resulting in huge impacts to the environment and the people of the the Bay Area.

Respectfully,
Sandra J. Bushmaker

Respectfully

From: [Martha Silver](#)
To: [Fred Castro](#); [Martha Silver](#)
Subject: FW: MTC Planning/ABAG Admin-11/14/25, Item 8-a
Date: Thursday, November 13, 2025 3:35:35 PM

From: Susan Kirsch
Sent: Thursday, November 13, 2025 3:01:12 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Cc: stephanie.moultonpeters@marincounty.org
<stephanie.moultonpeters@marincounty.org>; Lucan, Eric
<elucan@marincounty.org>; Pat Eklund <peklund@novato.org>
Subject: MTC Planning/ABAG Admin-11/14/25, Item 8-a

Dear MTC Planning & ABAG Admin Commissioners,
Thank you for holding public hearings on PBA2050+/DEIR. Please add my comments from the [Marin Voice column](#), published by the Marin Independent Journal, to the public record.

Besides the link, the column is cut & pasted below.

Marin Independent Journal



Marin Voice: Plan Bay Area's draft report is built on false narrative

By [Susan Kirsch](#)

PUBLISHED: November 9, 2025 at 12:57 PM PST

San Francisco Bay Area residents are once again being given a chance to see what regional planners propose for us through 2050 and the predicted impacts on our lives.

Two regional agencies sit at the center of this effort. The Metropolitan Transportation Commission has about 422 employees and a budget of roughly \$360 million. The Association of Bay Area Governments operates with a budget of about \$93 million and no separate staff; instead, MTC staff support ABAG's programs. Under this governance model, MTC staff shape how our region grows and oversee regional investments.

Their joint blueprint, Plan Bay Area 2050+, identifies needs and revenues for implementing 35 strategies covering transportation, housing, the

economy and the environment. The draft environmental impact report, a legally required analysis under the California Environmental Quality Act, examines what that growth will mean for aesthetics, air quality, wildfire risk, and 14 other environmental categories.

The draft report is intended to help the MTC/ABAG governing boards, with input from the public, weigh the plan's benefits against its hazards.

First, the glossy news: Plan Bay Area 2050+ lays out a plan to collect and invest about \$512 billion for transportation, \$746 billion to accommodate projected population and housing growth and \$229 billion to protect the region from sea-level rise.

These plans raise a key question: Where's the money going to come from? Just last year, the Bay Area Housing Finance Authority and MTC were forced to pull Regional Measure 4, a proposed \$20 billion regional housing bond, after financial errors surfaced. Reports described it as a "\$20 billion mistake" for a bond that overpromised and collapsed under scrutiny. If that single measure couldn't withstand public or financial review, how can the public be confident that a trillion-dollar plan will fare any better?

When we move from the plan itself to the environmental report, the good news sours. It acknowledges dozens of "significant and unavoidable impacts," harms that remain even if every mitigation measure were implemented.

Among the unavoidable impacts are aesthetic degradation, increased wildfire danger, water-supply vulnerability, and transportation congestion. The report lists aesthetic impacts that include loss of scenic vistas and damage to scenic highways. It concedes that the plan will exacerbate the risk of wildland fires. Water reliability remains precarious, with most of the region dependent on imported sources and aging groundwater basins. And while transportation models promise shorter commutes, the draft impact report notes that congestion and air-quality impacts will persist.

Because these harms remain, the MTC and ABAG boards cannot approve the plan without first adopting a "statement of overriding considerations." Under CEQA guidelines, the statement allows agencies to declare that the benefits of a project outweigh its unmitigated harms. In this case, MTC staff will likely urge the boards to cite the Bay Area's "housing crisis" as the overriding consideration justifying approval.

Here's the heart of the problem: The population and job forecasts baked

into Plan Bay Area 2050+ appears to be unreliable. The California Department of Finance, starting with data from 2020, projects only modest population growth statewide through 2050 — about 5% — while the plan assumes roughly 24% growth in the Bay Area. It also assumes housing costs will decline dramatically, with home-price trends returning to early-2000s levels by 2050, an assumption few economists consider realistic.

By inflating growth projections, I think the plan creates an artificial sense of crisis — ignoring the real issue of affordability. That “crisis” is then used as the political reason to override environmental harms. It’s the same logic behind unfunded housing mandates and the unreliable regional housing quotas that MTC and ABAG will revisit when they update the “sustainable communities” strategy.

If built on shaky assumptions, the whole structure tilts toward collapse. Yes, the Bay Area needs long-term planning and investments, but until the assumptions and the numbers are reliable, the draft environmental impact report and the 2050 plan should be sent back.

Here’s what you can do: Before Dec. 18, email comments to eircomments@bayareametro.gov; contact your MTC representative and say that, until the numbers and assumptions are reliable, all should vote no on any statement of overriding considerations and on certification of the draft report; attend a public meeting (details at planbayarea.org/draftplan); and join the next Catalysts online video conference on Monday at 5 p.m..

Mill Valley’s Susan Kirsch is founder of Catalysts for Local Control. Learn more at catalystsca.org.

Susan Kirsch, Founder & Director
Catalysts for Local Control
POB 1703, Mill Valley, CA 94942
www.catalystsca.org
415-686-4375

From: [Martha Silver](#)
To: [Martha Silver](#); [Fred Castro](#)
Subject: FW: Plan Bay Area 2050: Draft EIR: Comments
Date: Friday, November 14, 2025 6:29:51 AM

From: robert.cox.

Sent: Thursday, November 13, 2025 4:10:45 PM

To: MTC-ABAG Info <info@bayareametro.gov>; EIR Comments <eircomments@bayareametro.gov>

Subject: Plan Bay Area 2050: Draft EIR: Comments

To the Members of the Metropolitan Transportation Commission,

I am writing with concern about the Draft EIR for Plan Bay Area 2050, in particular the population projections.

The California Department of Finance Demographic Research Unit (DRU), which develops the official projections of population growth in our state, estimates a 6.4% increase in the Bay Area population by 2025. However, MTC is projecting a 24.1% increase in the Bay Area population for the same period. So, MTC's estimates are 3.8x that of DRU. MTC has not justified deviating from the projections offered by DRU.

Beyond this, COVID has dramatically changed the way that people work for tech companies. I live in Mountain View. Our city's Economic Vitality report indicated that as of this year 19% of our city's office space remains vacant. There is a vacancy rate of 14% for apartments built since 2016. This is largely due to employees moving to work in remote locations outside the Bay Area. Beyond this, as artificial intelligence displaces people in low level tech jobs, tech employment in the Bay Area is declining. Mountain View has actually lost population in each of the last four years. It is likely that other cities in the Bay Area have been similarly affected.

It appears that MTC has not corrected its population projections to account for changes due to remote work and the widespread adoption of artificial intelligence. I urge MTC to reject the Draft EIR and revise its population projections so that the recommendations for Plan Bay Area 2025 are based on sound assumptions.

Thank you for considering my views.

Robert Cox
Mountain View, CA

From: [Martha Silver](#)
To: [Fred Castro](#); [Martha Silver](#)
Subject: Public Hearing: Draft Plan Bay Area 2050+ and Draft Environmental Impact Report: 11/13/2025: Item 8a
Date: Thursday, November 13, 2025 5:06:52 PM

From: robert.cox
Sent: Thursday, November 13, 2025 4:33:29 PM
To: MTC-ABAG Info <info@bayareametro.gov>; EIR Comments <eircomments@bayareametro.gov>
Subject: Public Hearing: Draft Plan Bay Area 2050+ and Draft Environmental Impact Report:
11/13/2025: Item 8a

To the Members of the Metropolitan Transportation Commission,

I am writing with concern about the Draft EIR for Plan Bay Area 2050, in particular the population projections.

The California Department of Finance Demographic Research Unit (DRU), which develops the official projections of population growth in our state, estimates a 6.4% increase in the Bay Area population by 2025. However, MTC is projecting a 24.1% increase in the Bay Area population for the same period. So, MTC's estimates are 3.8x that of DRU. MTC has not justified deviating from the projections offered by DRU.

Beyond this, COVID has dramatically changed the way that people work for tech companies. I live in Mountain View. Our city's Economic Vitality report indicated that as of this year 19% of our city's office space remains vacant. There is a vacancy rate of 14% for apartments built since 2016. This is largely due to employees moving to work in remote locations outside the Bay Area. Beyond this, as artificial intelligence displaces people in low level tech jobs, tech employment in the Bay Area is declining. Mountain View has actually lost population in each of the last four years. It is likely that other cities in the Bay Area have been similarly affected.

It appears that MTC has not corrected its population projections to account for changes due to remote work and the widespread adoption of artificial intelligence. I urge MTC to reject the Draft EIR and revise its population projections so that the recommendations for Plan Bay Area 2025 are based on sound assumptions.

Thank you for considering my views.

Robert Cox
Mountain View, CA