

# Correspondence on Draft Plan Bay Area 2050 Amendment

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**Comment:**

Mindful of our critical statewide and regional equity and climate action goals, any MTC/ABAG updates to Plan Bay Area 2050 (PBA 2050) must be securely anchored on clear objectives, factual data, and unambiguous findings linking the two. This is necessary so as to prevent local politicians (some simply under-informed, others perhaps with conflicting more parochial objectives) from undermining the ambitious regionwide goals currently agreed upon and established in Plan Bay Area 2050.

Because the transportation strategies are so fiscally constrained, MTC & ABAG must take special care to ensure that any regionally significant capacity-increasing projects are targeted first to addressing the needs of historically disadvantaged equity priority communities. This is particularly important to avoid replicating old patterns of ex-urban sprawl known to enable and facilitate white-flight, rural land conversion, and other harmful social and environmental consequences of poor planning.

As noted in Alix Bockelman's memo (July 12, 2024, Agenda Item 7b) on the proposed PBA Amendment: SMART to Healdsburg: "the analysis found that many of the region's commuter rail projects, like the proposed northern extension of SMART, had low cost-effectiveness with limited ridership gains relative to their project costs. Furthermore, these projects often had equity concerns, given ridership forecasts skewed toward higher-income demographics." These are facts that cannot be simply wished away because "it is clear there is strong local support for... the Healdsburg extension project."

To the Statutory Requirements:

- RE Fiscal Constraint: The two projects Sonoma County offers to trade off in exchange for the Healdsburg extension are actually "ghost" projects (Table 1, DRAFT Amendment, Aug. 2024). Although these projects (Farmers Lane, Railroad Ave.) have long been identified in County transportation plans and the old Measure M sales tax project list, for several years it has been widely acknowledged by Sonoma County planning staff that these projects cannot secure the necessary state and/or federal funding needed to ever be built. As such, they fail to meet the requirement of fiscal constraint.

- RE GHG Target: Because the SMART train already induces more tourism-related trips than probably any other Bay Area rail system, the “small magnitude” claim should not be accepted without more evidence and findings. This region is highly tourism dependent, and air travel by visitors to destinations in Sonoma County are likely to be significant (as was successfully litigated in 2016 when Sonoma County’s Climate Action Plan was found to be inadequate under CEQA). Adding additional transportation capacity to Healdsburg is likely to induce greater air travel, which has not previously been calculated in PBA 2050 GHG estimates.

I strongly recommend rejecting the Amendment unless these requirements have been fully vetted and fixed. Respectfully Submitted, - Tom Conlon