

Comments Delivered to the Metropolitan Transportation Commission at the 1/28/2009 Public Hearing on the Regional Transportation Plan Draft Environmental Impact Report

Commissioners: This RTP has some great language and great programs, but when you look beneath the surface, the project mix is pretty much like the 1994 Plan. This RTP is all about accommodating the single-occupant vehicle, using HOT lanes. It's got some lipstick on it, but this Plan is disconnected from the realities of 2009. It is not bold enough for the needs of today. Here's the news from yesterday's Chronicle:

"Scientists familiar with the report said it emphasizes the need for immediate action to control emissions. "As a climate scientist, this was my intuition," said geoscientist Jonathan Overpeck of the University of Arizona. "But they have done a really good job of working through the details and ... make a case that the situation is more dire than we thought if we don't act quickly and aggressively to curb carbon dioxide emissions."

"The policy relevance is clear: We need to act sooner, even if there is some doubt about exactly what will happen, because by the time the public and policy makers really realize the changes are here, it is far too late to do anything about it," he added.

"Said geoscientist Jorge Sarmiento of Princeton University, "this is really a wake-up call about the seriousness of this issue."

There's a reason for the disconnect--your agency doesn't do an adequate environmental review. Your EIR does not take the threat of climate change seriously, and so, refuses to look at what a maximum effort to reduce GHGs would look like. As a result, you as decisionmakers have no idea what the actual tradeoffs would be. Without an adequate EIR, you can't make informed decisions.

The EIR treats committed projects as if they're already built, and ignores the discretion you have to change direction, as a result of changed conditions. The committed projects in your RTP come from an era of bottoms-up planning, when VMT was not an issue. The advent of AB 32 and SB 375 have effectively put an end to that era. This legislation requires a new kind of planning--one that looks at the overall performance of a Plan. The committed projects were explicitly excluded from the Performance Assessments. The problem is, you're waiting for someone on high to tell you that you've got to change your process.

TRANSDEF's strong preference would be for MTC to take the initiative to do the planning for an all-out effort to reduce GHGs. This would mean studying an alternative that did not include highway widening, along with a system of highway tolls. That would fund a network of cost-effective transit, and create the economic incentive for riders to use it. We think this kind of study is what a responsible MPO would want to do. And we believe CEQA requires such an alternative.

We recognize that this would be a major change from past practice, and we'd prefer you do it voluntarily. However, if you remain intransigent, we will exercise our legal options to make sure that you as decisionmakers have the option of acting now to vigorously protect us from climate change. We want the Bay Area to be a national leader. And we think you do too. This EIR is inadequate to that task.