



Bay Area Transportation Working Group (BATWG)

Dedicated to Creating a Balanced Transportation System for the Bay Area

P.O. Box 590888, San Francisco CA 94159

(510) 922-9983 cautn1@aol.com

Slightly altered from what was sent to MTC

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VIA E-MAIL ONLY

To Metropolitan Transportation Commission (MTC)
Plan Bay Area 2050+/ Draft EIR Comments
375 Beale Street, Suite 800
San Francisco, CA 94105

MTC's Plan Needs a Thorough and Independent Review

The Bay Area Transportation Working Group is a group of transportation professionals and activists dedicated to creating a balanced transportation system for the Bay Area.

Following are BATWG observations in response to MTC's Plan, especially regarding financing, and "Draft Transportation Project List Report"

1. Project 2050+ (PBA2050+) Financing Problems.

MTC-ABAG Have Failed to Inform the Public Adequately About Billions of Dollars of New Taxes, Fees, and Tolls in PBA2050+: "Freeways" Converted Into "Tollways". These

“New Revenues” Are Too Speculative to Serve as the Basis for a “Fiscally-Constrained” Project List. The Project List Must Therefore Be Re-Evaluated and Reduced.

...The PBA2050+ “Draft Technical Assumptions Report” includes new taxes, tolls, and fees, including:

- Plan Bay Area 2050+ Next Generation Freeways Pricing Strategy: \$20 billion
- Plan Bay Area 2050+ Parking Pricing Strategy: \$12.3 billion

The “Draft Technical Assumptions Report” explains both of those new taxes, tolls, and fees:

Plan Bay Area 2050+ includes a strategy to institute peak-period distance-based tolling on all Bay Area highways, or an equivalent pricing strategy, beginning no later than 2035. The distance-based fee is envisioned to range between 10 cents and 30 cents per mile during peak periods on weekdays, varying by vehicle occupancy, congestion levels, time-of-day, and direction of travel. ...

The Plan Bay Area 2050+ strategy to expand transportation demand management initiatives includes an envisioned increase in parking costs, no later than 2035, in Plan Bay Area 2050+ Growth Geographies, which are areas prioritized for housing and job growth in the plan. Parking fees would increase by 25% from the baseline levels in Transit-rich Areas (TRAs); and free parking would no longer be available in all Growth Geographies. (p. 13.)

Both of these proposed “new revenue” streams have significant legal and political hurdles that are not disclosed or discussed in the Plan. BATWG is unaware of any existing legal authority that would permit any government agency “to institute peak-period distance-based tolling on all Bay Area highways.” A fundamental flaw of the RTP is that MTC-ABAG assumes the existence of \$32.3 billion in revenues from these two new taxes without any assessment of the likelihood that these new taxes ever will be imposed.

The proposed RTP is heavily dependent upon these two “new revenues,” which may not actually materialize. The Draft Transportation Project List Report states:

While near-term fiscal capacity is constrained, the second period of the plan (FY 2036–2050) reflects greater revenue potential. This is due in part to inflation, the lasting effects of the 2020 economic downturn and the anticipated introduction of new transportation revenues beginning in 2035. As shown in Table 1, only \$149 billion of the \$512

billion in total revenues are available in the first period, which limits the scale of early investments. Some additional support is provided by a portion of the flexible category, while the later years of the plan allow for a broader set of regionally significant projects. (p. 9.)

So if the new Freeway Tolling and/or Parking Fees “pricing strategies” do not materialize, then the “fiscally-constrained project list” is unrealistic.

Many of the assumptions in the “Transportation Revenue Forecast Summary Table” (Table 2-2, pp. 14-29), especially the “NEW REVENUES” section, are fundamentally flawed and cannot serve as the basis for a “fiscally-constrained project list.”

- The “Regional Revenue Measure” on page 28 “assumes a 0.5% sales tax in all nine counties, starting in FY 2027-28.” But MTC knows that will not happen because SB 63, sponsored by MTC and enacted by the Legislature in 2025, limits the 2026 sales tax increase to just five counties. MTC needs to re-calculate the revenue assumptions, with the revenues from the four counties subtracted.
- The “Anticipated/Unspecified” “new revenues” amounting to \$22.7 billion on page 27 are so vaguely defined that they cannot serve as a reasonable basis for a “fiscally-constrained project list” in an RTP.

The Regional Transportation Plan proposed in PBA2050+ is founded upon the imposition of those new taxes, tolls, and fees. The capital projects, especially in the year 2035 and thereafter, especially are dependent upon those new taxes, tolls, and fees. Due to these “fiscal constraints,” many of the proposed projects are not realistic and must be deleted from the “fiscally-constrained project list.” MTC needs to disclose to the public which projects would be eliminated or reduced in scope (including how they would be reduced in scope) if the new taxes, tolls, and fees were not to materialize. In June 2018, many working class communities around the Bay Area voted “no” on the Regional Measure 3 (RM3) bridge toll increase. These communities included Richmond, San Pablo, Hayward, Concord, Pittsburg, Antioch, Fairfield, and Vallejo. BATWG is unaware of any “public information” efforts anywhere, especially in those impacted communities, about the new taxes, tolls, and fees that PBA2050+ proposes. Nor are we aware of public disclosure of MTC’s intention to impose tolls on SR 37. See (“Other New User Fees,” p. 28). MTC and ABAG claim to care about “equity,” but their failure to communicate the equity impacts of these new revenue proposals, especially in the impacted communities, suggests otherwise.

2. Flaws in MTC-ABAG PBA2050+ Projections for 2050.

There are fundamental flaws in data at the foundation of PBA2050+. In DEIR Table 2-14 on page 2-29, MTC-ABAG's population forecast from 2020 to 2050 is a 24 percent increase. That is much larger than the California Department of Finance's (DOF's) 5.2 percent projection,¹ The DOF forecasts a nine-county Bay Area population of 7,747,408 in 2020, rising to 8,149,816 in 2050 (a 5.2% increase). MTC-ABAG projects a much larger 9,586,000 population in 2050. There is a very significant and material difference between the MTC-ABAG and DOF population projections, with Plan Bay Area projecting an additional 1.4 million population in 2050 than the DOF forecast.

The FEIR should re-evaluate all of the environmental impacts throughout the plan using both the MTC-ABAG (9,586,000 population in 2050) and the DOF (8,149,816 population in 2050) projections. The smaller Bay Area population in 2050 in the DOF projections should result in very significant differences in transportation- and housing-related environmental impacts.

The "Valley Link" Project Must Be Re-Evaluated In Light of MTC's Interregional Project Policy and the Sponsoring Agency's Changes to the Project Definition. MTC Commissioners Cannot Violate MTC Resolution No. 4399.

3. RTPID No. 25-T12-177, "Rail Service Expansion."

Between San Joaquin County and Dublin/Pleasanton ("Valley Link")." The RTP project description is, "This program includes funding to implement new rail service between San Joaquin County (Mountain House) and Dublin/Pleasanton, including three new stations in Alameda County and four-car trains (12 minute peak headways)."

The capital cost in the RTP, "\$2,375" million (\$2.375 billion) for a project from East Dublin BART station to Mountain House is inconsistent with the capital cost range of \$3.794 billion to \$4.465 billion presented to the Regional Rail Authority Board in the agenda packet for the June 11, 2025 meeting. Assuming that the project definition remains unchanged in the RTP, then the RTP must increase the capital cost for the Valley Link project by at least \$1.4 billion. As a result, the rest of the Transportation Project List must be adjusted (with other projects dropped or reduced in scope) in order to meet the "fiscally-constrained" requirement for an RTP.

In December 2019, MTC adopted an "Interregional Project Funding and Coordination Policy" (MTC Resolution No. 4399), in part because then-San Jose Mayor Sam

¹ The DOF figure is based upon Report P-2A: Total Population Projections for California Counties, July 1 2020-2070, with the data series prepared by the Demographic Research Unit in September 2025. (See: https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx)

Liccardo voiced concern at MTC meetings that the Valley Link project was diverting scarce fiscal resources from transportation projects that actually have regional benefits, especially ACE.

MTC commissioners cannot include the Valley Link project, as defined in the Draft Transportation Project List Report, in this RTP because that project definition does not comport with MTC's "Interregional Project Funding and Coordination Policy" in MTC Resolution No. 4399. MTC's Interregional Project Policy states in part, "The Interregional Project must be consistent with the Regional Transportation Plan (RTP) for MTC and the applicable Metropolitan Planning Organization (MPO)/Regional Transportation Planning Agency (RTPA)."

The Valley Link project definition proposed in MTC's RTP is inconsistent with the RTP for the San Joaquin Council of Governments (SJCOG).

The sponsoring agency, the Tri-Valley-San Joaquin Valley Regional Rail Authority, is already in the process of significantly curtailing the Valley Link project.

4. The BART to San Jose-Phase 2 Project in Trouble.

The BART to San Jose Phase 2 project, the most expensive project in this RTP, is much costlier than it needs to be, to the point of being over-budget despite the federal government offer of \$5.1 billion. therefore, it deserves independent scrutiny. For these and other reasons, a variety of outside groups including BATWG have criticized this project extensively in recent years. See, e.g., <https://batwgblog.com/2024/01/01/that-giant-sucking-sound-from-san-jose/>.

As part of its RTP "fiscally constrained project list" analysis, MTC needs to undertake a thorough re-evaluation of the costs and cost-effectiveness of this project. MTC should require the project sponsors (including VTA and BART) to subject this project to independent evaluation and analysis, akin to the "value engineering" report that identified cost savings for the Valley Link project. MTC should not allow the flawed and wasteful "single bore tunnel" design of this BART project to throw billions of dollars of scarce transportation funding literally into a hole in the ground.

The independent evaluation and analysis should consider alternatives to the "single bore tunnel" that are less costly, have lower environmental impacts (due to less soil removed during excavation and transported away), provide better projected ridership, and are safer for facility users. The "single bore tunnel" would result in stations that are deep underground. Patrons would be dissuaded from using a deep underground BART station that requires too many minutes for ingress and egress. "Twin bore tunnel" option would be both more accessible and less expensive.

There is uncertainty over whether or not the VTA has conducted adequate geotechnical investigation before proceeding with the large single bore option. BATWG is concerned that another tunnel-boring machine disaster, such as occurred in Seattle might also occur on this project. (See, e.g., <https://seattlebusinessmag.com/policy-regulations/who-killed-bertha-why-seattle-tunnel-disaster-isnt-what-it-seems-and-why-wsdot-making/>)

5. “Dumbarton Rail” Should Be Added to the RTP Transportation Project List.

The first bridge across San Francisco Bay, circa 1910, was the Dumbarton Rail Bridge. The Legislature and MTC promised Regional Measure 2 voters in 2004 that passenger service on the Dumbarton Rail Bridge would be restored. (See, e.g., https://www.almanacnews.com/morgue/2004/2004_02_25.dumb.shtml) But after voters passed RM2, MTC engaged in a colossal “bait and switch,” diverting bridge toll revenues intended for the Dumbarton Rail project to the Warm Springs BART extension. A fast and reliable transbay passenger rail connection between the Southeast Bay and Redwood City has long been necessary.

6. “LINK 21” Project Appropriately Excluded from the RTP Transportation Project List.

This extremely costly project has been quietly underway for years. Despite the radically changed conditions caused by COVID and remote work practices, the project still seems to be proceeding in accordance with pre-COVID conditions. Some of BATWG’s past comments about Link 21 are set forth in <https://batwgblog.com/2023/04/15/time-to-shut-down-barts-link-21-project/>

7. Southbay Connect Project.

The Southbay Connect Project on the other hand is both practical and well thought-out. It deserves a higher priority in MTC’s PBA 2050 projections.

Respectfully submitted,

/s/ Jerry Cauthen

GERALD CAUTHEN
President, Bay Area Transportation Working Group