

Appendix D: Scoping Comments on Alternatives

Appendix D: Scoping Comments on Alternatives

This appendix documents the comments received on proposed alternative scenarios in response to the Notice of Preparation (NOP) for the EIR. The below tables summarize comments regarding definition of alternatives and information on why these suggestions were either included or not included for full evaluation in the EIR. General comments on methodology are not included.

GENERAL COMMENTS ON ALTERNATIVES

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Pricing	<p>Alternatives should avoid the usage of pricing or other policy levers.</p> <p>Each alternative should include the use of policy measures such as pricing. (separate comments)</p>	<p>The alternatives may include land use or transportation policies that are feasible and achieve the project objectives. Alternatives include a variety of road pricing and policy incentive options for local jurisdictions, including using none at all.</p>
Alternative Planning Strategy	<p>Given potential infeasibility of meeting GHG targets, consider an Alternative Planning Strategy (APS).</p> <p>Alternatives 3, 4 and 5 should be assessed within the context of an Alternative Planning Strategy and MTC should evaluate the need to environmentally clear these alternatives.</p>	<p>An APS was not considered as the proposed Plan, as well as Alternatives 3 and 5 can achieve the state assigned GHG targets. Because multiple alternatives meet the GHG targets an APS was not considered at this time. Also, an APS must only be developed for the Plan selected and adopted by MTC and ABAG, not every alternative, and only if that final Plan cannot achieve the GHG targets.</p>
Growth Forecasts	<p>Include an Alternative with lower rate of employment and residential growth, based on an assumption that the Bay Area and regional economy do not see a significant economic recovery.</p> <p>Make clear that all Alternatives (except Alternative 4) will be analyzed using the same growth forecasts, and demographic and economic forecasts for Alternative 4 should be provided.</p> <p>Alternatives should plan for the housing level in the Eliminate Inter-Regional Commute alternative.</p>	<p>All alternatives are based on the same regional forecasts for population and job growth. The forecasts are considered static, and each alternative considers various distributions of the projected growth. The exception of Alternative 4 accommodates a higher population by assuming no regional in-commute from outside counties, but uses the same baseline population and job growth projections otherwise.</p>

GENERAL COMMENTS ON ALTERNATIVES

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Preferred Transportation Investment Strategy	Concern that Alternatives 1, 4 and 5 do not include analysis using the Preferred Transportation Investment Strategy.	Alternative 1, the No Project alternative, by definition cannot use the Preferred Transportation Investment Scenario as it is restricted to projects already in progress. Alternative 4 uses the Preferred Transportation Investment Scenario with minor modifications to the Climate Program and road maintenance. Alternative 5 is based on the Preferred Transportation Investment Scenario, with modifications made as described later in this chapter.
Complete Streets	Complete Streets requirements and enforcement should be included and strengthened in all alternatives.	OneBayArea Grant (OBAG) funding is included in all alternatives, except the No Project alternative, and those funds include a complete streets requirement.
Free Youth Bus Pass	All alternatives (with the exception of "No Project") should include full regional funding for availability of a free bus pass for all middle and high school students, regardless of family income or school type.	This proposal has been incorporated into Alternative 5.
Travel Model	EIR analysis should rely on results of MTC's travel forecasting model, using fixed land use and demographic assumptions that apply in each alternative.	MTC's travel forecasting model was used, in conjunction with UrbanSim. The same land use and demographic assumptions were used in every alternative with minor variations. For example, Alternative 1 used different assumptions about urban growth boundaries and Alternative 4 assumes plans for no regional in-commuting, which results in the need to accommodate a higher population within the region. However, the basic types of land use and demographics (changes in age, income, household size, etc.) are fundamentally the same across all alternatives.

GENERAL COMMENTS ON ALTERNATIVES

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Legal Authority	<p>Use a consistent approach regarding legal authority for the alternatives considered, specifically do not reject some alternatives as beyond legal authority, while proposing other alternatives that are also beyond legal authority.</p> <p>Ensure assumptions tested are consistent with local policies and can be implemented, and that adequate resources are identified.</p> <p>Only include reasonable and potentially feasible policies and mitigation measures. Do not include regional development fee policy lever =, which would require voter approval and is not within authority of either co-lead agency.</p>	<p>Feasibility and legal authority is identified consistently across alternatives. Definitions of feasibility are based on, and consistent with, the CEQA definitions. CEQA recognizes a distinction between “potential” feasibility (which is what the EIR is based on) and “actual” feasibility. CEQA also allows agencies to find that certain measures can and should be implemented, but are outside the agencies’ jurisdiction (and the agency lacks legal authority to require). This distinction does not prevent discussion for the sake of public information.</p>
CEQA Streamlining	<p>Analysis should include a comparison of each alternative with and without CEQA streamlining.</p>	<p>CEQA streamlining opportunities are defined by State law (SB 375), not determined by MTC/ABAG, and therefore are considered part of the regulatory setting in the EIR analysis. Although Alternative 5 discourages CEQA streamlining, it is enabled by SB 375; Transit Priority Projects (TPP) are also defined by State law based project type and proximity to transit stops.</p>
Mix and Match	<p>Alternatives should be mixed-and matched.</p>	<p>This EIR discusses impacts in terms of land use and transportation plan components separately, as feasible, potentially allowing for a combined alternative for the final adopted plan. Upon review of this EIR, MTC and ABAG decision-makers may choose from among the different policy levers and eliminate some or add others to an alternative and still come up with an alternative that is within the range of impacts described in the EIR. However, if a combined alternative is selected, the Final EIR will need to confirm that the range of impacts from this combination of components has been fully addressed. The type and level of analysis that would be conducted will be determined by the changes under consideration.</p>

COMMENTS ON ALTERNATIVE 1 IN NOP – NO PROJECT

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Role of PDAs	Concerns about how this varies from the "Preferred Scenario" if the PDAs have already been established, and in particular how the "No Project" could mean "No PDAs" if they are already established.	The No Project scenario is based on currently adopted general plans. If those general plans reflect a local government's desire to see growth in the PDAs then the PDAs are <i>de facto</i> in the No Project alternative. However, if PDAs have not been re-zoned to match their PDA designations, then the alternative does not assume they will be. The No Project alternative also does not include OBAG funding (which goes to PDAs), since this is not a committed funding source without implementation of the Plan.
RTP 2035	Alternative should be modified so that it is the implementation of the existing Regional Transportation Plan, Transportation 2035.	The transportation system in the No Project alternative consists of those projects that would go forward without another RTP or further environmental review. That would be the system in Transportation 2035, minus those projects that have not received funding, or have not received environmental clearance by May 1, 2011.
Scale of Development	Alternative should include limiting future development to either a few remaining developable lots and/or infill development within the current scale and character of the town [of Fairfax].	None of the alternatives assign specific land uses, designate future development at the parcel level, nor set the scale and character of future development. Such details are the responsibilities of local jurisdictions through their land use plans and zoning. The alternatives are determined by applying specific policy measures rather than by tweaking growth projections for individual cities. For the No Project alternative, the UrbanSim model forecasts how future growth will likely distribute based on existing general plan policies and associated development regulations, plus some additional capacity from the expansion of urban growth boundaries based on historical trends.

COMMENTS ON ALTERNATIVE 2 IN NOP – PROPOSED PLAN

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Exempt North Bay	Exempt the North Bay (Marin, Sonoma, Solano and Napa counties) from this scenario, due to its relatively small population and small base of jobs.	The North Bay is included in the proposed Plan and all alternatives, as the Plan must cover the entire nine-county region administered by MTC and ABAG.
Sub-Regional Approach Preferred	Scenario should be based on a concept of identifying transit commute sheds in a way that establishes commute thresholds for locating housing nodes and employment centers. Concern that scenario is not based upon a sub-regional approach for reductions of commute sheds and greenhouse gas reductions, therefore placing an inordinate burden on individual cities.	The MTC travel model incorporates travel and commute patterns and modes, and the UrbanSim model distributes growth based on market supply and demand. All alternatives, are designed to meet GHG reduction targets, as well as regional targets to manage congestion and travel time, among other goals.
Coordination with Preferred TIS	Concern that scenario is poorly coordinated with the Preferred Transportation Investment Strategy. Scenario should be tested with the preferred transportation investment strategy, both with and without the recommended climate policy incentives.	The land use scenario has been designed to support the transportation patterns and usage in the Preferred TIS in order to meet State and regionally-adopted targets.
TPPs vs. PDAs	Concern that scenario refers extensively to PDAs and makes little mention of TPP's.	Much of the land designated as PDAs is also within TPPs, and most of the TPP-eligible land in the region falls within a PDA. TPPs and their associated CEQA streamlining opportunities were created by SB 375 and are not defined by Plan Bay Area.
Road Pricing	Unrealistic to assume no change in bridge toll revenues, and MTC's revenue estimates already assume some revenue from new bridge tolls.	MTC modeling has indicated that the proposed set of land use and transportation policies and transportation projects is able to meet the State's mandated greenhouse gas reduction targets without additional tolls or road pricing.
Parking Minimums	Using a "Parking Status Quo" should be reevaluated, as it contradicts the PDA and focused growth approach.	Alternative 2 (proposed Plan) includes reduced parking minimums for new developments in TPP-eligible areas.

COMMENTS ON ALTERNATIVE 2 IN NOP – PROPOSED PLAN

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Responsiveness to Local Priorities	This scenario should include planning measures that reflect changes in the population in funding priorities; such as the elderly are less likely to need bike lanes and more likely to need well-planned convenient access to services.	All of the scenarios were based on evolving age, income, and household size demographics across the region. Plan Bay Area is regional in nature, with many transportation and all land use decisions to be made at the local level. MTC anticipates that localities will determine the detailed location of bike lanes, services, etc. The Plan does, however, include Safe Routes to Transit projects, Complete Streets policies, and policies to encourage more bike lane miles and better connectivity of the bike network across the region and within bikeable areas in order to increase the capacity of the existing transportation system at a low cost, and preserve mobility while reducing GHG emissions in accordance with State mandates.
Local Growth Policies	Concerns about the assumption that local growth policies (such as those accommodating growth consistent with past projections) will be reversed in response to this scenario.	Plan Bay Area cannot change local land use policy. (Government Code section 65080, subd. (b)(2)(K) explicitly states that the SCS shall not supersede the exercise of the land use authority of cities and counties within the region.) This alternative and others, however, do provide incentives for local agencies to rezone PDAs to accommodate infill development and to hold urban growth boundaries constant with today's boundaries. Localities can decide whether and how to accommodate such incentives.
West Oakland	Scenario is missing the land use component for West Oakland.	Much of West Oakland is within a PDA and has been modeled as such in this and every alternative.
Freeway Performance Initiative	Alternative should include a discussion on how the scenario would impact or incorporate the strategies in existing freeway corridor system management plans prepared under the Freeway Performance Initiative.	The Preferred Transportation Investment Strategy selected by MTC, and incorporated into this alternative, adopts and funds the recommendations of the Freeway Performance Initiative.

COMMENTS ON ALTERNATIVE 2 IN NOP – PROPOSED PLAN

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Economic and Political Feasibility	Consider feasibility of alternative from an economic and political standpoint.	<p>This is an environmental impact report, which examines potential physical impacts on defined topic areas. This EIR is not required to, nor does it, consider economic and political feasibility. Such considerations are appropriately made in the agency’s findings of fact required prior to agency approval of a plan. The UrbanSim model used to forecast future land development does, however, incorporate economic and political elements.</p> <p>In addition, CEQA recognizes a distinction between “potential” feasibility (which is what this EIR is based on) and “actual” feasibility. CEQA also allows agencies to find that certain measures can and should be implemented, but are outside the agencies’ jurisdiction (and the agency lacks legal authority to require). This distinction does not prevent discussion for the sake of public information.</p>

COMMENT ON ALTERNATIVE 3 IN NOP – LOWER CONCENTRATIONS OF PDA GROWTH

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Source of Funds	Concern that this alternative would require transfer of funds from certain program areas to invest in AC Transit and BART; the EIR should include an analysis on the impacts of these funds and the congestion levels resulting from lower funding levels for other programs.	Alternative 3 does shift funds from the Freeway Performance Initiative and OneBayArea grants, and slightly scales back the Regional Express Lane Network, in order to support additional investment in BART service in the core of the region and increased AC Transit bus service in the urban core. The traffic analysis of this EIR does evaluate congestion levels to the extent that the regional travel model can do so.

COMMENTS ON ALTERNATIVE 4 IN NOP – ELIMINATE INTER-REGIONAL COMMUTE

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Feasibility	Consider feasibility of alternative in relation to zeroing-out the in-commute.	The RTP/SCS cannot end in-commuting per se, but rather can set the stage for an improved jobs/housing balance. The results of the UrbanSim model show that the region has the capacity to accommodate housing for all of its employed residents.
Request for Additional Components	Analysis should include the testing of increased Levels of Service for SF Muni and support studying road pricing.	Impacts specific to one operator (such as SF Muni) cannot be studied as part of the regional analysis of this EIR; they need to be evaluated at the local level. Alternative 4 does include a higher peak period toll on the Bay Bridge and cordon pricing in San Francisco, which charges a fee to drive within a certain area of the San Francisco (specifically the downtown).
HOV/Express Lanes	Concern that alternative assumes a much higher residential growth rate than does the project, and therefore this alternative should include build-out of an HOV/ Express Lane network in the transportation investment package.	The preferred Transportation Investment Scenario, which includes a regional Express Lanes network and the Freeway Performance Initiative, is adopted under Alternative 4.
Accommodate All Housing Needs	"Enhanced Network of Communities" Alternative should accommodate 100% of the region's housing needs during the planning period.	Alternative 4 has been configured to accommodate this request.

COMMENTS ON ALTERNATIVE 5 IN NOP – ENVIRONMENT, EQUITY AND JOBS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Location of Transportation Projects to Best Serve Low Income Population	Consider feasibility of alternative in relation to assuming low income populations do not need roadway and transit improvements in outlying areas and assuming that highway funds can be applied to transit projects.	Alternative 5 is configured to enhance transit service in both suburban and urban areas. This alternative does not shift committed highway funds to other projects, and it continues to fund road maintenance. It allocates uncommitted funds to expanded transit service rather than new road projects.
More Lower Income Housing in Suburban Cities	Alternative should modify the PDA-focused land-use map of the "Preferred Scenario" by shifting a portion of the lower-income housing from PDAs in the three large cities to suburban cities.	Additional areas for low income growth have been identified outside of the three major Bay Area cities in Alternative 5 by the stakeholder groups that defined the alternative.
Community Stabilization	Alternative should include community stabilization policies and incentives that protect against the indirect and direct displacement of existing low-income communities and communities of color from urban to exurban areas, and policies that incentivize affordable housing.	Alternative 5 includes a modified OneBayArea grant program focused on affordable housing and anti-displacement policies as pre-conditions for subsidies and incentives. However, the anti-displacement policies were not able to be represented in the model due to technical limitations; this does not affect the environmental conclusions.
Local Transit	Alternative should include high levels of local transit to support a robust local transit network.	The alternative seeks to strengthen public transit by significantly boosting service frequencies in suburban and urban areas.
SF Muni LOS	Analysis should include the testing of increased Levels of Service for Muni.	Impacts and analysis specific to one operator are beyond the scope of this regional EIR. Issues of a specific transit provider need to be evaluated at the local level; in the case of Muni, by the City of San Francisco. The advocates for Alternative 5 specifically included additional funding for transit operators other than SF Muni.
Shifting Funds to Transit	Test the impact of an alternative with transit service funded by shifting funds from Freeway Performance Initiatives, the OneBayArea Grant (OBAG) program, and Regional Express Lanes Network a	Most of these fund sources are not feasible to be used for transit due to fund source restrictions. However, Alternative 5 excludes all uncommitted road projects, other than maintenance projects, and does not include the Regional Express Lanes Network. The OBAG program is included as it is considered essential to incentivize infill development and affordable housing.
Unconstrained Land Use	Concern that this alternative presents an unconstrained land use scenario with a financially constrained transportation scenario.	Alternative 5 includes regional initiatives to support a strong urban growth boundary that does not expand future development beyond the current urbanized footprint. It also expands incentives to increase allowable density to

COMMENTS ON ALTERNATIVE 5 IN NOP – ENVIRONMENT, EQUITY AND JOBS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
		include jobs-rich, high-opportunity TPPs not currently identified as PDAs. In addition, it implements a vehicle miles traveled (VMT) tax of one cent per mile on all annual miles traveled within the region, exempting low income drivers, to fund the expanded investments in public transit and discourage residents from driving. Taken together, these policies are expected to encourage a constrained pattern of land use development.
Impact on Public Services	Unclear how this alternative includes additional affordable housing in locations with high-performing schools and local services when the EIR does not evaluate public services.	Alternative 5 considers additional affordable housing in high-opportunity areas with amenities such as good schools, parks, transit, etc. These areas are identified through several factors that act as proxies for areas of high opportunity, including median home values, low-income commuting statistics, and transit service levels. Communities with more expensive housing, greater low-income in-commuting, and more frequent transit are slated for encouragement of additional infill development in the analysis of Alternative 5. The impact of every alternative on public services and recreation is evaluated at a regional level in this EIR.

ALTERNATIVE LAND USE SUGGESTIONS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Different Growth Scenarios	<p>Consider alternative growth range scenarios, e.g., low, mid-range, and high growth rates and the impact of different scenarios.</p> <p>Include an alternative reflecting current regional growth trends or alternative including a realistic jobs scenario to test slower economic growth.</p> <p>Consider a ‘no population growth’ scenario.</p>	<p>Every alternative must demonstrate the ability to accommodate expected population and job growth through 2040, as estimated by ABAG (per SB 375). The alternatives do vary in how growth is distributed, however.</p> <p>Alternative 4 does accommodate a higher population than the other scenarios, but it is based on the same amount of population growth with no regional in-commute.</p>
Inter-Regional Commuting	All alternatives should assume a common set of land use control totals, which assume some inter-regional commuting.	All the alternatives, but one, assume that the current rate of in-commuting will continue. Alternative 4 assumes no inter-regional commuting, with projected future population growth to be accommodated within the nine Bay Area counties.
Combine Alternatives 1 and 3	Include an alternative based on a combination of Alternatives 1 and 3, and including a more realistic employment and housing growth scenario.	It is unclear what a “more realistic” scenario would be, as ABAG believes the residential and employment projections to be realistic. It is also unclear what that combination would be like, although Alternative 2, the Preferred Plan, could be considered as such.
Align with Local Plans	<p>Include an alternative reflecting current local general plans.</p> <p>A "local plans" alternative should be included.</p> <p>Include an alternative that is more closely aligned with local land use plans and policies.</p>	Alternative 1, No Project, reflects current local plans. However, population and job growth will be consistent with the proposed Plan.
Variations in PDA Growth Distributions	<p>Reconsider various growth allocations: Consider an alternative that promotes growth based on PDA ranking, given the vast differences among PDAs and the amount of transit that currently serves each PDA.</p> <p>Consider an alternative that places employment centers in Eastern Contra Costa and Solano Counties, thereby resulting in reduced vehicular miles traveled and carbon emissions.</p>	<p>Alternative 4 essentially achieves promoting growth based on PDA rankings.</p> <p>Employment centers in Eastern Contra Costa and Solano Counties are zoned for jobs, and therefore UrbanSim will place jobs in these areas if there is market support for Alternatives 1, 3 and 5. For Alternatives 2 and 4, the analysis assumes the housing and jobs distributions in PDAs from the Jobs Housing Connection and Current Regional Plans developed by ABAG, respectively. Areas outside of PDAs are evaluated using UrbanSim.</p>
More Concentrated Growth	Consider an alternative based on more concentrated growth in a fewer amount of core areas, e.g., a less even distribution	Alternative 3 represents this scenario.

ALTERNATIVE LAND USE SUGGESTIONS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Alternative	across all PDAs.	
Independent-Interdependent Cities Alternative	Network of strong independent and interdependent cities alternative.	None of the alternatives would prevent cities from being independent or interdependent.
Minimize Land Use Regulation	Analyze minimizing land use regulation.	There will not be any specific details proposed about minimizing land use regulations in the Plan itself, so the EIR will not address implementing this idea. By some measures, the No Project alternative which largely maintains the status quo would minimize land use regulations. By another measure, however, incentives to increase allowable densities and reduced parking requirements of Alternatives 2, 3, 4, and 5 could be seen as minimizing land use regulations, as those scenarios broaden rather than restrict what can be developed. Alternative 4 probably has the “least” land use regulation, as it increases allowable densities, reduces parking requirements, and does not restrict the expansion of urban growth boundaries.
Focus Development Around BART	Focus development around BART as a more effective way to reduce VMT.	Since most BART stations are designated as PDAs, future housing and job growth is focused around them in every alternative. However, accommodating the region’s projected growth through 2040 will require development in more than just BART station areas as those are relatively finite areas in relation to the entire Bay Area.

ALTERNATIVE TRANSPORTATION SUGGESTIONS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Automated Transit Networks	Include an alternative that includes the use of Automated Transit Networks.	An ATN is included in the Proposed Plan for San Jose International Airport. However, no other Automated Transit Network project proposals were submitted to MTC from an eligible sponsoring agency (transit operators, CMAs, etc.). Without eligible projects submitted, extensive use of ATNs was not included in the transportation networks.
Concerns About Funds Shifted to Transit	Concerns related to alternatives that eliminate funding for arterial operations/Freeway Performance Initiative in Alts 3 and 5 to increase transit funding.	Other ways to fund those alternatives are being analyzed by MTC/ ABAG and will be addressed in documents separate from the EIR.
New Rail System	Study 5-county BART/unified rail rapid transit with fewer transfers (details in letters) and effect of BART plan on long-distance automobile commutes and patronage gains. Include integrated BART/rail West Oakland station, HSR to West Oakland instead of San Francisco, Converting Caltrain to BART, A Port Costa/Benicia HSR tube, An SFO/OAK tube, and Replace "Regional Rail Plan" and "Blended Rail" with the above.	The regional transportation plan must be financially constrained and based on projects with relatively known budgets. MTC could consider such ideas in a future RTP should projects be developed to the appropriate level and submitted by project sponsors.
Telecommutes	Non-travel (e.g., telecommute) and Active Transportation improvements should be increased in each alternative to improve GHG.	All alternatives assume increases in telecommuting consistent with past trends. Active Transportation was analyzed as a GHG strategy. It was found to not be very effective, but the Plan does not allocate funding to active transportation projects to achieve other targets.
Gas Prices	Dramatically increase gas prices in order to reduce VMT.	MTC/ABAG does not have the authority to increase gas prices.
Safe Walking/Cycling	Include an alternative that invests in safe cycling and walking options.	There is funding identified in the Plan for cycling and pedestrian projects and safe routes to school projects. This is also an eligible expense of OBAG funding.
No Lane Miles Added Alternative	An alternative that does not add any lane-miles to the highway system, especially for "Express Lane" purposes needs to be included in at least one alternative other than the "No Project" alternative.	Alternative 5 removes highway expansion projects.

ALTERNATIVE TRANSPORTATION SUGGESTIONS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
Active Transportation	All alternatives need to include well-funded improvements in Active Transportation.	All alternatives provide funding for active transportation.
HOV Lane Conversions	Several of the alternatives should include only HOV Lane conversions for Express Lanes.	Alternative 3 slightly scales back the Regional Express Lane Networks to only include conversions of existing HOV lanes and network gap closures by removing proposed express lanes at the fringe of the region. Alternative 5 does not contain any new express lanes.
San Francisco Transit Projects	Include an alternative that promotes direct transit connectivity in San Francisco, particularly along 19th Avenue, with funding mechanisms to ensure that the connections are made initially to reduce parking/traffic/transit impacts and reconsider current plans for Parkmerced.	These issues need to be evaluated at the local level, by the City of San Francisco. They are not within the scope of the regional analysis of the Plan Bay Area EIR.
Tolling at Urban Fringe	Include an alternative that uses tolling around the edges of the region.	Congestion Pricing for San Francisco and Treasure Island will be tested as part of the Preferred TIS. Alternative 4 accomplishes the objective of no-net in-commuting without implementing tolling at the regions borders
West Oakland Transportation	Include an alternative to the proposed Light Rail System (LRS) being planned for West Oakland in the West Oakland Specific Plan such as a Bus Rapid Transit system (West Oakland Environmental Indicators Project). Include an alternative that analyzes a comprehensive transportation connections and linkages plan for West Oakland.	These issues need to be evaluated at the local level, by the City of Oakland's West Oakland Specific Plan or other local assessment. They are not within the scope of the regional analysis of the Plan Bay Area EIR.
Undergrounding BART in West Oakland	Include an alternative that analyzes undergrounding BART through West Oakland.	Transportation projects are identified and proposed by various agencies; such a project was not submitted by BART to the MTC for consideration of inclusion in the RTP.
Advanced Transit Options	Include an alternative that considers advanced transit options.	The proposed Plan would continue to fund expansions of the transit network.

ALTERNATIVE TRANSPORTATION SUGGESTIONS

<i>Topic</i>	<i>Comments</i>	<i>Response</i>
No Taxpayer Money Alternative	Include an alternative that eliminates the use of taxpayer money for road improvements.	MTC/ABAG funding forecasts are based on funds that are reasonably expected to come to the region. Many tax revenues, such as state and federal taxes on gasoline, are specifically allocated for transportation and declining them here would simply shift those funds to another region. Finally, as roads are public rights-of-way, maintaining roadways require public funds.

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