

February 10, 2025

Adam Noelting  
Principal Planner  
Metropolitan Transportation Commission  
375 Beale Street, Suite 800  
San Francisco, CA 94105

RE: Notice of Preparation of a Draft Environmental Impact Report for Plan Bay Area 2050+ (Regional Transportation Plan/Sustainable Communities Strategy for the Nine County San Francisco Bay Area)

Dear Mr. Noelting:

Bay Area Air Quality Management District (Air District) staff have reviewed the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050+ Regional Transportation Plan/Sustainable Communities Strategy for the Nine County San Francisco Bay Area (Project). The Project is designed to serve as the 2025 Regional Transportation Plan/Sustainable Communities Strategy for the San Francisco Bay Area. It is a limited and focused update to the region's long-range plan to guide the growth of the nine-county San Francisco Bay Area. The Project will focus on four key elements—transportation, housing, the economy, and the environment—and will identify a path to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. It refines select plan strategies to integrate the lessons of the last three years and will enable continued progress implementing the strategies of Plan Bay Area 2050.

## Recommendations

### *Particulate Matter Emissions*

The United States Environmental Protection Agency (EPA) revised the Primary Annual Particulate Matter [2.5 micron] (PM<sub>2.5</sub>) National Ambient Air Quality Standard (NAAQS) to 9.0 µg/m<sup>3</sup>. Based on existing data, the Air District anticipates a nonattainment designation for the region which will trigger significant planning requirements, including updates to the region's PM<sub>2.5</sub> budget and baseline inventory for the purposes of Transportation Conformity Determinations and State Implementation Plan approval.

The Air District strongly recommends the DEIR incorporates road dust in the analysis of operational emissions to ensure consistency with the upcoming moderate nonattainment Transportation Conformity Determination and the State Implementation Plan requirements. Further information on evaluating mobile sources and road dust can be found in [Appendix E of the Air District's California Environmental Quality Act \(CEQA\) Guidelines "Recommended Methods for Screening and Modeling Local Risks and Hazards"](#).

Additionally, the California Air Resources Board (CARB) plans to release EMFAC2025 with updates and improvements to the current model, EMFAC2021. The Air District recommends Metropolitan Transportation Commission (MTC) consult with CARB to ensure the DEIR reflects the most recent version of EMFAC2025.

### *Environmental Justice and Equity*

Title VI of the Civil Rights Act of 1964, along with its state law analog (Gov. Code section 11135), prohibits recipients of federal (and state) funds from causing a disparate impact on protected classes of people. Under both state and federal law, those protected classes include race. (Id.; 42 U.S.C. section 2000d). The Air District acknowledges the important work that the MTC has already completed in conducting Title VI and Environmental Justice Analysis in the Plan Bay Area 2050's Equity Analysis Report and urges MTC to continue addressing disparate impacts and

advancing equitable outcomes. To accurately reflect the equity-focused populations and geographies in the region, the Air District recommends including Overburdened Communities instead of Community Air Risk Evaluation (CARE) Communities in the Project's equity and DEIR analyses, as shown on the Air District's [Overburdened Communities Map](#).

Overburdened Communities, as defined by the Air District's Regulation 2, Rule 1: General Requirements<sup>1</sup> typically experience higher health impacts from pollution exposure, including exposure to transportation sources. Because of the potential impact to surrounding communities, the Air District strongly urges MTC staff to apply Environmental Justice principles as defined in Chapter 2 of the [Air District's California Environmental Quality Act \(CEQA\) Guidelines](#) entitled, "[Best Practices for Centering Environmental Justice \(EJ\), Health, and Equity](#)" to this Project. The Air District is available to provide technical support and assistance to help advance EJ, health, and equity efforts during the environmental review process.

If you have any questions or would like to discuss Air District recommendations further, please contact Alesia Hsiao, Principal Environmental Planner, [ahsiao@baaqmd.gov](mailto:ahsiao@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Executive Officer of Science and Policy

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<sup>1</sup> Bay Area Air Quality Management District. Regulation 2, Rule 1: General Requirements.  
[https://www.baaqmd.gov/~/\\_media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215\\_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1](https://www.baaqmd.gov/~/_media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1)