



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
OCCUPATIONAL & ENVIRONMENTAL HEALTH

Gavin Newsom, Mayor
Mitchell H. Katz, M.D.,
Director of Health

Rajiv Bhatia, M.D., M.P.H
Director of EHS & OSH

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Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Dear Mr. Heminger:

Thank you for the opportunity to comment on the Draft 2030 Regional Transportation Plan (RTP) and Draft Environmental Impact Report (DEIR). On behalf of the San Francisco Department of Public Health (SFDPH), we appreciate MTC's efforts to obtain the broadest public participation.

Overall, we believe the Draft RTP and DEIR describe a comprehensive and environmentally friendly blueprint for the future of the Bay Area. We note that the DEIR does identify the TRANSDEF Smart Growth Alternative, not the MTC's own Proposed Project, as the environmentally superior option. While we understand that the Smart Growth Alternative presents real issues of feasibility for the MTC, we do encourage the MTC to further investigate the possibility of specific measures within the Smart Growth Alternative.

Transportation planning and policy is of great importance to public health and in particular to issues of air quality, pedestrian safety, physical activity and access to goods and services. Recent research has highlighted the relationships between increasing auto use and physical inactivity, which has importance for obesity, diabetes, and mental health. Public health also recognizes that low-income, minority and special-needs populations depend on affordable and efficient public transit to get to jobs, schools, and health care services as well as to see family and friends.

Our first comments are on air quality and in particular the DEIR finding of no impact with respect to particulate matter. Asthma and other respiratory illnesses are a significant problem in San Francisco, and motor vehicle emissions and air quality are our foremost concerns. The DEIR predicts a 34% increase in personal auto trips between now and the year 2030 (Table 2.1-8) and an overall increase of 40% in vehicle miles traveled (Table 2.1-8). Despite expected decreases in ROG, NOx and CO (Table 2.2-9), we are very concerned about the expected increases in PM₁₀ (34.7%) and PM_{2.5} (25.1%). Research conclusively attributes to particulate matter significant health problems, including asthma, bronchitis, decreased lung function and premature death. Higher PM will be expected to increase population exposure and resultant illness; nevertheless, in comparing the RTP projects to the No Project Alternative, you fail to find significant impacts with respect to PM. As you note (page 2.2-20), attainment plans for PM have not been developed. However, the air district and ABAG's lack of action should not imply that the MTC ignore expected increases in PM. We believe you should find any increase in air pollution as a result of increased growth and travel as a "significant impact." We urge you to consider further mitigation measures within your scope to reduce automobile emissions.

From a public health perspective, we believe that attempts to prevent illness and disease, such as those caused by exposure to particulate matter, should focus on root conditions. On page 4

of the Draft RTP, you state "...the era of major freeway construction – the building of the Interstate system – is over." As public health advocates, we welcome this change of perspective, and we fully support the Draft RTP "livable communities" objectives (page 17) and "clean air" objectives (page 19). Remaining consistent with this perspective, attempts to mitigate transportation effects on air quality should be focused on measures to provide Bay Area residents convenient, safe, and affordable alternatives to automobiles, especially non-motorized alternatives such as onto public transit and walking/bicycling. We believe many people would welcome more options to get out of cars. Alternative land use patterns that promote residential and commercial mixed-use and high density development around existing and new transit hubs would address this issue at its root.

The TRANSDEF Smart Growth Alternative described in the DEIR provides a wonderful opportunity to challenge the historic land use patterns that have been so destructive to the environment and human health. In focusing future residential development in the urban core and in increasing residential density altogether, the Alternative lets people avoid cars and use public transit, reducing overall vehicle miles traveled and congestion. In addition, the Alternative benefits public health by encouraging walking, providing better access to jobs, and promoting social cohesion – all well-known attributes of healthy places. Furthermore, expanding public transit access and community mobility would improve the travel experiences for many of the Bay Area's transit dependent populations, meeting the MTC's own "livability" goals and objectives, and meeting its commitment to the Lifeline Transportation Network. We have played an active role in advocating for a fully funded LTN, and we appreciate the substantial increase in funding this RTP has brought. However, extensive, coordinated and affordable public transit, such as that described by the TRANSDEF Alternative, offers strong opportunities for people to get out of their cars and to improve the overall quality of life experienced by special populations and low-income communities.

On page 2.3-33, the DEIR states "MTC has no land use authority and cannot directly affect the pattern that future land uses will take..." As a public health agency, we understand the difficulty in intervening in the activities of other public agencies. However, we believe MTC may be able to take a significantly stronger stance on environmentally sound Bay Area growth by adopting some elements of Smart Growth Alternative, either through consideration of new pricing strategies that will reduce auto use or through increasing funding for public transit and Lifeline.

Environmental protection is not independent of land use and transportation policy making. While the MTC is directly responsible for our transportation system, the actions of all public agencies can affect environmental quality and human health. We see the day to day consequences of transportation decisions in emergency room visits for asthma and unnecessary injuries. Being mindful of health impacts of its public decisions, MTC can not only provide a great transportation system but also provide critical support to the mission of public health.

Should you have any additional questions or comments, feel free to contact us at 415.252.3988. Thank you again for the opportunity to provide our feedback.

Sincerely,

Lili Farhang, MPH
Program on Health, Equity and Sustainability
SF Department of Public Health

Rajiv Bhatia, MD, MPH
Director, Environmental Health Section
SF Department of Public Health