

RESOLUTION OPPOSING THE PLAN BAY AREA 2050 FINAL BLUEPRINT TELECOMMUTE MANDATE STRATEGY

WHEREAS, The Metropolitan Transportation Commission (MTC), as the federally designated Metropolitan Planning Organization (MPO) for the nine-county Bay Area (the region), is required to develop in conjunction with the Association of Bay Area Governments (ABAG) a regional plan every four years in order to satisfy federal and state planning requirements; and

WHEREAS, MTC and ABAG are currently undertaking the process to develop and adopt the 2021 update to the plan, entitled Plan Bay Area 2050; and

WHEREAS, Plan Bay Area 2050 is intended to result in an affordable, connected, diverse, healthy, and vibrant Bay Area for all, including an expanded, well-functioning, safe, and multimodal transportation system that connects the Bay Area and reduces our environmental footprint; and

WHEREAS, MTC is required by state law to include in this regional plan achievable strategies and investments to meet the region's greenhouse gas (GHG) emissions reduction target (as defined by the California Air Resources Board) of 19% per-capita by 2035 relative to 2005 levels; and

WHEREAS, The San Francisco County Transportation Authority (Transportation Authority) strongly believes that that MTC (and the region) must continue to strive towards achieving our share of the state's GHG emission reduction targets; and

WHEREAS, On September 23, 2020, MTC voted to adopt MTC Resolution No.4437 and ABAG Resolution No.16-20 Plan Bay Area (PBA) 2050: Final Blueprint; and

WHEREAS, The Plan Bay Area 2050 Final Blueprint includes Strategy Environment (EN) 7: Institute Telecommuting Mandates for Major Office-Based



Employers, which proposes to mandate that large (over 25 employees) office-based employers have at least 60 percent of their employees telecommute on any given workday; and

WHEREAS, The Final Blueprint indicates that the inclusion of Strategy EN7 is necessary to achieve the required GHG emission targets, and Strategy EN7 includes as a primary objective the reduction of GHG emissions; and

WHEREAS, Strategy EN7, as written, will not accomplish these goals, but instead will have negative impacts on San Francisco as a Transit First city as well as on low-wage workers and people of color throughout the region; and

WHEREAS, Strategy EN7 takes a blanket approach to the proposed telecommute mandate on workplaces, resulting in the suppression of both trips that contribute to regional GHG emissions, such as drive-alone, and trips that would be taken by zero-emission or low-emission modes, such as walking, cycling, and transit; and

WHEREAS, Though the COVID-19 pandemic and subsequent Shelter-in-Place orders necessitated that employers and employees quickly transition to telecommuting where possible, the economic, environmental, equity, social, and health impacts of sustained, significant percent share of telecommuting have yet to be fully understood; and

WHEREAS, Sustainable reduction in GHG emissions in the region requires fidelity to Plan Bay Area's goals to direct growth in population and employment to areas served by fast, frequent, and reliable transit, and areas that are walkable and bikeable for more than just commute trips; and

WHEREAS, The shift to telecommuting as a result of the COVID-19 pandemic response has resulted in significant ridership declines and budget shortfalls at all transit operators in the region, necessitating the reduction of service frequency,

capacity, hours, and coverage; and

WHEREAS, A higher number of essential workers are low-income people of color, who have suffered from COVID-19 in numbers disproportionate to their population and many of whom have not had the ability to work from home nor the type of jobs that can be accomplished through remote work; and

WHEREAS, If a large portion of the workforce is no longer commuting, transit fare revenues will continue to drop, forcing further cuts to public transit service, resulting in serious harm to low-wage workers and people of color in San Francisco and across the region; and

WHEREAS, San Francisco's downtown economic vibrancy relies on its daytime population, including large and small businesses and their office workers which support the city's tax and revenue base; and

WHEREAS, a mandate on large employers to require that majority of their workforce work from home would encourage sprawl and expand development into exurban and rural areas, leading to an increase in non-work related automobile trips and contributing to further environmental damage; and

WHEREAS, As a result of San Francisco's long-standing Transit First Policy, San Francisco is a transit-oriented, walkable, bikeable city, and has the lowest rate of GHG-emitting commute modes in the region with only 30% of overall commuters driving to work; and

WHEREAS, The organization Transportation Management Association San Francisco (TMASF), whose members comprise the largest office uses in downtown San Francisco, estimates a drive-alone commute rate of less than 10% for their participating employers, reflecting efficacy of combined transportation demand management (TDM) efforts of TMASF and the City and County of San Francisco over several decades; now, therefore, be it



RESOLVED, That the Transportation Authority hereby opposes the inclusion of Strategy EN7: Institute Telecommuting Mandates for Major Office-Based Employers, as it is currently described, in the ultimate adoption of Plan Bay Area 2050; and be it further

RESOLVED, That the Transportation Authority reiterates its support for the Plan Bay Area 2050 Guiding Principles for a more affordable, connected, diverse, healthy, and vibrant Bay Area, including the importance of strategies and investments designed to meet the region's GHG reduction targets; and be it further

RESOLVED, That the Transportation Authority encourages MTC to

- a) Re-focus and rename this strategy to TDM to Reduce Driving Commute Trips, where they occur throughout the region;
- Recognize the varied workplace circumstances across the region with flexibility in its TDM policies and programs to ensure efficiency, equity, and effectiveness; and
- c) Consider how other strategies in PBA 2050 could be amended, or new strategies added, in order to meet the region's GHG emissions reduction target, such as considering a regional gas tax and/or modifying or deferring freeway widening projects; and be it further

RESOLVED, That the Transportation Authority is committed to continuing to collaborate with MTC and partner agencies on these and other strategies in PBA 2050.



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Memorandum

AGENDA ITEM 9

DATE: October 22, 2020

TO: Transportation Authority Board

FROM: Maria Lombardo - Chief Deputy Director

SUBJECT: 11/10/2020 Board Meeting: Oppose the Plan Bay Area 2050 Final Blueprint

Telecommute Mandate Strategy

RECOMMENDATION	\square Information		☐ Fund Allocation
Oppose the Plan Bay Area (PBA) 2050 Final Blueprint Telecommute Mandate Strategy			☐ Fund Programming
			⊠ Policy/Legislation
SUMMARY			☐ Plan/Study
For the past two years, the Metropolitan Transportation Commission and the Association of Bay Area Governments (MTC/ABAG) have been undergoing a multi-step process to			□ Capital Project Oversight/Delivery
establish land use, transportati	☐ Budget/Finance		
environmental strategies to meet ambitious greenhouse gas (GHG) reduction targets set by the state as part of the			☐ Contract/Agreement
development PBA 2050. For the Resources Board (CARB) estaboreduction target at 19% per camust be met through local and related emissions reductions. Of the region meet this ambitious Telecommuting Mandates for IA the request of Commissions the MTC, this item is being age as written, which would not accommute First city as well as on location of color throughout the region modifications to PBA 2050 to he support the plan's guiding pring rename this strategy to Transport (TDM) to Reduce Driving Communication of the National Communication of t	□ Contract/Agreement □ Other:		



Agenda Item 9 Page 2 of 5

BACKGROUND

Every four years, MTC/ABAG are required to develop and adopt a Regional Transportation Plan and Sustainable Communities Strategy, called Plan Bay Area or PBA, to guide the region's long-term transportation investments and establish land-use priorities across all nine counties. The regional agencies adopted the last update in 2017, called PBA 2040. The next PBA, known as PBA 2050, must establish a strategy to meet the region's GHG emission reduction target as well as accommodate the region's projected household and employment growth through 2050.

In September 2019, MTC/ABAG officially launched work on PBA 2050. On July 23, 2019, through Resolution 20-06, the Transportation Authority Board approved goals to guide our work on PBA 2050. These goals (Attachment 1) include "Focus on Equity," and "Support coordinated transportation and land use planning." Throughout the process, we have worked in close coordination with local transportation agencies, regional transit providers, and our MTC representatives to develop San Francisco's input into PBA 2050, bringing periodic updates to the Board and Citizens Advisory Committee (CAC).

On September 23, 2020 the MTC Commission adopted the Final Blueprint for PBA 2050, the "first draft" of the plan with strategies to be included in the preferred scenario for the PBA 2050 environmental review process later this year. The blueprint strategies are intended to support PBA 2050's guiding principles – an affordable, connected, diverse, healthy and vibrant region – as well as help the plan meet achieve the region's GHG reduction target. The Final Blueprint, as adopted, includes <u>Strategy EN7: Institute Telecommuting Mandates for Major Office-Based Employers</u> (Attachment 2). Specifically, the strategy would:

"mandate that large employers [defined as having 25 or more employees] have at least 60 percent of their employees telecommute on any given day... limited to large office-based employers whose workforce can work remotely."

This was a new strategy proposed (without sufficient vetting) after public engagement and outreach demonstrated a general support for increased levels of telecommuting in the plan, generally thought to be a result of the number of people now working remotely under the COVID-19 stay-in-place orders. MTC staff have indicated that without this strategy, PBA 2050 would fall short of meeting the CARB-established GHG emission reduction target of 19% per capita by 2035. Failing to meet this goal would make projects in the region ineligible for certain state transportation funding programs, including the Solutions for Congested Corridors Program, which MTC estimates would amount to \$100 million per year in lost revenue opportunity.

DISCUSSION

At the September 23 MTC full commission meeting and subsequent Joint MTC Planning Committee / ABAG Administrative Committee meeting on October 9, there was significant conversation among Commissioners (including all of the San Francisco Commissioners), Board members, and members of the public representing various stakeholder organizations and local agencies/governments opposing Strategy EN7 as written. There were also many



Agenda Item 9 Page 3 of 5

letters opposing the strategy in its current form. Some of the many concerns with the strategy as written include:

- In San Francisco and other walkable, bikeable, transit-rich communities, a rigid
 mandate of this magnitude could reduce transit and bike/walk commute trips as well
 as the driving commute trips, and could in fact lead to more non-work trips being
 taken by automobile if people change their behaviors and potentially move to more
 auto-reliant areas.
- As a result of this mandate, employers are likely to downsize their office space, impacting the commercial real estate market particularly in downtowns like San Francisco's, where employers right now are reconsidering commitments to maintaining a presence in transit-rich, walkable and bikeable urban centers, which are often also higher-priced.
- Reducing the daily workforce population will also undermine the viability of all the supporting businesses that serve the workers and businesses there, including bars, restaurants, and retail.
- If transit commutes are reduced, this could significantly impact transit agency budgets
 as well as overall support for transit investments across the region, disproportionately
 impacting transit dependent populations which are more often lower income and
 people of color.

On October 8, Transportation Authority staff submitted a comment letter developed in collaboration with the San Francisco Municipal Transportation Agency (SFMTA), the Planning Department, and the Mayor's Office that made many of the points above and made recommendations for revisions to the strategy and Plan recognizing the importance of meeting the GHG reduction targets while finding ways to do so that wouldn't produce the negative impacts noted above. For example, our letter suggested that the strategy be revised to explicitly provide flexibility by allowing individual counties, cities and employment centers to design transportation demand management (TDM) programs best suited to their unique conditions. We also suggested that MTC look at postponing highway expansion projects until after 2035, or at additional pricing tool, to help reduce GHG emissions by targeting personal vehicle use specifically.

Though the telecommute mandate strategy was ultimately approved as part of the Final Blueprint package of strategies, significant opposition from other groups has been building in the weeks since. This includes:

- a joint letter from the Bay Area State delegation (Attachment 3),
- a joint statement issued by Mayor London Breen and San Jose Mayor Sam Liccardo, (Attachment 4), and
- letters and op-eds opposing the strategy from business associations like the Bay Area Council.



Agenda Item 9 Page 4 of 5

In addition, several transit operator boards are considering resolutions opposing the strategy, including BART, Caltrain, and WETA (already approved). In response to this outpouring of concern, MTC staff have stated that they do not intend for the strategy to be interpreted as a flat 60% mandate across all employers across the region, but that it could be tailored to each county or city. Staff also stated that the intention of the strategy is only to reduce car commute trips, not bike, walk or transit trips. MTC staff have not yet revised the strategy as written. The MTC Commission and ABAG Executive Board are scheduled to have a chance to take action on the preferred alternative for the PBA 2050 Environmental Impact Report (EIR), which offers a chance to revise the telecommute mandate strategy as the regional agencies shift to the environmental clearance phase for the plan.

At the October 20, 2020 Transportation Authority Board meeting, Commissioner Ronen asked the Chair to agendize a resolution opposing this strategy, as written. The draft resolution included in the agenda packet for the October 27 Board meeting includes the recommendation that MTC make modifications to the strategy, consistent with our October 8 staff letter, to:

- Re-focus and rename this strategy to TDM to Reduce Driving Commute Trips, targeting where they occur throughout the region,
- Recognize the varied workplace circumstances across the region with flexibility in its
 TDM policies and programs to ensure efficiency, equity and effectiveness; and
- Consider how other strategies in PBA 2050 could be amended, or new strategies added, in order to meet the region's GHG emissions reduction target, such as considering a regional gas tax and/or modifying or deferring freeway widening projects.

NEXT STEPS

We will continue to work with our Board, MTC Commissioners, transit operators, and partners on PBA 2050 strategies, to seek revisions as noted above that can be approved by MTC/ABAG at their December meetings. We will also look forward to collaborating with MTC, local and regional partners to support development of MTC's 5-year Implementation Plan for PBA, which is intended to layout the near term steps that the region will take to implement the strategies in PBA 2050. We will periodically report back to the CAC and Board on these efforts.

FINANCIAL IMPACT

There are no impacts on the Transportation Authority Fiscal Year 2020/21 budget associated with the recommended action.

CAC POSITION

The CAC will discuss this item at its October 28, 2020 meeting.



Agenda Item 9 Page 5 of 5

SUPPLEMENTAL MATERIALS

- Attachment 1 SFCTA Adopted Plan Bay Area 2050 Goals
- Attachment 2 Strategy EN7: Institute Telecommuting Mandates for Major Office-Based Employers
- Attachment 3 Joint Letter from the Bay Area Delegation
- Attachment 4 Joint Statement from San Francisco Mayor Breed and San Jose Mayor Liccardo

Attachment 1

San Francisco Goals for Plan Bay Area (PBA) 2050

Approved Resolution 20-06 July 23, 1019

Goals	Notes
Ensure that all San Francisco projects and programs that need to be in PBA 2050 in order to advance are included	 Projects need to be included in PBA 2050 if they: Need a federal action (e.g. federal environmental approval) or wish to seek state or federal funds before 2025 when the next PBA will be adopted Trigger federal air quality conformity analysis (e.g. projects that change capacity of transit or major roadways)
2. Advocate strongly for more investment in transit state of good repair to support existing communities and new growth	Coordinate with the "Big 3 Cities" accepting most of the job and housing growth in PBA and regional and local transit operators
3. Advocate for increased shares of existing revenues for San Francisco priorities (partial list at right)	 BART Core Capacity Better Market Street Blended High Speed Rail/Caltrain service from San Jose to the Transbay Transit Center Downtown Rail Extension Geary BRT Muni fleet and facilities expansion Muni Forward Vision Zero (support eligibility for MTC fund programs) Placeholders for transit expansion planning (e.g. west side rail, 19th Avenue/M-Line, Central Subway extension, etc.)
4. Advocate for new revenues for transportation and housing, and continue advocacy for San Francisco priorities in new expenditure plans	 Regional transportation measure(s) Regional housing measure(s) State road user charge (monitor pilots) Federal surface transportation bill
5. Support performance-based decision-making	 Support transparent reporting on strategy and project performance evaluation metrics, including impact on vehicles miles travelled Continue advocating for a better way of capturing of transit crowding in PBA evaluation, key to transit core capacity issues Advocate for discretionary funds for highperforming and regionally significant San Francisco projects
6. Support coordinated transportation and land use planning	 Advocate for regional policies to support jurisdictions accepting their fair share of housing and employment growth, especially in areas with existing or planned transit service to support new growth Advocate for more funds to support Priority Development Area planning

Attachment 1 San Francisco Goals for Plan Bay Area (PBA) 2050 (June 20, 2019)

Goals	Notes
	Support update to the Regional Transit Expansion Policy to reflect appropriate land use requirements as a prerequisite for regional endorsement and investment
7. Focus on equity	 Access to transportation – Late Night Transportation Study, Prosperity Plan Affordability – MTC Means-Based Pilot, BART university pass/discount Communities of Concern – Continue Community Based Transportation Planning grant program, more funds for Lifeline Transportation Program Housing/Displacement – Work with the Board, Mayor, SF agencies, etc. to develop recommendations for planning, production, and preservation of affordable housing and to prevent/mitigate displacement Vision Zero – SFTP 2040 demonstrated that communities of concern experience disproportionately high rates of pedestrian and bike injuries. Continue to advocate for regional Vision Zero policies and investments.
8. Support comprehensive, multimodal planning for the region's network of carpool and express lanes	Develop a regional carpool/express lane vision that includes regional/local express transit service
9. Continue to show leadership in evaluating and planning for emerging mobility solutions and technologies	To the extent PBA 2050 addresses this topic, provide input to shape and lead on regional policy on emerging mobility services and technologies, including shared mobility and autonomous vehicles
10. Provide San Francisco input to shape and lead on other regional policy topics	Sea level rise/adaptionEconomic performance and access to jobs

Plan Bay Area 2050: Final Blueprint

Environment: Reduce Climate Emissions

Strategy EN7:

Institute Telecommuting Mandates for Major Office-Based Employers

Strategy Cost not applicable

Strategy Objective Reduce greenhouse gas emissions, traffic congestion, and

transit overcrowding by increasing the number of Bay Area workers that work from home one or more days per week.

Strategy Description Build upon the significant shift to work from home during

COVID-19 and mandate that large employers have at least 60 percent of their employees telecommute on any given workday. This requirement would be limited to large office-based employers whose workforce can work remotely. telecommuting target of 60 percent on a typical weekday.

This could enable an increase from the projected

telecommute share of 14 percent in the Draft Blueprint to

up to as high as 25 percent in the Final Blueprint,

recognizing that half of the workforce has a job that must be completed in-person (not eligible for telecommuting). The policy would require the employer to meet this target each workday. Employers could meet this target using any variety of alternative work options, such as compressed work weeks, flexible work schedules, or remote work

policies.

Changes Since Draft Blueprint This strategy was not included in the Draft Blueprint and was

added based upon public feedback this summer. Given the changes in travel patterns during the coronavirus pandemic, there was strong support for bolder policies on this front in the Final Blueprint, including a mandate for office-based employers. To ensure this strategy achieves equity goals, a complementary strategy to expand internet access in underserved communities was added to the Economy

Element as well.

STATE CAPITOL P.O. BOX 942849 SACRAMENTO, CA 94249-0115

California Legislature

October 14, 2020

The Honorable Scott Haggerty Chair, Metropolitan Transportation Commission 375 Beale Street, #800 San Francisco, CA 94105

Re: Concerns about MTC Potential Work from Home Mandate

Dear Chair Haggerty:

We commend you and the Metropolitan Transportation Commission (MTC) staff for your work on Plan Bay Area 2050 (Plan) to make our region a more sustainable, prosperous and equitable place. We are writing to express our concern about the inclusion of a Work From Home Mandate in Plan Bay Area. While requiring or encouraging work from home during the pandemic makes sense, we do not agree that a Work From Home Mandate is a viable or appropriate long-term strategy for the Bay Area.

We understand that the Work From Home Mandate was included late in the process of developing the Plan, and is intended to help meet greenhouse gas emissions reduction goals set out by the State pursuant to SB 375 (Chapter 728, Statutes of 2008). We are concerned, however, that the Work From Home Mandate was not adequately vetted, may not achieve a reduction in transportation greenhouse gas emissions, and may have additional negative consequences for our constituents and our region as a whole.

In particular, we are deeply concerned about the inclusion of a blanket Work From Home Mandate because:

- 1. It is likely to meaningfully reduce fare revenue for our public transit systems systems that are absolutely essential to the Bay Area's future prosperity and further damage the financial health of these systems. As is clearly stated throughout the rest of the Plan, well-funded transit systems are of critical importance for equity, climate and our region's quality of life. Well-funded transit systems are particularly important for workers who cannot work from home, who are disproportionately low-income and people of color, as well as for seniors, the disabled, youth, and other transit-dependent groups. Draining funds from our transit systems will badly harm these low-wage workers, who simply cannot work from home.
- 2. A Work From Home Mandate is likely to dramatically reduce the number of office workers in our region's downtowns, threatening the livelihoods of non-

The Honorable Scott Haggerty October 14, 2020 Page 2

office downtown workers in service industries and causing severe impacts to local city budgets. In counties like San Francisco and Santa Clara, over 50% of workers are Work From Home-eligible. Additionally emphasizing working from home undermines other strategizes in the Plan such as walkable urban neighborhoods and increased housing density near employment and transit centers, two data supported strategies proven to reduce transportation related GHG emissions.

- 3. This mandate doesn't acknowledge the difference between downtown offices in walkable neighborhoods near transit where the majority of workers commute by sustainable modes, and suburban office parks where almost everyone drives alone to work. In San Francisco, for instance, fewer than 30% of workers eligible to Work From Home drive to work. What would be the rationale for requiring office workers who walk to work to work from home?
- 4. The mandate fails to account for equity. Low wage and service workers are typically not able to work from home their jobs simply don't allow it. Moreover, even for lower wage office workers whose job may allow work from home, they are more likely to live in smaller homes with large families or multiple roommates, and thus not be able, realistically, to work from home. They should not be required to do so.
- 5. This mandate would likely result in people leaving the region or moving further from their workplace or from transit that can transport them to their workplace. Such a mandate could also be used as a rationale for those who assert that building sufficient housing for all those who will live in our region is not necessary.
- 6. There is meaningful evidence that Work From Home mandates increase greenhouse gas emissions. While working from home may eliminate a commute trip, errands and other non-work trips can increase, increasing daily VMT. Additionally, teleworkers tend to live farther from job centers, in lower-density environments, leading to longer, more auto-dependent commutes when they do go into the office, and higher levels of greenhouse gas emissions from home energy usage. The region's efforts to avert deepening our climate crisis should not rely on a strategy that could actually worsen our climate crisis.

Instead of a blanket Work From Home mandate, we suggest MTC pursue efforts to reduce trips and VMT by adding to the existing PBA2050 strategies that:

- Locate more new housing near transit and jobs,
- Locate new office space near transit and housing,
- Invest more in transit rather than highway widening, and
- Implement aggressive but flexible policies that give Bay Area residents the option of shifting their commute and non-commute trips onto sustainable modes and reduce unnecessary commute and non-commute trips.

The Honorable Scott Haggerty October 14, 2020 Page 3

Policies that MTC pursues to enable employees to work from home must be designed to ensure that such policies do not result in an increase in GHG emissions, a decrease in transit ridership and transit funding, or inequitable outcomes.

We look forward to working together to move our region toward a more sustainable future. Thank you for your work, collaboration, and attention.

Sincerely,

Senator Scott Wiener

Scott Wiener

Mancy Seinner

Senator Nancy Skinner

Senator Jerry Hill

Buffy Wicks

Assemblymember Buffy Wicks

Assemblymember Evan Low

Assemblymember Tim Grayson

Tinthy D. Drayson

Assemblymember David Chiu

David Chiese

Senator Mike McGuire

Assemblymember Philip Y. Ting

Assemblymember Marc Berman

Bill Quirk

Assemblymember Bill Quirk

Clevia In Aguar luna

Assemblymember Cecilia Aguiar-Curry

Attachment 3

The Honorable Scott Haggerty October 14, 2020 Page 4

Assemblymember Kevin Mullin

Assemblymember Jim Wood

Man D Word

Assemblymember Kansen Chu

Assemblymember Rob Bonta

Cc: Therese McMillan, Executive Director, Metropolitan Transportation Commission

Attachment 4

Visit the City's new website, SF.gov

Office of the Mayor

News Releases

The latest news and announcements from Mayor London N. Breed

Statement from San Francisco Mayor London Breed and San Jose Mayor Sam Liccardo on Plan Bay Area Telecommute Strategy

Posted Date: Wednesday, October 14, 2020

San Francisco, CA — On September 23, the Metropolitan Transportation Commission (MTC) approved the Final Blueprint for Plan Bay Area, which is a policy document to guide the growth of the Bay Area through 2050. This Blueprint included a strategy of increasing the number of Bay Area workers that work from home one or more days per week in pursuit of a goal to reduce greenhouse gas emissions and traffic congestion. It would do this by mandating all large office-based employers (25 or more employees) have at least 60 percent of their employees telecommute on any given day.

San Francisco and San Jose have been working with the MTC over the last few weeks to address significant challenges stemming from the proposal. Today, the 15 members of the Bay Area delegation to the California State Legislature issued a letter raising significant concerns.

Mayors Breed and Liccardo released the following statement about the proposal:

"As the Mayors of the two largest cities in the Bay Area, we appreciate the work the Metropolitan Transportation Commission staff have committed to developing and completing the Plan Bay Area 2050 Blueprint that will help us meet our collective climate goals. We also acknowledge Plan Bay Area's responsibility to meet State emissions reduction targets with a fiscally constrained transportation investment plan -- especially given the more recent impacts of COVID-19 on our respective communities.

While we support many of the innovative and bold strategies MTC has developed to help address our shared transportation challenges and meet our emissions reduction targets, we remain concerned about the telecommute mandate and cannot support it as currently drafted. We look forward to working with MTC staff, and our colleagues, on refining this strategy and considering alternatives that allow us to equitably meet our GHG reduction target and support the vitality of our downtowns."

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