SAN FRANCISCO   SAN JOSE   SANTA ROSA   WALNUT CREEK

GREENBELT ALLIANCE

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October 14, 2016

Dave Cortese, MTC Chair
Metropolitan Transportation Commission
Julie Pierce, ABAG President
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

RE: Feedback on the Draft Preferred Scenario for Plan Bay Area 2040

Dear MTC Commissioners and staff and ABAG Board members and staff:

Greenbelt Alliance is the San Francisco Bay Area's leading organization working to protect natural and agricultural landscapes from sprawl development and help our cities and towns grow in ways that create thriving communities for everyone. We are the champions of the places that make the Bay Area special, with more than 10,000 supporters and a 58-year history of local and regional success.

We appreciate this opportunity to comment on the "Draft Preferred Scenario" (DPS) for Plan Bay Area 2040. These comments build upon the joint comment letter submitted on Thursday, October 13th from 17 conservation and environmental non-profit organizations and agencies.

<u>1) Adopt a compact footprint</u>
We're very pleased that the DPS meets the "open space and agriculture preservation" target for Plan Bay Area 2040. This target calls for keeping all growth within existing Urban Growth Boundaries—or city limits where there is no growth boundary.

By adopting a compact footprint in keeping with this target, the Draft Preferred Scenario provides important benefits for the entire Bay Area. Earlier this year, we commissioned Calthorpe Analytics to conduct a conservation-focused analysis of the Plan Bay Area 2040 scenarios (see slides in appendix). Their analysis found that the DPS has *less than half* the amount of development on natural and agricultural lands as the "No Project" scenario, which assumes "business-as-usual" development patterns throughout the region. Choosing the DPS rather than the "No Project" scenario would save almost 18,000 acres of natural and agricultural lands from sprawl development, preserving the lion's share of the region's 3.6 million acre greenbelt.

The conservation benefits of this more compact footprint can't be understated. Here's how the DPS stacks up against "business as usual" development trends:

- By avoiding development on watershed lands that recharge our groundwater supplies, it saves enough water for 66,000 households per year.

- By reducing sprawl development on natural and agricultural lands that sequester carbon, it saves the greenhouse gas emissions equivalent of 100,000 passenger vehicles per year.

- By focusing more growth in existing cities and towns, it protects more than 20,000 acres of habitat that is critical for wildlife movement.

- And more than 2,500 acres of cultivated cropland are saved; lands that produce more than $9 million a year in agricultural output here in the Bay Area.

And even more could be done. Calthorpe Analytics also analyzed the "Big Cities" scenario, released by MTC and ABAG in summer 2016 as an example of a scenario with a more compact footprint than the DPS. This scenario reduced the number of acres of natural and agricultural lands lost to development by an additional 15 percent compared to the DPS. This in turn produced even greater benefits for our drinking water supplies, greenhouse gas emissions, wildlife habitat, and our agricultural economy.

These aren't the only benefits from a compact footprint. By re-directing growth from edge jurisdictions to infill locations that are well served by transit and jobs, we can also do more to improve our regional jobs-housing imbalance, reducing housing costs, cut lengthy commutes, and reduce infrastructure costs—freeing up funds for pressing local needs such as affordable housing and transportation. To maximize these benefits, the DPS could be refined to redirect housing growth from outlying cities and towns such as Rio Vista, Brentwood, and Gilroy to jurisdictions that are slated to receive far more jobs than new homes, such as Palo Alto and Cupertino. These shifts in growth should be accompanied by strategies to improve the plan's social equity performance and shifts in transportation funding toward walking, biking, and transit, particularly for low-income communities, to improve the plan's performance toward the Plan Bay Area 2040 mode share target.

2) Create a robust "Implementation Action Plan"
We look forward to working with MTC and ABAG to develop a robust implementation action plan as part of the final Plan Bay Area 2040. This action plan should include bold strategies for advancing housing affordability; open space protection; transit service; and sustainable, equitable development patterns. For example, the action plan should identify the funding and policy gaps for the key topics of open space preservation, affordable housing, transit, and PDA infrastructure and include clear actionable measures to close those gaps. This should be accompanied by explanatory language in the final plan that describes the benefits of open space preservation—highlighting such features as drinking water supply, natural carbon sequestration, habitat, and agricultural preservation—as well as the critical need for strategies that address our housing affordability challenges.

Thank you for your consideration of these comments. We look forward to working with MTC commissioners, ABAG board members, regional agency staff, and other stakeholders to shape the Final Preferred Scenario and prepare a strong final plan.

Sincerely,

Matt Vander Sluis
Program Director
mvandersluis@greenbelt.org

Plan Bay Area
Conservation Analysis

Results Summary
October 2016

www.calthorpeanalytics.com

Analysis completed by
Calthorpe Analytics for:

GREENBELT ALLIANCE

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Plan Bay Area Conservation Analysis

The UrbanFootprint Conservation Module was utilized to measure select conservation impacts of the Plan Bay Area scenarios.

Conservation Module Team and Funders:

Funders

Model Development
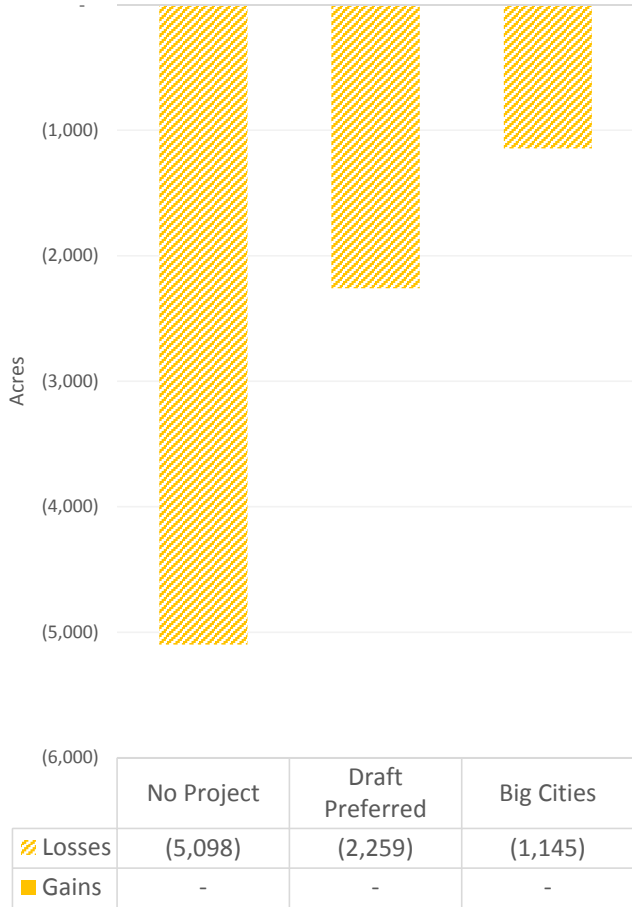
CoreTeam/Technical Advisors
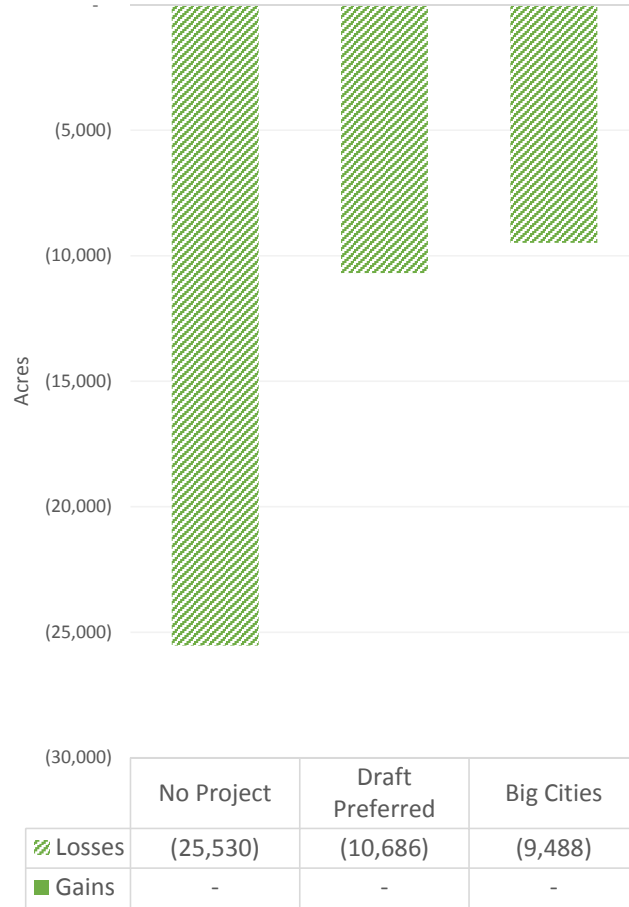
Policy Advisory Committee

The UrbanFootprint Conservation Module was developed as part of an effort by The Nature Conservancy to elevate conservation modeling within city and regional land use planning in California.

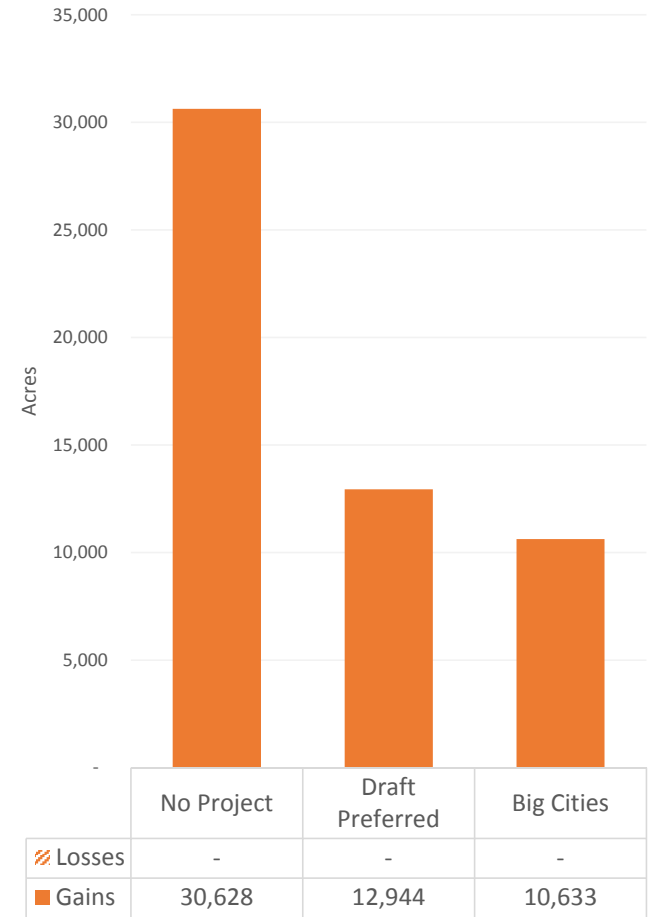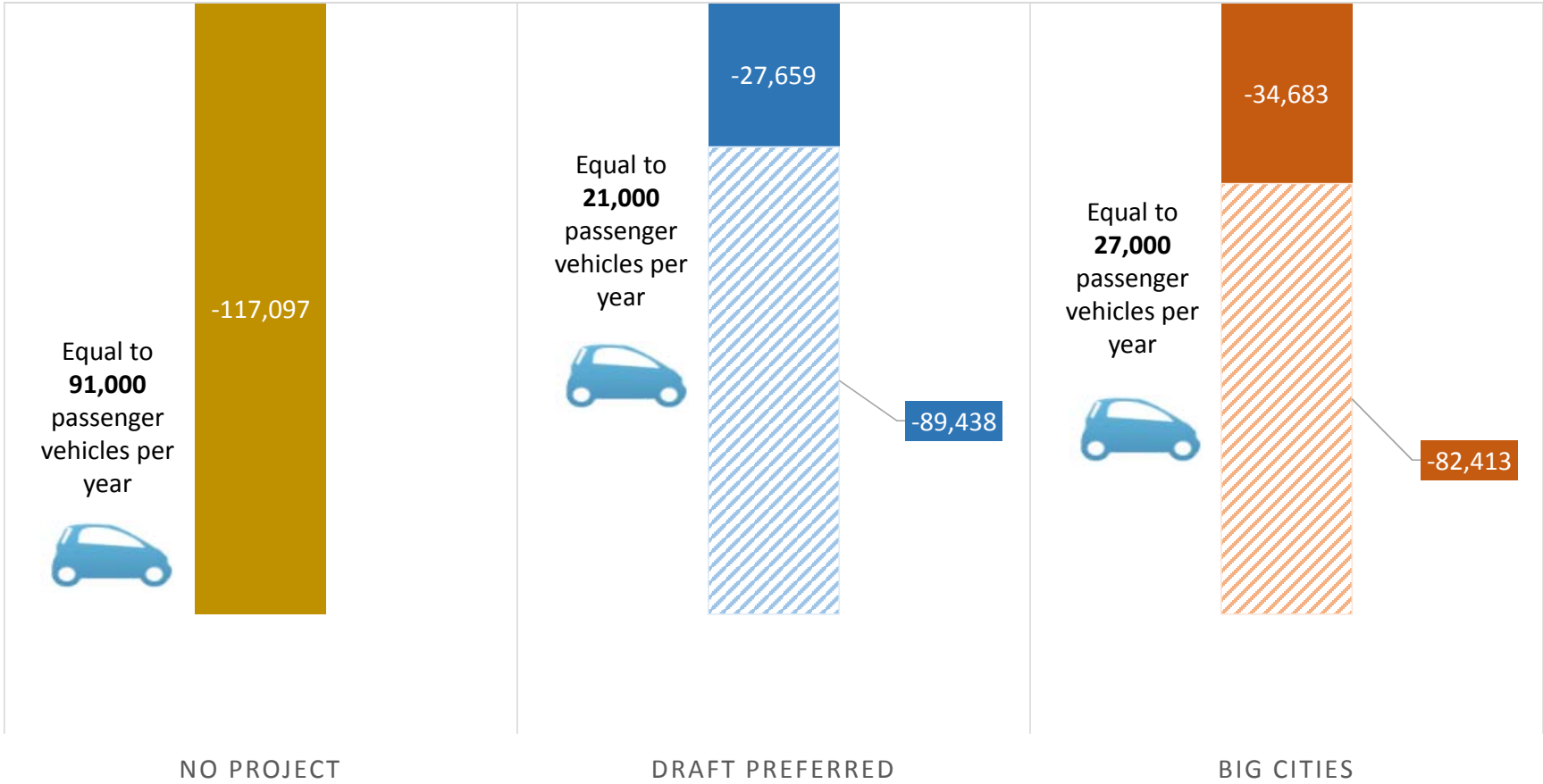# LAND COVER CHANGE (ACRES) 2015-2040

Cultivated Crop Lands

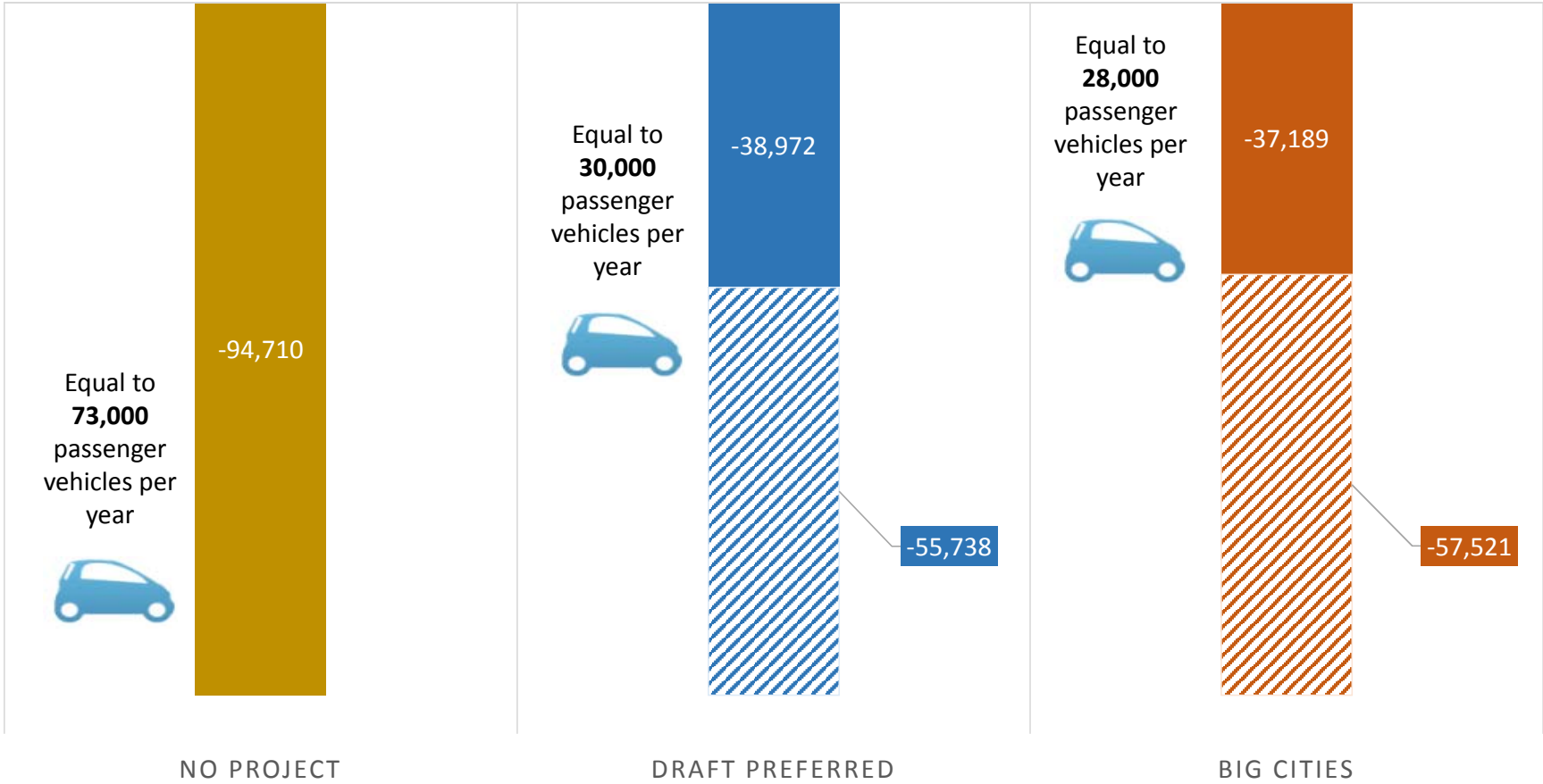|	No Project	Draft Preferred	Big Cities
▨ Losses	(5,098)	(2,259)	(1,145)
■ Gains	-	-	-

Natural Lands

	No Project	Draft Preferred	Big Cities
▨ Losses	(25,530)	(10,686)	(9,488)
■ Gains	-	-	-

Urban Lands

	No Project	Draft Preferred	Big Cities
▨ Losses	-	-	-
■ Gains	30,628	12,944	10,633

Carbon Storage and Sequestration

CHANGE OF ABOVE GROUND CARBON STOCKS
(METRIC TONS OF CARBON EQUIVALENT)

Equal to **91,000** passenger vehicles per year

-117,097

Equal to **21,000** passenger vehicles per year

-27,659

-89,438

Equal to **27,000** passenger vehicles per year

-34,683

-82,413

NO PROJECT

DRAFT PREFERRED

BIG CITIES

CHANGE OF BELOW GROUND CARBON STOCKS
(METRIC TONS OF CARBON EQUIVALENT)

Equal to **73,000** passenger vehicles per year

-94,710

Equal to **30,000** passenger vehicles per year

-38,972

-55,738

Equal to **28,000** passenger vehicles per year

-37,189

-57,521

NO PROJECT

DRAFT PREFERRED

BIG CITIES

CALTHORPE ANALYTICS

The Nature Conservancy

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Groundwater Recharge

Water Supply and Quality Impacts

GROUNDWATER RECHARGE POTENTIAL IMPACTED (AC-FT)

Equal water use for **107,000** households per year

-12,825

NO PROJECT

Equal water use for **41,000** households per year

-4,885

-7,940

DRAFT PREFERRED

Equal water use for **35,000** households per year

-4,164

-8,661

BIG CITIES
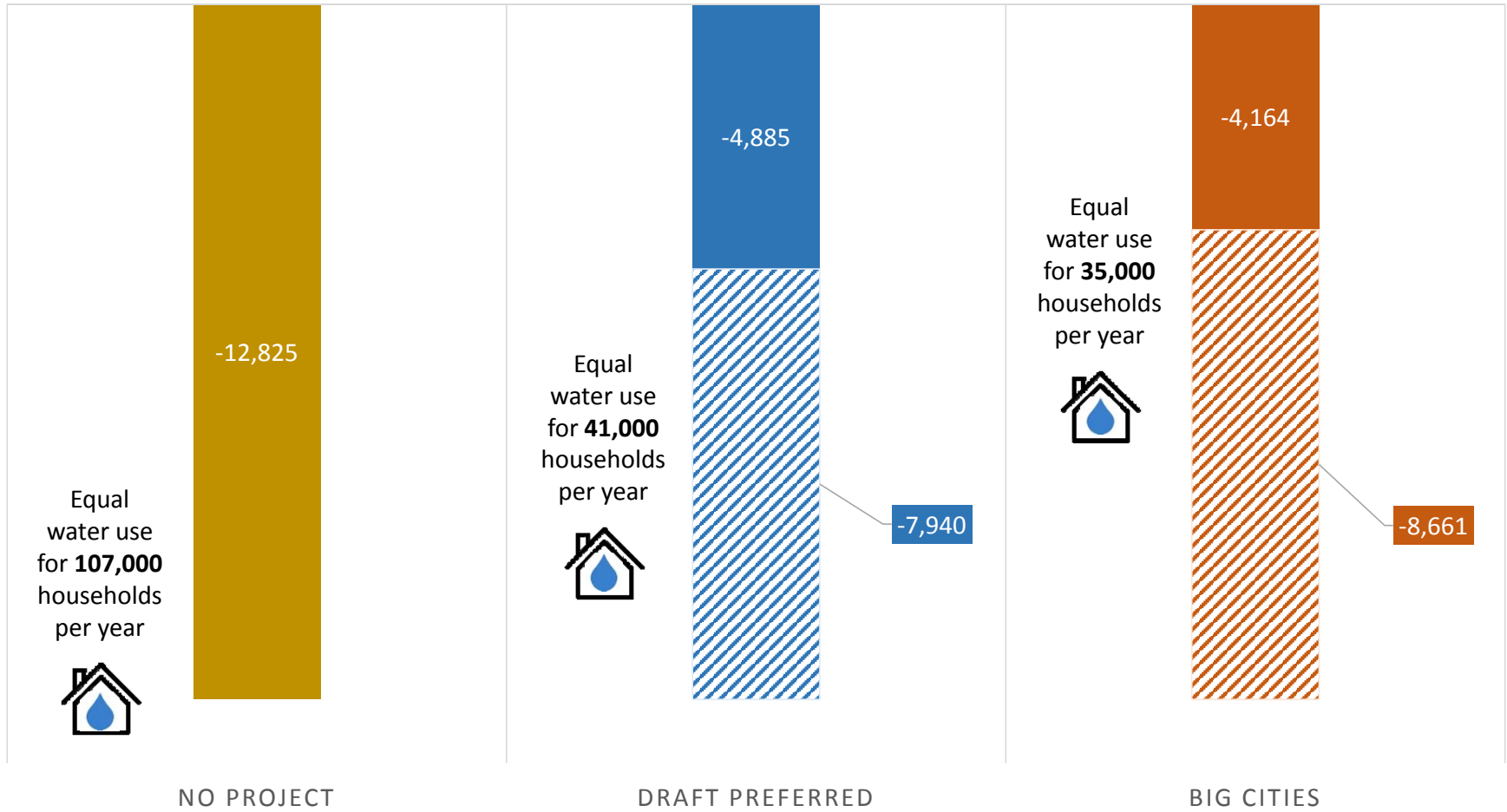
Species Movement Potential
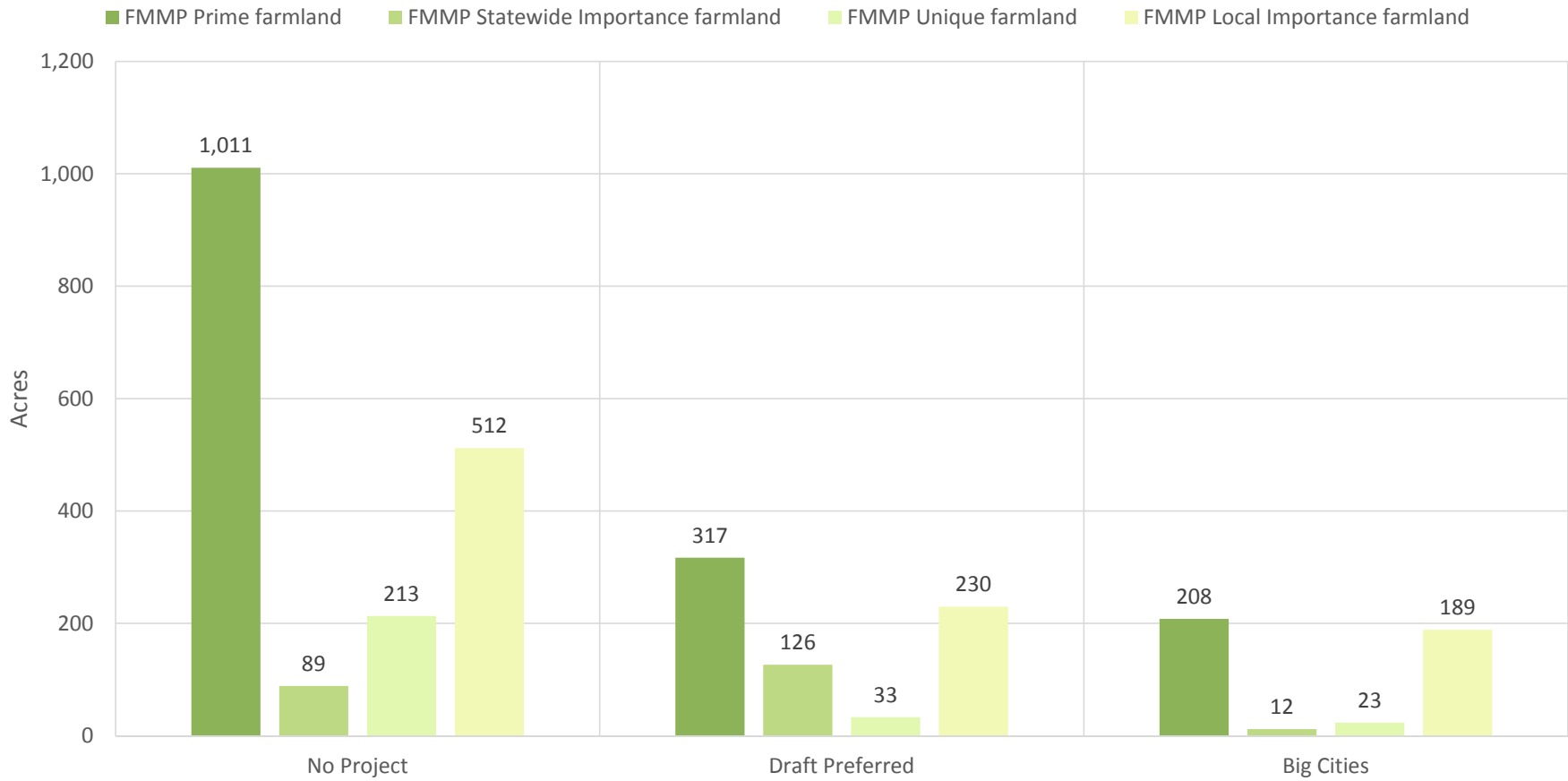
Terrestrial Habitat Conservation
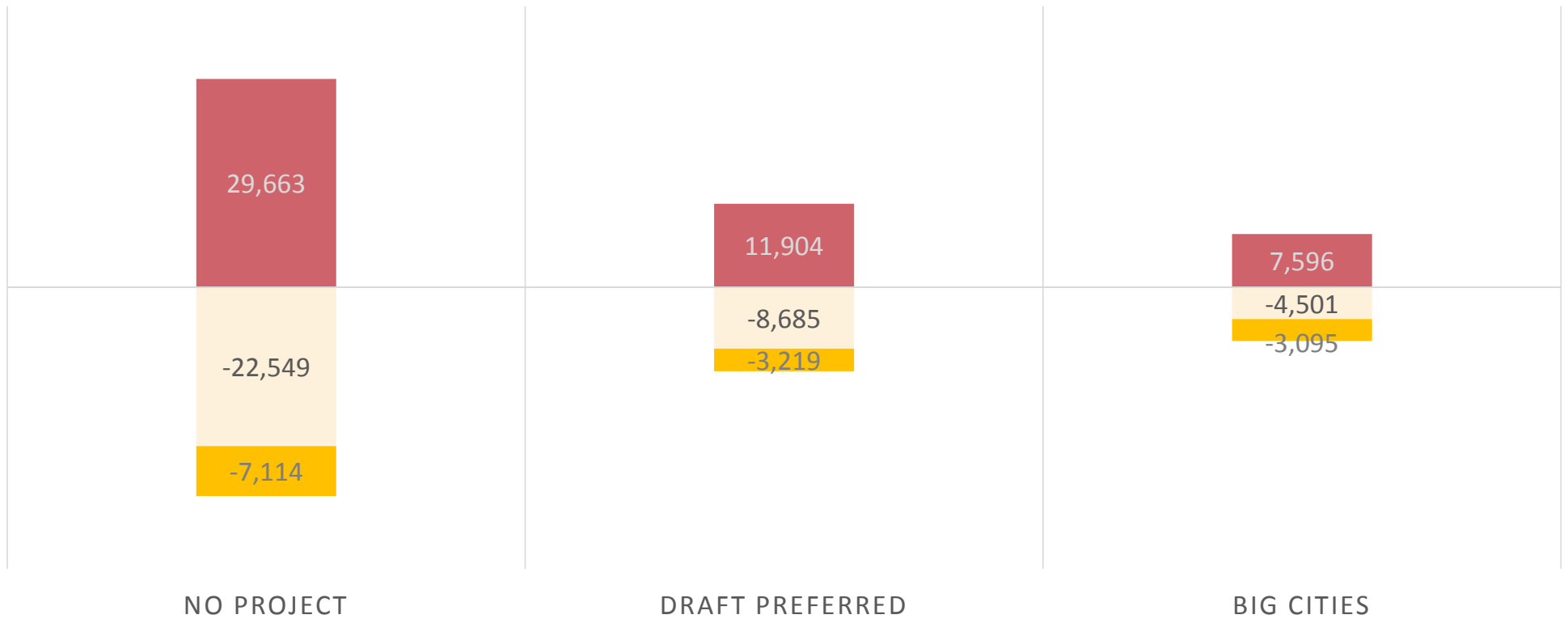
A1 Agricultural Capacity & Production

Agriculture

Acres converted from Agriculture to Urban in FMMP* categories

*Farmland Mapping and Monitoring Program (2014)