



Center for Sustainable
Neighborhoods



<A> Trailhead Labs



October 13, 2016

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

Re: Draft Preferred Scenario for Plan Bay Area 2040

Dear MTC Chair Cortese, ABAG President Pierce, and Commissioners:

Thank you for this opportunity to comment on the draft Preferred Scenario for Plan Bay Area 2040.

The Bay Area is unique in its natural beauty, globally important landscapes and waters, vibrant farm and ranchlands, parks and open spaces. Bay Area residents and employers recognize the value of these natural and working lands and consider them essential contributors to the high quality of life, health, and economic prosperity of the region.

We applaud the steps that ABAG and MTC have taken to better integrate land-use and transportation planning to protect our region’s treasured open spaces and address interconnected regional challenges of climate change, transportation, housing affordability, displacement, and shared economic prosperity to create a more environmentally sustainable, socially equitable, and economically prosperous region.

ABAG and MTC have made notable strides in advancing the protection and stewardship of our natural resources in recent years. Plan Bay Area 2013 affirmed a regional commitment to grow smartly and avoid development on our open spaces. The update to the Priority Conservation Area program and the recent \$16 million contribution to the Priority Conservation Area grant program are exciting actions to support this vision. The ongoing development of a Regional Advanced Mitigation Program also has the potential to significantly improve conservation planning and execution across the Bay Area.

The development of the Preferred Scenario for Plan Bay Area 2040 provides the opportunity to build on these past accomplishments for a more healthy, prosperous, and sustainable future for all Bay Area residents.

We are pleased that the draft Preferred Scenario appears to meet Target 4, which calls for “directing all non-agricultural development within the urban footprint (existing urban development and UGBs¹).” This is a significant and laudable commitment to focus growth and avoid sprawl development.

However, we are concerned that the current draft falls short in several important ways. As you prepare the Final Preferred Scenario for Plan Bay Area 2040, we urge you to incorporate the following recommendations:

1) Redirect growth away from “edge jurisdictions” with natural and agricultural lands

Compared to the original Plan Bay Area, the draft Preferred Scenario allocates far more housing growth to jurisdictions at the outer edges of our region.

Some of the most notable examples of this trend include the following:

- Brentwood's household allocation is nearly six times the amount envisioned in Plan Bay Area with 12,900 new households.
- Rio Vista's household allocation is more than 13 times higher than it was in Plan Bay Area, with 6,700 new households.
- Unincorporated Solano County's household allocation is more than 4.5 times higher than it was in Plan Bay Area with 7,800 new households.
- Gilroy's household allocation is nearly twice what it was in Plan Bay Area with 5,600 new households.

These communities are surrounded by important farms, ranches, and natural lands that provide a wealth of benefits, from storing carbon to protecting our local drinking water supplies to producing fresh fruits and vegetables. Directing such substantial amounts of growth to these areas puts unnecessary pressure on

¹ MTC and ABAG staff have explained that the “urban footprint” for Plan Bay Area 2040 is defined as land within Urban Growth Boundaries and Urban Limit Lines or within city limits where such a boundary does not exist.

our region's natural resources and undermines the plan's environmental, climate, equity, and economic goals. At the same time, there are communities in the core of the region that are well served by transit and jobs that would benefit from the integration of additional homes in infill locations in a compact, walkable pattern to better address the region's significant housing crisis, improve our regional jobs/housing imbalance, and reduce lengthy commutes on our congested roads.

We recommend that the final Preferred Scenario address this significant shortcoming by reallocating growth from outer edge communities to infill areas near transit and jobs and include additional policies and programs to encourage and support this more focused growth pattern. This will help protect important natural and agricultural lands and preserve the many benefits that they provide. It would also offer a host of other co-benefits, including shorter commutes and avoided Vehicle Miles Traveled (VMT); reduced infrastructure costs; increased rates of walking, biking, and transit; and greater access to opportunity for people across the income spectrum.

2) Improve the draft plan's social equity outcomes

We are concerned that the draft Preferred Scenario falls short of many of MTC and ABAG's adopted targets for social equity, particularly in regard to housing affordability and displacement.

The region's housing affordability challenges are creating a tremendous financial and emotional toll on Bay Area families, especially low-income residents. Housing unaffordability is also a problem for the future of our natural and agricultural lands. When people are no longer able to afford to live in communities near jobs and transit, they often move to less-expensive neighborhoods at the edges of the region and beyond. This can create new sprawl pressure in these edge communities, threatening the greenbelt lands that benefit us all and increasing VMT.

The final Preferred Scenario should include stronger measures to achieve our region's interrelated goals regarding open space conservation, environmental health, housing affordability and displacement, equitable transportation, and middle-wage job growth to improve the lives of all Bay Area residents. In particular, it should include new tools and strategies to ensure that people across the income spectrum can afford a place to live within our existing cities and towns.

3) Prepare a regional roadmap to implement the plan's conservation vision

It will take bold regional leadership to protect, steward, and restore the Bay Area's natural and agricultural lands. Fortunately, the Bay Area's residents and businesses have long expressed a commitment to invest in and safeguard these lands and a network of public agencies, non-profit organizations, and community-based groups are well positioned to support this endeavor.

We look forward to working with MTC and ABAG to shape a detailed implementation roadmap for how the regional agencies and their partners can advance the Plan Bay Area 2040 goal of open space and agricultural preservation. This implementation roadmap should be included as part of the final Plan Bay Area 2040 and result in a detailed work plan for regional agency staff to carry out. The roadmap should include commitments to develop specific policies and programs, including the following:

Funding strategies to support the region's open space needs

- Identify the regional funding gap for open space preservation and stewardship. Develop an integrated regional funding strategy, uniting the nine Bay Area counties, to close this gap. In developing this strategy, a variety of tools should be explored, including regional and sub-regional funding measures, Regional Conservation Investment Strategies, Transfer of Development Rights programs, and others.
- Condition regional transportation funds on local protection of open space, building on the One Bay Area Grant (OBAG) framework. For example, condition eligibility for OBAG funds on local adherence to the open space protection target in Plan Bay Area.
- Continue to expand funding for the successful Priority Conservation Area (PCA) grant program and move toward one regional PCA grant program with consistent rules and administration.
- Adopt a Regional Advanced Mitigation Program (RAMP) to coordinate funding for open space protection related to expected impacts from transportation projects. If the model is successfully established for the transportation sector, consider expanding the model for other infrastructure sectors in the future.

Policy support for local conservation action

- Increase policy support to local jurisdictions to advance open space protection and stewardship.
- Examples of needed regional actions include distribution of best practices in local open space protection policies, facilitating a strong conservation role for LAFCOs, enhancing urban greening within Priority Development Areas, and aiding in the development of local environmental justice policies to foster equitable access to parks and open space in keeping with SB 1000 of 2016.

Prioritization of our agricultural economy

- Ensure agricultural lands remain in active production by developing a regional farmland protection plan that identifies opportunities and potential funding, such as agricultural easement programs, for enhancing the economic viability of agriculture and permanently protecting agricultural lands to help secure our region's food supply.
- Include strong mitigation actions for farmland loss anticipated in the Plan Bay Area 2040 growth footprint. Enhance the mitigation ratios that were included in the EIR for Plan Bay Area 2013 to better reflect the value of agriculture lands.
- Integrate funding for regional agriculture programs in the Bay Area's forthcoming Comprehensive Economic Development Strategy (CEDS) and new Regional Economic Development District (REDD).

Support for our region's trails, recreational lands, and green infrastructure

- Support the completion of the Bay Area regional trail network and expand our system of urban trails, parks, and bikeways to serve the Bay Area's diverse population.
- Expand "Transit to Trails" programs to enhance access to open space and reduce vehicle miles traveled and greenhouse gas (GHG) emissions.
- Establish a Regional Bicycle and Pedestrian Metrics Program to aggregate data on walking and biking throughout the region, including segments of the regional trail system.

- Encourage policies and funding for nature-based solutions and green infrastructure in urban areas to incorporate natural systems into the built environment, address challenges such as flood control and water supply protection, and provide environmental, health, and safety benefits to Bay Area residents.

Integration of conservation data into decisionmaking

- Compile and integrate conservation-related datasets across the region. Provide a mechanism to allow public agencies and stakeholders to easily access and incorporate this data at all stages of decisionmaking.
- Establish new regional policies to factor in natural resources, working lands, and parks in infrastructure plans, programs, and project decisions. Include a full assessment of conservation impacts, such as water and energy use, farmland and habitat preservation, and carbon sequestration in future regional planning scenario assessments.
- Measure and report the GHG emissions that will be released from disturbance of the land base in the Plan Bay Area 2040 growth footprint and incorporate that information into the plan’s mitigation measures.
- Develop a robust regional plan for sea level rise and climate adaptation, with an emphasis on strategies that protect and enhance our natural resources as a strategy for resilience.

Conclusion

Since the adoption of Plan Bay Area in 2013, the need to grow smartly and protect our natural and agricultural lands has become increasingly urgent, with an ever-growing body of data on the economic, environmental, health, and social equity benefits of choosing sustainable, equitable development patterns rather than sprawl.

We look forward to working with MTC and ABAG to refine the Draft Preferred Scenario for Plan Bay Area 2040 and ensure that the final plan positions our region for success.

Sincerely,

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