

July 20, 2021

Metropolitan Transportation Commission and  
Association of Bay Area Governments  
Plan Bay Area 2050 Project Team  
*Submitted via email to [info@planbayarea.org](mailto:info@planbayarea.org)*

**Subject: Comments on Draft Plan Bay Area 2050 and Draft Implementation Plan**

Thank you for the opportunity to provide comments on the Draft Plan Bay Area 2050 (PBA 2050) and the associated Draft Implementation Plan. My comments are focused on the Transportation and Environment elements of the PBA 2050 and Implementation Plan.

Background

We recognize that streets, as the largest publicly controlled land in most cities occupy up to 50% of the land in urbanized areas. This is our greatest opportunity for climate change and usable open space in urban areas .

Recent efforts to better accommodate bicycles, pedestrians, and transit as part of Complete Street programs do not go far enough to address the environmental impacts of streets and provide climate resilience. **We must create Green Sustainable Streets**, i.e., multi-benefit roadway projects that support transportation, sustainable water supply/quality, sustainable urban ecology, and sustainable habitat for people and wildlife.<sup>1</sup> Roadway investments should prioritize integration of urban ecology and green infrastructure in streetscapes to better manage stormwater runoff, improve water quality, reduce local flooding, increase tree canopy/shading, establish ecological corridors, and create better public gathering, interaction, and recreational opportunities.

Municipalities throughout the Bay Area will be required in future years to make major investments in green stormwater infrastructure to comply with stormwater quality requirements in the Municipal Regional Stormwater Permit. Transportation funding programs need to recognize the links between climate resilience/adaptation, water quality protection, and other benefits of Green Sustainable Streets with green infrastructure, and allow for funding of those elements.

Implementation Plan Needs a Broader Vision and Emphasis on Green Infrastructure

We believe that the vision of the Implementation Plan, and specifically the definition of green infrastructure, needs to be broadened . We request that MTC/ABAG consider the following additional implementation actions that would help achieve this goal:

- Incentivize cities to update Complete Streets policies to Green Sustainable Streets policies that incorporate climate resilience/adaptation measures, and that prioritize integration of habitat vlaue trees, native plants, and green infrastructure to better manage stormwater runoff,

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<sup>1</sup> The 2020 Green Streets for Sustainable Communities Symposium showed that the public, municipal staff, advocates, and elected officials can create streets that are responsive to all these issues.  
See: <http://transportchoice.org/events/>

improve water quality, increase tree canopy/shading, establish ecological corridors, and to create better public gathering, interaction, and recreational opportunities.

- Prioritize multi-benefit roadway investments that go beyond Complete Streets to include green infrastructure for stormwater management, trees to reduce urban heat islands, streetscape improvements to support gathering and recreation, and inclusion of native plants and focus on roadways as ecological corridors.
- Advocate for prioritizing incorporation of resilience/adaptation and sustainability measures in roadway projects (above and beyond just Complete Streets) in existing state and federal transportation funding programs.
- Advocate for inclusion of funding for Green Sustainable Streets in any climate resilience bond measures – funds specifically for adapting roadways to the negative impacts of climate change, including flooding, heat, drought, and sea level rise.

Thank you again for the opportunity to provide comments.

Sincerely, Gita Dev, 485 Mountain Home Road, Woodside, CA 94062



**It's getting serious-** We need to plant more trees