



July 19th 2021

Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Re: Plan Bay Area - Full Draft

Dear MTC Commissioners and Staff,

The undersigned organizations appreciate the opportunity to participate in the development of the Plan Bay Area 2050 process. As our region plans for the next 30+ years of development, Plan Bay Area ensures that equity, climate adaptation and mitigation, environmental preservation, and resilience are primary drivers for planning decisions being made throughout the Bay Area. We are grateful to MTC staff and leadership for incorporating many of our suggestions from previous letters throughout this process into the full draft plan released in June.

We applaud MTC for the prioritization of high value conservation land for biodiversity and climate benefits. We look forward to working with MTC on the Priority Conservation Area revamp. Additionally, we think the suggestion to increase policy capacity around transferable development credits and tradable conservation credits is a great concept that could be expanded upon.

Plan Bay Area 2050 is an important framework through which our region can establish a strong vision for climate change response, and begin to plan for and advance achievable, meaningful climate actions.

Recommendations for Plan Bay Area 2050

Expand research about inland/riverine flooding and groundwater challenges. We understand Plan Bay Area will not address flooding beyond 2 feet of shoreline sea level rise, but sea level rise is a problem that goes well beyond the shoreline. If MTC will be in fact leading the SLR efforts for the region it needs to move in a direction that encompasses a broader definition of SLR and the first step to doing so would be to commit more research of these topics in PBA2050 to set the stage for PBA2070.

Incorporate drought more comprehensively and support existing drought strategies. As drought conditions continue to worsen, it is important to highlight strategies for addressing drought and water conservation throughout Plan Bay Area. Many of the strategies, like discouraging sprawl and prioritizing green infrastructure and watershed protection/stewardship are already good drought resilience strategies, however we believe that drought should be highlighted throughout the documents. Many of our organizations are already working on this issue and we look forward to working with you on drought issues in the future.

More aggressive CARB Models

With some of the latest climate extremes far exceeding [worst case scenarios](#) in climate models and tipping points more likely to be triggered (or [already triggered](#)), it is time to include more aggressive targets in statewide modeling to guide the most effective planning. 2045 is simply too late.

CARB models should include more aggressive scenarios, including net negative emissions by 2030, as part of the Scoping Plan update. We believe this broader range of scenario planning is crucial for state policy makers to make the most informed decisions as the climate crisis worsens.

50x50 as opposed to 30x30

The Bay Area conservation community, through the Conservation Lands Network, has set a goal of 50% of lands and waters conserved by 2050. The goal of 50% by 2050 is based on the California 4th Climate Assessment, which indicated that by mid-century, weather extremes caused by global climate change will sharply increase. The idea of conserving a significant portion of the earth's surface emerged from the scientific community over the past decade, most notably by leading conservation biologist E. O. Wilson, who proposes that 50% is a good minimum for conserving functional ecosystems. Healthy, functioning ecosystems absorb the effects of climate change and thus safeguard people. Conserving only 30% of land and coastal waters is not enough to ensure a full suite of Bay Area habitats is conserved into the future. The richness, the geography, the rarity, and expert guidance drive a larger goal here.

Take a more comprehensive approach to wildfire resilience. We applaud MTC's focus on addressing sea level rise convening comprehensively as a region. We need to have the same level of attention paid for wildfire. Wildfire prevention needs to happen at a regional scale and coordination of wildfire mitigation should happen through regional wildfire principles.

Expanded public transit and bicycle/pedestrian access to open spaces

Access to parks and open space was a key relief valve for many during this past year of the pandemic. However, for many lower income communities, whose access to automobiles is more limited, transportation to rural open space areas continues to be a challenge. So-called "transit to trails" can help fill this gap by providing meaningful, regular and timely service to these "far-away" places, particularly during weekends. This should include active transportation connections to open space because the bike, pedestrian and trail networks in progress across the Bay Area provide connections to many open spaces. Because traveling to open space areas incurs high vehicle-miles traveled (VMT), transit service has the additional benefit of reducing carbon emissions.

Prioritize skilled and trained labor Publicly funded transportation, housing and environmental projects called for in the plan should use apprentices and skilled and trained journey-level workers for all construction work. Such commitments will create a robust pipeline to high road,

middle class career opportunities via bona-fide apprenticeship programs. Building a skilled and trained workforce within the region will reduce in-commutes from outside the region and improve economic opportunities and equity for communities of color within the region.

Recommendations for Plan Bay Area 2070

As discussed above, it is critical for Plan Bay Area to take a more comprehensive approach to addressing flooding issues like inland, riverine flooding and groundwater rise. Plan Bay Area states that, “it is important to remember the lifespan of assets within the plan. If an asset is anticipated to last until 2100, for instance, it may need to be built for 6.9 feet of permanent inundation (under the medium-high risk aversion scenario) or be designed to be adapted to that level of rise. The rate of sea level rise becomes more and more uncertain the further into the future it is explored.” If Plan Bay area is planning for 2050, but the infrastructure that is being built could have a 100+ year life and by 2100 we are looking at upwards of 6 feet of SLR, we need to plan for higher levels now. It is understood that this will not happen in the current iteration of Plan Bay Area but it is imperative to plan for anyways and must be included in Plan Bay Area 2070.

As a coalition, we look forward to working with you during the partnership phase of the implementation part of Plan Bay Area, and beyond to make our region safer, healthier and more resilient.

Regards,

Amanda Brown-Stevens
Executive Director
Greenbelt Alliance

Katherine Boxer
Chief Executive Officer
Alameda County Resource Conservation District

David Lewis
Executive Director
Save The Bay

Laura Cohen
Director
Rails to Trails

Jerry Kent
Board Member
Claremont Canyon Conservancy

Ellie Cohen
CEO
The Climate Center

Brian Schmidt
Legislative Advocacy Director
Committee for Green Foothills

Tim Frank
Executive Director
Center for Sustainable Neighborhoods