



July 20, 2021

Metropolitan Transportation Commission Public Information  
Attn: Draft Plan / Draft EIR Comments  
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**Subject: Plan Bay Area 2050, and the Draft EIR for Plan Bay Area 2050**

Dear MTC Commissioners and Staff,

On behalf of the Santa Clara Valley Open Space Authority (Open Space Authority), I submit the following comments to both the full Draft Plan Bay Area 2050 and the Draft EIR.

The Open Space Authority is a public, independent special district created by the California State Legislature in 1993 to conserve the natural environment, support agriculture, and connect people to nature by protecting open spaces, natural areas, and working farms and ranches for future generations.

First, let me express our gratitude to MTC staff and leadership for their work to prepare this 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.

We applaud MTC for incorporating visionary strategies into the Environment Chapter that prioritize investment in protection and management of high value conservation lands, inclusive public access at parks and open spaces, managed retreat and nature-based solutions that help communities adapt to climate change, such as marshland restoration and ecotone levees. We also are grateful for the emphasis in this Chapter on smart growth strategies that reduce reliance on automobile commuting through programs that encourage alternative transportation and transit, which will result not only in reduced vehicle emissions, but also reduced pressure on conversion of greenfields that results from automobile-enabled sprawl.

We look forward to working with MTC on updates to the Priority Conservation Area program, as it has been a very effective tool in the land conservation toolbox. Additionally, we support the suggestion to increase policy capacity around transferable development credits and tradable conservation credits, as an important additional conservation tool.

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## Recommendations for Plan Bay Area 2050

**Expand research and implementation related to Sea Level Rise, to address climate issues at a more comprehensive watershed-based level.** While Plan Bay Area includes important measures to address Sea Level Rise, the issues of flooding go well beyond the shoreline. A comprehensive approach that contemplates upstream flooding during storm events which often exacerbate storm surge from the shoreline, needs to be developed. Nature-based upstream solutions, like natural floodplain and hillside protection, can contribute significant hazard reduction benefits, while providing many other environmental co-benefits such as wildlife habitat, agricultural preservation, and groundwater recharge.

**Incorporate drought more comprehensively and support existing drought strategies.** As drought conditions continue to worsen, it is important to highlight strategies for addressing drought – including 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.

**Take a more comprehensive approach to wildfire resilience.** As with the regional focus on addressing Sea Level Rise, a coordinated regional approach to enhancing wildfire resilience, through development and implementation of regional wildfire principles and actions, is critical.

**Expanded public transit to open spaces.** Access to nature via parks and open space was an important resource for mental, physical, and emotional health during the pandemic. However the pandemic highlighted the ongoing issue of insufficient access to private transportation for many lower income communities, which makes it difficult to impossible to benefit from urban edge open space areas. So-called “transit to trails” programs can help fill this gap by providing meaningful, regular and timely service to these locations, particularly during weekends. This should include active transportation “last mile” connections to open space. Because traveling to open space areas incurs high vehicle-miles traveled (VMT), transit service has the additional benefit of reducing carbon emissions.

**Prioritize local labor from underserved communities.** Publicly funded transportation, housing and environmental projects called for in the plan should use local labor from disadvantaged communities to the greatest extent possible. Engaging with and collaborating with organizations that have workforce development programs – for example *San Jose Works* in the South Bay - for underserved or opportunity youth can provide new opportunities to address economic inequities. These programs also provide solid educational and career paths to strengthen the next generation of regional leaders, critical to a strong Bay Area and in support of the goals of Plan Bay Area. 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.

### Support for Draft EIR Alternative 1

As mentioned above, the Open Space Authority supports Plan Bay Area 2050 strategies and objectives that promote compact urban communities using smart growth approaches to focus job and housing development in already-urbanized areas around transit. This sort of smart growth approach aligns well with the Authority’s mission to conserve the natural environment,

support agriculture, and connect people to nature. It is also consistent with statewide planning efforts, including Executive Order N-82-20, which aims to conserve at least 30% of California's natural spaces by 2030.

**The Open Space Authority strongly supports *Alternative 1 - Transit Rich Area (TRA) Focus Alternative*** – the environmentally superior alternative identified in the DEIR – as the preferred Plan Bay Area 2050 growth strategy to protect our natural and working lands.

Alternative 1 would create a more urban-oriented growth pattern relative to the current Plan Bay Area 2050, which would reduce development pressure on undeveloped greenfields, the wildland-urban interface, land zoned for agriculture, and Essential Connectivity Areas. In addition, Alternative 1 would minimize mobile source greenhouse gases (GHG) and vehicle miles travelled, which will support the reduction of GHG emissions that contribute to climate change.

Alternative 1 also drives Plan Bay Area in the direction of reducing, and ultimately eliminating sprawl, which is the direction we all need to head, given the severity of our climate crisis, and its impacts on natural and human communities, especially those communities with the greatest vulnerabilities. We feel Plan Bay Area, even under Alternative 1 of the DEIR, could go even further in discouraging sprawl and all of the damaging impacts that sprawl has on communities and the environment, but this alternative is at least a step in the right direction.

The Open Space Authority appreciates the opportunity to comment on this important framework for the Bay Area, and stands ready to partner with the Metropolitan Transportation Commission to further develop and implement the strategies our region most needs.

Sincerely,

A handwritten signature in blue ink that reads "Andrea Mackenzie". The signature is fluid and cursive, with a long horizontal stroke at the end.

Andrea Mackenzie  
General Manager

Cc:

Santa Clara Valley Open Space Authority Board of Directors