

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

Re: Improving equity and adaptation outcomes in Plan Bay Area 2050 Draft Blueprint

Dear MTC Commissioners and Staff,

We appreciate the opportunity to provide recommendations on the Plan Bay Area Draft Blueprint. As our region plans for the next 30+ years of development, the Blueprint should ensure that equity, climate adaptation, environmental preservation, and resilience are primary drivers for planning decisions. The COVID-19 and climate crises underscore the urgency of preventing foreseeable harm to our communities and preparing them to recover quickly from disasters that hurt those most vulnerable to climate, economic and public health impacts.

Save The Bay, TOGETHER Bay Area, Greenbelt Alliance, and our partners are working together to provide the support and technical assistance needed to make the environmental section of the Draft Blueprint more robust and responsive to today's challenges. To ensure an inclusive process and provide the highest quality recommendations that can enjoy broad support we **formally request an extension of the comment deadline from August 10, to August 24.**

With encouragement from MTC staff, we are gathering stakeholder input on the Draft Blueprint and convening our members and partners next week to ensure robust, inclusive engagement across conservation, stewardship, and environmental stakeholders in the SF Bay Area region. In advance of submitting those more detailed and complete comments, we offer these high level goals for the Blueprint:

Improve equity outcomes. The Draft Blueprint must center equity in the development of environmental policies by prioritizing the needs of Communities of Concern, responding meaningfully to their leadership in designing solutions, and leveraging resources to ensure equity-focused outcomes are tied to each strategy. Compact infill and affordable housing in urban centers will help to ensure that all Bay Area residents have access to housing near job centers and transit hubs - not just the wealthy. Ensuring access to nature and implementing green infrastructure in urban areas will support public health and encourage active transportation, leading to better climate mitigation outcomes. Coupling homeowner and renter protections with access to nature and urban greening will help to prevent these amenities from exacerbating gentrification and displacement.

Emphasize adaptation and resilience through robust natural solutions to climate threats, both on the shoreline and inland. Sea level rise mitigation strategies must address subsidence and riverine flooding in addition to shoreline protection. Focusing Plan Bay Area 2050's efforts only on sea level rise leaves infrastructure, business centers, neighborhoods, and Communities

of Concern away from the Bay shoreline susceptible to serious climate risks, including precipitation-based flooding, extreme heat, and wildfire. As a result of historic redlining practices, many low-lying, vulnerable communities are susceptible to flooding from upstream and sea level rise impacts. The Blueprint should encourage urban green infrastructure - such as bioretention, rain gardens, parks, and urban canopy - to reduce local flood risks and fluvial flooding downstream. Urban greening projects that encourage active transportation over single-occupancy vehicles should be part of a comprehensive GhG emissions reduction strategy.

Potential language:

1. Require the implementation of green infrastructure in new construction, redevelopment, and in public right-of-ways.
2. Protect communities and infrastructure affected by sea level rise and storm-based flooding, prioritizing Communities of Concern and nature-based solutions.
3. Prioritize upland flood risk reduction strategies through natural means, including the protection of riparian zones and upland watersheds that absorb water, slow flows, and benefit wildlife habitat and biodiversity.

Prioritize wildfire prevention and recovery. Because 4 million people live within the Wildland-Urban Interface (WUI) here in the San Francisco Bay Area, the threat of wildfire will directly impact more than half of our region's population. The Blueprint should emphasize wildfire prevention and recovery preparation that also creates desperately needed jobs..

Potential language:

1. Explicitly name fire reduction strategies. Reduce wildfire risk in the WUI by strengthening land use policies, wildfire scenario planning, building codes, fuel management, and fire protection plans for development in fire-risk areas. Encourage forest health actions that contribute to wildfire resilience and enhance our region's biodiversity, natural resources and water supply.

Utilize high value conservation lands for both adaptation and mitigation strategies. A focus on high value conservation lands, which includes agricultural and working lands, will create opportunities for reducing GHG emissions through conservation and restoration. Expand the vision of 2 million acres of preserved open space to 3 million acres and encourage funding and policies to implement that vision.

Potential language:

1. Implement an equitable VMT credit program that focuses on directing money to conservation projects in our region, where they can have the most impact as dictated by datasets. A VMT credit program will directly benefit the transportation sector and provide robust mitigation for both habitat restoration and ghg reduction.
2. Adopt plans and support projects for forest management activities to restore Bay Area forest lands to a fire resilient condition that will mitigate wildfire size and severity.
3. Adopt plans and support projects for watershed health and flood control to create resilient water supplies, reduce flooding risk, and enhance local fish populations.

4. Adopt plans to enable a regional Transfer of Development Rights (TDR) program to convey density credits from the WUI to urban infill opportunities.

Increase accountability and fidelity to implementation targets. The success of the RHNA process and Plan Bay Area will be dependent on MTC’s willingness to hold local jurisdictions accountable for meeting their housing and adaptation obligations.

Maintain and enhance Urban Growth Boundaries to preserve and protect high value conservation lands and focus new developments in infill areas. Utilize Urban Growth Boundaries as fire reduction strategies through defensible space.

The Blueprint should promote climate change mitigation and adaptation with environmental justice and public safety. It must advance equitable outcomes for residents, prioritizing the needs of disadvantaged and historically marginalized communities.

We appreciate your consideration of our request for a brief comment period extension to provide greater detail on these recommendations. We look forward to working with MTC staff and leadership to support this important effort.

Regards,

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