

August 14, 2020

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

Re: Improving equity, mitigation 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 and mitigation, 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.

A coalition of environmental stakeholders 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.

We are concerned that the Draft Blueprint achieves less than half of the state-mandated reduction in carbon emissions of 19% from 2005 levels, achieving a reduction of only 9%. **The Draft Blueprint needs to not just meet the state-mandated goals, but go above and beyond in order to play our role in preventing catastrophic climate change.** If we fail to lead, the region will need to rely on a much greater investment in equitable climate resilience solutions, most of which will be natural. While we support the transportation strategies designed to reduce greenhouse gas emissions, we need to take bold actions to reduce our greenhouse gas emissions and think beyond the constraints of SB375. We need to take action to achieve net-negative emissions by 2030, as 2050 will be too late based on the latest science. The DNC Climate Committee has set the following national climate targets: near-zero emissions by 2040; 100% clean renewable energy by 2030 in electricity generation, buildings, and transportation; and 100% zero-carbon new buildings by 2025.

Accelerated national targets are also articulated in the recently released plans from the House Select Committee on the Climate Crisis and presumptive Democratic presidential nominee, Joe Biden. To get anywhere close to these updated national goals, California must accelerate its efforts. The proposed [Climate-Safe](#) CA 2030 targets are: 80% below 1990 GHG levels; Net-negative emissions (sequestration greater than emissions, CA becomes net carbon sink); and resilient communities for all. For specific recommendations on how to take bold action to reduce greenhouse gas emissions, please refer to our detailed recommendations in Attachment A. Additionally, we recommend reviewing Los Angeles' [2028 transportation plan](#) which goes beyond current state mandates, and Santa Monica's [2030 plan](#) here which has a big focus on climate-friendly water management and landscaping.

Establish a climate goal and vision for Bay Area conservation lands, which could complement state efforts to reach carbon neutrality and serve as a model for other regions. The Bay Area has a strong conservation ethic and as a consequence there have been multiple climate benefits associated with existing and potential conservation lands and actions but have not been fully quantified. As part of the next Plan Bay Area update, MTC/ABAG can use existing tools to estimate the greenhouse gas emissions reduction benefits of natural and working lands and urban greening projects. This will allow the region to leverage state policies and funding to invest in the Bay Area and support state efforts to reach climate neutrality and to inform strategies and actions to meet the goals of Plan Bay Area.

Improve equity outcomes. The Draft Blueprint must center equity in the development of environmental policies by prioritizing the needs of Communities of Concern and other climate-vulnerable communities, 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, transit hubs and amenities. 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.

We strongly encourage a shift away from engineered solutions in all of the Environmental Strategies. We instead urge the prioritization of nature-based adaptation and resilience solutions wherever feasible; forest health actions and active ecological management of fuels in the wildland-urban interface; and use of green infrastructure solutions to a range of climate threats. Natural infrastructure projects provide more durable solutions, reduce the risk of wildland fires and flooding, provide clean drinking water, fresh food and improve air quality, while promoting climate change resilience and supporting the ecological systems upon which we all depend.

We recognize that improving access to parks and open space, restored habitat, and urban greening projects can contribute to gentrification and displacement unless these projects are implemented alongside strategies to keep people in their homes. We support implementation of the CASA Compact's core recommendations to increase

housing production, preserve existing affordable housing, and protect vulnerable households from displacement.

Revamp and expand the PCA program. There needs to be a deep re-assessment of and reinvestment in the PCA program that includes a robust re-calculation of costs for protection of and investments in natural and working lands, including trails and incentives for adoption of climate friendly farming practices. With revised guidelines, the PCA program could be a source of funding and support for resilience and nature-based solutions. The PCA program needs to be expanded to include multi-benefit projects related to climate hazards.

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, salt-water infiltration, 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.

Prioritize wildfire prevention and resilience. 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 through fuels reduction coupled with ecologically sensitive vegetation management and prescribed fire, in order to prevent the spread of flammable invasive plant species. Fire resilience can be achieved through the creation of effective defensible space around structures and home hardening. This will have the additional benefit of the creation of desperately needed jobs. Communities should also be incentivized to plan for additional growth away from the WUI to allow for effective vegetation management activities, including the use of prescribed burning practices. Given that wildfires and their embers do not distinguish between municipal boundaries, effective regional planning and coordination is imperative.

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. The Regional Advance Mitigation Program initiative is a good way to leverage the existing science and adopted conservation plans in the region to also support transportation goals. This may be an opportunity to establish a state-enabled, regional Transfer of Development Rights (TDR) program to both protect open space from development and enhance urban infill opportunities. To support these strategies and improve efficacy, we recommend a review and update of the One Bay Area Grant (OBAG) program for additional funding.

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. Additionally, the analysis behind the projected cost for the Environmental Strategies is unclear. We request clarification from MTC on the cost estimates to fully understand the proposed scope of these strategies and the extent to which MTC has committed to securing the necessary funding for implementation.

Expand Building Retrofits There is a great deal of change occurring in the building retrofits sector and we implore Plan Bay Area to capture this moment to take advantage of both climate mitigation strategies in addition to adaptation strategies such as decarbonizing buildings and 100% clean energy.

Expand the Climate Initiatives Programs to include active transportation, conservation, and resilience. Presently the climate initiatives are more focused on transportation and there is not a lot of emphasis on active transportation or the value of open space. The COVID-19 crisis inspired open and healthy streets movement is showing new opportunities to promote truly complete streets and push for more transformative changes in walking and biking. There needs to be funding incentives for trails (and protected bike lanes and healthy streets), including regional trails including the SF Bay Trail and Bay Area Ridge Trail, and other investments that support sustainable mobility and getting more people out of gas-powered cars. In addition, the region should explore implementing a VMT credit/fee program to incentivize VMT reductions in the region and use the revenues to invest in projects (including conservation projects) that reduce GHG emissions.

Maintain and enhance Urban Growth Boundaries to preserve and protect high value conservation lands and focus new developments in infill areas near transit. Utilize Urban Growth Boundaries as fire reduction strategies through defensible space. Encourage infill development where existing infrastructure exists and discourage development in WUI for fire safety. There needs to be a more robust investment in achieving this, given the multiple benefits provided from UGBs.

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.

Thank you for this opportunity to comment. For any questions or for more detail, please contact Zoe Siegel, the Director of Special Projects at Greenbelt Alliance (zsiegel@greenbelt.org).

Regards,

Save the Bay, TOGETHER Bay Area, Greenbelt Alliance, The Climate Center, Claremont Canyon Conservancy, The Nature Conservancy, Bay Area Ridge Trail, Save Mt Diablo, Sustainable Agriculture Education (SAGE), Santa Clara Valley Open Space Authority

Attachment A - Environmental Strategies language suggestions and supporting notes

Below are suggestions for editing the current language in the Environmental Strategies of the Draft Blueprint. Under each strategy, we include specific language recommendations and associated notes and details that can be used to further flesh out the strategies. We encourage the inclusion of as much depth and detail as possible to ensure that the Blueprint provides clear guidance for the implementation planning phase of Plan Bay Area 2050.

Improve Equity Outcomes

Detailed Comments:

- Specify which definition is used for vulnerable communities and communities of concern.
- Consider using the Under-Resourced Community definition (PRC 71130(g)) to determine eligibility for struggling communities, *and* use the Cal OES's definition and analysis methodology of "vulnerable population/community" used in their State Hazard Mitigation Plan.
- The Blueprint should address vulnerable populations in contrast to vulnerable geographies (communities). With growing economic segregation in the Bay Area, many low-income communities of color have been forced into the least desirable areas in the region. By implementing tenant protections articulated in the CASA compact, along with anti-gentrification and displacement mechanisms into implementation strategies of the Blueprint, the region can support the inclusion of Under-Resourced Communities in high-opportunity areas thereby addressing environmental justice issues, provide access to greater job and economic opportunities, and reduce VMT.
- Investments in urban greening and other adaptation strategies must be led by the communities those proposed investments would serve, such as through a community-led design process.
- In addition to the above, many recommendations below are designed to improve equity outcomes associated with specific Blueprint Strategies.

Adapt to Sea Level Rise

Suggested language:

Adapt to sea level rise and shoreline flooding. Protect the ecological health of the Bay, our communities, and critical infrastructure throughout the region using nature-based shoreline adaptation. Communities of Concern and other vulnerable populations should be prioritized for improving resilience to flooding. Prohibit Priority Development Areas within projected flood zones unless these locations are protected by tidal marsh, horizontal levees, or other adaptation strategies. Further reduce shoreline flood risk and riverine flooding resulting from upland stormwater flows by protecting riparian zones and upland watersheds.

Notes:

- The California Ocean Protection Council's [*Strategic Plan to Protect California's Coast and Ocean 2020–2025*](#) includes a target to “ensure California’s coast is resilient to at least 3.5 feet of sea-level rise by 2050.”
- We encourage an equitable approach to the language in this section that avoids calling out specific locations where adaptation might occur. In addition to critical transportation infrastructure like Highway 37, other areas/infrastructure of great concern to the environmental community include Priority Development Areas proposed within flood zones; wastewater treatment facilities in the flood zone; and communities with areas that already flood on an annual basis (many of which are Communities of Concern) and are expected to see increased flooding in the near future.

Revamp the PCA Program

Detailed Comments:

- Revise PCA criteria to effectively address SLR, WUI/wildfire issues, and other climate change-related hazard risks through acquisitions, restoration, and other land management choices.
- Reassess the PCA (and PDA) program, update guidelines and increase funding for PCAs.
- Conduct a deep re-assessment of the PCA program; including a robust re-calculation of costs for protection of and investments in natural and working lands (e.g. in trails, adoption of climate-smart ag, invest in ongoing stewardship of protected lands, etc.)
- Develop a stronger relationship with the State Coastal Conservancy to co-manage projects such as resilience.
- Redesign the PCA Program to provide funding for regional-scale collaboration on project design, planning, and implementation to promote climate resilience and the use of nature-based solutions to address hazards and land use challenges.
- Lands designated in the PCA Program are not to be included within the Urban Growth Boundaries. Develop a map in PBA identifying hazards and overlays with PCAs.

Expand Building Retrofits

Detailed Comments:

- Consider phasing out fossil gas as increased methane in the atmosphere from fracking is likely one of key causes of accelerated global warming.
- Address building decarbonization which is not adequately addressed in state building standards. There is a momentum towards moving to total building decarbonization with the goal of 100percent clean energy.

Maintain and Enhance Urban Growth Boundaries

Suggested Language:

Maintain and enhance urban growth boundaries to preserve and protect high value conservation lands and production lands, avoid. Focus new development where existing infrastructure exists. Using urban growth boundaries and other existing environmental protections, confine new development within areas of existing development or areas otherwise suitable for growth, as established by local jurisdictions. **Use Urban Growth Boundaries as a strategy to reduce emissions,**

increase fire resilience, and protect multi-benefit lands when local control reigns. This strategy is consistent with the approach taken in Plan Bay Area, Plan Bay Area 2040, and Horizon. These measures include urban growth boundaries, urban service areas, environmental corridors, slope & density restrictions, stream conservation areas, and riparian buffers.

Notes:

- Create funding incentives to de-densify the WUI as a method of sprawl prevention for ghg reduction and fire resilience. E.g. no OBAG funds for a municipality that does not have a UGB.
- Encourage PCAS as wildfire buffers in the WUI.
- Adopt plans to enable a regional Transfer of Development Rights (TDR) program to convey density credits from the Wildland-Urban Interface (WUI) to urban infill opportunities.
- Incentivize regional planning across local/county jurisdictions to support co-development of wildfire resilience plans, forest health actions, and ecological, multi-benefit fuels management. A coordinated, regional effort with this focus could be leveraged through partnership with relevant state agencies and local jurisdictions.

Utilize High Value Conservation Lands

Suggested language:

Provide strategic matching funds **and establish implementation approaches** to help conserve **and steward** high-priority natural and agricultural lands, including but not limited to Priority Conservation Areas. Conserving the region's biodiversity and agricultural abundance requires additional prioritization and investment for natural and working land acquisition, protection, and management. **In addition, natural solutions to a variety of equity concerns, climate risks, and land management challenges faced in our region, such as green infrastructure projects, public access, land preservation, and active land management, can provide multiple benefits for the environment and communities.** This strategy would support regional goals for agriculture, open space **and public lands**, bayland and trails, **and an expanded criteria of High Value Conservation Lands to include urban forests and urban-wildland habitat linkages**, which include a vision of 2.5 million acres of preserved open space, 100,000 acres of restored marsh, **active ecological management of the Wildland Urban Interface (WUI) to reduce wildfire risk**, 2,700 miles of trails, and a thriving agricultural economy. **Innovative fund sources and leveraged partnerships with relevant state agencies can help realize additional revenues to support this Strategy.** Because this strategy requires New Revenues, it can only be included in Blueprint Plus.

Notes:

- Utilize working lands as a method for carbon sequestration, given their capacity to capture carbon from the air through soils management, vegetation and habitat management, and climate-smart habitat restoration. Such actions provide many benefits including improving climate resilience, food security, preserving biodiversity, and promoting job creation. Note, this is distinct from carbon capture and storage technologies that allow and promote continued fossil fuel production, which we strongly oppose.

- Support the Regional Advance Mitigation Planning initiative at MTC and the State Coastal Conservancy to coordinate and leverage regional conservation and transportation planning to deliver benefits to both sectors.
- Increase carbon sequestration beyond the Urban Growth Boundary (UGB) and Urban Forests through compost application-based carbon farming activities and tree planting.
- Referenced in further detail below (Climate Initiatives Program), use funding from an equitably implemented VMT credit program to direct money to conservation projects in our region, especially where such projects can have the greatest multi-benefit impact as dictated by the best available science and existing datasets.
- Include support for plans and projects that will restore Bay Area forest lands to a fire resilient condition, such as forest health actions, ecological fuels management, and prescribed fire, which will reduce wildfire size and severity. This strategy should support, for example, the Five Key ABAG Strategies for Reducing WUI Wildfire Vulnerability.
- Include support for plans and projects that will promote watershed health and flood control in order to create resilient water supplies, reduce flooding risk, and enhance local fish populations.
- Adopt plans to enable a regional Transfer of Development Rights (TDR) program to convey density credits from the Wildland Urban Interface (WUI) to urban infill opportunities.
- In addition to a full review and overhaul of the PCA Program as described above, establish criteria within the PCA program to identify high value conservation lands which if acquired and/or restored would provide multiple benefits, hazard risk reduction, and climate resilience. Discourage development of such lands by including them within UGBs.
- Given the scarcity of funding for stewardship, restoration, and ongoing maintenance of High Value Conservation Lands, develop and/or revise funding for High Value Conservation Lands so that there is parity with PDAs, for example through mechanisms of regional advanced mitigation. Consider support for a pilot Regional Conservation Investment Strategy (RCIS) for the Bay Area.
- Integrate focus on critical habitat linkages into PCA Program and RAMP to reflect conservation multiplier value.
- Implement a Regional Advance Mitigation Program.
- Develop a stronger relationship with the State Coastal Conservancy to co-manage projects such as resilience.
- Prepare a Regional Trails Plan in coordination with the Active Transportation Plan MTC is initiating later this year.
- Incentivize carbon sequestration actions not related to SB375 requirements.

Expand the Climate Initiatives Program

Detailed comments:

- Create a VMT fee/crediting program to discourage projects in greenfields that increase VMT; shift VMT to infill PDAs with revenues (through fees or mitigation) applied to conservation acquisition and restoration. Investments/projects would need to be close to the 'impact' to ensure the right investments. 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.

- Reference the [integrated planning scenario](#) that the Nature Conservancy did in Merced County created to investigate conservation as a driver for VMT reduction. The results were that the integrated planning scenario (conservation as a driver) had the lowest VMT.
- Adopt plans to increase access to broadband internet to enable greater telecommuting. - The assumption here with telecommuting is that it will reduce VMT
- Adopt plans to enable more "transit to trails" to encourage people to access open space without having to use a car.
- Adopt plans to encourage "safe routes to open space" when using non-automotive means to access preserves.
- Subsidize EV infrastructure in open space parking lots to reduce VMT impact and further encourage people to embrace EV adoption
- Support funding for urban greening projects for resilience, complete streets, community health, biodiversity and GHG emissions reductions
- Encourage transfer of VMT to infill locations to reduce GHG, address climate impacts and increase community benefits of protecting natural infrastructure (floodplains, wildland-urban interface, groundwater recharge areas, etc.)
- Increase investment in the electrification of the freight fleet and associated infrastructure; building off the Mega-Region Goods Movement Study (2019)

Additional solutions to meet emissions goals

Detailed comments:

- Incentivize habitat restoration as a climate smart strategy
- Parking policy reform: Create incentives for affordable housing development by reducing parking requirements for affordable units.
- Pair reduced parking requirements with other transportation demand management strategies, including unbundled parking, transit passes, bike commute reimbursement programs, and carshare memberships.
- Utilize multibenefit green infrastructure to help quantify the mode shift.
- Fund urban greening to reduce GHG emissions and prioritize investments in disadvantaged communities/Communities of Concern
- Prioritize investments in bicycle and pedestrian infrastructure in all elements of the plan to integrate this infrastructure, reduce GhG emissions, and increase the overall health of communities.

Prioritize Wildfire Prevention and Recovery

Suggested Language:

This Strategy provides support for cross-jurisdictional, regional-scale planning efforts, fund leveraging, and implementation of wildfire resilience actions to protect communities, the built environment, air quality, water quality, and natural resources from the threats of catastrophic wildfire. Warming temperatures and drought conditions combined with the expansion of the Wildland Urban Interface (WUI) are projected to increase fire risk across much of the Bay Area. This Strategy supports the reduction of wildfire risk in the Wildland Urban Interface (WUI) by strengthening wildfire scenario planning, building code

updates, ecological fuels and vegetation management, evacuation and egress planning, and avoiding development in fire-prone areas.

Notes:

- Include invasive plant management approaches into vegetation management and fuels reduction work. Many fuel reduction projects today exacerbate the spread of sometimes highly flammable invasive plant species, which crowd out native plants that provide habitat and benefit water quality and supply.
- Develop a map of state-designated High Fire Hazard Severity zones adjoining urban areas in the Bay Area.

Urban Greening

Suggested language:

Protect inland areas from storm-based flooding, extreme heat, and other climate risks with urban greening strategies. Multi-benefit strategies include urban canopy, parks, rain gardens, green roofs, and bioretention. Integrate urban greening into new construction and redevelopment, road projects, bike and pedestrian projects, and other public spaces to encourage mode shift, improve public health, maximize infrastructure investments, and protect vulnerable populations. Focus investments in Communities of Concern.

Notes:

- The Draft Blueprint states that protecting public health is a goal of Plan Bay Area 2050. With PDAs proposed for many areas expected to experience worsening localized flooding and urban heat island effect, street trees and other urban greening strategies must be incorporated into PDAs to protect the public from this climate impact. This will especially impact people who depend on public transit and spend a lot of time walking to and standing at transit stops.
- Additionally, urban greening will complement regional efforts to increase active transportation as a climate mitigation strategy, and should be incorporated into bike and pedestrian infrastructure to encourage these activities. Urban greening can be integrated into road safety features such as dividers and bulbouts, and create much needed shade to protect cyclists and pedestrians from extreme heat.
- Street trees can extend the life of asphalt by up to 60% by reducing extreme temperature changes throughout the day, protecting investments in road infrastructure.
- Urban greening should complement efforts to reduce surface parking, which should be incorporated into strategies to reduce reliance on single-occupancy vehicles.

