On behalf of the undersigned fourteen member groups and agencies of the Bay Area Trails Collaborative (BATC), we appreciate the opportunity to comment on Plan Bay Area 2050. BATC is a multi-sector regional coalition of more than 40 organizations, agencies and businesses working together for the completion and stewardship of a 2,500+ mile regional trail network that connects the region’s 8+ million residents to schools, transit, jobs, open space and outdoor recreation, to enhance the quality of life of all Bay Area residents and visitors. BATC conducted a multi-year engagement process to define and map our proposed regional trail network and is in discussions with MTC staff to share our GIS data.

We would like to first recognize the bold and important step MTC/ABAG has taken to include the importance of trails as active transportation in Chapter 4: Transportation, and trails as recreation, green infrastructure and expansion of equitable access to parks and open spaces, trails, land conservation, and equity in Chapter 5: Environment. The importance of parks, open spaces, and trails has been highlighted during the Covid-19 pandemic, as was the unequal access to these mental and physical health refuges experienced by low-income communities of color. As stated in Plan Bay Area 2050, “…quality outdoor spaces near home are more essential for health and recreation than ever before.”

**Chapter 4: Transportation**

We appreciate the inclusion of the strategies to build a Complete Streets network, including separated paths and trails, and commend MTC for making this a priority. Active transportation investments will help achieve many of the region’s goals for air quality, congestion and greenhouse gas reduction, and expanding equitable access for transportation and recreation in Equity Priority Communities.

To complement the active transportation network and support transit, we propose that the implementation plan include the following:

**Recommendation: 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, transportation to suburban and 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 recreation destinations, particularly during weekends. This should be coordinated with a build out of trail and other active transportation connections both to transit and directly to open space. The 2,500-mile regional trail network that has been mapped by BATC illustrates where we have good trail connections, and where we need to complete critical gaps to open space, recreation and transit. Because traveling to open space areas incurs high vehicle-miles traveled (VMT), improving transit and active transportation connections has the additional benefit of reducing carbon emissions.

**Chapter 5: Environment**

**Recommendation: Develop a Regional Trails Plan**

A robust, connected network of regional and local trails has the potential to address key aspects of **five of the nine** Environmental Strategies listed in Plan Bay Area. In order to capitalize on these synergies, to effectively coordinate cross-jurisdictional and regional trail issues and opportunities, and to thoughtfully advocate for and direct resources, we strongly recommend that MTC take the lead in developing a Regional Trails Plan within the first five years of Plan Bay Area 2050. The many members of BATC,
along with dozens of local jurisdictions that are actively engaged in trail planning and development, will be active and enthusiastic partners with MTC in this effort.

There are excellent examples of MPOs preparing regional trail plans. Please see the attached addendum with relevant information and resources.

**Recommendation: Expedite Efforts to Secure New Revenue to Implement Environmental Strategies, Especially EN 6 and 7**

The Blueprint Investment Analysis of December 2020 indicates that only 15% of the cost of the Chapter 5 Environment Strategies have existing revenue to support them, leaving 85% currently unfunded. We encourage MTC to work with stakeholders to expedite an effort to develop and implement a strategy to raise that revenue - which could include a regional parks measure. BATC and the trails community will actively partner with MTC to pursue this important objective.

On page 97 of the Plan Bay Area draft, we recommend that “can” should be replaced with “will” in this sentence:

“Through advocacy, legislation, initiatives, planning and research over the next 30 years, MTC and ABAG *can* work with partners to secure a $102 billion investment into our region’s future health and safety, ensuring that our natural land, air and water belongs to everyone — especially those historically marginalized and currently underserved.”

*Comments: EN5. Protect and manage high-value conservation lands. Provide strategic matching funds to help conserve and maintain high-priority natural and agricultural lands, including but not limited to Priority Conservation Areas and wildland-urban interface areas. $15 BILLION*

We understand that the Priority Conservation Area (PCA) program will be significantly restructured over the next few years. This is an important and long-overdue effort, particularly for the north bay counties where the PCA program has historically lacked a focus on actual land conservation. We recommend that:

- Funding for PCA projects be significantly increased; and
- The program continues to recognize the Bay Area’s unique regional trails as designated PCAs, including the San Francisco Bay Trail, Bay Area Ridge Trail, Vine Trail and San Francisco Bay Area Water Trail.

*EN6. Modernize and expand parks, trails and recreation facilities. Invest in quality parks, trails and open spaces that provide inclusive recreation opportunities for people from all backgrounds, abilities and ages to enjoy. $30 BILLION*

This is a critically important goal for the Bay Area, and we commend MTC for including it as a strategy. Many of BATC’s members work tirelessly toward these same goals and look forward to continuing to partner with MTC to achieve them. There’s been tremendous progress: two of the San Francisco Bay Area’s regional trails—the San Francisco Bay Trail and the Bay Area Ridge Trail—are at similar stages of completion, with each just over 70% complete. For both, the easy pieces of trail have been completed and the more difficult and expensive segments remain. Programs like Transit to Trails, as well as a redoubled effort to complete key trail segments in Equity Priority Communities (EPCs), can begin to address equity and inclusivity.

We recommend that MTC prioritize completion of gaps in the regional trail network that would connect EPCs to important destinations such as schools, transit, jobs and recreation. Leveraging funding sources like RM3 (once the litigation is resolved) will help achieve this. For example, efforts by the City of Richmond (an EPC), in coordination with local advocacy groups, have led to Richmond completing a greater share of its Bay Trail than any other jurisdiction in the Bay Area. Additionally, focused efforts to
improve trail networks in communities, such as those surrounding San Jose’s Berryessa BART Station, neighborhood and others are making a real difference. Replication of this type of work elsewhere in the region would provide tangible results and expand equitable access to a wide range of transportation and recreation destinations.

In closing, we want to convey that we remain committed to being active partners with MTC in pursuing the strategies and goals of Plan Bay Area 2050. We are inspired by the ambitious objectives to create equitable multi-modal transportation networks, affordable housing and a resilient, sustainable environment, and look forward to working with you on these exciting initiatives.

Sincerely,

Laura Cohen
Western Region Director
Rails-to-Trails Conservancy

Janet McBride, Executive Director
Bay Area Ridge Trail Council

Maureen Gaffney, Acting Director
Marin County Bicycle Coalition

Zoe Siegel, Director of Climate Resilience
Greenbelt Alliance

Matt De Young, Executive Director
Santa Cruz Mountains Trail Stewardship

Philip Sales, Executive Director
Napa Valley Vine Trail Coalition

Sofia Zander, Owner
Sofia Zander Design

Erich Pfuehler, Chief of Government and Legislative Affairs
East Bay Regional Park District

Walter T. Moore, President
Peninsula Open Space Trust (POST)

Bruce Beyaert, Chair
Trails for Richmond Action Committee (TRAC)

Patrick Band, Executive Director
Napa County Bicycle Coalition

Jake Bayless, President
California Mountain Biking Coalition

Eris Weaver, Executive Director
Sonoma County Bicycle Coalition

James Wheeler, General Manager
Hayward Area Recreation and Park District

Please see Addendum on following page: Resources Relating to Proposed Regional Trails Plan
ADDENDUM: Resources Relating to Proposed Regional Trails Plan

In support of our recommendation that MTC lead the creation of a Regional Trail Plan, we offer these additional comments and resources.

Contemporaneous efforts like the federal “30 x 30” plan, aiming to conserve 30% of California land by 2030, and the federal infrastructure bill are good reasons to believe that new revenue for trail implementation may be available in the coming years. Being ready with a Regional Trail Plan will demonstrate the region’s commitment to the environmental strategies laid out in Plan Bay Area—equitable access to parks, trails; clean air and water; GHG and congestion reduction; and connected and protected open space, recreation and habitat corridors.

Many Metropolitan Planning Organizations across the country have prepared, adopted and are implementing regional trail plans. For these regional trails, many policies involve coordination and cooperation with the region's cities on trail planning, siting and funding. San Diego is one such example where the trails program addresses regional trail facilities affecting areas not within the County’s land use jurisdiction. Here’s an excerpt from the San Diego plan:

*Countywide Policy 2.3: Participate in completing missing segments of regional trails to satisfy the need for long range trail opportunities.*

“Regional trails are significant on a countywide, state or national level...these trails are important, desirable, provide a public benefit, serve as the backbone for a larger trail network, provide connectivity to existing trails, and provide an overall significant regional resource worthy of consideration for various forms of future funding. The Regional Trails Map identifies approved general alignment corridors of regional trails in the County. These trails have characteristics and conditions that serve a regional function by covering long linear distances, transcending community and/or municipal borders, having state or national significance, or providing important connections to existing parks and open space preserves.”

Other MPO’s with adopted Regional Trail Plans include:

- Oregon Metro
- Boston Region Metropolitan Planning Organization
- Greater Buffalo Niagara Regional Transportation Council
- Knoxville Regional Transportation Planning Organization
- Madison Area Transportation Planning Board
- Southern California Association of Governments
- San Diego Association of Governments

Two of the Bay Area’s premier regional trails--the San Francisco Bay Trail and the San Francisco Bay Area Water Trail--are already administered by ABAG/MTC, and much of the essential coordination and collaboration work to complete missing segments of trail has been performed by these programs in the past. Several of the Bay Area’s regional trails--Bay, Ridge, Water, Vine, SMART--have reached a high level of maturity and a greater coordination of some or all planning, funding, outreach and implementation efforts at this juncture could be highly beneficial. Nascent efforts such as the Great California Delta Trail, the Great Redwood Trail, and the Bicycle Superhighway would also benefit from a unified Regional Trails Plan.

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