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July 20, 2021

MTC Public Information  
Attn: Draft Plan/Draft EIR Comment  
375 Beale Street, Suite 800  
San Francisco, CA, 94105

**RE: Comments on MTC/ABAG draft Plan Bay Area 2050 Plan Document and Supplemental Reports**

Dear MTC/ABAG Staff:

The City/County Association of Governments of San Mateo County (C/CAG) appreciates the opportunity to provide comments on MTC/ABAG's Draft Plan Bay Area 2050 EIR. C/CAG is the County Transportation Agency (CTA), also known as the Congestion Management Agency (CMA) for San Mateo County. C/CAG plays a key role in climate action planning and mitigation of greenhouse gas emissions in partnership with all local jurisdictions in San Mateo County. In addition, C/CAG manages the Countywide Stormwater Pollution Prevention Program and is the Airport Land Use Commission in San Mateo County.

San Mateo County has 21 jurisdictions, a population of 774,000, and is an integral part of the dynamic Silicon Valley/San Francisco economic region. San Mateo County is home to 16 of the top 100 employers and 26 of the top 50 biopharma employers in the Bay Area.

The draft Plan Bay Area 2050 is a long-range plan charting the course for the future of the nine-county San Francisco Bay Area and takes a comprehensive look at the region's challenges and identifies actions to be advanced by all levels of government in the coming years. As such, it shares much in common with C/CAG's regional approach and outlines a path forward for a more environmentally sustainable and equitable future. C/CAG's comments are supportive and provided within the context of our long-standing positive relationship with MTC/ABAG.

Thank you for this opportunity to provide input on this critical document. Please see Attachment 1 for C/CAG's comments on the draft Plan Bay Area 2050 EIR document. If you have any questions, please contact Sean Charpentier, C/CAG Program Director, at [scharpentier@smcgov.org](mailto:scharpentier@smcgov.org).

Sincerely,

A handwritten signature in black ink that reads 'Sandy Wong' with a stylized flourish at the end.

Sandy Wong  
C/CAG Executive Director

Enclosures: Attachment 1: Comments on MTC/ABAG draft Plan Bay Area 2050 Plan Document and Supplemental Reports

## **Attachment 1: Comments on MTC/ABAG draft Plan Bay Area 2050 Plan Document and Supplemental Reports**

### Transportation Chapter, pages 72 and 76, Draft PBA – Strategy Build an Integrated Regional Express Lane and Express Bus Network:

We are supportive of building out the Express Lane Network and expanding Express Bus. San Mateo County is working on extending the US101 San Mateo County Managed Lanes between I-380 and the San Francisco County line. Express Lanes are a valuable tool reducing GHG, and providing incentives for carpooling and express bus transit.

### Supplemental Reports – Equity Analysis Report

Map 4. Equity Priority Communities (EPCs): Change between Plan Bay Area 2040 and Plan Bay Area 2050 Designations

Provide guidance on the Former EPC's in Plan Bay Area 2040 and if they will continue to be recognized in Plan Bay Area 2050. Currently, CCAG is updating the Community Based Transportation Plan (CBTP) in Daly City and there are three tracts that are categorized as former EPC's in Plan Bay Area 2040 on Map 4 of the Equity Analysis Report. We are concerned with how former EPC's will be treated in future updates to the CBTP's in the region.

### Environmental Chapter, page 98 Strategy EN1 Adapt to Sea Level Rise

San Mateo County is one of the most vulnerable to sea level rise. We support Strategy EN1 - Adapt to Sea Level Rise-and encourage MTC to continue to work regionally and locally with organizations like the San Mateo County Flood and Sea Level Rise Resiliency District, also known as OneShoreline, <https://onshoreline.org/>

### Plan Bay Area 2050 - Plan Document

General Sustainable Street Comments:

While streets play a pivotal role in supporting movement of goods and people via various modes, their impervious surfaces generate runoff when it rains that municipalities must manage to prevent flooding and protect water quality. Vehicles deposit pollutants that are carried by runoff directly into local creeks and the Bay. Pavement absorbs heat, soaking up solar radiation and heating urban areas. Climate change will exacerbate the absorption and emission of heat, and result in more intense storms, runoff and flooding.

Recent efforts to better accommodate bicycles, pedestrians, and transit as part of Complete Street programs have greatly improved the way projects are implemented, but do not go far enough to address the environmental impacts of streets and provide climate resilience. Roadway investments

should consider integration of green infrastructure in streetscapes to better manage stormwater runoff, improve water quality, reduce local flooding, increase tree canopy/shading, establish ecological corridors, and create better public gathering, interaction, and recreational opportunities.

### Plan Bay Area 2050 Strategies – The Sustainable Street Gap

The Draft PBA 2050 Transportation and Environment elements include the following themes and strategies that are related to our issues and concerns expressed above. The following themes and strategies should also be linked to Sustainable Streets and their benefits.

#### Transportation Theme: Create Healthy and Safe Streets

- Strategy T8. Build a Complete Streets network. Enhance streets to promote walking, biking and other micro-mobility through sidewalk improvements, car-free slow streets, and 10,000 miles of bike lanes or multi-use paths.

#### Environment Theme: Reduce Risks from Hazards

- Strategy EN1. Adapt to sea level rise. Protect shoreline communities affected by sea level rise, prioritizing low-cost, high-benefit solutions and providing additional support to vulnerable populations.

Strategy EN1 is focused on “prioritizing low cost, high-benefit solutions” and should include improvements throughout the watershed. Green infrastructure in the upper portions of watersheds is also needed to provide upstream storage and peak flow reduction that helps alleviate flooding when storm drains are backed up due to higher Bay levels. This strategy should be broadened to prioritize climate resilience measures in urban areas, especially along streetscapes, throughout Bay watersheds.

### Implementation Plan Needs a Broader Vision and Emphasis on Green Infrastructure

The purpose of the Implementation Plan is to develop short-term actions that MTC/ABAG and its partners can take over the next five years to advance the strategies identified in PBA 2050.

We support several of the draft implementation actions in the Environment/Reduce Risks from Hazards section of the Implementation Plan, including:

- 9(a) - Seek new revenues for the full range of resilience needs (emphasis added);
- 9(b) - Advocate for legislative reforms to better address climate adaptation and resilience goals and establish clear roles and responsibilities for sea level rise adaptation planning, funding and implementation; and
- 9(e) - Develop a sea level rise funding plan to support the implementation of projects that reduce sea level rise risks to communities, infrastructure and ecology, prioritizing green infrastructure wherever possible.

We believe that the vision of the Implementation Plan, and specifically the definition of green infrastructure, needs to be broadened beyond sea level rise adaptation at the Bay margins to include green stormwater infrastructure in streetscapes and all of the climate resilience/adaptation

benefits of Sustainable Streets. We suggest that MTC/ABAG consider the following additional implementation actions that would help achieve this goal:

- Incentivize cities to update Complete Streets policies to Sustainable Streets policies that incorporate climate resilience/adaptation measures.
- Include multi-benefit roadway investments that go beyond Complete Streets to include green infrastructure for stormwater management, trees to reduce urban heat islands, streetscape improvements to support gathering and recreation, and inclusion of native plants and focus on roadways as ecological corridors.
- Support the incorporation of resilience/adaptation and sustainability measures in roadway projects (above and beyond just Complete Streets).
- Advocate for inclusion of funding for Sustainable Streets in any climate resilience bond measures – funds specifically for adapting roadways to the negative impacts of climate change, including flooding, heat, drought, and sea level rise.

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