



**Santa Clara Valley  
Urban Runoff  
Pollution Prevention Program**

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July 20, 2021

Metropolitan Transportation Commission and  
Association of Bay Area Governments  
Plan Bay Area 2050 Project Team

Submitted via email to [info@planbayarea.org](mailto:info@planbayarea.org)

**Subject: Comments on Draft Plan Bay Area 2050 and Draft Implementation Plan**

To Whom It May Concern:

Thank you for the opportunity to provide comments on the Draft Plan Bay Area 2050 (PBA 2050) and the associated Draft Implementation Plan. These comments are submitted on behalf of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), an association of 13 cities and towns in the Santa Clara Valley, unincorporated Santa Clara County, and Santa Clara Valley Water District (Valley Water). Along with other San Francisco Bay Area public agencies, SCVURPPP participants are permittees under the Municipal Regional Stormwater Permit (MRP) which regulates discharges of municipal stormwater to creeks and San Francisco Bay. The MRP includes requirements for municipalities to plan and implement green stormwater infrastructure to capture and treat stormwater from public property and rights-of-way. Since its inception, SCVURPPP has been a recognized leader in stormwater management and green stormwater infrastructure (GSI) in the San Francisco Bay region and is dedicated to protecting and improving the quality of our surface water bodies.

Our comments are focused on the Transportation and Environment elements of the PBA 2050 and Implementation Plan.

**Background**

We recognize that streets, as the largest publicly controlled land in most cities (occupying up to 50% of urbanized areas), create great opportunities and challenges for municipalities. 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” projects (i.e., streets designed to provide safe access for all modes of transportation) 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. Future roadway investments must be directed toward creating “Sustainable Streets”, i.e., multi-benefit roadway projects that support sustainable modes of transportation, sustainable

water supply/quality, sustainable urban ecology, and sustainable habitat for people.<sup>1</sup> Roadway investments should prioritize 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.

Municipalities throughout the Bay Area have been making major investments in GSI to comply with stormwater quality requirements in the MRP and will be required to increase the amount of GSI implementation in future years. Transportation funding programs must recognize and make the links between climate resilience/adaptation, water quality protection, and other benefits of Sustainable Streets with GSI, and provide funding of those elements.

### **Plan Bay Area 2050 Strategies – The Sustainable Streets 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:

#### *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.*

Unfortunately, neither of these strategies recognizes the benefits of Sustainable Streets with GSI and the linkage that concept of Sustainable Streets provides between these strategies. Strategy T8 should not be implemented in a vacuum without looking at how Complete Streets improvements can be leveraged to provide multiple benefits and climate resilience.

Strategy EN1 is focused on “prioritizing low-cost, high-benefit solutions” but only near the Bay margins. The Environment Chapter of PBA 2050 states that:

*Coordinated action at the regional level is needed to adapt to sea level rise and protect homes, businesses and transportation corridors... Plan Bay Area 2050 imagines a future of regional sea level rise adaptation, where vulnerable communities can employ a mix of human-engineered “grey” infrastructure and natural “green” infrastructure to protect the majority of these at-risk areas, as well as road and rail assets at risk of inundation... While there is still important research to be done to understand the appropriateness and efficacy of various adaptation measures, Plan Bay Area 2050 emphasizes nature-based interventions, such as restoring degraded marshes or implementing ecotone levees...*

This strategy fails to recognize that GSI 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 also be broadened to prioritize not just sea level rise adaptation, but multiple climate resilience measures in urban areas, especially along streetscapes, throughout Bay watersheds.

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<sup>1</sup> The 2020 Green Streets for Sustainable Communities Symposium showed great interest from the public, municipal staff, advocates, and elected officials to create streets that are responsive to all these issues. See: <http://transportchoice.org/events/>

### 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.*

However, as expressed above, 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 request 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, and that prioritize integration of green infrastructure to better manage stormwater runoff, improve water quality, increase tree canopy/shading, establish ecological corridors, and to create better public gathering, interaction, and recreational opportunities.
- Prioritize 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.
- Advocate for prioritizing incorporation of resilience/adaptation and sustainability measures in roadway projects (above and beyond just Complete Streets) in existing state and federal transportation funding programs.
- 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.

### Partnership Opportunities

Local jurisdictions are identified as strategic partners in the draft PBA 2050. As mentioned earlier, these jurisdictions will not only be implementing the transportation and housing improvements recommended in PBA 2050, but those that are MRP permittees will also be retrofitting urban areas with GSI to comply with permit requirements and meet climate resilience goals. SCVURPPP members and other MRP permittees have

developed GSI Plans that provide approaches for these actions and priorities for locations of GSI that are coordinated with future development projects and capital improvement projects. However, lack of funding for the green infrastructure component of roadway projects remains a significant barrier to implementation. Our members welcome the opportunity to partner with MTC/ABAG to advocate for inclusion of green infrastructure funding in transportation and climate resilience funding programs. Integration of the Sustainable Streets concept into the PBA 2050 and Implementation Plan strategies priorities would greatly assist this effort.

Thank you again for the opportunity to provide comments. We look forward to continuing dialogue on these topics during the Partnership Phase of the Implementation Plan and other engagement meetings. Please feel free to contact me at [jcbicknell@eoainc.com](mailto:jcbicknell@eoainc.com) if you have any questions.

Sincerely,



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