GREENBELT ALLIANCE

May 31, 2017

MTC Public Information
375 Beale Street, Suite 800
San Francisco, CA, 94105

<div align="center">

RE: Recommendations on Resource Lands Mapping
in Draft Plan Bay Area 2040 and its Draft Environmental Impact Report

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To whom it may concern,

Thank you for this opportunity to comment on the Resource Lands Maps in the Draft Plan Bay Area 2040 (Draft Plan) and Draft Environmental Impact Report (DEIR). We appreciate MTC and ABAG's continued attention to improving the illustration and analysis of the Bay Area's natural resource lands and their policy protections in Plan Bay Area. What follows are our suggestions for refining the Draft Plan so that it more comprehensively reflects the natural resources in our region. These proposed revisions will increase the accuracy and utility of the Draft Plan, so that it may best guide land use and transportation decision-making across the Bay Area and serve as an example for other regions across the state and country.

Resource Lands Maps

Within Plan Bay Area's Statutorily Required Plan Maps, the Policy Protection maps (Maps S-5 through S-13) show a good representation of the legislative efforts to safeguard the region's major natural resources. However, the Resource Lands maps (Maps S-14 through S-21) do not include a similar quality of depiction of natural values. These resource maps only display agriculture as the solitary natural resource in the region, effectively ignoring wildlife, carbon, and watershed resources. To address this inadequacy, we recommend that the Resource Lands maps be revised to exhibit the best scientifically-accepted map layers to account for four important natural resource categories:

- Wildlife habitat
- Carbon storage
- Watershed lands
- Agricultural lands

What follows is a more detailed description of how the Resource Lands maps should reflect the three missing natural resource categories. The table at the end of this letter provides data sources for the following recommendations, including hyperlinks to map layers and notes.

1. Wildlife habitat
Our primary recommendation is to use the Conservation Lands Network (CLN) to represent Wildlife Habitats in the Resource Lands maps, as these areas comprise the most essential lands needed to sustain the biodiversity of the San Francisco Bay Area. The CLN is a collaborative, science-based effort to map terrestrial upland habitats and rare landscapes for biodiversity conservation. This research dataset was created in consultation with government agencies focusing on the Bay Area, including a committee comprised of members from the following government agencies:

Federal
- USDA Natural Resources Conservation Service
- US National Park Service
- US Fish and Wildlife Service

State
- California Department of Fish and Game
- California State Parks
- University of California, Davis, UC Reserve System
- California State Coastal Conservancy

Regional
- Midpeninsula Regional Open Space District
- Marin County Open Space District
- Sonoma County Water Agency
- Sonoma County Agricultural Preservation and Open Space District
- Santa Clara County Parks and Recreation Department
- San Francisco Bay Joint Venture
- East Bay Regional Park District

To visualize this dataset in a single Resource Lands map, we recommend using the CLN fields of "Essential," "Important," and "Fragmented" habitat.

Our secondary recommendation for Wildlife Habitat is to use the Department of Fish and Wildlife's coarser layer to show areas important for preserving biological richness, called the Areas of Conservation Emphasis. To include this layer on the Resource Lands maps, it may be necessary to select a threshold of biological richness and display those areas that are above this threshold.

2. Watershed lands
California counties are currently updating their groundwater management plans under the mandate of the Sustainable Groundwater Management Act. Our recommendation is to include the groundwater basin layer (Figure 2.12-3 of the PBA 2040 DEIR) in the Resource Lands maps to represent Watershed Lands showing the distribution of this vital drinking and irrigation water resource.

3. Carbon storage
The emergence of new and updated datasets provide a great opportunity to show important lands for carbon sequestration and storage that help address SB 375's mandate to reduce emissions of carbon dioxide and other greenhouse gases. Above ground carbon sources include forests and woody biomass while below ground carbon includes soil organic carbon such as in wetlands and agricultural lands. Our recommendation is to combine above ground and below ground sources that significantly contribute to carbon storage and sequestration in the Resource Lands maps. To include these layers on the Resource Lands map, it may be necessary to select a threshold of carbon stock density and display those areas that are above this threshold.

Maps in the Draft Plan

Farms and ranches are a core foundation of the culture and economy of the Bay Area, and we applaud the inclusion of Map 1.2 on p.17 of PBA 2040 Draft Plan showing recent development on natural resource lands. While this story is critical to keep in the Draft Plan, it contains one notable shortcoming: while purporting to display "resource lands," it only includes farmland and grazing land – rather than displaying the many other important natural resource land types across the region. Our primary recommendation to remedy this situation is to include the full breadth of resource lands across the Bay Area in this map. Our secondary recommendation is to change the name to "Historical Development Pattern and Agricultural Lands."

Draft Environmental Impact Report

The US Department of Agriculture and the National Park Service have recently published spatial data showing above ground carbon and below ground carbon. This data must be assessed in Plan Bay Area 2040 Environmental Impact Report. The availability of these new data layers provide a direct connection to SB 375's mandate to reduce greenhouse gas emissions. Urban development, transportation projects, and land conversion can reduce or eliminate a landscape's ability to store and sequester carbon and therefore require analysis in the EIR. Links and notes on the data sources are included in the attached spreadsheet.

Bay Area Greenprint

As the latest scientific data becomes available for the Bay Area's natural resources, it's critical to provide an open avenue for all stakeholders to have access to this information. A new online conservation planning platform called the Bay Area Greenprint Tool (bayareagreenprint.org) is

now available to provide a detailed map-based source for the latest research and data on the four natural resource categories described above.

Plan Bay Area and the Greenprint Tool can be very complimentary efforts. Plan Bay Area offers a valuable regional vision for growth, identifying the need to guide growth appropriately in our region. Meanwhile, the Bay Area Greenprint Tool offers a map-based platform to better understand the region's multiple natural resource values and assess open space impacts from transportation and development projects. We look forward to partnership opportunities to explore how the Greenprint Tool can be most efficacious in advancing the Plan Bay Area vision and in integrating conservation values in our local and regional planning decisions.

Sincerely,

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Plan Bay Area 2040: Recommendations for Resource Lands Map & DEIR Carbon Sources

Layers in the Resource Lands Map					Layers in the Policy Protection Map		
Natural Value	Existing Layers	Primary Recommendation for Resource Map Layers	Secondary Recommendation for Resource Map Layers		Natural Value	Existing Layers	Recommended Layers
Agriculture	Farmland Grazing Land	Combine Farmland and Grazing Land into a single Agricultural Lands layer	*sufficient* *sufficient*	-->	Agriculture	Williamson Act	*sufficient*
Watershed	*none*	Include Groundwater basins *source: Figure 2.12-3, PBA 2040 DEIR*	-	-->	Watershed	Flood Risk Areas	*sufficient*
Wildlife	*none*	Include Conservation Lands Network *source link: Bay Area Open Space Council* *view link: CLN map*	Include CA Biological Richness - Areas of Conservation Emphasis *source link: CA Dept Fish & Wildlife* *view link: view ACE II map*	-->	Wildlife	Critical Habitat	*sufficient*
Carbon	*none*	Combine Soil organic carbon and… *source link: USDA* *notes: Nationwide dataset from gSSURGO,* …Above ground carbon biomass into a single Carbon layer *source link: NPS, USDA* *report link: Aboveground carbon changes in CA* *notes: Living, aboveground carbon density*	-	-->	Carbon	*none*	*no known geographically specific policies protecting carbon stocks*
General	*none*	*none*	-	-->	General	Parks, Easements, PCAs	*sufficient*