



INSERT ADDITIONAL LOGOS HERE

January 2021

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

Re: Plan Bay Area - Implementation Planning & Recommendations

Dear MTC Commissioners and Staff,

The undersigned organizations appreciate the opportunity to participate in the development of the Plan Bay Area 2050 Implementation Plan. As our region prepares for the next 30+ years of development, the Implementation Plan must ensure that equity, climate adaptation and mitigation, environmental preservation, and resilience are primary drivers for planning decisions being made in the built environment. We are grateful to MTC staff and leadership for incorporating some of these principles into the final Blueprint.

We see Plan Bay Area 2050 as an important framework through which our region can establish a strong vision for climate change response and begin to plan for and advance achievable, meaningful climate actions. Given the magnitude of the problem, we must seek alignment between regional plans, Governor Newsom's Biodiversity Executive Order ([N-82-20](#)), and other statewide and international plans that call for the use of nature-based solutions to address a variety of climate threats. Tools like the Bay Area Greenprint provide a framework for incorporating adaptation strategies and natural solutions to address climate impacts here in our region and help organizations like MTC, ABAG and its members to achieve their infrastructure and land use goals.

While we support the Blueprint transportation strategies designed to reduce greenhouse gas emissions, we need to take bold actions and think beyond the constraints of SB375 to achieve net-negative emissions by 2030, as 2050 will be too late based on the latest science.

In order to achieve our regional goals, we need to leverage our natural and working lands to reduce greenhouse gas emissions, make progress on our equity goals, and prioritize

nature-based solutions for climate change in all transportation, housing, and open space improvements. Our recommendations below are underpinned by the following three priorities:

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 result there have been multiple climate benefits associated with existing and potential conservation lands and actions which have not been fully quantified. As part of the next Plan Bay Area update, MTC/ABAG can use existing tools to estimate the current greenhouse gas emission sequestration benefits of natural and working lands and urban greening projects, as well as their potential for future carbon capture. 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 Implementation Plan must center equity in the development of environmental strategies 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 to provide multi-generational benefits. Ensuring access to nature and implementing green infrastructure in urban areas will support public health, instill environmental sensibilities and encourage active transportation, leading to better climate mitigation outcomes. Please note that our specific Implementation Plan recommendations below align with our organizations' commitment to improving equity outcomes in our region.

Shift away from engineered solutions in all of the Environmental Strategies. We 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 urban green infrastructure solutions to a range of climate threats. Natural infrastructure projects provide more durable solutions, reduce the risk of wildland fires and flooding from rising seas and stronger storms, 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 were greatly appreciative to see the inclusion of such strategies in the wildfire section of the final Blueprint, as ecological vegetation management, multi-benefit forest restoration projects, and avoiding development in the Wildland-Urban Interface can help keep communities safe, while providing climate benefits.

Specific Implementation Plan Recommendations:

- 1) Priority Conservation Areas (PCA) program.** There needs to be a deep reevaluation of and reinvestment in the PCA program that includes a robust recalculation of costs for protection and ongoing stewardship of natural and working lands, including trails and incentives for adoption of climate-friendly farming practices. Additionally, the revised program should be firmly rooted in equity principles by creating either a set-aside for climate vulnerable communities or by focusing investments in communities where they are needed most to address disinvestment and environmental neglect. 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. Incentives and disincentives should be created to support local government keeping development within Urban Growth Boundaries. Finally, The PCA needs to increase the frequency of its grant cycle, and double its funding to \$38 million to truly prioritize projects that implement Blueprint environmental policies, such as EN 4,5,6, and reflect the essential role our natural and working lands play in the resilience of the region.

- 2) **Vehicle Miles Traveled (VMT) Credit Program.** Consider implementing a VMT credit/fee program to incentivize VMT reductions in the region. Revenues could be used to invest in projects, including conservation and green infrastructure projects that reduce GHG emissions. Typically, such projects provide multi-benefit impact, such as improved access to nature, reduced heat island effect, and attenuated storm flows to protect neighborhoods and infrastructure, as shown by the best available science and existing datasets. Consistent with the goals of SB 743 (Steinberg, 2013), a VMT credit program could also discourage projects in greenfields that increase VMT, and shift VMT to infill PDAs through fees or mitigation revenues that get applied to conservation acquisitions and restoration projects. Investments/projects would need to be close to the 'impact' to ensure the right investments. A VMT credit program will directly benefit the transportation sector and provide robust mitigation for both habitat restoration and GHG reduction. Please reference the [integrated planning scenario](#) that the Nature Conservancy did in Merced County to investigate conservation as a driver for VMT reduction. The results showed that the integrated planning scenario (using conservation as a driver) had the lowest VMT.
- 3) **Regional Advance Mitigation Program (RAMP).** The Regional Advance Mitigation Program sponsored by MTC prioritizes landscape-scale conservation action to protect wildlife habitat and natural resource values by helping cities, counties, and transportation agencies to mitigate the impacts of development. The Implementation Plan should focus on funding RAMP, so that multi-benefit conservation and restoration projects can be advanced more effectively. RAMP should also include a focus on critical habitat linkages so that a conservation multiplier effect can be achieved.
- 4) **Maintain and enhance Urban Growth Boundaries.** Preserve and protect high value conservation lands and focus new developments in infill areas near transit. Use Urban Growth Boundaries (UGBs), preferably voter-approved UGBs, as a strategy to reduce emissions, and reduce fire risk. Create funding incentives to encourage growth inside UGBs as a method of sprawl prevention for ghg reduction and fire resilience.
- 5) **Plan for future fire and flooding.** Create disincentives to prevent and reduce development in areas at risk for wildfire or flooding from sea level rise, both along the shore and inland, unless adequate protections are planned and funded. Prioritize adaptation measures to protect existing developed areas within risk zones.

We thank MTC staff and leadership for their ongoing collaboration on the development of Plan Bay Area 2050, and we look forward to continuing to support this process. Please reach out with any questions about the recommendations in this letter.

Sincerely,

David Lewis, Executive Director, Save the Bay
Amanda Brown-Stevens, Executive Director Greenbelt Alliance
Annie Burke, Executive Director TOGETHER Bay Area
Liz O'Donoghue, Sustainable Development Strategy Director, The Nature Conservancy