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**From:** Zoe Siegel  
**Sent:** Monday, April 19, 2021 9:44 AM  
**To:** MTC-ABAG Info; Michael Germeraad; Dave Vautin; Therese W. McMillan; Nick Josefowitz; Rachael Hartofelis; Ben Botkin  
**Subject:** Comments from Environmental Stakeholders on PBA Implementation  
**Attachments:** PBA Implementation Phase Comments 41921.pdf

**\*External Email\***

Hello,

In advance of the upcoming MTC Commission meeting and subsequent RAWG meeting, the undersigned organizations have reviewed the draft implementation strategies and provided the attached letter as our response. **We want to make sure that equity, climate adaptation and mitigation, environmental preservation, and resilience are primary drivers for planning decisions being made throughout the Bay Area.** We look forward to working with MTC to make the region more resilient.

Please let me know if you have any questions.

Regards,

Zoe

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**Zoe Siegel (she/her/hers)**  
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Schedule a meeting with me through [Calendly](#)

Check out my [Chronicle Op Ed](#) about why infill housing is a critical climate solution.

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April 19th 2021

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

**Re: Plan Bay Area - Implementation Phase Suggestions and 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 plans 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 throughout the Bay Area. We are grateful to MTC staff and leadership for incorporating some of these principles into the final Blueprint.

We applaud MTC for taking a holistic approach to how we build, transport and protect the Bay Area in order to create healthy, resilient communities. We know that 2020 was a challenging year for public transportation and we appreciate the focus on seeking new revenue streams for transportation to enhance local transit frequency, capacity, and reliability (Strategy T10). We also appreciate the multitude of ways in which the implementation plan addresses the 3 Ps of housing. We recognize how important it is to strengthen renter protections (Strategy H1), preserve existing affordable housing (Strategy H2), and accelerate reuse of public and community land for mixed income housing (Strategy H8).

Plan Bay Area 2050 is 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. We appreciate that many of the changes that the environmental advocates have pushed for have been incorporated throughout the draft implementation document. There are however, a few additional considerations we would like to request.

Below are some specific suggestions for individual implementation strategies:

- **Strategy EN1: Adapt to Sea Level Rise**
  - We appreciate MTC's focus on establishing stronger governance systems around this issue in order to expedite planning, funding and implementation.
  - We would like to see a **more explicit prioritization of natural infrastructure**. Investing in natural infrastructure is a critical element of SLR adaptation and we would like to see natural infrastructure prioritized throughout the implementation document. We need to enable the ability for species and habitats along the bay shore to withstand those effects as well, not just human impacts we are experiencing
- **Strategy EN2: Provide Means-Based Financial Support to Retrofit Existing Residential Buildings**
  - We believe that the wildfire assessments component of this strategy needs to address considerations like discouraging the spread of urban development in Cal Fire Very High Fire Hazard Zones.
- **Strategy EN4: Maintain Urban Growth Boundaries**
  - We appreciate the inclusion of Urban Growth Boundaries as an environmental strategy in the implementation plan.
  - We would like to see a **more explicit call out of the wildfire benefits** of UGBs. UGBs are an effective way to keep people out of harm's way.
  - As UGBs are an effective climate strategy that not every jurisdiction has, we think it's important to **go beyond maintaining existing UGBs** and also advocate for additional UGBs in jurisdictions that do not yet have one.
  - There are presently no funding incentives for maintaining (or increasing) UGBs. It is critical to prioritize funding for cities that have established UGBS, perhaps as part of the One Bay Area Grant program. We would like MTC to explore financial and policy incentives and disincentives for having an established UGB.
- **Strategy EN5: Protect and Manage High Value Conservation Lands**
  - We are happy with this strategy, support the RAMP initiative and especially appreciate that MTC is seeking **new revenues** for climate resilience purposes.
  - **We strongly support a revamp of the PCA program**, we agree it needs to be based on science, and include better resilience, equity and community engagement components. We look forward to working in partnership and offer our support through this process.
- **Strategy EN6: Modernize and Expand Parks, Trails, and Recreation Facilities**
  - We appreciate the inclusion of this strategy but would like to make a distinction between paved trails used for transit and natural surface recreation trails. Often, funding is channeled towards paved bicycle commute trails; given that this strategy is focused on parks, recreation and open space, priority should be given here to natural surface trails in open space areas that are used for recreation, not transit. Park and open space trails provide critical respite opportunities for those lacking green space and help to foster a greater appreciation for nature. Our current COVID crisis has demonstrated this dramatically.

- In both this strategy and throughout the implementation plan it is critical to Include recreational trails in any access to transit strategy (like safe routes to trails).

We hope you take these suggestions into consideration and look forward to working with you on the PCA revamp and other implementation strategies in order to make our region healthy, equitable and more resilient.

Regards,

David Lewis  
Executive Director, Save The Bay

Amanda Brown Stevens  
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