



January 4, 2016

MTC Planning Committee
ABAG Administrative Committee
101 Eighth Street
Oakland, California 94607

Subject: Plan Bay Area 2040 Scenarios

Dear MTC Commissioners and ABAG Administrative Committee members:

Thank you for this opportunity to comment on the development of scenarios for Plan Bay Area 2040. As you consider alternative land-use patterns for Plan Bay Area, we have several recommendations:

1) Ensure that the majority of scenarios do not expand past the Plan Bay Area development footprint

Plan Bay Area—adopted just two and half years ago—affirmed a regional commitment to maintain growth within existing urban growth boundaries for the next generation. Since then, the need to grow smartly has become increasingly urgent, with an ever-growing body of data on the economic, environmental, health, and social equity benefits of choosing sustainable, equitable development patterns rather than sprawl.

Accordingly, most of the Plan Bay Area 2040 scenarios should not include any development beyond existing urban growth boundaries and should not expand beyond the Plan Bay Area development footprint.

In addition, a scenario that builds upon the “environmentally superior alternative” from Plan Bay Area (“Equity, Environment and Jobs”) should be included. For Plan Bay Area 2040, this scenario should aim to achieve open space conservation, environmental health, housing affordability, displacement mitigation, equitable transportation, and middle-wage job growth goals for a more healthy, prosperous, and sustainable future for all Bay Area residents.

2) Include effective strategies that curtail sprawl and foster more sustainable, equitable development

The scenarios should include land use and transportation strategies that encourage smarter development patterns. These strategies should include, but not be limited to, the following:

- a) A VMT fee on sprawling development (Like the Central Valley's Indirect Source Rule)
- b) Removal of outdated parking minimums for new development, particularly in PDAs
- c) Strong financial incentives for growing smartly (such as a stronger OBAG program)

MTC and ABAG should conduct a sensitivity analysis that identifies the scale of impact that each of these strategies would have in protecting natural and agricultural lands and achieving the other Plan Bay Area 2040 performance targets.

3) Provide a detailed assessment of the impacts each scenario will have on our region's natural resources

The public should be provided with a clear picture of the full range of impacts that each scenario will have on the many values provided by the Bay Area's natural and agricultural lands.

Some of the most important questions are:

- What will the effects of different development patterns be on our farms and ranchlands?
- Will habitat for rare, sensitive or endangered species be directly or indirectly impacted?
- Will habitat connectivity be directly or indirectly impacted?
- Will there be any fragmentation of habitat?
- Will any scenarios negatively impact the region's proposed trail network or other recreational lands?
- How will regional water consumption vary between the scenarios? Will groundwater recharge areas be preserved to protect our local water supplies or will they be paved over?
- What land use policies are in place today for any impacted lands? Are they currently covered by any protective policies (e.g. urban growth boundaries, hillside ordinances, rural zoning)?

This information is needed to adequately assess the scenarios and determine the most appropriate development footprint and policy strategies for the region's "Preferred Scenario."

4) Provide transparency and consistency regarding the scenario development process

To achieve a successful plan that is broadly supported and implemented by local jurisdictions, we encourage you to provide a transparent scenario development and assessment process. This should include clear information about modeling inputs and outputs, description of modeling activities and post-processing refinements, and definitions of key concepts.

In particular, we encourage the development and use of a standardized approach for determining which lands are within "existing urban development and urban growth boundaries." This information will be essential to accurately evaluate the performance of each scenario against the Open Space and Agricultural Preservation Performance Target, which aims to "direct all non-agricultural development within the urban footprint (existing urban development and UGBs)." We look forward to connecting MTC and ABAG staff with our staff to develop a standard definition that protects important natural and agricultural lands and reflects a common approach across jurisdictions.

Thank you again for your leadership on these issues.

Sincerely,

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American Farmland Trust

Deb Callahan
Bay Area Open Space Council

Matt Vander Sluis
Greenbelt Alliance

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Local Government Commission

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