Handout
Agenda Item 5a

Name	Sender Name	Sender County	Signer Name	Org Type
6_Wins_for_Social_Equity_Network_10-13-2016_Letter.pdf	6 Wins for Social Equity Network	Multiple	Mehrens, Derecka et al.	Stakeholder Organizations
City_of_Brentwood_9-30-2016_Letter.pdf	City of Brentwood	Contra Costa	McCann, Casey	Cities and Counties
City_of_Brisbane_10-7-2016_Letter.pdf	City of Brisbane	San Mateo	Lentz, Cliff	Cities and Counties
City_of_East_Palo_Alto_10-12-2016_Letter.pdf	City of East Palo Alto	San Mateo	Persicone, Guido F.	Cities and Counties
City_of_Mountain_View_9-12-2016_Letter.pdf	City of Mountain View	Santa Clara	Tsuda, Randy	Cities and Counties
City_of_Pleasanton_10-5-2016_Letter.pdf	City of Pleasanton	Alameda	Beaudin, Gerry	Cities and Counties
City_of_San_Pablo_10-4-2016_Letter.pdf	City of San Pablo	Contra Costa	Dunn, Elizabeth	Cities and Counties
City_of_San_Rafael_10-11-2016_Letter.pdf	City of San Rafael	Marin	Phillips, Gary O.	Cities and Counties
City_of_San_Ramon_10-12-2016_Letter.pdf	City of San Ramon	Contra Costa	Chamberlain, Debbie	Cities and Counties
City_of_South_San_Francisco_9-13-2016_Letter.pdf	City of South San Francisco	San Mateo	Futrell, Mike	Cities and Counties
Cupertino_9-15-2016_Letter.pdf	Cupertino	Santa Clara	Brandt, David	Cities and Counties
Non-Profit_Housing_Association_of_Northern_California_10-14-2016_Letter.pdf	Non-Profit Housing Association of Northern California (NPH)	San Francisco	Fishman, Amie	Stakeholder Organizations
Non-Profit_Housing_Association_of_Northern_California_9-9-2016_Letter.pdf	Non-Profit Housing Association of Northern California (NPH)	All Counties	Fishman, Amie	Stakeholder Organizations
San_Mateo_County_Union_Community_Alliance_10-10-2016_Letter.pdf	San Mateo County Union Community Alliance (SMCUCA)	San Mateo	Spalding, Rev. Kirsten Snow	Stakeholder Organizations

Severinghaus_Jean_9-18-2016_Email-REDACTED.pdf	Severinghaus, Jean	Marin		Individuals
Sonoma_County_Transportation_Authority_10-10-2016_Letter.pdf	Sonoma County Transportation Authority	Sonoma	Rabbitt, David	Transportation and Other Govt. Agencies
Town_of_Portola_Valley_10-10-2016_Letter.pdf	Town of Portola Valley	San Mateo	Dennis, Jeremy	Cities and Counties

October 13, 2016

Metropolitan Transportation Commission &
Association of Bay Area Governments
375 Beale Street
San Francisco, CA 94105

Re: **Plan Bay Area 2040 Preferred Scenario**

Dear members of the Joint MTC Planning Committee and ABAG Administrative Committee:

Thank you for the opportunity to comment on the draft Preferred Scenario for Plan Bay Area 2040. We write to propose solutions that will lead to a Plan Bay Area that works better for everyone, on behalf of members and allies of **the 6 Wins for Social Equity Network**, a regional coalition of over 20 organizations working to promote social, racial, economic and environmental justice in the Bay Area.

According to MTC and ABAG's own analysis, the draft Preferred Scenario will significantly worsen the housing and displacement crisis for low-income people. Housing and transportation costs for lower-income households would increase by at least 13%, and at least 9% more low-income families – tens of thousands of people – would be at risk of displacement. Meanwhile, the Scenario does nothing to increase access to good jobs and little to reduce the health harms these communities face.

In a recent interview[1], 100-year-old San Francisco resident Iris Canada discussed her impending eviction from a place she's called home for more than 50 years – an experience she described as "killing me." Ms. Canada is just one of countless Bay Area residents facing, and trying to survive, this unprecedented crisis that disproportionately affects low-income communities of color and seniors. For example, dozens of residents powerfully and personally described these challenges at the regional housing forum[2] in February and during a Commission meeting[3] on July 27th, and nearly 500 people from 54 cities sent emails to MTC ahead of that meeting pleading for the region to take meaningful action.

Yet MTC and ABAG have failed to include effective strategies in the Scenario that would promote affordable housing opportunities, prevent displacement of low-income residents from rapidly gentrifying neighborhoods, and increase access to affordable transit and middle-wage jobs.

In 2013, the 6 Wins Network's **Equity, Environment and Jobs (EEJ) Scenario** produced the strongest equity and environmental outcomes for the Bay Area. The choice to exclude

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[1] *The Guardian*, "'This is killing me': 100-year-old woman fights eviction in San Francisco," by Sam Levin, available at https://www.theguardian.com/us-news/2016/oct/03/san-francisco-100-year-old-iris-canada-eviction.
[2] Watch remarks from Melissa Jones, Reyna Gonzalez, and Theola Polk at https://www.youtube.com/watch?v=Jm-7v17car0 (starting at 18:26).
[3] Watch testimony from residents and students at http://baha.granicus.com/MediaPlayer.php?view_id=1&clip_id=1510 (starting at 39:35).

an EEJ Scenario this time has led to predictable results. That "environmentally superior" scenario should be the basis for improving the draft Preferred Scenario. This means (1) leveraging regional funding to promote local anti-displacement policies, (2) planning for a fair-share distribution of affordable housing growth in *all* transit-served and high-opportunity neighborhoods, (3) increasing funding for projects and programs that serve the needs of transit-dependent riders, and (4) supporting and prioritizing *inclusive* economic development that generates good jobs for members of underserved communities.

It also means developing a clear **roadmap for actions** necessary to achieving these goals, and implementing those actions promptly. These are the conditions necessary for Plan Bay Area to serve all communities, rather than simply creating unachievable aspirations that create greater disparities.

For Plan Bay Area to meet its GHG reduction and housing targets as well as the other social equity goals, **we recommend the following actions** (with more detail in the addendum):

a) **Incorporate key EEJ components into the Preferred Scenario and final plan**, and include an EEJ Scenario in the environmental review for Plan Bay Area 2040.

b) **Include a detailed and aggressive implementation plan** in Plan Bay Area 2040 that establishes the necessary concrete policy actions at the local, regional and state levels to meet the region's affordable housing and anti-displacement goals, including fully leveraging transportation funds to incentivize local actions.

c) **Increase funding** for bus operations, the Lifeline Transportation Program, and the Community-Based Transportation Planning Program.

d) **Fully fund** a regional free youth transit pass, means-based fare discount program, and fare stabilization.

e) **Distribute household growth equitably** – ensuring that *all* neighborhoods near transit and in high-opportunity areas take on a fair share of housing growth rather than over-concentrating growth in the big three cities (Oakland, San Jose and San Francisco) in ways that would make displacement worse.

f) **Model anti-displacement policies**, such as rent stabilization and just cause eviction protections, in the Preferred Scenario in cities where low-income residents are undergoing or at risk of displacement, and provide incentives in the Scenario for those policies.

g) **Quantify affordable housing funding gaps** in the Preferred Scenario that must be filled in order to achieve the region's affordable housing goals.

h) **Support middle-wage job creation** by acknowledging the limitations of the draft Preferred Scenario to measure or target middle-wage jobs, and include in the implementation plan action steps to develop both data and policies that support local initiatives to address income inequality and the middle-wage jobs gap.

i) **Provide transparent information and data** on jobs-housing fit, affordable housing production, the effect of anti-displacement policies, and estimates on available

revenue and revenue necessary to implement Plan Bay Area 2040 investments, programs and projects.

We envision a Bay Area in which residents are part of a transparent decision-making process and where the costs and benefits of development lead to shared prosperity. We challenge MTC and ABAG to join us in creating a just and inclusive region and begin undoing the damage of inequitable planning and a legacy of historically discriminatory policies that continue to marginalize low-income communities of color.

We look forward to working with you to discuss, further develop, and operationalize these recommendations to ensure that Plan Bay Area 2040 provides a clear and effective roadmap for ensuring that all communities benefit from the region's growth.

Thank you,

Derecka Mehrens
Working Partnerships USA

Mashael Majid
Urban Habitat

Rev. Earl W. Koteen
Sunflower Alliance

Rev. Kirsten Spalding
SMC Union Community Alliance

Marty Martinez
Safe Routes to Schools National Partnership

Poncho Guevarra
Sacred Heart Community Service

David Zisser
Public Advocates

Omar Medina
North Bay Organizing Project

Jill Ratner
New Voices Are Rising Project
Rose Foundation for Communities and the Environment

Genesis Leadership Council

Jennifer Martinez
Faith in Action Bay Area

Gloria Bruce
East Bay Housing Organizations

Peter Cohen and Fernando Martí
Council of Community Housing Organizations

Jasmin Vargas
Communities for a Better Environment

Dawn Phillips
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Jason Tarricone
Community Legal Services in East Palo Alto

Tim Frank
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To: MTC Planning Committee: Chair Spering (JPSering@solanocounty.com); Vice Chair Halsted (ahalsted@aol.com); and Members Aguirre (aaguirre@redwoodcity.org), Azumbrado (Thomas.W.Azumbrado@hud.gov), Giacopini (dgiacopini@mtc.ca.gov), Haggerty (district1@acgov.org), Kinsey (skinsey@co.marin.ca.us), Liccardo (mayoremail@sanjoseca.gov), and Pierce (jpierce@ci.clayton.ca.us)

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Cc: MTC Chair Cortese (dave.cortese@bos.sccgov.org) and Vice Chair Mackenzie (blumacjazz@aol.com); Steve Heminger (sheminger@mtc.ca.gov), Alix Bockelman (abockelman@mtc.ca.gov), Ken Kirkey (kkirkey@mtc.ca.gov), Ezra Rapport (ezrar@abag.ca.gov), Miriam Chion (MiriamC@abag.ca.gov), info@mtc.ca.gov

Addendum: Detailed Recommendations

As MTC and ABAG prepare to discuss and adopt the Preferred Scenario, we urge you to address the concerns, and incorporate the recommendations, below.

Concern #1 – Social Equity: **The draft Preferred Scenario performs poorly on social equity measures, particularly related to housing and displacement.** For example, MTC and ABAG set a target of decreasing the housing and transportation costs for lower-income households by 10%. Instead, the draft Preferred Scenario increases housing and transportation costs for lower-income households by 13%. The agencies project that 67% of household income will be spent on housing and transportation by 2040, up from 54% in 2005. In addition, the agencies aimed to not increase the share of households at risk of displacement, but the draft Preferred Scenario increases the risk of displacement by 9%. Finally, the agencies had a target to increase the share of affordable housing in PDAs, TPAs, and HOAs by 15%, but instead, the share of affordable housing will increase by just 1%, while the Scenario does nothing to increase access to jobs and little to reduce the adverse health impacts facing communities.

Recommendations:

1. **Incorporate key components of the Equity, Environment and Jobs (EEJ) Scenario into the Preferred Scenario, and study the EEJ in the Environmental Impact Report (EIR)** for Plan Bay Area 2040. In the EIR for Plan Bay Area 2013, the EEJ proved to be the superior alternative, both environmentally and for low-income communities of color. The failure to include an EEJ Scenario this time has led to predictable results.
2. **Include a detailed and aggressive implementation plan** as part of Plan Bay Area 2040 that identifies concrete policies and programs for how the region will meet its affordable housing and anti-displacement goals, boost local transit service and reduce fares, and support middle-wage job creation. The implementation plan should include the actions that MTC and ABAG will take, those that local jurisdictions need to take, and those that the regional agencies will take to get local jurisdictions to act.

Concern #2 – Land Use and Housing: **The draft Preferred Scenario does not include adequate affordable housing and anti-displacement strategies, or equitably allocate growth.** Despite the region's exceedingly poor performance on affordable housing since the adoption of the prior Plan Bay Area, and the role that regional transportation investments play in exacerbating the Bay Area's housing affordability and displacement crisis, the draft Preferred Scenario includes just one strategy to mitigate the crisis: apply inclusionary zoning in all cities with PDAs, making 10 percent of units deed-restricted. There are a number of problems with relying so heavily on this particular strategy. First, inclusionary zoning for rental housing is not currently permitted under the *Palmer* decision, making the strategy purely aspirational. Second, reducing displacement risk and increasing affordable housing production requires more than just inclusionary zoning – it

requires a broad array of policies that also include rent stabilization, just cause ordinances and other eviction protections, impact and commercial linkage fees, housing bonds, and public land policies. Moreover, any affordable housing strategy should specifically serve the lowest-income households and should be included in cities with TPAs and HOAs, not solely PDAs.

In addition, the Preferred Scenario includes no clear plan to encourage cities to adopt affordable housing and anti-displacement policies. MTC and ABAG have essentially given up on taking a robust role in addressing the crisis, claiming they have limited strategies available to them. They should instead work with the affordable housing and tenants' rights communities to develop concrete strategies.

Finally, the draft Preferred Scenario allocates a disproportionately low share of housing to many of the mid-size cities, which are job centers within the urban core, with the result that a number of cities are allocated 4 times or more as many new jobs as they are new housing units – and even fewer affordable housing units. Moreover, the projections for average annual housing growth in San Francisco and Oakland are far above anything they have achieved even at peak levels, despite actions these cities have already taken to accommodate growth and streamline the approval process. These unrealistic and inequitable allocations create the conditions for guaranteed "failure" and the potential for politically justifying even more aggressive deregulation and pro-gentrification agendas, threatening to move us backwards rather than forward in realizing an equitable development vision.

Recommendations:

3. **Establish concrete actions in the implementation plan to meet the region's affordable housing and anti-displacement goals and to mitigate Plan Bay Area's negative impacts.** Examples include:
    a. **Develop and fund a Regional Housing Trust Fund** to support the development of affordable housing throughout the region.
    b. **Modify the One Bay Area Grant (OBAG) and other transportation funding programs** to more effectively encourage local land use planning and development that will make things better, not worse. OBAG's new anti-displacement scoring criteria and affordable housing incentive funding are steps in the right direction, but MTC must create stronger incentives for local jurisdictions to produce affordable housing and adopt anti-displacement policies by using the full countywide OBAG funds and other transportation dollars.
4. **Include – and model – anti-displacement policies**, such as rent stabilization and just cause eviction ordinances, in the Preferred Scenario in cities where low-income residents are undergoing or at risk of displacement. These protections are the most effective at keeping low-income renters in their homes.

5. **Distribute household and employment growth equitably** – near transit and in high-opportunity areas[4], not just in PDAs concentrated in the big three cities, and in a manner that achieves both jobs-housing balance[5] and jobs-housing fit (availability of affordable housing in proportion to the number of low-to-moderate wage jobs in a city). It is critical that we end our historic patterns of sprawl development – which has both negative environmental and equity consequences. But we must do so in a manner that does not concentrate development in ways that actually exacerbate displacement, and we must ensure that all cities are doing their fair share to create affordable housing and job opportunities. Allocating growth into a more "poly-nodal" land use pattern is a far superior "smart growth" vision that will enable Bay Area residents to live and work in their home communities rather than endure extreme commutes and the associated greenhouse gas emissions, increased transportation costs and public health impacts.
6. **Quantify affordable housing funding gaps** in the Preferred Scenario that must be filled to achieve the housing affordability and share of affordable housing targets, particularly for production of housing for very low-, low-, and moderate-income families that is proportional to market-rate housing production.
7. **Analyze and share the following data**:
    a. How jobs-housing fit is – or is not – achieved in the Preferred Scenario, and how the Preferred Scenario drives household distribution to places with poor jobs-housing fit, near transit, and in high-opportunity areas.
    b. Total housing production for each jurisdiction and how it compares with the actual track record of past production.
    c. Affordable housing production for each jurisdiction and (i) how it compares with actual track record of past production and (ii) how much it will cost compared to affordable housing subsidy dollars available annually.
    d. The effect that additional affordable housing and anti-displacement policies would have on meeting the performance targets.

Concern #3 – Transportation Investments: **The draft Preferred Scenario does not include adequate transportation funding to meet the needs of underserved communities.** We have concerns about projected revenue and the presentation of new investments in expanding equitable transportation. We acknowledge the policy decision to fully fund transit operating shortfalls. However, the assumed increase in revenue from sales-tax-based discretionary sources (e.g., Transportation Development Act and local measures) may be overstated; if so, there is the risk of major service cuts should the economy falter in the future. Packaging mostly pre-existing programs as an "Equity

[4] Allowing people to live closer to their jobs and other key community assets, even with limited public transit access, still reduces VMT and GHG emissions.

[5] The jobs-housing ratios for the three big cities vary widely – from 0.8 in San Jose, where the projected job growth is well below what's planned in its General Plan, to 2.4 in San Francisco. These numbers are not only unrealistic, but they result in completely inadequate jobs-housing balance and, even more importantly, the jobs-housing affordability "fit."

Roadmap" is misleading and inadequate. Deceptive because conversations with staff indicate that bus versus other modes are not clearly broken out; inadequate because, e.g., Lifeline, is still stuck at the low level from PBA 2013. Consistent with the Gioia amendment, Communities of Concern should be receiving a fair share of all discretionary revenues in the first four years of the plan.

Recommendations:

8. **Allocate "bus operations" funding for bus service**, which low-income riders rely on disproportionately to get to their jobs, schools and critical services. The current categories appear to include capital costs and need to be broken out and described more clearly.
9. **Allocate $2 billion to the Lifeline Transportation Program by 2021** to fund the transportation projects that low-income communities of color identify in the Community-Based Transportation Plans (CBTPs). This important program is the only one that specifically targets the needs identified by low-income residents who rely on transit, but current funding levels do not come close to closing the gap in transit service for this population, much less meeting the full range of critical transportation needs in underserved communities.
10. **Increase funding for updating CBTPs to $3 million.** MTC recently allocated $1.5 million in OBAG funds for updating CBTPs, enough to update approximately 15 plans. However, 28 CBTPs are at least 6 years old, and the new Community of Concern definition may create a need for additional community-based plans.
11. **Develop and fund a regional free youth transit pass** program. The overwhelming success of the Free MUNI for Youth program (over 33,000 youth currently receive passes) highlights the need for this investment. Moreover, MTC's investment in the MUNI pilot youth program demonstrates that regional funding can play a key role in supporting local models that can be scaled up and replicated throughout the region.
12. **Fully fund MTC's Regional Means Based Fare Discount program**. This pilot study is examining program alternatives that can both reduce transportation costs for transit-dependent riders on major operators with existing discount programs as well as reduce costs for those transit dependent riders forced to take multiple unlinked trips (e.g., local bus to BART to another local bus) because of the displacement crisis. The draft investment strategy includes $150 million over the life of Plan Bay Area to support this effort. However, current staff estimates range from $57 million to $100 *annually*. This does not include cost estimates for new service needed to meet increased demand, which are still being developed.
13. **Allocate discretionary revenue to develop a fare stabilization fund** to help prevent fare increases or service cuts during periods of unanticipated economic downturn.
14. **Provide reliable estimates** on available revenue and revenue necessary to implement Plan Bay Area 2040 investments, programs, and projects.

15. **Conduct an equity analysis** of the proposed expenditure of the regional discretionary share of funds, including a focus on the equity of discretionary fund allocations in the first four years of the new Plan. This will help ensure that low-income populations and people of color are not being subjected to any delay in the receipt of a fair share of the Plan's benefits.

Concern #4 – Economic Opportunity: We commend the regional agencies for incorporating Middle-Wage Job Creation as an explicit Performance Target for Plan Bay Area. However, the draft Preferred Scenario falls short in two respects.

First, it inaccurately represents that the share of middle-wage jobs is growing in the Bay Area and will grow under any scenario – even "No Project." This positive forecast is sharply contrasted by real world data, which show growth concentrated in high-wage and low-wage jobs, exacerbating the region's income inequality and attendant impacts on housing, transportation and public health. This reality is what our communities are facing as they struggle to maintain economic security. While we understand that these results stem from the current limitations of the forecasting model, this should be acknowledged in the Performance Targets Results as a limitation of the methodology, rather than presented as an indication that the actual share of middle-wage jobs will increase.

Second, and more importantly, the next Plan Bay Area needs a sharper focus on understanding and effectively leveraging the impacts that policies, investments, incentives and planning decisions have on the type and quality of jobs that are created or retained. At a minimum, MTC and ABAG should establish strong policies to ensure that the direct impacts of Plan Bay Area investments are moving us in the right direction.

Furthermore, if the region moves forward with the actions outlined in the Implementation Strategies – which include establishing a Regional Economic Development District and creating "Priority Production Areas" – it is critical to start from the basis of an inclusive economic development strategy that addresses the type and quality of jobs that are being created.

Recommendations:

16. **Include in the implementation plan an action item focused on developing the data and capacity to analyze wages at the job / workers level** and to project potential impacts of land use scenarios and policy decision on the jobs and wage distribution. In the meantime, indicate the modelling limitations of the Middle-Wage Jobs target in the Performance Targets Results (by including a footnote or similar indicator).
17. **Establish policies in the implementation plan to ensure that the direct investments made through Plan Bay Area are aligned with the goal of expanding the share of middle-wage jobs.** These could include:
    a. **Ensure minimum standards**: Require prevailing wages, participation in state-registered apprenticeship, and priority for veterans on all construction work that is supported by Plan Bay Area investment, including where

funding is used for land acquisition, architectural or engineering fees, or project planning.

b. **Expand middle-wage career pathways in construction and operations:** Support transportation operators and local jurisdictions that are seeking to implement models such as Community Workforce Agreements that combine efficient project delivery, strong enforcement of minimum job standards, and career pathways for workers in underserved communities. Support might include providing resources for pilots, convening and/or technical assistance, and supporting local jurisdictions in applying to the FTA for approval of innovative career pathway mechanisms.

18. **The process underway to create a Bay Area Economic Development District should explicitly target middle-wage job creation and access**. Refocus the stakeholder process of developing a Comprehensive Economic Development Strategy for the Bay Area to explicitly prioritize creating and sustaining middle-wage jobs and ensure access to those jobs for members of underserved communities.

19. **Provide support and incentives for local jurisdictions to innovate, replicate and collaborate on approaches to support the growth and retention of middle-wage jobs.** A number of cities and counties are already taking action on policies, programs and initiatives to expand economic opportunity. MTC and ABAG's role in economic development should be to support and prioritize those local efforts that, when aggregated, can demonstrate effectiveness in supporting middle-wage jobs. In particular, the concept of Priority Production Areas should prioritize investment in and support for projects that will explicitly lead to middle wage job creation, pathways into those jobs and/or the upgrading of low-wage jobs.

THE CITY OF
BRENTWOOD
HERITAGE • VISION • OPPORTUNITY

September 30, 2016

Ken Kirkey
Director, Planning
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Miriam Chion
Director of Planning and Research
Association of Bay Area Governments
375 Beale Street Suite 700
San Francisco CA 94105

Re: Plan Bay Area 2040: Response to Draft Preferred Scenario

Dear Mr. Kirkey and Ms. Chion:

Two years ago, in July of 2014, the City of Brentwood adopted a comprehensive update of its General Plan. The timeline of this plan coincides with the 2040 forecast horizon for Plan Bay Area 2040.

The Draft Preferred Scenario forecast compares to the General Plan as follows:

	Households	**Employment**
Brentwood General Plan	27,849	33,800
Draft Preferred Scenario	29,700	12,150

The Draft Preferred Scenario household forecast is a modest seven percent higher than the General Plan. It is entirely plausible that, over time, the City could approve general plan amendments which increase density and result in a household buildout total close to the Draft Preferred Scenario number.

According to the East Bay Economic Development Alliance, the total number of jobs currently in Brentwood is 12,463 (Q3 2016), 313 jobs higher than the Draft Preferred Scenario forecast for the year 2040. Plan Bay Area 2040 therefore projects Brentwood to

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have negative jobs growth in the next quarter century. We seriously question the basis and reasoning for this forecast.

We are also perplexed as to how the Draft Preferred Scenario could be so extremely inconsistent with a locally prepared, locally adopted General Plan: 178 percent lower, precisely.

This is not the first time we raised this concern. Plan Bay Area 2012 also severely underestimated future employment growth for Brentwood. Our 2012 comment letter indicated that unrealistically small job growth projections for east Contra Costa County will worsen already severe traffic congestion on regional roadways and thereby increase GHG emissions. The 2012 letter stated:

… The City supports the reduction of gashouse gas emissions and the associated goal of decreasing freeway congestion, but to severely limit the ability of suburban communities like Brentwood to provide needed jobs – which furthers the intent of Plan Bay Area – is unrealistic and short-sighted. While Brentwood is not currently served by direct rail transit, increased job growth needs to be a priority so that residents are not forced to commute to inner Bay Area job locations. A more realistic approach would be to assume that many people prefer the single-family housing lifestyle over higher density development, and to find a reasoned and balanced means to acknowledge and accommodate that preference into the Strategy. The City suggests that both ABAG and MTC include higher job growth for the cities in east Contra Costa County as a means of reaching target emission goals and accommodating housing preference.

The City respectfully requests that the Draft Preferred Scenario be revised to significantly increase the projection for future jobs growth in east Contra Costa County, consistent with local general plans. Thank you for this opportunity to comment. If you have any questions, please let me know.

Sincerely,

Casey McCann
Community Development Director

cc: Mayor and Council Members – City of Brentwood
Planning Commissioners – City of Brentwood
Randell H. Iwasaki, CCTA Executive Director

CITY OF BRISBANE

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October 7, 2016

Ken Kirkey, Planning Director
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Subject: Plan Bay Area 2040 Draft Preferred Scenario

Dear Mr. Kirkey:

The City of Brisbane has reviewed the *Plan Bay Area 2040 Draft Preferred Scenario*, including Household and Job Growth Projections by jurisdiction. The City objects to the Brisbane projections and requests that these figures be revised as noted below.

Specifically, the draft preferred scenario projects 4,400 new households in the Brisbane portion of the Bi-County PDA. Currently this portion of the City includes no residential units. The Housing Element of the City's General Plan proposes 230 additional residential units in the Parkside subarea, and the City is actively engaged in the development of a precise plan to plan for these units. The bulk of the PDA lies within the Brisbane Baylands where the City's General Plan currently prohibits housing. You are aware that the City of Brisbane is currently considering an application by the property owner to amend the City's General Plan to allow housing and approve a specific plan containing approximately 4,400 residential units. This application is currently under review by the Brisbane City Council, with a decision expected in summer/fall of 2017.

The City of Brisbane is extremely troubled by the draft household projection, which can only be achieved if the Brisbane Baylands project as proposed by the developer is approved. ABAG/MTC has taken great lengths to reassure local municipalities that whatever land use scenario is included, Plan Bay Area does not govern, control, or override local land use regulations. Given that the City is actively engaged in the review and decision making process for the Baylands, it is objectionable for the preferred scenario to include the household projections as proposed which are inconsistent with the City's General Plan. Utilizing these projections does not reflect acceptance or recognition of the City's land use regulations, rather these projections can only be construed either as an unjustified presumption on the part of MTC regarding the outcome of the City's land use process, or as an unseemly attempt on MTC's part to pressure and/or intimidate the City of Brisbane and unduly influence the outcome of the City's independent planning process. The City respectfully suggests this is not an appropriate role for MTC to play in local land use matters.

The City requests that the Household and Employment Projections for the Brisbane PDA be revised to reflect the current Brisbane General Plan. This was the approach utilized in PBA 2013, and the City sees

no justification for MTC to make different assumptions at this time. The projections should be revised to reflect the planned 230 housing units within the PDA. In regard to employment, the General Plan currently does not accommodate appreciable job growth within the PDA, so it is recommended that the PDA employment projections utilize the same growth rate projections applied to employment within non-PDA areas of Brisbane.

Thank you for your consideration in this matter. Should you have any questions regarding this letter, please contact John Swiecki, Community Development Director at jswiecki@ci.brisbane.ca.us or at 415.508.2120.

Sincerely,

Cliff Lentz
Mayor

cc: Brisbane City Council
Clay Holstine, City Manager

C I T Y O F E A S T P A L O A L T O
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October 12, 2016

ABAG/MTC Joint Planning & Administrative Committee
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Subject: Comments on Plan Bay Area 2040 Draft Preferred Land Use Scenario

Dear Members of the ABAG/MTC Joint Planning & Administrative Committee:

This letter is in response to the current Plan Bay Area 2040 Draft Preferred Land Use Scenario. Thank you for the opportunity to comment. This Plan is of critical importance to the region due to its ability to influence future growth in the land use, housing and transportation areas. The City of East Palo Alto has the following comments on the Draft Preferred Land Use Scenario.

While supporting the overall aim of Plan Bay Area 2040 and the attempt to better integrate job, housing and transportation in the region the City does not believe that the Draft Proposed Land Use Scenario is sufficient. A more aggressive strategy is needed to better balance jobs, housing and transportation in the Bay Area.

The Staff Report and the presentation made at your meeting on September 9 showed a 2040 Draft Preferred Land Use Scenario primarily involving the three largest cities in the Region (San Jose, Oakland and San Francisco) taking on the lion's share of the obligation for future housing with accommodation of future jobs generally at current rates in the region. This creates further imbalance in the jobs/housing area. A portion of the remaining growth is primarily proposed to be allocated to the Priority Development Areas in the region (PDAs). These PDA areas are located where there is ability to concentrate jobs or housing or both with transit, such as Downtowns or near transit hubs. Transportation funding was recommended primarily around maintenance and operations of the existing transit system and road network with more limited funds allocated to transportation growth generally assuming continuation of current growth patterns. This serves to support a widening imbalance between jobs, housing and transportation demands.

Members of the public as well as a number of ABAG/MTC Board and Committee members at the September 9 meeting expressed significant concerns with the 2040 Plan Bay Area Draft Proposed Land Use Scenario. ABAG/MTC representatives including the Mayor of San Jose, Sam Liccardo and Santa Clara County Board Member, Dave Cortese, strongly objected to the proposed Draft Land Use Scenario and its' emphasis on continued tolerance for and continuance of the current significant jobs/housing imbalance in the western and southern part of the region especially. They and others who spoke noted the need to leverage more of the discretionary transportation and other funds available to 2040 as an incentive to cities to create a better land use pattern in the location of jobs and housing, a better transportation pattern and a more equitable balance. There were also calls for improved mobility management, especially for disadvantaged groups and multiple requests for one or more public meetings on this Draft Scenario and the Plan in the Fall before a final Scenario is sent to the ABAG and MTC Boards for adoption.

East Palo Alto is an island of affordability, affordable housing, and poverty that is completely encircled by the City of Menlo Park and the City Palo Alto. East Palo Alto has the lowest jobs to employed resident ratio in the core Bay Area, and Menlo Park and Palo Alto have the highest. This Plan Bay Area 2040 Draft Preferred Land Use Scenario further exacerbates this imbalance. The systematic overdevelopment of jobs and the underdevelopment of housing mean that the vast majority of the new employees in Menlo Park, Palo Alto and other jobs-rich cities will have to live in other cities. The housing crisis exists because cities willfully develop significantly more jobs than housing units.

Controlled for size, East Palo Alto provides significantly more affordable housing than its neighbors. Including the Tax Credit Affordable Housing units, units in the rent stabilization program, and other Below Market Rate programs, 39% of the total housing units in East Palo Alto are affordable. Because it has the lowest jobs per employed resident ratio (0.2) and the most affordable housing in the region, every housing unit in East Palo Alto subsidizes a job in places such as Menlo Park and Palo Alto.

This significant imbalance of land uses produces significant benefits for the cities that have more jobs than homes, and significant fiscal distress for cities with fewer jobs. Despite having roughly the same population, East Palo Alto has less than 50% the per capita staff that Menlo Park does.

	East Palo Alto	**Menlo Park**
Population	29,662	33,449
Jobs Per Employed Resident	0.23	1.94
Total Staff	109	259
Total Staff Per 1,000 Residents	3.67	7.74

Displacement

The City of East Palo Alto is deeply concerned about the potential for additional displacement from the current jobs/housing imbalance and the Draft Preferred Land Use Scenario. East Palo Alto experienced the most severe wave of involuntary displacement since the City incorporated in 1983 in the period between the entitlement of the first Facebook project and the opening of that project. Based on the information in a Keyser Marston Displacement Study, between 2012 and 2015, the largest landlord in East Palo Alto created a 35% vacancy rate while the regional average was a normal 5%.

Traffic/Air Quality

Due to its low jobs per employed resident ratio, East Palo Alto experiences significant traffic that neither originates nor ends in East Palo Alto. Approximately eighty-four (84%) of the peak hour traffic on University Avenue for example is cut through traffic from employees driving from homes in the East Bay to jobs along the Peninsula.

Air Quality is a significant concern for the City of East Palo Alto. Some employment projects in the region, such as Facebook, exceed BAAQMD emissions standards in 2020. Proposed project mitigation with emissions offset programs will not reduce emissions at project sites sufficiently which affect East Palo Alto neighborhoods. This is a significant concern because the State of California CalEnviroScreen Version identifies all of East Palo Alto as an area disproportionately burdened by multiple source of pollution. As a result of this asthma hospitalization rates for children in East Palo Alto are twice that of San Mateo County.

We appreciate the opportunity to review and comment on these projects and plans and to continue working collaboratively with local agencies. We wish to be notified of upcoming meetings that you plan to hold and future hearings on the final proposed 2040 Land Use Scenario and Plan. If you have any questions you can call me at (650) 853-3195 or at gpersicone@cityofepa.org.

Yours truly,

Guido F. Persicone, AICP
Planning and Housing Manager
gpersicone@cityofepa.org

CITY OF MOUNTAIN VIEW

COMMUNITY DEVELOPMENT DEPARTMENT • PLANNING DIVISION
500 Castro Street • Post Office Box 7540 • Mountain View • California • 94039-7540
650-903-6306 • Fax 650-962-8501

September 12, 2016

Miriam Chion, ABAG Planning and Research Director (via email)
Association of Bay Area Governments

Dear Ms. Chion:

Thank you for the opportunity to comment on the Plan Bay Area 2040 DRAFT Preferred Scenario. The City of Mountain View previously sent a letter to ABAG staff in June with several comments (see Attachment). We have also met with ABAG staff regarding this process.

Below are several city comments on the Plan Bay Area 2040 DRAFT Preferred Scenario.

Household and Job Growth Comparisons
The following table compares the 2040 DRAFT Preferred Scenario for Mountain View with several of our larger surrounding jurisdictions, with some comments below:

City	2010 Households	2040 Households	% Change	2010 Jobs	2040 Jobs	% Change
Cupertino	20,900	24,450	17%	26,800	53,100	98%
Milpitas	19,000	30,800	62%	42,000	56,400	34%
Mountain View	31,800	58,500	84%	48,500	69,600	44%
Palo Alto	26,550	29,150	10%	102,000	123,200	21%
San Jose	297,700	440,600	48%	387,700	502,600	30%
Santa Clara	42,100	54,900	30%	102,900	189,100	84%
Sunnyvale	52,600	80,700	53%	65,800	116,000	76%

- We previously commented on what we believe are 'low' job estimates for both 2010 baseline and 2040 projections across the County. We still are unclear how and why ABAG's job numbers are so much different than job numbers expressed by several local cities, particularly the 2010 baseline numbers for Mountain View.
- In 2012 the three initial Plan Bay Area scenarios projected between approximately **6,000 to 8,800** new households to 2040. The proposed Preferred Scenario shows Mountain View increasing its number of households by 26,700 households to 2040. This is an increase of **84%** over the number of existing households in the City. This increase is also the highest percentage of household growth of any city in the County. The City has added, or is planning to add, significant amounts of new housing in several areas,

including our El Camino Real corridor, San Antonio Precise Plan area, and our North Bayshore and East Whisman Precise Plan areas, which are predominantly office uses. The City also recognizes that achieving a better jobs/housing balance and Plan Bay Area objectives requires that we provide more housing in the region. However, it appears that several cities in the County with large employment bases and significant future job growth can provide more housing to help Plan Bay Area reach its targeted amount of new housing in the County.

Thank you for the opportunity to comment on this important regional planning effort. Please let me know if you have any comments or questions.

Regards

Randy Tsuda
Community Development Director

Attachment

THE CITY OF

PLEASANTON

October 5, 2016

Via electronic mail to: kkirkey@mtc.ca.gov

Ken Kirkey
Director, Planning
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Pleasanton Comment on Plan Bay Area 2040 – Draft Preferred Scenario

Dear Mr. Kirkey,

Thank you for the opportunity to comment on the Draft Preferred Scenario for Plan Bay Area 2040. Given that the projected growth for Pleasanton is not in alignment with the City's adopted General Plan (including the Housing Element) and for other reasons detailed in this letter, on behalf of the City of Pleasanton, I am respectfully asking MTC and ABAG staff to re-examine the Draft Preferred Scenario numbers to more accurately reflect Pleasanton's planned growth.

As stated in your correspondence, the Draft Preferred Scenario is intended to represent a projected regional pattern of household and employment growth in 2040, and was in large part developed with ABAG's economic and demographic forecasts employed by a regional land use model, UrbanSim.

The Draft Preferred Scenario for Pleasanton indicates household and employment growth summarized in Table 1 for City-wide, and Table 2 for PDA Hacienda.

Table 1: September 2016 Draft Preferred Scenario – City-wide

	Households		Employment	
Plan Bay Area 2013 Growth Proposed Projection	2010	2040	2010	2040
City Wide	24,700	34,600	60,100	69,900
2010-2040 Change (30 Years)	9,900		9,800	
Number Per Year (Over 30 Years)	330		327	
2010-2040 Percentage Change	**40%**		**16%**	
Average Percentage Change Per Year	**1.3%**		**0.5%**	

COMMUNITY DEVELOPMENT **P. O. BOX 520, Pleasanton, CA 94566-0802**

Planning	**Building & Safety**	**Engineering**	**Traffic**	**Inspection**
200 Old Bernal Ave.	200 Old Bernal Ave.	200 Old Bernal Ave.	200 Old Bernal Ave.	157 Main Street
(925) 931-5600	(925) 931-5300	(925) 931-5650	(925) 931-5650	(925) 931-5680
Fax: 931-5483	Fax: 931-5478	Fax: 931-5479	Fax: 931-5479	Fax: 931-5484

Table 2: September 2016 Draft Preferred Scenario – PDA Hacienda

	Households		Employment	
Plan Bay Area 2013 Growth Proposed Projection	2010	2040	2010	2040
Priority Development Area (Hacienda)	1,300	8,000	12,500	19,600
2010-2040 Change (30 Years)	6,700		7,100	
Number Per Year (Over 30 Years)	223		237	
2010-2040 Percentage Change	**515%**		**57%**	
Average Percentage Change Per Year	**17%**		**2%**	

The Draft Preferred Scenario represents a significant departure from the anticipated growth in the City's General Plan, including Pleasanton's adopted and State certified Housing Element, as well as from previous projections provided by ABAG. Additionally, the growth projected for the Hacienda Business Park (Hacienda) – an average annual growth rate of 17% a year – is unrealistic and oddly disproportionate to what is projected for the remainder of the City. Somewhat problematic for the level of growth is that while Hacienda is shown as a Potential PDA, there is no pending plan for a long-range plan to intensify development or include more residential opportunity sites for the area. Further, the Draft Preferred Scenario far exceeds the City's current growth management ordinance allotment of 235 residential units per year. These concerns have been communicated in previous letters and during conference calls with ABAG staff on March 31, 2016, April 13, 2016, and June 8, 2016.

As previously communicated, I am proposing growth rates that I believe are consistent with the City's adopted planning policies and existing data:

1. A City-wide increase of 235 units (households) per year, which is consistent with the City's current annual benchmark established by the adopted growth management ordinance. This results in a 28% increase over the 30 years between 2010 and 2040, and an average annual increase of approximately 1%.
2. Update the baseline values for Hacienda Business Park to reflect correct values for households and jobs (these are based off the U.S. Census data): 1,540 households and approximately 17,000 jobs in 2010.

I look forward to receiving revised projections for the Draft Preferred Scenario prior to adoption by the ABAG Executive Board.

Sincerely,

Gerry Beaudin
Director of Community Development

Cc:

Adam Weinstein, Planning Manager
Shweta Bonn, Senior Planner
Miriam Chion, ABAG, Director of Planning & Research, miriamc@abag.ca.gov

CITY OF SAN PABLO

City Manager

October 4, 2016

CITY OF SAN PABLO
City of New Directions

San Pablo
All-America City
NATIONAL CIVIC LEAGUE
2014

Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

SENT VIA EMAIL: info@mtc.ca.gov

RE: Comments from the City of San Pablo for the Draft Plan Bay Area 2040 Land Use Scenarios

Dear MTC Public Information Staff:

The City of San Pablo has reviewed the Draft Preferred Plan Bay Area 2040 Land Use Scenario and is submitting the following comments:

1. The City of San Pablo is a disadvantaged community and considered a community of concern. We have embraced Plan Bay Area and adopted three PDAs as an approach to greenhouse gas (GHG) reduction. As additional support of greenhouse gas reduction, the City signed ABAG's Memorandum for the East Bay Corridors Initiative to collaborate at a corridor level on GHG reduction. We obtained a CCTA grant to complete a Targeted Industries Study on green jobs. For these reasons, we are pleased to see that Draft Results for Performance Targets, and Equity Measures, and a Draft Transportation Strategy have been created and are identified as critical components of the overall Draft Preferred Plan Bay Area 2040 Land Use Scenario.

2. The City is pleased to see that the total household projections for 2040 for the City of San Pablo have been reduced to a total of 9,600 units, which includes the anticipated potential growth of the three Priority Development Areas in the City for the total number of potential new households. Additionally, the City appreciates that a lower number - 8,950 for existing households for 2010 - has been incorporated into the Draft Preferred Plan Bay Area 2040 Land Use Scenario.

3. ABAG has reduced its 2040 projection for jobs, from a total of 10,680 to 10,000, for the City and the three PDAs. The City of San Pablo continues to strive to meet the job creation projections for the Draft Preferred Plan Bay Area 2040 Land Use Scenario by the 2030, the term of the City of San Pablo General Plan, and the 2040 Plan Bay Area document.

4. The City acknowledges the following statement in the Plan Bay Area 2040 Draft Land Use Scenario, where ABAG states, "many PDAs may not be able to accommodate forecasted growth and require additional policy interventions to increase their development potential. As a result, ABAG assumes a range of regional policy and investment strategies in the draft preferred land use scenario to increase development potential in PDA's, and influence the overall regional pattern. These strategies are described as follows:

13831 San Pablo Avenue, Building 1 • San Pablo, CA 94806
Main: 510-215-3000 • *Direct:* 510-215-3001 • *Fax:* 510-215-3011
www.SanPabloCA.gov

- Current urban growth boundaries/limit lines are kept in place.
- Inclusionary zoning is applied to all cities with PDAs, meaning that these jurisdictions are assumed to allow below-market-rate or subsidized multi-family housing developments.
- All for-profit housing developments are assumed to make at least 10 percent of the units available to low-income residents, in perpetuity (via deed restrictions).
- In some cases, PDAs were assigned higher densities than what those cities currently allow.
- The cost of building in PDAs and/or Transit Priority Areas (TPAs) is assumed to be reduced by the easing of residential parking minimums and streamlining environmental clearance
- Subsidies are assumed to stimulate housing and commercial development within PDAs."

While the City may agree with the overall intent of these six strategies, the City needs to consider the implications of inclusionary zoning for future residential housing development, as well as the possibility of easing residential parking minimums. The City continues to use the infill exemptions as allowed by CEQA, when they are applicable and appropriate, and will apply for future funding and grants, as we have three PDAs which makes the City of San Pablo a strong candidate for future transportation related grants.

Thank you for the opportunity to comment on the Plan Bay Area Draft 2040 Land Use Scenario. Please feel free to contact Development Services Director, Michele Rodriguez at MicheleR@sanpabloca.gov, or 510-215-3030, if there are questions about these comments.

Sincerely,

Matt Rodriguez
City Manager

Copies:
Johnny Jaramillo, Senior Planner
Economic and Housing Development
Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Martin Engelmann, P.E
Deputy Executive Director, Planning
Contra Costa Transportation Authority
2999 Oak Grove Road, Suite 100
Walnut Creek, CA 94597

October 11, 2016

Bay Area Metro Center
Association of Bay Area Governments/Metropolitan Transportation Commission
ATTN: Miriam Chion and Ken Kirkey
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Subject: City of San Rafael Comments on Plan Bay Area Draft Preferred Scenario (City File No. P15-008)

Dear Ms. Chion and Mr. Kirkey:

Over the past year, the City of San Rafael has been actively following the update to Plan Bay Area 2040. During this process, our staff has reviewed revisions and studies that have been released, and have submitted written comments to ABAG/MTC on behalf of our City.

The latest Draft Preferred Scenario was published in late August 2016 and we have been diligently reviewing the scope of and the growth projections for this scenario to determine the Plan implications on our City. On October 3, 2016, the San Rafael City Council reviewed a report on the Draft Preferred Scenario, including the revised household and employment projections. Following a discussion of the Draft Preferred Scenario, the City Council directed the preparation of this letter with comments. We respectfully submit the following comments:

1. We question the use of 2010 as the base year for modeling input. It is unclear why 2010 was chosen as the base year for the UrbanSim model input. As acknowledged by the information we received from your staff, nearly one-third of the forecast jobs using this base year have occurred as a result of the post-recession employment boom. For this reason, the use of a more recent base year for model input would be more logical and appropriate.

2. Priority Development Area (PDA) Growth Distribution. The scope of the Draft Preferred Scenario presents an adjustment in the growth distribution to PDAs. By comparison to the 2013 Plan Bay Area, the percentage of growth proposed to be distributed to PDAs has been reduced from 80% to 75% for households and from 70% to 52% for jobs. The City of San Rafael supports this change. We are committed to maintain our Downtown PDA and the lower distribution of growth provides a better benchmark for the long-range planning of this PDA.

3. The household projection for San Rafael is reasonable and acceptable. The latest draft projection show a reduction in housing growth of 330 households from those in the adopted 2013 Plan Bay Area. This projection is within the household growth projection range of the current San Rafael General Plan 2020. From 2000 to 2010, our number of households grew by 393 units. By this

Gary O. Phillips, **Mayor** • Kate Colin, **Vice Mayor** • Maribeth Bushey, **Councilmember** • John Gamblin, **Councilmember** • Andrew Cuyugan McCullough, **Councilmember**

account, we can reasonably expect that San Rafael can accommodate the projected growth in households.

4. The 2040 jobs projection growth for San Rafael is ambitious given the built environment conditions and constrained transportation network. While the 2040 jobs projection (growth of 5,800 jobs citywide) presented with the Draft Preferred Scenario has been reduced from the Adopted 2013 Plan Bay Area (by approximately 21% or 1,540 jobs), there is still a significant concern regarding the feasibility to accommodate this projection. As noted in our past comments on Plan Bay Area: a) San Rafael is a built out community with very limited capacity for new commercial growth; and b) the development equivalent to accommodate some of this job growth would require major transportation and utility service infrastructure improvements that exceed our current and planned capacity.

In addition, we understand that a portion of this jobs projection has been realized as a result of the surging job growth in the past several years (result of the recovered economy). However, our staff has not been able to obtain specifics from your staff on this recent job growth in our community; this information would be helpful for the City to better understand and analyze the jobs projection. Lastly, as job growth varies by geographic area, prior to further adjustments in this projection, it is recommended that your staff consult with the Marin Economic Forum. The Marin Economic Forum is an excellent local source on business and employment trends.

We appreciate the opportunity to review and comment on the Draft Preferred Scenario projections. We look forward to a response to our comments. Should you have any questions regarding the information in this letter please feel free to contact Paul Jensen, our Community Development Director at (415) 485-5064 or email at paul.jensen@cityofsanrafael.org.

Sincerely,

Gary O. Phillips, Mayor
CITY OF SAN RAFAEL

cc: City Council
Planning Commission
City Manager
Economic Development Director
Community Development Director
Marin Economic Forum, 555 Northgate Drive, Suite 255, San Rafael, CA 94903

CITY OF SAN RAMON

2401 CROW CANYON ROAD
SAN RAMON, CALIFORNIA 94583
PHONE: (925) 973-2500
WEB SITE: www.sanramon.ca.gov

October 12, 2016

Ken Kirkey, Director
MTC
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Plan Bay Area 2040 DRAFT Preferred Scenario

Dear Mr. Kirkey

Thank you for the opportunity to provide input on the Draft Preferred Scenario. The August 30, 2016 letter outlines the proposed land use strategy for the nine Bay Area counties, providing household and employment forecasts for each city, unincorporated areas and Priority Development Areas through 2040 and builds upon the current Plan Bay Area (PBA) adopted in 2013. It is our understanding that ABAG forecasts the Bay Area to grow by the 820,000 households and 1,276,000 jobs in the next 25 years, to meet the housing and greenhouse gas targets under Senate Bill 375. The Draft Preferred Scenario assumes the highest household and job growth will be directed to the PDAs, primarily in Oakland, San Francisco and San Jose.

Job Growth Projections

For San Ramon, the Draft Preferred Scenario decreases our job growth between 2010 and 2040, resulting in 1,800 fewer jobs in the City. This is in contrast to Projections 2013 which showed an increase of 14,360 jobs, in line with our General Plan assumptions of 13,317 new jobs. General Plan 2035 projects at buildout San Ramon will have 57,667 jobs, with 33,288 located in our City Center and North Camino Ramon PDAs. It is difficult to understand the loss of jobs when our primary business center, Bishop Ranch located within our City Center PDA, has entitlements to construct over 700,000 s.f. of new office.

Household Projections

The Draft Preferred Scenario estimates 31,100 households in 2040, with 5,800 located in the above identified PDAs. Our General Plan 2035 estimates 34,670 households, with 2,666 households in our PDAs. It appears PBA has transferred households from our outlying areas into our PDAs and reduced our buildout projections by approximately 3,500 households. While in theory this appears to be realistic, practically, it is not. San Ramon is a city with fairly new and

well maintained housing stock. Additionally, there are approximately 1,700 new units under construction over the next 3 years located in our Dougherty Valley and Northwest Specific Plan areas, which makes it difficult to understand the de-population of San Ramon by 2040.

We appreciate the opportunity to share our comments regarding Plan Bay Area and request the projections be revised to align with those within our General Plan 2035. If you would like to discuss our projections further, please do not hesitate to contact me at (925) 973-2566.

Sincerely,

Debbie Chamberlain
Division Manager, Planning Services

Attachments
Plan Bay Area 2013 Growth Projections

cc Miriam Chion, ABAG
Martin Engelmann, P.E., CCTA
Joe Gorton, Interim City Manager
Eric Figueroa, Assistant City Manager

Plan Bay Area 2013 Growth Feedback

Jurisdiction Name: City of San Ramon
Contact Person/Title: Debbie Chamberlain / Division Manager, Planning Services
Email/Phone: dchamberlain@sanramon.ca.gov / (925) 973-2566

Instructions: Check 'one' box per row to indicate whether/how Plan Bay Area 2013 growth should be adjusted for the Plan update in 2017. If growth estimates warrant a lower or higher adjustment, please provide a brief explanation in the adjacent text box. You may provide other general feedback below. Please return this form via email to your county's ABAG regional planner by July 20, 2015.

		Same	Lower	Higher	
JURISDICTION TOTAL	Population	☐	☐	☒	See attached General Plan 2035 figures
	Housing	☐	☐	☒	See attached General Plan 2035 figures
	Employment	☐	☒	☐	See attached General Plan 2035 figures
PRIORITY DEVELOPMENT AREAS	Population	☐	☐	☐	See attached
	Housing	☐	☐	☐	See attached
	Employment	☐	☐	☐	See Attached

Click here to enter text.

Attachment 3

City Center PDA

2010	2040
Population 0	**Population:** 3,254
Households: 0	**Households:** 1,542
Jobs: 17,071	**Jobs:** 20,707

North Camino Ramon PDA

2010	2040
Population: 0	Population 2,372
Households: 0	Households 1,124
Jobs: 9,534	Jobs 12,576

levels of the General Plan, assume average densities and intensities for the various land use classifications identified in the General Plan Land Use Diagram.

Residential

As of January 1, 2014, an estimated 27,993 residential units exist within the San Ramon Planning Area, which includes an estimated 501 units outside the City limits, but still within the Planning Area. The General Plan will result in a projected 7,198 additional units, based on identified housing opportunity sites, for an estimated General Plan 2030 buildout total of 35,385 residential units for the Planning Area. The majority of these units are associated with the buildout of the Dougherty Valley Specific Plan. Northwest Specific Plan, North Camino Ramon Specific Plan, City Center Project, and Crow Canyon Specific Plan. Table 4-6 shows the estimated current and projected residential units for the San Ramon City Limits and Planning Area.

Table 4-6: San Ramon Planning Area Residential Units

Estimated Current Residential Units 2014		*Additional Residential Units Under General Plan Buildout*		*Estimated Buildout of Residential Units 2035*	
City limits	**Planning Area**	**City limits**	**Planning Area**	**City limits**	**Planning Area**
27,492	27,993	7,198	7,392	34,690	35,385

Note:

Estimate of Planning Area residential units extrapolated from California Department of Finance Jurisdictional projections 01-01-2014.[ER4]

Non-Residential

As of 2014, approximately 16.4 million square feet of non-residential floor area currently exist in the San Ramon Planning Area, which includes retail, commercial, office, light industrial, and public space. Approximately another 5 million square feet of space is approved, underway, or programmed with City Center project, buildout of the approved Specific Plans and the additional square footage contemplated as part of the North Camino Ramon Specific Plan. In total, General Plan buildout in 2035 is estimated to result in approximately 21.6 million square feet of non-residential floor area in the San Ramon Planning Area. Table 4-7 shows the estimated current and projected non-residential square footage for the San Ramon Planning Area.

Table 4-7: San Ramon Planning Area Non-Residential Square Footage

Estimated Current Non-Residential Square feet 2014	*Additional Non-Residential Square feet General Plan Buildout*	*Estimated Buildout of Non-Residential Square feet 2030*
16,465,691	5,165,039	21,630,730

Note:
Estimate of Planning Area Non-residential square footage based on GP 2020 background data and project specific projections from the City of San Ramon.:[ER5]

BUILDOUT POPULATION AND EMPLOYMENT

Approximately 90 percent of the buildout population and employment either already exists or will occur with approved or programmed developments.

Population

At the General Plan 2035 buildout, the San Ramon Planning Area is estimated to accommodate a population of approximately 96,174 people , an increase of about 18 percent over the current population estimate of approximately 78,820 people for the Planning Area (77,270 City). The majority of these new residents will result from the development of housing units already anticipated by the General Plan. This additional population reflects an estimated annual growth rate of about 1.0 percent per year over the next 20 years, which is considerably less than the projected 2.77 percent annual growth rate experienced by the City from 2000-2014. Table 4-8 shows the estimated current and projected populations for the City and San Ramon Planning Area.

Table 4-8: San Ramon Planning Area Buildout Population

Estimated Current Population 2014		*Additional Population Under General Plan Buildout*		*Estimated Buildout Population 2035*	
City limits	**Planning Area**	**City limits**	**Planning Area**	**City limits**	**Planning Area**
77,270	78,820	16,754	17,354	94,024	96,174

Note:
Estimate of Planning Area population extrapolated California Department of Finance Jurisdictional Projections 01-01-2014.-Projections are based on an estimated average of 2.91 persons per household. Multifamily and single family of persons per household are estimated at 2.11 and 3.21 respectively based on 5 yr. ACS data (2012).[ER6]

Employment

San Ramon Plan Area will accommodate approximately 57,667jobs at buildout, for an increase of about 25 percent over the current estimated employment of 45,994. The additional employment accommodated by this General Plan is about 11,673jobs. This reflects an overall annual job growth rate of about 1.08 percent over the next 21 years. This projected job growth is anticipated to be steady, but more active than that experienced in the 2000's

culminating in the economic downturn in 2007-2008. A significant part of this new employment growth is anticipated by the completion of the City Center project and implementation of the North Camino Ramon Specific Plan. The General Plan 2035 Economic Element provides addition information of existing and future employment trends specific to the City. Table 4-9 shows the current estimated and projected employment for San Ramon.

Table 4-9: San Ramon Planning Area Buildout Employment

	Estimated Employment 2014	*Additional Jobs Under General Plan Buildout*	*Estimated total Buildout Employment (2035)*
Total	45,994	11,673	57,667

Note:
Estimate of Planning Area employment is extrapolated from ABAG 2010 Jurisdictional Projections (P2013) based on the average growth rate from 2000-10, plus project specific NCRSP PDA employment information.[ER7]

Jobs to Housing Ratio

A city's jobs/housing ratio (jobs to employed residents) would be 1:1 if the number of jobs in the city equaled the number of employed residents. In theory, such a balance would eliminate the need for commuting and signifies a balanced community. A ratio greater than 1.0 indicates a net in-commute (jobs rich); less than 1.0 indicates a net out-commute (housing rich). As shown in Table 4-10, the current jobs/housing ratio in San Ramon is 1.26, which means that the number of jobs in the City exceeds the number of employed residents by about 26 percent. The addition of significantly more residential units (employed residents) as compared to the relatively flat growth rate in jobs has resulted in a reduction in the jobs/housing ratio from 1.51 to 1.26 since 2000. As future residential development decrease with buildout of the General Plan, the growth of employed resident will likely also slow, absent a change in the existing household employment profile. As such, if the job growth remains constant or slows, the jobs housing balance will also remain flat as the City approaches buildout in 2035.

Table 4-10: San Ramon Planning Area Jobs – Housing Ratio (Employment–Employed Residents)

	Estimated Jobs/Employment	*Estimated Employed Residents*	*Estimated Jobs/Housing Ratio*
2000	40,030	26,561	1.51
2010	44,350	32,820	1.35
2014	45,994	36,630	1.26
2035	57,667	47,164	1.22

Note:
Estimate of Planning Area employment and employed residents extrapolated from ABAG Jurisdictional Projections (P2013) and 5 yr. ACS data (2012).[ER8]

Buildout under the General Plan is expected to add proportionately more population than jobs. As a result, the jobs/housing balance is expected to fall to 1.22 resulting in only a 22

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September 13, 2016

Miriam Chion, Director of Planning and Research
Association of Bay Area Governments
Bay Area Metro Center, 375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Ken Kirkey, Director of Planning
Metropolitan Transportation Commission
Bay Area Metro Center, 375 Beale Street, Suite 800
San Francisco, CA 94105-2066

RE: Plan Bay Area 2040 Draft Preferred Scenario

Dear Ms. Chion and Mr. Kirkey,

Thank you for the opportunity to comment on the Plan Bay Area 2040 Draft Preferred Scenario. We appreciate the outreach that MTC and ABAG are conducting to the Bay Area agencies, and submit the following comments for your consideration regarding South San Francisco.

Residential Projections

The Draft Preferred Scenario projects an additional 3,000 housing units in South San Francisco by 2040. We have reviewed these projections and compared them with City estimates based on recently entitled projects, projects in the development pipeline and potential projects which staff expects will materialize in the foreseeable future. Our analysis anticipates an additional **4,500** dwelling units in South San Francisco, higher than the Plan Bay Area projection of 3,000.

South San Francisco: Residential Projection	
Under Construction / Entitled / Pipeline Projects	
Acres	Projected Units (Based on Zoning)
23	1,008
City/RDA Successor Agency owned Land	
Acres	Projected Units (Based on Zoning)
16	973
Potential East of 101 Area	
Acres	Projected Units
40	2,500
Total Projected Units	
Acres	**Projected Units**
79	**4,481**

City Hall: 400 Grand Avenue • South San Francisco, CA 94080 • P.O. Box 711 • South San Francisco, CA 94083
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The City is planning major transportation and infrastructure improvements, including the relocation, improved access, and modernization of the Caltrain station. This investment will improve transit access and create additional opportunities for transit-oriented residential and mixed-use development throughout East of 101 and Downtown.

Employment Projections

The employment projections for South San Francisco show a 2010 baseline of 38,880 jobs, with growth to 55,400 by the Plan Bay Area horizon of 2040. The 2010 baseline does not match our most recent jobs inventory; the 2012 Census included 52,444 jobs in South San Francisco at that time.

In addition to residential development under construction or in the pipeline, the City has experienced significant commercial growth recently, including entitlements for approximately one million square feet of commercial, and approximately 7.5 million square feet of office/ R&D space. We anticipate an additional two to three million square feet of employment development going through the entitlement process within the next three years. The entitled and projected employment development equates to approximately 18,000 additional employees in South San Francisco, or a total employment projection of nearly **70,500,** which is significantly higher than the Plan Bay Area projection.

It is also important to note that the vast majority of projected jobs and residential units in South San Francisco are in close proximity to regional transit stations (Caltrain, BART, and the ferry terminal), supporting efficient patterns of transit-oriented development, and encouraging transit use as viable commute alternative.

We are looking forward to meeting with ABAG and MTC staff in the very near future to discuss the Plan Bay Area methodology and assumptions in detail, and review the specific projections for South San Francisco. Should you have any questions in the meantime, however, please feel free to contact me at any time.

Sincerely,

Mike Futrell
City Manager, City of South San Francisco

cc: South San Francisco City Council

CUPERTINO

OFFICE OF THE CITY MANAGER

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September 15, 2016

Ken Kirkey
Planning Director
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Plan Bay Area 2040 Draft Preferred Scenario

Dear Mr. Kirkey:

Thank you for allowing local jurisdictions the opportunity to comment on the Plan Bay Area 2040 Draft Preferred Scenario. Upon review of the information provided, the City of Cupertino has the following comments.

1. **Household Growth:** *The Draft Preferred Scenario indicates that Cupertino's Household growth is expected to increase by about 1.9% over Plan Bay Area 2013 adopted figures.*

   Cupertino remains committed to accommodating its share of the Regional Housing Needs Allocation (RHNA) provided it is consistent with past estimates. Additional housing growth beyond the City's RHNA is not anticipated to occur.

2. ***Jobs Growth:*** *The Draft Preferred Scenario indicates that Cupertino's Jobs growth is expected to increase by over 60% over Plan Bay Area 2013 adopted figures. On the other hand, the County's job growth has been projected to increase a mere 3% over Plan Bay Area 2013 numbers. Cupertino's job growth number appears to be grossly overstated and the City disagrees with this projected increase. An increase of up to 3% above Plan Bay Area 2013 numbers would be a more realistic projection for the following reasons.*

   Cupertino uses a development allocation system instead of floor area ratios, which provides a hard cap for office development in the City's General Plan (2015-2040). Currently, there is approximately 500,000 square feet of office allocation available in

the entire City. There is an additional 2M square feet of office potential at the Vallco shopping center site. However, it is currently the subject of an election measure which proposes to remove the office allocation. If passed, the City would have only 500,000 square feet available.

We would like to note that Apple's new campus, approved in late 2013, was largely a teardown and rebuild of an existing HP campus with only a small increase (approximately 200,000 square feet) which was already anticipated in the 2005 General Plan. Therefore, no additional job growth should be allocated to Cupertino as a result of this redevelopment in the Draft Preferred Scenario.

The Draft Preferred Scenario shows that many of our neighboring cities appear to have extremely low or negative office growth, even though they are currently processing General Plan amendments with a great deal of office development. While the market may show that Cupertino has a strong potential for additional office development, many of the neighboring cities share the same characteristics. What differentiates Cupertino from the other cities is it's extremely limited ability, per the General Plan, to approve additional office development.

We believe that the Plan Bay Area 2013 projection for job growth for Cupertino is closer to what could realistically occur within the City. At the most, a 3% increase consistent with the growth rate for Santa Clara County as a whole could be justified. As a result, we recommend that the job numbers not exceed 34,100 or 3% above the Plan Bay Area 2013 numbers.

We have additionally requested parcel level data from MTC's model so that we can review it and provide feedback where MTC may have allocated additional growth. We hope that MTC and ABAG will consider this information prior to adopting the final Plan Bay Area 2040 Preferred Scenario later this year.

Again, we appreciate the opportunity to comment on the Draft Preferred Scenario and hope to work with you to adjust the numbers based on our feedback. If you have any questions, please feel free to contact Aarti Shrivastava, Assistant City Manager at aartis@cupertino.org or Piu Ghosh, Principal Planner at piug@cupertino.org.

Regards

David Brandt
City Manager

CC: Miriam Chion, Director of Planning and Research, Association of Bay Area Governments, 375 Beale Street, Suite 300, San Francisco, CA 94105
Aarti Shrivastava, Assistant City Manager, City of Cupertino, 10300 Torre Avenue, CA 95014

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Friday, September 9, 2016

ABAG Administrative Committee with the MTC Planning Committee
Bay Area Metro Center
375 Beale Street, San Francisco, CA

Re: Item 5 Plan Bay Area Preferred Scenario

On behalf of the Non-Profit Housing Association of Northern California (NPH), I write to commend staff for putting together a thorough and thoughtful Draft Preferred Scenario of Plan Bay Area. This Draft enables the Bay Area to meet its greenhouse gas emissions targets, preserves the region's open spaces, increases jobs in middle wage industries, and improves goods movement. However, some policy items essential to the well-being of the region's low-income families are still lacking especially in terms of housing affordability and displacement risk.

Founded in 1979, NPH is the collective voice of those who support, build and finance affordable housing. We promote the proven methods of the non-profit sector and focus government policy on housing solutions for lower-income people who suffer disproportionately from the housing affordability crisis. We are 750 affordable housing developers, advocates, community leaders and businesses, working to secure resources, promote good policy, educate the public and support affordable homes as the foundation for thriving individuals, families and neighborhoods.

NPH offers its input in the hopes that the Plan's outcomes could be improved for the region's neediest residents. We focus on three areas 1) process, 2) next steps 3) improving model assumptions to provide a more realistic vision for growth in the Bay Area.

1. **Process:**

NPH would like for the joint committee to add an additional meeting to the Plan's schedule to consider public feedback to the Plan and to get an initial response from staff. The Plan's current schedule, which calls for the adoption of the final preferred scenario by November 17th, leaves too little time to have an open and deliberate discussion on the feedback staff will receive from jurisdictions, stakeholders, and the public between now and October 14th (the last date for written comments). Having an additional meeting to review feedback and to discuss staff's reaction to that feedback creates a more transparent and accountable process for the Plan and allows the boards to have a richer and more informed discussion prior to adopting the final scenario. *The additional meeting could take place either during the last week of October keeping to the current schedule* OR *the adoption of the final preferred scenario could be pushed back two weeks to the first week of*

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December so staff can use the presently scheduled meetings to discuss the input they received.

2. Next Steps for the Plan:

NPH also firmly believes that once adopted the Plan should be actionable. For the plan to have a greater impact on the ground it should include a chapter that quantifies the plan's remaining funding gap in housing, transportation, and open space preservation and outlines the actions that the regional agencies, local governments, and the state can take to fill in those gaps. Plan Bay Area 2013 had a final chapter called "A Plan to Build On." Plan Bay Area 2040 should go a step further and quantify funding gaps and outline actions that could be taken at the state, regional, and local levels to get the Bay Area to where it needs to be. Making this change would result in a more meaningful planning document that could help structure the work of the merged agency.

3. Improving model assumptions to provide more realistic vision for growth in the Bay Area:

The UrbanSim model should make realistic land use assumptions based on current best practices and trends. To that end, NPH has extensive recommendations on the types of policies that should be considered by the modelers to ensure that UrbanSim reflects a realistic, if aspirational, vision for what growth could look like in the Bay Area.

Land use distribution*:* Jurisdictions should do their fair share of housing the region's growth especially if they have access to fixed rail transit. More housing should be distributed to Bayside jurisdictions with new jobs to new housing unit ratios of 2.5 or greater especially if such jurisdictions have access to rail transit. NPH's analysis found 15 such jurisdictions with new jobs to housing ratios ranging from 10.8 new jobs/housing unit to 2.5 new jobs/housing unit.

Inclusionary Zoning: While NPH is supportive of including inclusionary zoning among the model's assumptions we believe that they need to be calibrated:

- Inclusionary zoning should be assumed only for the development of ownership housing for consistency with the *Palmer* court ruling from the State Supreme Court.
- Rental housing developments should be assumed to pay housing development impact fees with a modest assumption for development agreements/community benefits agreements that could yield some affordable rentals (no more than 5-8% of all future development)

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- The income affordability of inclusionary units should be specified (low vs. mod) as a model output

Public Lands: As part of OBAG 2, the MTC Commission unanimously adopted guidelines that required all general law jurisdictions that receive OBAG funding to adopt resolutions detailing how their disposition of public land complies with the state's Surplus Land Act. Consistent with Resolution 4202 UrbanSim should assume compliance with the act:

- UrbanSim should assume that a certain percentage of all publicly-owned parcels in the Bay Area will be developed by affordable housing developers who will make at least 25% of the units deed-restricted affordable to low income households - consistent with the Surplus Land Act.
- 35% of the units developed on land owned by VTA should be assumed to be affordable to low-income households – consistent with VTA's own adopted policy
- 35% of the units developed on land owned by BART should also be assumed to be affordable to low-income households – consistent with BART's proposed TOD policy update for November of 2016

Anti-Displacement policies: Consistent with the MTC Commission's direction to CMAs to award jurisdictions with adopted anti-displacement policies additional points for transportation projects, it would be beneficial to the region to analyze the impact of anti-displacement policies in preventing the displacement of the Bay Area's low income communities. Policies that help keep low-income households in place include rent stabilization, just cause eviction and local minimum wages higher than the state minimum wage. In addition, UrbanSim should take into account current rent stabilization ballot measures in East Palo Alto, Mountain View, Burlingame, Richmond, Alameda, and San Mateo and gauge their impact.

Available Subsidies: To provide the Bay Area with a plausible, though optimistic, picture of what it could achieve, UrbanSim should take into account all existing and potential subsidy sources under consideration on the November ballot.

- ***Bonds:*** Subsidy sources should include all the affordable housing bonds/sales tax measures under consideration by Alameda County ($580 million), Santa Clara County ($950 million), and San Mateo County (up to $40 million/year), it should also include San Francisco's Prop A adopted in 2014 ($310 M bond) and Proposition C (repurposing $260 million for affordable housing).
- ***Value Capture:*** Value capture as a source of affordable housing subsidy should be assumed in the 3 big cities and jurisdictions along El Camino Real, International Boulevard, and San Pablo Avenue as those are places most likely to experience growth and to use this tool.

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- ***Housing Impact and Commercial linkage fees*** should be assumed for jurisdictions with nexus studies in the Peninsula, South Bay, and Alameda County jurisdictions
- ***Funding for Affordable Housing Preservation:*** Sources of funding for housing preservation should be incorporated into the model, including MTC's own Naturally Occurring Affordable Housing Fund (NOAH) at $50 million, Oakland's Infrastructure Bond at $100 million, San Mateo County's Affordable Rental Housing Preservation Program at $10 million, and SF's Prop A (2015) and C (2016).
- ***Boomerang funding***: analyze the use of affordable housing "boomerang funds" returned to the jurisdiction following the dissolution of their redevelopment agencies and potential to bond against those funds to subsidize affordable development.
- ***Regional Housing Trust Fund:*** The model should take into account potential subsidy sources raised through a Regional Housing Trust Fund as proposed by ABAG through its Regional Housing Agenda.
- ***Make existing subsidy assumptions explicit:*** The model should make explicit existing assumptions about subsidy sources including a regional commercial linkage fee and a regional infrastructure financing fund.

Second units: UrbanSim should also gauge the regional impact of the easing of restrictions associated with developing second units that were lifted after this year's passage of SB 1069 (Wieckowski) and AB 2406 (Thurmond and Levine).

NPH truly appreciates the work of MTC and ABAG staff in making Plan Bay Area 2040 an ambitious but achievable document to create a region that allows us to meet our housing needs while improving our transportation system and protecting our natural resources. We stand ready to continue our successful partnership with the agencies and are grateful to staff and the boards for your thoughtful work to date.

Sincerely,

Amie Fishman
Executive Director
Non Profit Housing Association of Northern California (NPH)

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Friday, October 14, 2016

Jim Spering, Chair, MTC Planning Committee
Julie Pierce, President, Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Re: Item 5 Plan Bay Area 2040 Draft Preferred Scenario and Investment Strategy

Dear Chairs Spering and Pierce,

The Non-Profit Housing Association of Northern California (NPH) is grateful to both the ABAG Executive Board and the MTC Commission for being partners in crafting a Plan that can respond to the needs of the Bay Area's lowest income residents. We appreciate your responsiveness to our proposal for additional meetings to discuss feedback on the Plan and for staff's consideration of our concerns.

No one wants to live in a region where half the population spends nearly seventy percent of their income on housing and transportation costs. Nor is it desirable to live in a Bay Area with longer commutes and deteriorated roadways as our workforce is forced to look farther and farther away for homes they can afford. If Plan Bay Area 2040 to be a guiding document then we must plan for a Bay Area that is able to house all of its population including its young people, seniors on fixed income, teachers, medical assistants, and countless service workers who make the economy thrive but who cannot afford the region's astronomical housing costs. We must also work towards ensuring that our region's longtime residents, who have made the Bay Area what it is, can stay in the place that they call home. Unfortunately, the Draft Preferred Scenario fails to create the Bay Area that we want but instead depicts the Bay Area that we are headed towards without meaningful action.

NPH has two requests of the Joint MTC Planning and ABAG Administrative Committees: **1.) We urge staff to develop a meaningful and aggressive implementation plan to address the region's housing affordability and displacement crises that will result in a joint work program and action items for MTC and ABAG staff AND 2.) The Joint Planning and Administrative Committees should also be open to making policy assumptions and pushing for growth allocations for the Bay Area that may not necessarily be able to be modeled.**

1. Developing a meaningful and aggressive implementation plan to address the region's housing affordability and displacement crises:

Now is the time for bold action if we wish for the Bay Area to maintain any of its income diversity over the next 24 years. Alameda, Santa Clara and San Mateo Counties have

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already answered the call by placing over $2 billion worth of affordable housing subsidies on the November ballot, while San Francisco voters approved a $310 million bond in 2015 and with another on this year's ballot – it is time for the regional agencies to consider similar action to help address the yawning funding gap for affordable housing.

A final Plan Bay Area chapter should detail both the funding gaps and policy changes needed achieve the Plan's housing performance and anti-displacement targets at the desired levels. The chapter should also include a roadmap for filling in the subsidy gaps and for adopting the policy changes necessary for building and preserving affordable housing at scale as well as preventing further economic displacement of tenants. To make the Plan actionable, staff should simultaneously create a work program based on the roadmap to guide their joint work through the next iteration of Plan Bay Area in 2021. Both the implementation plan and the joint work program should be adopted at the same time as the final EIR.

A Final Plan Bay Area chapter should at a minimum:

a) Detail how the Plan moves in the wrong direction in terms of housing affordability and displacement risk and present findings from UrbanSim as to why. Staff should ensure that the model is making realistic assumptions including taking into account proposed affordable housing bonds in Alameda and Santa Clara Counties and a sales tax measure in San Mateo County as well as modeling the effect of anti-displacement policies on local jurisdictions that have such proposals on the ballot. The Plan should also examine approaches to improving local jobs-housing fit.

b) Quantify both the funding and policy gaps for Plan Bay Area to achieve its housing affordability performance target at scale while also identifying available resources at the local, regional, state, and federal levels.

c) Establish a roadmap of specific housing policy actions to be taken in the near, medium, and long term to address funding gaps and shortcomings of the Plan's performance targets including identifying areas for which additional work is needed.

- *The roadmap would specify housing actions to be undertaken by ABAG and MTC.* These actions should include fostering the creative use of billions of discretionary transportation dollars to create OBAG-like programs that incentivize and support local action targeted towards affordable housing; a proposal for a Regional Housing Trust Fund that can help finance affordable housing development at a scale commensurate with former redevelopment agencies; creation of an ongoing Infill Infrastructure Grant (IIG) Fund for sites designated for 100% affordable housing developments in PDAs and PDA-like places.
- *Actions to be undertaken in partnership with stakeholders (local jurisdictions, other agencies, stakeholder organizations)* These should include programs to promote

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local adoption of residential development and commercial impact fees to fund the production of affordable units; adoption of community benefits agreements that lead to the creation of more affordable units; implementation of existing state law to yield more deed-restricted and naturally occurring affordable units (Surplus Land Act, Teacher Housing Act, Accessory Dwelling Units including Junior Accessory Dwelling Units.)

- *Actions to be advocated for at the state level.* These include advocating for an ongoing source of affordable housing subsidy at the state level, passing a new statewide affordable housing bond, Ellis Act reform, the "Palmer Fix" for inclusionary housing, etc.
- *Actions to be advocated for at the federal level.* Restoring funding that has been cut from crucial federal programs such as HOME and CDBG and fully funding both tenant-based and project-based Housing Choice Vouchers.

d) Commit MTC and ABAG to creating an "implementation plan" and a work program for the housing actions that are detailed in this final chapter to be adopted concurrently with the final EIR by both the ABAG Executive Board and the MTC Commission.

2. The Joint Planning and Administrative Committees should also be open to making policy assumptions and pushing for growth allocations for the Bay Area that may not necessarily be able to be modeled.

UrbanSim's complex simulations allow policymakers, stakeholders, and members of the public to better understand how land use decisions and policy assumptions are likely to impact development patterns in the Bay Area through 2040. The model is still a work in progress and, as such, the Draft Preferred Scenario has a number of flaws that must be corrected irrespective of UrbanSim's modeling capabilities. If UrbanSim is not able to appropriately model basic housing assumptions, we should not shy away from making off-model adjustments so that the region can benefit while the model is improved.

The Draft Preferred Scenario presently assigns unrealistically high growth projections to some jurisdictions while failing to meet even basic assumptions for others. The region's three large cities are expected to shoulder the lion's share of the region's housing growth (43%) while some suburban jurisdictions with access to high quality rail transit are projected to receive as many as 10 new jobs per new housing unit. For certain jurisdictions, the Draft Preferred Scenario projects less housing growth than what is called for in either the jurisdiction's own general plan (i.e. Palo Alto) or their 8-year RHNA allocation (i.e. Livermore, Los Gatos, San Carlos). The region must address such discrepancies even if they are "off-model" or we risk pursuing a disingenuous development pattern that exacerbates the region's displacement pressures, jobs-housing imbalance, and housing affordability crisis. NPH believes that all neighborhoods near transit and jobs should do their part to house the region's future population.

The Draft Preferred Scenario currently makes assumptions that, in some cases, may be inconsistent with the current state of the law. For example, one of the Draft Preferred

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Scenario's major assumptions is a 10 percent inclusionary requirement on all new residential development in the Bay Area. Such requirements, outside of the context of a developer agreement or community benefits program, could be legally challenged due to the erroneous ruling in *Palmer v. Sixth Street Properties* from 2009. Because UrbanSim is unable to model future housing growth by tenure this assumption becomes doubly problematic as new inclusionary zoning requirements can only be applied to for-sale housing units while, if development trends hold, much of the region's new housing stock will be rental units. At the very least staff should also specify the income levels for whom these inclusionary units are projected to be affordable to even if those numbers are likely to be halved.

Much as the model takes into account local zoning and proposed transportation funding measures, the Draft Preferred Scenario should be recalibrated to take into account proposed and adopted local housing policies. The model should include the proposed general obligation housing bonds in Alameda and Santa Clara Counties (Measures A1 and A respectively) and San Mateo County's proposed sales tax extension (Measure K). The Draft Preferred should also consider all local residential and commercial development impact fees that are targeted towards the provision of affordable homes. It should also analyze the impact of local anti-displacement policies (rent stabilization and just cause eviction ordinances) that have both been adopted and proposed.

We look forward to continuing to work with both the MTC Commission and the ABAG Executive Board as well as regional staff in the coming months to ensure that Plan Bay Area 2040 is truly the best Plan for the region. We appreciate your responsiveness to and engagement with NPH and are grateful for your work to date.

Sincerely,

Amie Fishman
Executive Director
Non-Profit Housing Association of Northern California (NPH)

SAN MATEO COUNTY UNION COMMUNITY ALLIANCE
1153 Chess Drive, Suite 200 Foster City, CA 94404
Serving Workers and their Families

October 10, 2016

Julie Pierce, ABAG President
Dave Cortese, Chair, Metropolitan Transportation Commission

Dear Ms. Pierce and Mr. Cortese:

I write to give comment on the Plan Bay Area Draft Preferred Scenario. My comments will address four issues related to the performance of the preferred scenario around Middle-Wage Job Creation. Two are criticisms of the draft preferred scenario:

1) the model for projecting middle-wage job creation is faulty; and
2) the resulting performance numbers are misleading; and performance against economic vitality targets, (even if projections were accurate) is coincidental, not the result of planning or policy choices.

And two points are offered as constructive proposals for strengthening the implementation agenda:

3) the Economic Development District process must be refocused on creating and sustaining middle wage jobs and ensuring access to those jobs for low wage residents; and
4) successful PBA implementation efforts will require incentives for local jurisdictions to promote economic vitality for everyone in the region.

Middle-Wage Job Model: We commend the regional agencies for incorporating Middle-Wage Job Creation as an explicit Performance Target for Plan Bay Area. However, the forecasting methodology has not, to date, been developed so as to be able to project wage shares of job growth. As a result, the draft Performance Target Results for Performance Target #9, which purport to show a 43% increase in middle-wage jobs under all five scenarios, are misleading and should not be considered or adopted as an accurate representation of the trends in job growth.

The methodology behind the 'middle-wage' job projections identified some industries as "middle wage" industries and then projected job growth in those industries. But that projected growth in "middle-wage industries" does not necessarily mean those jobs will pay good wages or reduce income inequality in the region. Most of the industries include a wide range of jobs and wages—for example, "financial services" is included as a middle wage industry, but "manufacturing" is excluded. Industries like construction (included as a middle wage industry) will produce many low wage jobs unless wage standards and incentives are part of Plan Bay Area's implementing policies. The forecast also assumes that we have workers in the Bay Area who can afford to live here and can perform with the skills required by these industries. As we suggested in the past, the model needs to look into actual wages not an entire industry in order to provide a better reflection of the economic landscape.

Preliminary Results: As a result of the faulty job projection methodology, performance targets misleadingly show that we are doing well on "Increasing jobs in middle-wage industries." Current census data shows the opposite—the Bay Area is on a path towards

greater income inequality with a precipitous decline in the number of middle wage jobs.[1] Even if the inputs to the model were real jobs numbers (not industry projections), they are static across all scenarios, and therefore performance results are a reflection of economic growth, not policies or planning decisions. This economic reality check is not helpful to ensuring the economic vitality that our communities seek.

PBA Implementation-A Bay Area Economic Development District: We support the stakeholder process of developing a Comprehensive Economic Development Strategy for the Bay Area as one aspect of implementing PBA. But to achieve the goal of creating middle wage jobs and ensuring that local workers get those jobs we must refocus that process on 1) providing incentives or policy recommendations to ensure continuous creation of middle wage jobs (if the economic boom cycle slows down); 2) creating programs that will ensure skill upgrades and pathways for low wage workers into middle wage jobs: and 3) improving the quality of the low wage jobs that will continue to exist. Without these implementation measures, the naturally occurring creation of middle wage jobs will lead to more people moving in from outside the Bay Area to take these jobs and greater income inequality and displacement for our existing low wage workforce.

PBA Implementation-Incentives for Local Jurisdictions: The OBAG program has created some incentives for local jurisdictions to focus on increasing housing production and transit-oriented development and mitigating the displacement of Bay Area communities, which are all priorities for PBA. This program can now also be used to create incentives for local jurisdictions to promote economic vitality. Policies to be included in a menu of economic vitality measures--living wage ordinances and minimum wage increases, community workforce agreements, public land for public good measures and target hiring measures. We propose that a new incentive program to support Priority Production Areas could also focus on middle wage job creation, pathways and skills into those jobs and the upgrading of low wage jobs so that our existing communities do not continue to suffer the disruption of economic displacement and increasing poverty.

We are encouraged that the draft preferred scenario for PBA 2040 includes middle wage job growth as a goal. Without this objective, our housing and transportation plans could fail to support the diverse and vibrant communities who have made the Bay Area the most desirable place to live and work in the US. We hope that final implementation measures that support PBA will meaningfully contribute to achieving this goal.

Yours truly,

The Rev. Kirsten Snow Spalding
Executive Director

cc. Metropolitan Transportation Commissioners
Association of Bay Area Governments Executive Council

[1] http://www.mercurynews.com/2016/10/03/silicon-valley-east-bay-gain-wealthy-households-while-middle-

From: REDACTED
Sent: Sunday, September 18, 2016 4:22 PM
To: MTC Info <info@mtc.ca.gov>
Cc: Safe Routes to School National Partnership <info@saferoutespartnership.org>
Subject: Public comment on PBA draft 2040

Plan comments:

It is unacceptable that the draft 2040 plan falls far short of 10% improvement in health and activity MTC targets.

Re Safe Routes analysis:
"None of the scenarios assessed by MTC and ABAG staff achieve the physical activity and health goals set by MTC. The Healthy and Safe Communities target is a decrease in negative health impacts of 10 percent. All scenarios assessed fall far short of that goal, with the draft preferred scenario only decreasing negative health impacts by 1 percent. (The 1 percent figure is still the best of any of the scenarios assessed.)"

Please shift the Plan's transportation priorities to fund, over the first five years starting in 2017, a complete build out in all the PDA s and PCA s of a comprehensive "Low Stress" "Protected Bikeways" "Network." This will give true choice to the 60% of our overall population (in those areas) who would like to ride a bike for transport but need vertical-barrier protection from cars in order to take their bikes out of their houses and Apts where they are languishing.

Immediate five year buildout of Protected networks within the priority areas will go a long way to increasing activity and health goals in the Plan, and to reducing traffic congestion: this priority funding should be applied to Low stress Protected networks both near and in all the PDA s and PCA s.

As funding allows in the second five years these networks should be built regardless of economic status.

This will provide the most widespread possible health impacts, encouraging further local investments outside the PDA s by enabling in the widest population recognition of the value of Low stress complete networks to everyone in the region.

Most people have never yet seen such Protected low-stress networks and seeing and feeling them will help us all understand their critical value in improving health and activity.

Thank you for your consideration.

Jean Severinghaus
Caltrans District 4 Bicycle Advisory Committee, Marin Member At Large

Sent from my BlackBerry 10 smartphone.

Sonoma County Transportation Authority
Regional Climate Protection Authority

October 10, 2016

MTC Chair Cortese and Commissioners
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

We understand that the Regional Governments are charged with planning for GHG emissions reductions, improving the regional transportation system, and for encouraging the provision of adequate housing in Plan Bay Area. Plan Bay Area also facilitates the development of the regional transportation project list, which was once the primary plan deliverable to many of the jurisdictions, along with the Regional Housing Needs Allocation (RHNA) numbers.

At the countywide level, we are concerned at the differences between the draft preferred scenario and the adopted Plan Bay Area Sustainable Communities Strategy housing and employment forecast. We observe that housing growth estimates have increased from the previous forecast, and that employment growth estimates have been reduced. We are concerned that higher housing growth which is not accompanied by similar levels of employment growth could increase vehicle trips, trip lengths, and increase countywide and regional VMT and GHG emissions.

We are concerned with the technical accuracy of modeled growth output generated using UrbanSim. We recognize that the processes and tools used for forecasting population, housing and employment and modeling transportation projects are extremely data intensive. While this is not, in itself a bad thing, it should be accompanied by rigorous validation of modeled results and in some cases parcel by parcel verification. Unfortunately, there appear to be many errors in the detailed growth forecasts for Sonoma County parcels that may have the potential, if not corrected, to lead to unreasonable forecasts for Sonoma County jurisdictions. Regional forecasts are often used by local jurisdictions in planning studies and to estimate project and development impacts. These forecasts are also used to develop forecasts which are used by SCTA in the Sonoma County Travel Model, and SCTA would like to continue to ensure that forecasts used in local modeling are consistent with regional forecasts and the regional travel demand model. SCTA also recognizes that forecasts developed for this regional transportation plan may be used to develop future regional, county, and local forecasts which may be used to develop future RHNA allocations, and recommends that this process use a reasonable forecast which has been vetted by local jurisdictions.

We urge MTC and ABAG to continue working with local jurisdictions and CMAs to verify and validate inputs and assumptions that are used by the region growth model UrbanSim. We recommend that MTC/ABAG work with local jurisdictions and SCTA staff to develop reasonable countywide, jurisdictional, and PDA housing and employment forecasts before the final adoption of the Plan Bay Area Preferred Scenario, and that regional planning and modeling staff continue to work with local and SCTA staff to correct detailed modeling inputs and output errors.

Chair David Rabbitt
Sonoma County Transportation Authority

TOWN of PORTOLA VALLEY
Town Hall: 765 Portola Road, Portola Valley, CA 94028 Tel: (650) 851-1700 Fax: (650) 851-4677

October 10, 2016

Ken Kirkey, Director, Planning
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Request to Revise Plan Bay Area 2040 Preferred DRAFT Scenario 2010 Employment Figures for Portola Valley

Dear Mr. Kirkey:

Thank you for taking the time to meet with Planning Director Debbie Pedro and Associate Planner Arly Cassidy to discuss the Plan Bay Area 2040 Draft Preferred Scenario.

At the meeting on September 29, 2016, Town staff explained that based on a recent survey of Town employers (Attachment 1), the draft scenario's employment number for the 2010 base year of 2,700 is significantly higher than our assessment. Town staff concludes that there are approximately 1,500 jobs for 2010, a more accurate number. Additionally, the forecast of 300 additional jobs by the year 2040 seems unrealistically high as the Town has very few commercial and institutional zoned parcels and there are no plans to expand such zoning districts.

MTC/ABAG and Town staff discussed the methodology for estimating the employment numbers and there was general agreement with the Town's assessment of the employment figures. Therefore, the Town of Portola Valley requests that the DRAFT Preferred Scenario Employment number for the 2010 base year be revised from 2,700 to 1,500 and the 2040 forecast of 300 be lowered accordingly.

Please let us know if you would like any additional information or background; Town Staff is happy to assist. Thank you for your time and consideration of our request.

Sincerely,

Jeremy Dennis
Town Manager

Attachments
1. Town of Portola Valley Employers and Number of Employees
2. Town of Portola Valley Zoning Map

Portola Valley Employers and Number of Employees (September 2016 Survey)

Employer Category/Area	Name	# of Employees
Commercial - General		
	Spring Down Equestrian	8
	Jelich Ranch	3
	Golden Oak Equestrian	8
	The Sequoias	180
	Alpine Rock Ranch	1
Commercial - Nathorst Triangle		
	Roberts Market,	40
	Portola Valley Garage	7
	Additional small busnesses, estimated	50
Commercial - Village Square		
	Park Side Grille	25
	Bay Area Lyme Foundation	2
	Woodside & Portola Private Patrol	26
	Portola Valley Feed	2
	Carousel Saddlery	5
	Village Square Vetrinary Hospital	10
	Briarwood Vetrinary Building	5
	Village Cleaners	2
	Hoffman & Moore Chiropractic	9
	Woodside Fire Temp Location	6
Educational Institutions	PVSD-Ormandale	36
	PVSD-Corte Madera	47
	PV SD	16
	Woodside Priory	90
	Creekside School	5
	Windmill School	5
Religious Institutions	Our Lady of Wayside Church	3
	Christ Church - The Episcopal Parish	4
	Valley Presb. Church	10
Recreation/Open Space	Farmer's Market	20
	Mid Peninsula Open Space	2
	Alpine Swim and Tennis Club	25
Town	Parks and Rec vendors/instructors	8
	Business Lisences, expiring 6/30/17	741
	Town Hall	14
Fire	PV Fire Station	6
Library	PV Library	8
Total		**1415**

ZONING MAP
FOR THE
TOWN OF PORTOLA VALLEY

	Ordinance No.	Date	Ordinance No.	Date
Adopted:	1967-80	7/12/67		
Amended:	1969-97	9/24/69	1989-246	9/22/89
	1973-119	2/14/73	1990-251	4/11/90
	1973-126	1/9/74	1990-253	7/11/90
	1976-147	10/13/76	1995-283	4/21/95
	1979-171	4/11/79	1996-287	4/10/96
	1981-181	3/11/81	1998-305	1/14/98
	1981-182	4/8/81	2003-347	2/26/03
	1983-247	7/20/83		

Reprinted July 2007

Legend

RE/1A Zoning Boundary & Designation

Special Building Setback Lines - S

N W E S

0 500 1,000 1,500 2,000
Feet

PROJECTION: CALIFORNIA STATE PLANE COORDINATES,
ZONE III, NAD83 DATUM. UNITS IN FEET.
PUBLISHED: OCTOBER, 2004