



September 11, 2015

Dear MTC Chair Cortese and ABAG President Pierce:

The Bay Area Planning Directors Association (BAPDA) Steering Committee is concerned about the proposal to move the Planning and Research function from the Association of Bay Area Governments (ABAG) to the Metropolitan Transportation Commission (MTC). The BAPDA Steering Committee provides professional development opportunities for Planning Directors throughout the Bay Region and participates in implementing sound regional planning principles at the local level. We urge you to carefully evaluate the implications and consequences of this proposal, and provide an opportunity for the ABAG General Assembly to comment and participate in this important decision.

ABAG's governance as a Council of Governments facilitates the participation and involvement of all 109 jurisdictions within the Bay Region. With a General Assembly that includes a representative from every jurisdiction, ABAG is accountable to each of our communities. ABAG's Planning and Research staff demonstrates this accountability by meeting with local planning officials to listen and understand the local context before creating land use recommendations that integrate local objectives into a regional vision. This direct approach supports local control, which is a critical issue for the update of *Plan Bay Area*.

MTC has unique strengths related primarily to transportation planning. A consolidated planning function within MTC is likely to distance local jurisdictions due to its historic reliance on Congestion Management Agencies, as an intermediary for input regarding cities and counties. This distance will challenge the ABAG General Assembly and Executive Board to support the land use recommendations coming from MTC. In addition, the distance will also impede localities from participating in essential regional planning and implementation of housing, economic development, disaster preparedness, and other topics.

On a related note, we are concerned that a rushed merger would not create a government structure that is conducive to a healthy dialog between land use and transportation. Specifically, we are concerned that the land use component of *Plan Bay Area* will not be based on local information and instead be driven by desired top-down transportation investments. While it may not occur in this Sustainable Communities Strategy cycle, the likelihood is high over time. This will render the land use component of *Plan Bay Area* meaningless and move it further from the objectives of state law, exacerbating the land use-transportation disconnect in the Bay Region.

Finally, we are also concerned about the loss of valuable technical services beyond the land use component to *Plan Bay Area*. Specifically, local governments rely on the ABAG Planning and Research Department's forecasting for local general plan and housing element updates, and research regarding hazard mitigation planning and best practices. The Department's current economic research is foundational to the potential creation of Priority Industrial Areas to complement the successful Priority Development/Priority Conservation Areas framework for wise land use planning in the Bay Region. The ABAG Planning and Research Department also implements programs to enhance the quality of life through its Bay Trail and Farmland Preservation programs. It is unclear how a planning function within a transportation agency will continue to provide such services.

While some are urging quick action, we would caution that speedy action without thorough deliberation and involvement of the ABAG General Assembly may result in more costs overruns in the long-term. From a purely logistical standpoint, merging and hiring staff takes time and causes disruption—this alone may delay the update to *Plan Bay Area*. Further, we

can likely all agree that the concept of integrated regional planning is laudable; however, as we are well aware the structuring of agencies can greatly affect its success. Any merger should be well thought out so that not only government efficiency is valued; but also so that public involvement and government effectiveness are achieved. For these reasons, we urge both agencies to proceed thoughtfully and for MTC to continue funding for ABAG beyond the December timeline so that any planned merger may proceed in a purposeful manner and with benefit of input from the public and local jurisdictions.

Thank you for your consideration of these comments. We ask that you provide this letter to your Board and Commission members. We welcome the opportunity to engage in further discussion.

Sincerely,



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