

10 August 2020

Association of Bay Area Governments and Metropolitan Transportation Commission

Via E-mail: info@planbayarea.org

Re: Cities Association of Santa Clara County Planning Collaborative Comments on Plan Bay Area 2050 DRAFT Blueprint

Dear ABAG Executive Board and MTC Commissioners:

On behalf of the Cities Association of Santa Clara County Planning Collaborative which includes the fifteen cities and the county, we are pleased to offer our comments on the Draft Blueprint for Plan Bay Area (PBA) 2050.

As a general vision for the future growth and evolution of the Bay Area through 2050, the Blueprint sets forth an ambitious agenda for addressing the region's challenges and directing growth. While we understand your goal is to create a more affordable, connected, diverse, healthy and vibrant Bay Area, we have concerns that the Blue Print fails to do so.

While the Cities Association of Santa Clara County Planning Collaborative endorses the Blueprint's guiding principles, we have a number of concerns about how the Blueprint will achieve the key goals of the Sustainable Communities Strategy (SCS) and requirements of SB 375, as well as the feasibility and practicality of implementing the PBA Blueprint in Santa Clara County as a whole as well as for its individual jurisdictions, as enumerated below:

- 1. Does not Achieve Key Goal of the Sustainable Communities Strategy.** The primary goal of the regional SCS per the requirements of SB 375 is to link household and employment growth to transit infrastructure and services to reduce VMT and GHG emissions. Unfortunately, the PBA 2050 falls short of this goal because it locates a large percentage of growth in areas that do not currently have excellent access to transit (i.e. Santa Clara County communities). Even with new investments in transit infrastructure in Santa Clara County by BART and VTA, the cities in Santa Clara County are not as well served by transit than cities such as San Francisco, Oakland and Berkeley. While the Cities Association maintains a strong commitment to investing in new transit facilities and related community development, we believe that it is a strategic mistake for the region to actively plan for a level of housing and employment growth in Santa Clara County that could not possibly be accommodated in transit and service rich neighborhoods during the PBA time frame.
- 2. Unrealistic Household and Employment Growth Targets for Santa Clara County.** The Draft Blueprint allocates 41% of the region's household growth and 44% of the region's employment growth to Santa Clara County. For Santa Clara County jurisdictions, this level of future growth is both unrealistic and unsustainable based on current and projected levels of infrastructure spending. Our local cities, school districts, transportation agencies, utility providers, special districts, etc. are unable to provide the necessary services and infrastructure that would be required for this level of new development. Even with significant new infrastructure spending

measures at the jurisdictional, sub-regional or regional levels, this level of growth would still likely be unrealistic within PBA time frame.

3. **Potential Impact of the Draft Blueprint assumptions on the Regional Housing Needs Allocation Housing Methodology.**

The RHNA Housing Methodology Committee will be making a recommendation to ABAG's Executive Board on whether RHNA for the region should be based on Plan Bay Area or existing households in addition to other demographic factors. The Cities Association does not recommend using the Plan Bay Area assumptions in the RHNA process for the following reasons:

- **Timing.** Public comment on the PBA Blueprint ends August 10, with the Final Blueprint scheduled for adoption in late 2020. Based on their existing schedule, the HMC won't have time to recommend adjustment or modification of the RHNA methodology based on the Final Blueprint.
- **Double-Counting of Factors.** Plan Bay Area is presumed to include some of the same inputs as the RHNA process, such as a focus on access to jobs. While these are important factors, they could be double counted through the RHNA process, especially since the HMC and jurisdictions' staffs have had less opportunity to review and understand the PBA model.
- **Locating Growth in the Regional Transit-Oriented, Jobs-Rich Core.** As noted above, several major cities in the region's transit-oriented, jobs-rich core, including San Francisco and Berkeley, would receive *less allocation than the regional average (16%)*. This seems to conflict with the PBA's goals of focusing growth near jobs, high-quality transit and existing infrastructure. This is especially problematic since most of the region's proposed transportation funding (approximately 75%) is scheduled for the maintenance and operation of existing transportation infrastructure.
- **Lack of Access to Transit.** The PBA options reveal a large percentage of projected growth within Santa Clara County cities. While as a whole Santa Clara County cities do have large parcels of underutilized land to accommodate additional growth, the area's transportation system is not well equipped to provide viable transportation options for new residents to help meet the Plan's GHG reduction targets. If these PBA options become part of the final RHNA determination, the Cities Association recommends that an equivalently proportional amount of transportation funding be allocated to Santa Clara County to support the transit improvements necessary to support this growth and reduce VMT and GHG emissions, per the goals of the SCS.
- **Unachievable Housing Targets.** Combining the PBA Baseline Option with some of the RHNA allocation factors already studied could create an extraordinary housing allocation for Santa Clara County jurisdictions to achieve within the eight-year time frame of the next Housing Element. In some instances, these increases could represent a 30 to 50% increase over existing households. These are unrealistic assumptions which would not be achieved, especially considering that many of our jurisdictions have to largely rely on redevelopment of infill sites for housing growth.

The Cities Association of Santa Clara County Planning Collaborative wholly recognizes our regional responsibility to add housing to meet the current housing crisis and future growth needs. Many of our jurisdictions have already planned for significant housing growth by rezoning major employment and commercial areas and adopting policies mandating the development of housing supply in tandem with new jobs added to achieve a jobs-housing balance. However, the household and employment growth projected in the PBA Draft Blueprint would simply be unrealistic and at odds with the SCS stated goals of creating, affordable, connected, diverse, healthy and vibrant communities. We strongly recommend a recalibration of the PBA Blueprint employment and household projections for Santa Clara County to produce practical and implementable targets that are more consistent with the ability of our communities to grow sustainably over the next 30 years.

Signed,

cc: Therese McMillan