



CITY OF EAST PALO ALTO
Community and Economic Development Department
Planning and Housing Division

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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,



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