

PAT EKLUND

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SUBJECT: Comments on Preferred Scenario for Plan Bay Area 2040

Dear Miriam and Ken:

As an ABAG Executive Board member and a member of the ABAG Regional Planning Committee, I have closely followed Plan Bay Area since its inception. Following are my questions and comments on the draft preferred scenario released in September 2016.

Base Year for Households and Jobs Projections

The household and jobs base year (2010) numbers are different. Please explain how the base year calculations were arrived at when Plan Bay Area (PBA) was originally approved by ABAG/MTC in 2013; and, how the current base year calculations were determined for the preferred scenario.

It was my understanding when ABAG/MTC approved PBA in 2013, that the base year numbers would be used as a comparison over time. Some MTC staff has stated that local governments should not be concerned about the base year numbers, but only look at the delta on the projections. That response begs the issue – why not keep the base year approved in 2013 and reduce the projections to maintain the delta?

I understand that MTC may be using a different data source than what ABAG used in 2013. Please identify the data source used to determine the base year in 2013 and what was used in the draft preferred scenario issued in September 2016? Also, please explain the pros and cons of the different data sources; and, why MTC decided to use a different data source.

Priority Development Areas (PDAs) Growth

The draft preferred scenario reduces the growth in PDAs from 80% to 75% for households and from 70% to 50% for jobs. The reduction of job growth in PDAs does not coincide with the intent of SB 375 and PBA which is to reduce Greenhouse Gas Emissions (GHG) by focusing housing and jobs near transportation corridors and/or transit. What was the reasoning behind changing the growth patterns in the PDAs as proposed in the preferred scenario? In order to work towards achieving the objectives outlined in SB 375, the PDA percentages should remain at 80% for households and 70% for jobs.

The PBA is by definition a planning document that envisions what could be done to reduce the GHG emissions and meet the PBA performance targets. Planning documents – whether it is the PBA or a

General Plan – are visionary to identify the ‘road map’ to achieving our goals. I understand that MTC staff has indicated that the PBA should be more ‘realistic’ and not ‘visionary’ in which case the performance targets and strategies (assumptions for the preferred scenario) should be revisited since many of them are visionary and not realistically achievable before the next update in 2021.

Use of UrbanSim Model for Land Use Scenario and Household/Jobs/Housing Projections

For the first time, PBA is using the UrbanSim model for establishing the 2040 employment and household forecasts for each city/town and county which may not reflect the projected growth in our General Plans. It is our understanding that the UrbanSim model incorporates zoning tools, the most recent PDA assessment, and household, business, and developer choice models.

Please provide an explanation on:

- 1) How the employment and household forecasts for each city/town and county were established for PBA approved in 2013 and why that approach was not used for the PBA update in 2017. What were the reasons for using only the UrbanSim model vs using both approaches especially for comparisons?
- 2) What specific assumptions are used in the UrbanSim model and what specific comments have been received from the Bay Area cities/towns and counties on those assumptions?
- 3) Does UrbanSim include specific projections identified in the cities/towns and counties General Plans? Since many cities do not update their zoning maps once the General Plan is updated, there may be substantial differences between those projections.

Proposed PBA 2040 Assumptions (Strategies)

Some of the Proposed PBA 2040 assumptions are not realistic and may not be legal. Specifically,

- a) Current urban growth boundaries (UGBs) are kept in place. Comment: If an UGB is adopted by the voters changing the boundary assumed in the growth forecast, will ABAG/MTC respect the voter adopted change?
- b) Inclusionary zoning to all cities with PDAs, meaning that these jurisdictions are assumed to allow below market-rate or subsidized multi-family housing developments. Comment: Since at least 11 cities with PDAs have not adopted an inclusionary zoning ordinance, will ABAG/MTC be modifying the assumption accordingly? If ABAG/MTC does not change this assumption, will MTC be requiring jurisdictions to adopt an inclusionary zoning ordinance?
- c) 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). Comment: Not all jurisdictions require for-profit developments to include units for low-income residents (see above) and some require less than or more than 10% affordable as part of their inclusionary zoning ordinance. ABAG and MTC should survey the local jurisdictions and modify the assumption accordingly.
- d) In some cases, PDAs were assigned higher densities in the future than are currently allowed. Comment: Not all jurisdictions agreed with the higher densities in PDAs requested by ABAG/MTC. This assumption should be changed to include only those local jurisdictions that agreed with higher densities in their PDAs since they were self-nominated.

- e) 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.
Comment: This assumption should be changed to reflect only those jurisdictions that have passed ordinances to 'reduce the residential parking minimums and streamlined the environmental clearances' in PDAs. Since local jurisdictions did not propose TPAs nor may not even know where the TPA's are located in their jurisdiction, TPA's should be removed from this assumption. Before TPAs are included, ABAG/MTC should identify and share the locations with the governing jurisdiction to ensure that the Council/Board of Supervisors (elected body) support the specific TPA locations.

- f) Subsidies are assumed to stimulate housing and commercial developments within PDAs.
Comment: This assumption is unrealistic especially given that local governments do not have the financial strength and no longer have the legislative tools (Redevelopment Areas) to provide subsidies to for-profit housing and commercial developments. ABAG/MTC should not include this assumption unless the specific financial subsidies will be provided by ABAG/MTC with the local governments' support. Most local governments do not have access to 'subsidies' for private housing and commercial developers; and struggle to help not for profit housing developers. In addition, most local governments do not have the financial strength to provide the services (e.g. police, fire, parks, recreations, street maintenance, etc..) needed for the anticipated household and job growth articulated in PBA.

- g) Lastly, ABAG/MTC should consider an assumption which would include providing financial support to cities/towns and counties for general services including, but not limited to: police, recreation, stormwater, fire, water, wastewater, parks and general street maintenance for the housing and job growth in their jurisdiction.

I would appreciate a detailed response so I am able to explain some of these discrepancies and help others to understand why ABAG and MTC are taking this approach. If you have any questions, please contact me at home.

Sincerely,



Pat Eklund