

August 6, 2020

President Jesse Arreguin, ABAG Executive Board  
Vice President Belia Ramos, ABAG Executive Board  
Chair Scott Haggerty, Metropolitan Transportation Commission  
Vice Chair Alfredo Pedroza, Metropolitan Transportation Commission  
MTC and ABAG Staff

Via E-mail to: [info@planbayarea.org](mailto:info@planbayarea.org)

**RE: Comments on Plan Bay Area 2050 Draft Blueprint**

Dear Commissioners, Board Members, and Staff,

The City of Palo Alto wants to express gratitude for the exceptional long-range planning work that staff, under the leadership and direction of MTC and ABAG, have performed to develop Plan Bay Area 2050, the Draft Blueprint, and other associated reports and documents. The effort aims to ensure that by the year 2050, that the Bay Area is affordable, connected, diverse, healthy, and vibrant for all.

As partners in realizing this vision, please accept the following comments on the Plan Bay Area 2050 Draft Blueprint:

- **Request a time extension from appropriate regulatory bodies and statues in order to provide more time to complete Plan Bay Area 2050.**

While the COVID-19 pandemic has not eliminated the housing crisis in the State or region, the impacts of COVID-19 on population growth and job growth remain to be seen. While working to address the housing crisis is absolutely necessary, conducting long-range planning processes for a thirty-year cycle may be unwise given the unknown impact of COVID-19 on critical variables. A temporary extension of the timeline may provide sufficient time to gather data, for circumstances to change so that the Plan is more useful to the region and to jurisdictions.

**Furthermore, smaller cities like Palo Alto are reeling from the impacts of COVID-19, which continue to unfold. Insisting the long-range planning process unfold unabated is out of sync with the demands the global pandemic has placed on residents, elected**

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**leaders, and staff.** In this context, 30 days to review and respond to Plan Bay Area 2050 is insufficient. The outreach efforts are extensive, but the time frame is insufficient.

- **Revise the near-term projections and long-term projections to accurately integrate the impacts of COVID-19 into the long-range model.**

The Horizon Initiative “stress tested” Plan Bay Area strategies against a wide range of external forces and commend the foresight to conduct such a planning exercise, the results of which have informed the Draft Blueprint. The Horizon Initiative, however, falls far short of the type of long-range planning required for a regional response to the pandemic. Failing to specifically integrate the ongoing crisis into the near-term of the forecast is a disservice to the millions of households suffering due to the pandemic. The impact of the current recessionary period will stretch into the next decade, as the Blueprint rightly notes. It is unclear how ABAG/MTC staff draw the conclusion that the effects of the pandemic essentially wear off by 2030 and the region returns to the forecasted growth trend.

It is unclear what underlying assumptions lead to this conclusion and whether a traditional recessionary analysis is preferable given we are currently experiencing large-scale, and long-term telecommuting. It is not clear if the assumptions include a foreclosure and/or eviction crisis coupled with massive unemployment and the closure of thousands of small business and the associated elimination of both wealth and livelihoods for many throughout the Bay Area. The interest of Palo Alto isn't to foretell doom from the pandemic, but rather encourage that long-range regional planning pause to more thoughtfully and collaboratively consider the compound impacts of this crisis--which really is the genesis of several crises. Many Bay Area families and communities may not fully recover from these crises for decades to come.

- **Update telecommuting projections.**

Telecommuting may be a long-term impact of COVID-19. Many businesses and institutions are, out of necessity, finding ways to shift operations to completely or mostly remote operations. In particular, large employers have shifted to remote operations. Once the pandemic subsides--which could be as long as two years from its inception—many employers may continue a portion of their operations remotely. The potential is very real that telecommuting could represent a large share of jobs, and thus a reduction in the number of commuters and a shift in where jobs are located.

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Palo Alto encourages ABAG and MTC to work with CARB to **increase the level of telecommuting above 14%**. Palo Alto also requests that **increased telecommuting be used to forecast shifts in housing demand, decrease in office demand**. This adjustment in the model could occur even if 14% needs to be the CARB initiated limit for calculating potential decreases in greenhouse gas emissions. We would like to know how close the Shelter In Place telecommuting levels bring us to meeting the greenhouse gas emission reductions and addressing the regional job/housing imbalance.

Further, Palo Alto suggests that **increasing telecommuting become a key separate strategy in the Blueprint**; it is a strategy the Bay Area can pursue in order to meet our climate action goals and decrease greenhouse gas emissions, which are not currently met by the draft Blueprint.

- **Revise the Growth Geographies to more accurately represent the accessibility and proximity of transit to adjacent neighborhoods.**

The Growth Geographies show a ½ mile radius around transit stations and bus stops. While this is meant to indicate an ability to access transit expediently, the reality is that this might not always be the case. These transit-oriented growth geographies may not accurately represent the accessibility of transit in Palo Alto. In many locations, the Caltrain tracks create a physical barrier meaning that a transit stop is not within a ½ mile of a residence, office, or retail location. Furthermore, electrification of the Caltrain system will increase the frequency of train service and diminish the ability of transit users to cross the tracks and access the transit stops. **The Growth Geographies must take a more nuanced, user-centered approach to indicating what areas are truly proximate to transit.**

- **Revise and refine the definition of transit rich areas and include a more user-centered view of transit use.**

The transit-rich growth geographies include proximity to some high-speed and high-capacity transit, such as the Downtown Palo Alto and California Avenue Caltrain stations. The remainder of the Palo Alto Growth Geographies rely on bus service provided by the Valley Transportation Authority. While headways along some of these routes can be 15-minutes or less during peak times, we challenge the inclusion of these bus routes in the definition of transit rich areas.

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First, the off-peak capacity of these lines do not provide sufficient service to potential residents of housing units along these transit lines. In off-peak times, these residents may still need and/or use vehicles, which will lead to greater greenhouse gas emissions and traffic increases. Secondly, changes to the service may occur. Recently, despite local objection, VTA changed and decreased service to Palo Alto highlighting a concern about the reliability of such service its ability to meet the needs of future car-light residents.

- **Confirm the accuracy of underlying data used to map Growth Geographies.**

The City of Palo Alto seeks confirmation in writing that information provided to ABAG and MTC staff has been received and incorporated into the model and mapping for Growth Geographies. This information includes locations and dimensions of historic districts, areas zoned for single-family homes, location of Priority Development Areas, transit services, and other information. In addition, Palo Alto wants to ensure the Growth Geographies in nearby unincorporated Santa Clara County are not part of Palo Alto's growth geographies.

In particular, Palo Alto wants to ensure that **newly designated Priority Conservation Areas are taken into account when creating Growth Geographies. A large portion of Palo Alto's acreage consists of protected open spaces;** these areas cannot be envisioned for housing and/or job growth.

- **Model the office development cap instituted in Palo Alto.** Job growth numbers should consider the fact that Palo Alto has adopted restrictions on the annual amount of office growth that can occur in Palo Alto. The purpose of this cap is to decrease the jobs/housing imbalance locally. Communities like Palo Alto and San Francisco that proactively seek to address their jobs/housing imbalance through local policies should not be subjected to projected job growth that is out of synch with local policies.
- **Explain the distinction and overlap between the methodologies used to create Plan Bay Area 2050 versus the methodologies used by the Department of Finance and the Housing and Community Development Department to generate the regional housing need determination.**

Department of Finance (DOF) and Housing and Community Development (HCD) prepared projections for population growth and growth in households. Palo Alto staff understand that MTC/ABAG staff also prepared industry/employment, population by age and ethnic characteristics, and household/occupancy/income information for incorporation into the growth forecast for the region and into small area analysis. The Plan Bay Area 2050

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Regional Growth Forecast Methodology was presented to the ABAG Executive Board in 2019. At that time the staff memo indicated that further public input would be requested during the 2020 outreach on the Draft Blueprint. However, the latest methodology information was not included in detail at any of three public presentations during the week of July 7, 2020. Toward providing helpful comments on the Draft Blueprint, City staff would appreciate an overview of the aforementioned methodologies used by DOF/HCD and by MTC/ABAG staff and to understand how they are similar or different in their inputs and assumptions.

- **Palo Alto requests more specific data regarding how ABAG/MTC determined the jobs growth in the plan.** With this information, Palo Alto and other jurisdictions can offer more feedback regarding how the job growth projections may be refined.
- **Explain if or how policies, such as SB 35 Streamlining, were factored into models and methodologies.** MTC/ABAG staff included streamlining of housing projects in draft strategy for public consideration in 2019. City staff would like to know how SB35 status or other streamlining was or was not included in methodology assumptions for local jurisdictions.

## Strategies & Objectives

- **The City supports inclusion of strategies that locate jobs near housing.** All jurisdictions need to support Bay Area residents with employment diversity and options. By locating jobs near housing across the Bay Area, the region can decrease commute times, decrease greenhouse gas emissions, and increase the resiliency of jurisdictions. This could be achieved through office caps in jobs-rich areas, while other jurisdictions might incentivize office and job center development.
- **The City supports frontloading those strategies that best respond to COVID-19,** including those that advance safe bicycle and pedestrian facilities, advance renter protections, advance strategies for childcare which in turn could help essential workers, and advance protecting much-needed open space. The pandemic has made clear the need to address these issues in the near term in order to support households and put the Bay Area back on track for a growing and expanding economy.

## Transportation

- **The City of Palo Alto supports the following transportation strategies:**
  - Operate and Maintain the Existing System.
  - Enable Seamless Mobility with Unified Trip Planning and Fare Payments.
  - Reform Regional Transit Fare Policy.

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- Build a Complete Streets Network.
- Advance Regional Vision Zero Policy through Street Design and Reduced Speeds.
- Advance Low-Cost Transit Projects.

## Economic

- **The City of Palo Alto supports the following economic strategies:**
  - Expand Childcare Support for Low-Income Families.
  - Create Incubator Programs in Economically Challenged Areas.
  - Retain Key Industrial Lands through Establishment of Priority Production Areas.

## Housing

- **The City of Palo Alto supports the following housing strategies:**
  - Fund Affordable Housing Protection, Preservation, and Production.
  - Require 10 to 20 Percent of New Housing to be Affordable.

## Environmental

- **The City of Palo Alto supports the following environmental strategies:**
  - Adapt to Sea Level Rise.
  - Modernize Existing Buildings with Seismic, Wildfire, Drought, and Energy Retrofits.
  - Maintain Urban Growth Boundaries.
  - Protect High-Value Conservation Lands.
  - Expand the Climate Initiatives Program.

Thank you for your time and attention to these suggestions, comments, and requests for further information. To follow up on and/or respond to the content of this correspondence, please reach out to Jonathan Lait, Director of Planning and Development Services for the City of Palo Alto. You can reach Mr. Lait at [Jonathan.Lait@CityofPaloAlto.org](mailto:Jonathan.Lait@CityofPaloAlto.org) or at (650) 329-2679.

Sincerely,

DocuSigned by:  
  
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Adrian Fine  
Mayor of Palo Alto

Cc:

City Council members

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