

Draft PBA 2050 Comment Form submission

Plan Bay Area <info@planbayarea.org>

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Submitted on July 20, 2021 Submitted values are: *Name* Marlene Subhashini *Email* msubhashini@fostercity.org [1] *Zip Code* 94404 *Affiliation* City of Foster City *Comment* 1. The Plan Bay Area 2050 fails to acknowledge the serious potential loss of up to 90 million gallons of water per day during times of drought from the San Francisco Regional (Hetch Hetchy) Water System as a result of the implementation of the Bay-Delta Plan. Recently, the San Francisco Public Utilities Commission (SFPUC) indicated that water-supply cutbacks could be as high as 50% during multiple year of droughts. These unprecedented water supply reductions would greatly impact the ability of cities in our region to plan for housing growth per the Plan Bay Area 2050 projections. This would further severely impact the ability to accommodate additional development in jurisdictions like Foster City that rely solely on the Hetch Hetchy Water System for their water supplies. An issue as critical as potential reduction in water availability of this magnitude is not addressed in the Plan. For additional information, please see the attached statement from the Bay Area Water Supply and Conservation Agency (BAWSCA) dated April 19, 2021 - https://bawasca.org/uploads/userfiles/files/2021_0419_Sandkulla%20Statement%20Re%20Bay%20Delta%20Plan%20Impacts%20in%20UWMPs%20and%20TRVA_final.pdf 2. The proposed plan's core strategy is focused growth in existing communities along the existing transportation network. It further includes that it builds upon existing community characteristics, efficiently leverages existing infrastructure, and lessens impacts in undeveloped areas. The proposed Plan also includes the designation of new growth geographies for both housing and jobs. For housing, in addition to PDAs, growth geographies include the newly added High-Resource Areas (HRAs) and Transit-Rich Areas (TRAs). Though Foster City has jobs and access to amenities like schools and parks, the means of access to these is greatly hindered due to lack of adequate high quality transit. Targeting growth in areas such as Foster City that have poor-quality public transit, in which bus routes have average service intervals during peak traffic hours that are so long (30-60 minutes) that make public transit unattractive/inconvenient is impractical. Instead, growth should be targeted in "Transit Rich Areas". Transit Rich Areas should be areas near a "major transit stop", such as a rail transit station or ferry terminal, or a "high-quality transit corridor", which is a fixed bus route service with average service intervals of no longer than 15 minutes during peak commute hours. The Plan also assumes that a Hovercraft Terminal may become viable in the future making Foster City "transit-rich." However, given the lack of certainty around this future ferry terminal transit project and funding (which could take years to materialize), it is premature to take this into account in the growth projections at this time. 3. Plan Bay Area 2050, includes a diverse range of strategies to reduce greenhouse gas emissions, including: Focusing more housing growth in areas near high quality public transit and in high-resource communities near job centers. Contrary to the Plan's objectives, assuming growth in certain areas that have access to high opportunity areas and factors related to job proximity will not further greenhouse gas reduction goals or protect residents from environmental impacts because there are many suburban areas including Foster City that lack high quality public transit and/or have unattractive or inconvenient public transit. 4. Plan Bay Area 2050 as the baseline for regional policy changes and unfunded initiatives – some of which require voter approval, political compromise and infrastructure that has not been funded, approved or built – in order to house the projected Bay Area population

growth in 2050. If the policies and initiatives set forth in PBA 2050 are not implemented within a reasonable timeframe, which seems unlikely given the impacts of the COVID-19 pandemic, the region will fall well short of meeting the projected housing needs and most jurisdictions will fail to meet their housing projections (RHNA). The plan should consider a phased approach that recognizes these constraints and stretches jurisdictions to produce achievable housing targets, which can be scaled if the ambitious policies in PBA 2050 come to fruition. Foster City believes that ABAG has incorrectly assigned more housing units to Foster City than warranted in Plan Bay Area 2050. 5. Another important consideration in the plan should be the availability of vacant land and adequate infrastructure such as water, sewer, streets, school capacity, and other local constraints that a City like Foster City faces or any other 'built-out' city faces to support housing growth. Furthermore, consideration should be given to cities like Foster City that have limited access points of ingress and egress with only two major arterials. Given the increase in housing production over the last several years, the City's roadways and traffic has been impacted considerably. Adding more housing without taking into consideration, the City's roadway networks, circulation and limited ways to get in and out of the City would only exacerbate the current problem. The Plan does not take into consideration the availability of vacant land, school capacity, water supply (as noted above), roadway capacity (especially evacuation route capacity during an emergency) and other factors that are very jurisdiction-specific. 6. While Foster City embraces a strategic approach for advanced planning purposes, we believe that planning with consideration for actual constraints is the appropriate method to stimulate community goals. Aggressive projections can have significant negative environmental impacts to resources such as water, as well as to local community and regional character. 7. While the focus on housing production in the Bay Area is a key consideration to reduce greenhouse gas emissions, the plan cannot lose sight of actual growth patterns (pre- and post-pandemic). The strategies in the Plan need to account for inter and intra-regional constraints when it comes to transit expansions and integrating it with affordable housing challenges. The plan needs to reflect market realities and local land use plans. [1] <mailto:msubhashini@fostercity.org>