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July 20, 2021

Therese McMillan
Executive Director
**Association of Bay Area Governments and
Metropolitan Transportation Commission**
375 Beale St., Suite 800
San Francisco, California 94105

RE: Contra Costa County Comments on Draft Plan Bay Area 2050

Dear Ms. McMillan:

The Contra Costa County Department of Conservation and Development appreciates the effort the regional agencies have expended in order to develop the Draft Plan Bay Area 2050 – the Bay Region’s Regional Plan. Staff has reviewed Draft Plan Bay Area 2050 and has some comments and concerns regarding some of the strategies and assumptions that have formed Draft Plan Bay Area 2050. Attachment A outlines our general comments on the draft as it relates to the County as a whole, as well as housing unit and job allocations for Unincorporated Contra Costa County communities.

Thank you for this opportunity to comment on the Draft Plan Bay Area 2050. Contra Costa County looks forward to working collaboratively with ABAG-MTC as the final plan is developed and adopted in fall 2021.

Sincerely,

A handwritten signature in blue ink, appearing to be "JK", is written over the printed name and title of John Kopchik.

John Kopchik
Director

Attachment A

Executive Summary

1. EC5. Provide incentives to employers to shift jobs to housing-rich areas well served by transit. We appreciate ABAG for recognizing the importance of taking advantage of existing housing and shifting jobs to where people live but, the plan does not go far enough to address the jobs housing imbalance in Contra Costa County, which needs greater regional support for increasing the number of jobs relative to housing units in our county, particularly in unincorporated Contra Costa.
2. Build Next Generation Transit Network. Would like to see more addressing of the first mile/last mile challenge. Look at micro- and/or shared mobility solutions. Because even if we do more transit-oriented development, the vast majority of homes in the Bay Area are in suburbs, and if we want to get people off roads and on to transit, we have to provide them with options to get to transit stops without using a car.
3. EN2. Provide means-based financial support to retrofit existing residential buildings. This is very important to our collective equity goals. It is complicated and expensive to retrofit existing buildings.
4. Staff recommends that ABAG address the issue of life cycle costs, particularly for infrastructure projects.

Chapter 2 Housing

1. This is a regionwide document making recommendations for the local jurisdictions to meet their housing and economic development needs. The Plan recommends regional coordinated policies and practices when it's ultimately up to the local jurisdiction to make that determination on whether they want to adopt a policy. How are jurisdictions expected to do this when there are limited resources, staffing, and so many different governing bodies involved?
2. The discussion regarding providing housing opportunities for the missing middle references teachers as an example of the population it would serve. The missing middle is defined as moderate income households (81% - 120% AMI), whereas the Table 2-1 lists teachers as lower income professionals (50%-80% AMI). (p. 23)
3. On the section on protect and preserve housing, the recommended renter protections to be provided regionally (such as rent increase caps, tenant protection services, and fair housing laws) are measures that should be done at a statewide level as there is no precedent or framework for "regional" laws. (p.26)
4. Preserve existing affordable housing by creating pathways to home ownership for working families by transferring existing affordable deed-restricted or non-deed restricted housing to individual tenants, housing cooperatives, or public or non-profit housing organizations, including community land trusts. What is the funding source for this activity? (p.26)

5. Putting low-income persons close to transit would provide opportunities for access to transit; however, not all low-income jobs have standard working hours and transit may not operate during the hours needed to commute to and from work. This means that not everyone will have equal access to transit and that more should be done to address non-standard work hours transit needs. (p. 30)
6. Due to the limited amount of available land for development, the strategy to have inclusionary housing policies applied to projects on a sliding scale from 10% to 20% to be evaluated on a project-by-project basis could make the requirement for the development of inclusionary housing subjective, and weaken local jurisdictions' policies when they are stronger or more uniform. (p. 30)

Chapter 3 Economy

1. Universal basic income (UBI) is an interesting idea worth exploring for the Bay Area but putting into a basket for statewide programs is punting it. Everything in Plan Bay Area would be more effective if implemented on a statewide level. If UBI only works as a statewide program, don't include it in a regional plan.
2. What is meant by incentives for employers and how will ABAG-MTC fund those? Would there be a minimum pay requirement, living wage or similar? (pg. 48)
3. Allow PPAs to overlap with PDAs to reduce commute times, allow for greater transit use by PPA employees, allow more opportunities for people to work closer to where they live (pg. 49).
4. Please note Contra Costa County has trademarked the phrase "Capital of the Northern California Megaregion" (p. 51)
5. We want to see greater recognition of counter-commute capacity on major transit systems, and more support in terms of regional infrastructure grants and transit system policy to build up job centers in transit-accessible locations outside of Silicon Valley, SF, and downtown Oakland. For example, BART policy, is to prioritize housing development on surface lots. ABAG-MTC should encourage BART to change that policy to also welcome commercial or industrial jobs, or campus uses (medical, higher education).
6. Typo on page 48: Easy Bay instead of East Bay

Chapter 4 Transportation

1. Maintenance of the existing transportation system should include major paved trail facilities. (p. 56)
2. In the healthy and safe streets bullet and section, respectively, "*rollers*," which is a catch-all term that includes wheelchairs, scooters, skateboards, other mobility devices, should be included in the list of road users. MTC's Active Transportation Working Group has advocated

including this term in the *MTC Active Transportation Plan*, which is tied to PBA 2050. (pgs. 56 & 63)

3. The line representing SR-239 should extend all the way to the San Joaquin County Line. (Map 4.1)
4. Bicycle/pedestrian facilities that serve as a first-mile/last-mile connectivity to transit or as a major regional connection should be eligible for revenue generated by the proposed freeway per-mile tolling. (p. 61)
5. Interstate Freeways and State Highways are often barriers for bicycle and pedestrian travel. PBA 2050 should emphasize eliminating these barriers by acknowledging them and supporting future planning, policies, and funding efforts to retrofit these areas to better accommodate non-motorized travel. (p. 63)
6. The list of new ferry service destinations should include Contra Costa County locations (e.g., Hercules and potentially additional Northern Waterfront sites). (p. 70)
7. Show the planned BART to Brentwood extension. The Contra Costa Transportation Authority is currently studying interim transit connections (e.g., express bus service) between Antioch and Brentwood. (Map 4.2)
8. The *Transportation* section is silent on issues specific to older persons and those with disabilities, paratransit, and more broadly accessible transportation. While it is useful to have specific plans for target population and modes, the *Coordinated Public Transit-Human Services Transportation Plan* (Coordinated Plan) in this case, the findings and recommendations in those plans must be included in PBA 2050 as it is MTC's/ABAG's principal planning document. Segregating this topic exclusively to the Coordinated Plan results in the needs of this population being left out of the critical, priority setting dialog with the other needs of the system. The current Coordinated Plan paints a dire¹ picture of the state of accessible transportation, PBA 2050 should propose a proportionally appropriate response to address the needs of this vulnerable population.
9. In addition to the grim state of accessible transit as established by MTC's Coordinated Plan, that segment of the transportation system is a significant source of GHGs as established² by the U.S. Department of Energy, the Federal Highway Administration, and the American Public Transit Association. Investments in this mode will not only address the under-investment legacy but significantly reduce GHGs.

¹ "Current senior-oriented mobility services do not have the capacity to handle the increase in people over 65 years of age...the massive growth among the aging ...points to a lack of fiscal and organizational readiness...the closure and consolidation of medical facilities while rates of diabetes and obesity are on the rise will place heavy demands on an already deficient system."

² <https://afdc.energy.gov/data/10309>

10. We applaud the effort of MTC/ABAG to prioritize issues of equity relative to race and low-income populations, this effort must be expanded to include ableism and ageism which also have a legacy of inequity that must be addressed.
11. The section *Build a Next-Generation Transit Network* should include specific references to accessible transportation and funding the implementation of the Coordinated Plan.
12. Legislative initiatives should be listed to include the passage of a statewide vulnerable road user's law and the development of a revenue stream to implement the Coordinated Plan.
13. Consider including aggressive expansion of Class I and IV Bicycle Facilities which is shown to be the most effective in getting people on bikes. While expansion of recreational trails is addressed in Chapter 5, Environment, of PBA 2050 their relationship with implementation of Transportation actions should be noted. (p. 135)
14. County staff appreciates MTC's advocacy for elimination of the "85th percentile rule" for setting speed limits and for authorization of automated speed enforcement, as seen to create healthy and safe streets and advance Vision Zero. (p. 135)

Chapter 5 Environment

1. The goal to reduce climate emissions only focuses on vehicles, it does not address active transportation. (p. 79) Some of staff's suggested edits are as follows:
 - a. Strategy 2 Reduce climate emissions from vehicles: The strategy should modify the following sentence, "*On an individual level, the plan encourages Bay Area residents to drive less through transportation demand management initiatives, **particularly active transportation.***"
 - b. Strategy 3 Reduce risks from hazards: Extreme heat needs to be included as a hazard. Climate change is increasing the temperature in the Bay Area and the number of days the Bay Area experiences extreme heat. On ABAG's website there is a page dedicated to extreme heat, citing a study by the California Energy Commission that found that heat waves claim more lives in California than all other disasters combined, making it the number one hazard Bay Area residents' encounter. Draft Plan Bay Area 2050 should discuss how to reduce risk from extreme heat in the Bay Area. (p. 79)
2. The discussion on trees, in the strategy to Expand Access to Parks and Open Space, should also recognize the benefits trees provide in terms of property values in neighborhoods and for privacy between neighbors. (p. 80) The Arbor Day Foundation website (<https://www.arboday.org/trees/benefits.cfm>), provide the following statistics on the importance of trees in a community setting:

- a. A mature tree can often have an appraised value between \$1,000 and \$10,000. *Council of Tree and Landscape Appraisers*
 - b. Having large trees in yards along streets increases a home's value from 3 percent to 15 percent. *Wolf, Kathleen L, PhD, University of Washington (2007) City Trees and Property Values. Arborist News. 16, 4:34-36.*
 - c. In Portland, Oregon, street trees increase the value of homes by a total of \$1.1 billion, an average increase of \$7,020 for each house. *Donovan, G.H.; Butry, D.T. (2010). Trees in the City: Valuing Street Trees in Portland, Oregon. Landscape and Urban Planning 94:77-83.*
 - d. Landscaping, especially with trees, can increase property values as much as 20 percent. *Management Information Services/ICMA*
3. In the third paragraph on p. 80 again should recognize bicycles: "...emissions vary by type of developed land: walkable, bicycle- and transit-friendly neighborhoods have a lower climate footprint than poorly connected, low-density neighborhoods..." (p. 80)
 4. The discussion about transportation demand management initiatives needs to acknowledge the importance of life-cycle funding for these projects so they can be operated and maintained as designed. (pg. 84) Suggested edit:
 - a. Transportation demand management is an area ripe for partnership between regional government, local jurisdictions, and the private sector, as well as an opportunity to partner with the state Legislature and the Bay Area Air Quality Management District. It will be important to ensure that transportation demand management projects are funded on a life-cycle basis to ensure they are operated and maintained as designed.
 5. The discussion on electric vehicles should include electric bicycles. E-bikes are less expensive to purchase and maintain than a car, even an electric car, and do not have to be insured. They also have the potential to help with medium-length trips. (p. 86)
 6. Extreme heat needs to be added as a hazard to the, Reduce Risks From Hazards strategy. (p. 89) Suggested edit:
 - a. The most high-profile, and more visibly destructive, environmental events come from hazards like extreme weather (including extreme heat), wildfires, earthquakes, and sea level rise.
 7. Retrofits for energy efficiency, particularly insulation, as well as seismic retrofits should be discussed. (last paragraph p. 89)

8. Edit the following sentence to add building insulation, *“Other home modification assistance, beyond safety upgrades, could include energy efficiency upgrades, **building insulation**, water efficiency upgrades, and electrification to replace natural gas for heating and cooking.”* (p. 90)
9. Does the final table, on the last page of this chapter reflect both first costs (i.e., installation costs) and life-cycle costs? If these costs are not reflected the table should be modified to reflect both first costs (planning and installation) and life-cycle costs (ongoing operation and maintenance).

TECHNICAL ASSUMPTIONS REPORT (appendix)

1. Staff is checking technical assumptions report to be sure local tax information is up to date and includes Contra Costa County’s Measure X.

Draft EIR Comments

1. The no project alternative assumes that higher household growth will primarily take place in Contra Costa County based on data by MTC and ABAG. Why is this, especially compared to other jurisdictions where there are more jobs to housing? Wouldn’t market forces level it out even with “no project”?