

This letter is my public comment on MTC/ABAG's proposed Plan Bay Area 2050 DEIR

Plan Bay Area 2050 over estimates population growth

Plan Bay Area 2050 is estimating 25% population growth from 8 million residents today to 10 million in 2050. However, California's population growth has been steadily declining since 2016 with zero growth in 2018 and negative growth in 2019 and 2020. Santa Clara county fell 0.6% in 2020 after being zero in 2018 and 2019. Due to high costs, many companies are relocating to other states offsetting jobs growth in California. This is good for our nation and will also contribute to less upward pressure on housing in the Bay Area. The Plan Bay Area 2050 is over estimating population growth.

California / Bay Area Housing Projections are too high

The California Department of Finance estimated housing growth at about half of the latest Housing and Community Development estimates. Freddie Mac's estimates were very similar to the original DOF estimates. Without evidence state legislators claimed these estimates were too low and had HCD revise their estimates much higher via Senate Bill 828. Senate Bill 828 introduced double-counting errors and resulted in double counting of housing needs estimated by the Department of Housing and Community Development.

RHNA Allocation Numbers are more than double the last cycle and unrealistically high

In the previous (fifth) RHNA cycle 99% of all jurisdictions in California did not meet their numbers because they were too high. The sixth RHNA cycle is more than twice as high for 2023-2031 with 441,176 new housing units vs. the previous 187,989 for the fifth cycle for the Bay Area. This is additional housing for 1,160,293 people. This is also more than half of the Plan Bay Area 2050 and is dramatically front loaded. The front-loading has not been properly justified by RHNA and ABAG.

It's more equitable to move job growth close to existing affordable housing

By concentrating job growth near lower housing and land, you can create more job opportunities for existing economically disadvantaged communities and enable more lower cost housing to be built. Placing new job growth on the most expensive land in the most affluent areas which are hardest to reach, such as the Peninsula, disadvantages lower income families to the benefit of the largest corporations.

Plan Bay Area 2050 does not evenly distribute jobs and housing in the Bay Area

The proposed Bay Area Plan 2050 objectives include to "Support the creation of quality job opportunities for all and ample fiscal resources for communities by more evenly distributing jobs and housing in the Bay Area and by enabling the regional economy to thrive"

Instead of adding more jobs and commuters to a small geographic region of the South Bay, identified as Super District #9, they should add new jobs near areas with cheaper land and housing to communities which do not have a high jobs to housing ratio. This includes San Jose, the East Bay and Central Valley (e.g. Stockton). They should use job caps programs to limit job growth on the peninsula instead of concentrating new jobs in an area with the most expensive

land values, which will only drive them higher. We should not be adding jobs in areas with high jobs to housing ratios as those will add additional commuters for the next century. In addition, rezoning office parks and areas to housing is also helpful. One look at Manhattan and Tokyo will make clear that high density does not result in affordable housing.

Plan Bay Area 2050 did not hold public meetings to explore alternate means of addressing the intra-regional jobs-housing imbalances

MTC/ABAG has not followed the California Government Code during their preparation of Plan Bay Area 2050. The Code clearly states that the regional government body “explore in public meetings alternate means of dealing with intraregional jobs-housing imbalances”. Despite formal documented requests from citizens requesting a serious study of the positive impacts of dispersing jobs to areas of less concentrated development, MTC/ABAG failed to effectively explore the dispersal of jobs in any of the alternatives they looked at. In fact, without any substantial public discussion they announced in October 2019 that they would not look further at one of their identified strategies—the positive impacts of putting business caps on cities experiencing rapid job growth

Plan Bay Area 2050 Housing and Transportation Funding Estimates are overly optimistic

The funding needed to achieve the plans proposed by Plan Bay Area 2050 is overly optimistic and relies on a set of assumptions unlikely to fully materialize. This includes funding for preserving existing affordable housing and building new affordable housing, which totals \$468 billion for just the Bay Area. Transportation Strategies estimate \$579 billion in spending for the Bay Area. The entire California 2020-21 Budget General Fund for all expenses for the state was \$134 billion. The proposed one trillion dollar spending on transportation and housing for the Bay Area is 8 times the state’s entire annual general funds including funding education and all the other state expenditures. Last year the state allocated about \$1 billion total for affordable housing programs for all of California. Thus Plan Bay Area 2050 estimated spending to support its transportation and housing strategies necessary is unrealistically high to support its projected growth and the state does not have the budget to support it.

RHNA Low Income Housing Requirements is an Unfunded Mandate

The current 6th RHNA cycle requires 180,000 housing units for low and very low income families. Below market housing subsidies for each unit is estimated about \$350,000 or higher per unit in Santa Clara County. Thus this represents a mandate to provide \$63 billion for below market housing over the next 8 years for just the Bay Area. However, the state has only spent \$1 billion (roughly) last year on affordable housing programs. While supposedly jurisdictions only need to zone for these housing units, HCD and the state penalize local jurisdictions for not building them and remove local zoning control if they fail to meet these unrealistic growth estimates. Thus the current RHNA cycle is a giant unfunded mandate.

Plan Bay Area 2050 does not provide realistic transportation plan to accommodate its proposed growth

CalTrans is already at capacity. There is already more future office development in the pipeline, including Stanford and corporate expansion, than added CalTrans capacity from electrification.

Bus ridership is declining and it takes too long to be a practical means of public transportation for most people. San Jose light rail has been a major failure. The transportation infrastructure to add a large number of commuters to Super Area #9 does not exist. It is unlikely to materialize, especially given purchasing rights of way are no longer feasible.

Eliminating Parking near public transportation is unrealistic

The elimination of parking requirements for housing within half a mile of public transportation is unrealistic. What study shows that all or most families within half a mile of public transportation own no cars? This will overcrowd the street parking, well beyond capacity.

Trend towards multifamily rentals limits upward mobility

The number one way families build wealth is through owning their home and paying their mortgage. Creating lots of multi-family rental housing, prevents workers from building equity and wealth and limits their upward mobility.

Conclusion

At its core, Plan Bay Area 2050 uses unrealistic and overly optimistic estimates of growth and funding. It concentrates growth in the most affluent and expensive areas far away from large amounts of affordable housing and land to build future affordable housing, thus depriving those communities of future opportunities. It unintentionally relies on lower income workers to commute long distances using saturated or extremely slow public transportation. Instead the plan should include dispersion of future job growth.

Why has there been no public discussion of these issues as the California Code and public inputs have repeatedly requested?

Public meetings and discussions on these concerns raised via public comment and in this letter should be held and Plan Bay Area 2050 DEIR approval should be delayed until it can be made more realistic.

Sincerely,

Hamilton Hitchings

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