

Please halt Plan Bay Area 2050/RHNA process

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To: EIR Comments <eircomments@bayareametro.gov>

External Email

Dear ABAG -

MTC/ABAG has developed a proposed Plan Bay Area 2050 that focuses excessively high jobs and housing growth in a small geographic region of the South Bay, identified as Super District #9. This concentration challenges one of the key purposes of the proposed Objectives of the Plan: “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”.

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.

Toward that end, this note asks critical questions about this process and outlines legal reasons why these questions must be addressed. Until they are formally answered in public session, the Plan Bay Area 2050/RHNA process must be halted.

MTC/ABAG must meet in meaningful public session to explore the potential community benefits that might flow from a more effective job dispersion plan.

We need an open public discussion of alternate ways of working toward improving the intraregional jobs-housing balances that are appearing around the Bay Area; and, the potential impacts on the mobility that has been a key characteristic of Silicon Valley’s historical growth.

Questions to be answered are:

1. When will HCD release their Code mandated Guidebook (Government Code 65890.5) that would provide methodologies for an open discussions of a range of possible incentives that local, regional and state bodies could offer the private sector to encourage developments which will facilitate an improved balance between jobs and housing?
2. Why are ABAG and HCD relying on in-house models (REMI and Bay Area Urban Sim) that have produced such striking errors in the location of job concentrations during the period 2010-2018 without clear and open public discussion about model assumptions and characteristics?
3. Identify when “alternate methods of improving dealing with intraregional jobs-housing imbalances” were discussed in open public sessions. In that discussion please describe the “controversy” that was identified in the “EIR: AREAS OF CONTROVERSY” section that stated

“Strategies integrated in EIR Alternative 2...included office development caps in job-rich cities, that were controversial and ultimately discarded earlier in the process” (EIR, p EC 9-10)?

4. When was there any discussion of the possible severe economic and social consequences raised by the public from the further concentration of growth in both jobs and housing in a single relatively small geographic area (Super District #9)?

5. It is clear that large businesses benefit from concentrated growth and that the state budget does as well. At the same time, the tax and cost burdens of transit, infrastructure and affordable housing on local residents will move dramatically higher. Why has there been no public discussion of the benefits flowing to large businesses and the state budget while the costs burden is so severe on local residents?

6. Has there been any public discussion of the growing dominance of very large firms that is a clear consequence of business concentration and its impacts on the mobility of ideas and talent that has been such a key part of Silicon Valley’s emergence and growth?

7. What changes may be needed given Covid 19 working changes and housing needs?

Please halt any RHNA targets until this questions have been answered.

Sincerely,
Tina Peak
Palo Alto, CA