

From: [Marcus, Justine](#)
To: info@planbayarea.org
Subject: Plan Bay Area 2050 Blueprint Comment Letter
Date: Monday, August 10, 2020 8:22:02 PM
Attachments: [PBA Blueprint Comment Letter 081020 Enterprise.pdf](#)

External Email

To whom it may concern:

Attached please find our comment letter on the draft PBA Blueprint. Thank you for all of your important work on this effort.

I am more than happy to talk further about any of our comments and suggestions by email or phone.

Thank you!

Warmly,

j.

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August 10, 2020

RE: Plan Bay Area 2050 Draft Blueprint

To Whom It May Concern:

Enterprise Community Partners submits this letter to express our gratitude for the work of the staff and elected officials of the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) on the Plan Bay Area 2050 Blueprint. Plan Bay Area (PBA) is an enormous opportunity as well as a tremendous effort, and we appreciate the thoughtful, diligent work that has gone into developing the draft Blueprint. In reviewing the Blueprint, we have also identified several strategies that can further strengthen the draft Blueprint, especially to promote opportunity and well-being for households and communities historically excluded or burdened by planning and development in our region.

Enterprise is a national nonprofit that develops programs, advocates for policies, and delivers the capital to create and preserve affordable housing. Our vision is that one day, all people – regardless of race, income, or zip code – will live in vibrant, inclusive communities. However, the Bay Area is far from realizing this vision. Plan Bay Area 2050 is an important opportunity to set our region on a more inclusive, equitable path forward, recognizing the importance of a diverse set of policies and programs to holistically address the persistent challenges facing our region. We have identified several key areas where we believe the draft Blueprint can be strengthened to achieve these goals.

- **Meaningfully Support All 3 P's.** Supporting the “3 P's” of affordable housing must all be central to PBA's housing strategy. The draft Blueprint proposes to raise an additional \$1.5 billion each year in new revenue to advance these three interconnected strategies, generating \$171 billion over the Plan period; however, 97 percent of this revenue is currently outlined for affordable housing production. Strong renter protections and efforts to preserve existing housing affordable to low- and moderate-income households are critical strategies to ensure Bay Area families remain stably housed and can live in the communities where they live, work, and play. Moreover, these housing instability challenges are disproportionately faced by Black residents of the Bay Area and other people of color.

We therefore recommend a more equitable commitment across the 3 P's, including meaningful investments in strategies for tenant protections programs and capital funding for growing acquisition-rehabilitation preservation efforts. MTC already supports this preservation work through the Bay Area Preservation Pilot (BAPP), and PBA is an opportunity to grow this important work that both increases the stock of deed-restricted affordable housing while also directly preventing displacement of existing residents. Given the need for non-capital funding for affordable housing, PBA should also explore strategies that can provide dedicated funding for operating and rental subsidies as well as services. Integrating the Blueprint more systematically with the expanded regional housing portfolio and the new Bay Area Housing Finance Authority (BAHFA) will be important to achieving this holistic housing approach.

- **Include Strategies to Prevent Displacement of Community-Serving Business and Organizations.** The draft Blueprint incorporates innovative economic mobility strategies, including a business incubator programs in economically declined areas to ensure that Bay Area residents can more equitably access opportunities in the regional workforce and start new businesses of their own. These proposed strategies also offer an important pathway toward residential stability, helping families to remain in place by building their access to livable-wage jobs in the region. However, the final blueprint must also consider the challenges that many existing community-oriented businesses and organization face as new investments in transit, market-rate housing, and other amenities raise commercial rents and threaten their stability in the communities they serve.

We recommend that the final blueprint broadens the scope of the proposed incubator program strategy to include technical assistance, mentorship, and grant programs geared toward protecting local businesses and organization at risk of displacement, with a particular focus on vulnerable businesses and organizations located near new and proposed transit investments. This addition to the strategy will be an essential component of a broader community and economic development framework for the Bay Area that aims to create and preserve neighborhoods rich with diverse services and amenities for all residents to access.

- **Continue to Deepen Plan Bay Area’s Commitment to Racial Equity.** In June, we were thrilled to see ABAG and MTC jointly release their new equity platform. While the current draft Blueprint does outline strategies for advancing equity, we believe there is an opportunity to further prioritize and deepen efforts that center the needs of Black residents of the Bay Area and other people of color.

Thank you for your consideration.

Sincerely,



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