



CITY OF PIEDMONT CALIFORNIA

August 10, 2020

Chair Jesse Arreguin
ASSOCIATION OF BAY AREA GOVERNMENTS
info@planbayarea.org

VIA ELECTRONIC MAIL

SUBJECT: Comments on Plan Bay Area 2050 Draft Blueprint

Dear Chair Arreguin;

The City of Piedmont wants to express gratitude for the exceptional long-range planning work that staff, under the leadership and direction of the Executive Committee, have performed to develop Plan Bay Area 2050, the Draft Blueprint, and other associated reports and documents. The effort aims to ensure that by the year 2050, that the Bay Area is affordable, connected, diverse, healthy, and vibrant for all.

The City of Piedmont has participated whole-heartedly in the ABAG meetings, surveys, and webinars and followed the development of the Plan closely. As partners in realizing this vision, please accept the following comments on the draft Plan Bay Area 2050 Blueprint:

We request a time extension from appropriate regulatory bodies and statutes in order to provide more time to complete Plan Bay Area 2050.

While the COVID-19 pandemic has not eliminated the housing crisis in the State or region, the impacts of COVID-19 on population growth and job growth remain to be seen. Cities are reeling from the impacts of COVID-19, which continue to unfold. Insisting the long-range planning process unfold unabated is out of sync with the demands the global pandemic has placed on residents, elected leaders, and staff. In this context, 30 days to review and respond to Plan Bay Area 2050 is insufficient. The outreach efforts are extensive, but the time frame is insufficient.

Revise the near-term projections and long-term projections to accurately integrate the impacts of COVID-19 into the long-range model.

The Horizon Initiative “stress tested” Plan Bay Area strategies against a wide range of external forces and we commend the foresight to conduct such a planning exercise, the results of which have informed the Draft Blueprint. The Horizon Initiative, however, falls far short of the type of long-range planning required for a regional response to the pandemic. Failing to specifically integrate the ongoing crisis into the near-term of the forecast is a disservice to the millions of households suffering due to the pandemic. The impact of the current recessionary period will stretch into the next decade, as the Blueprint

rightly notes. It is unclear how ABAG/MTC staff draw the conclusion that the effects of the pandemic essentially wear off by 2030 and the region returns to the forecasted growth trend.

It is unclear what underlying assumptions lead to this conclusion and whether a traditional recessionary analysis is preferable given we are currently experiencing large-scale, and long-term telecommuting. It is not clear if the assumptions include a foreclosure and/or eviction crisis coupled with massive unemployment and the closure of thousands of small business and the associated elimination of both wealth and livelihoods for many throughout the Bay Area. The interest of Piedmont isn't to foretell doom from the pandemic, but rather encourage that long-range regional planning pause to more thoughtfully and collaboratively consider the compound impacts of this crisis--which really is the genesis of several crises. Many Bay Area families and communities may not fully recover from these crises for decades to come.

Update Hazards Planning

The Blueprint should take into account hazards such as landslides, flooding, seismic faults, and fire, in growth projections and provide adjustments to the growth projections on the level of individual cities. A large percentage of the City of Piedmont is in a steep hillside area with narrow roadways and also in a State-designated zone for very high fire severity. These hazards are likely to grow in the coming years due to climate change. There is pending State legislation likely to pass later this year that would require fire risk to be added as a requirement in consideration of regional housing needs allocation. However, ABAG can and should take these risks into consideration now as this is prudent regional policy without waiting for the State to mandate this. More information on pending State legislation is at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB182.

Update telecommuting projections.

The City of Piedmont encourages ABAG and MTC to work with CARB to increase the level of telecommuting above 14%. The City also requests that increased telecommuting be used to forecast shifts in housing demand, decrease in office demand. This adjustment in the model could occur even if 14% needs to be the CARB initiated limit for calculating potential decreases in greenhouse gas emissions. We would like to know how close the Shelter In Place telecommuting levels bring us to meeting the greenhouse gas emission reductions and addressing the regional job/housing imbalance.

Further, the City suggests that increasing telecommuting become a key separate strategy in the Blueprint; it is a strategy the Bay Area can pursue in order to meet our climate action goals and decrease greenhouse gas emissions, which are not currently met by the draft Blueprint.

Revise and refine the definition of transit rich areas and include a more user-centered view of transit use.

Growth Geographies for Piedmont rely on bus service provided by AC Transit. While headways along some of these routes can be fifteen minutes or less during peak times, we challenge the inclusion of these bus routes in the definition of transit rich areas.

First, the off-peak capacity of these lines do not provide sufficient service to potential residents of housing units along these transit lines. In off-peak times, these residents may still need and/or use vehicles, which will lead to greater greenhouse gas emissions and traffic increases. Secondly, changes to the service may occur. Recently, AC Transit changed and decreased service to Piedmont highlighting a concern about the reliability of such service and its ability to meet the needs of future residents.

Confirm the accuracy of underlying data used to map Growth Geographies.

The City of Piedmont seeks confirmation in writing that information provided to ABAG and MTC staff has been received and incorporated into the model and mapping for Growth Geographies. In particular, Piedmont wants to ensure that jobs projections and baseline conditions are accurate.

Explain the distinction and overlap between the methodologies used to create Plan Bay Area 2050 versus the methodologies used by the Department of Finance and the Housing and Community Development Department to generate the regional housing need determination.

Department of Finance (DOF) and Housing and Community Development (HCD) prepared projections for population growth and growth in households. Piedmont staff understand that MTC/ABAG staff also prepared industry/employment, population by age and ethnic characteristics, and household/occupancy/income information for incorporation into the growth forecast for the region and into small area analysis. The Plan Bay Area 2050 Regional Growth Forecast Methodology was presented to the ABAG Executive Board in 2019. At that time the staff memo indicated that further public input would be requested during the 2020 outreach on the Draft Blueprint. However, the latest methodology information was not included in detail at any of three public presentations during the week of July 7, 2020. Toward providing helpful comments on the Draft Blueprint, City staff would appreciate an overview of the aforementioned methodologies used by DOF/HCD and by MTC/ABAG staff and to understand how they are similar or different in their inputs and assumptions.

Provide more specific data regarding how ABAG/MTC determined the jobs growth in the plan. With this information, Piedmont and other jurisdictions can offer more feedback regarding how the job growth projections may be refined.

Explain if or how policies, such as SB 35 Streamlining, were factored into models and methodologies. MTC/ABAG staff included streamlining of housing projects in draft strategy for public consideration in 2019. City staff would like to know how SB35 status or other streamlining was or was not included in methodology assumptions for local jurisdictions.

Strategies & Objectives

The City supports inclusion of strategies that move jobs toward housing rich areas. All jurisdictions need to support Bay Area residents with employment diversity and options. By distributing jobs across the Bay Area, the region can decrease commute times, decrease greenhouse gas emissions, and increase the resiliency of jurisdictions. Such distribution strategies could be achieved through office caps in jobs-rich areas, while other jurisdictions might incentivize office and job center development.

The City supports frontloading those strategies that best respond to COVID-19, including those that advance safe bicycle and pedestrian facilities, advance renter protections, advance strategies for childcare which in turn could help essential workers, and advance protecting much-needed open space. The pandemic has made clear the need to address these issues in the near term in order to support households and put the Bay Area back on track for a growing and expanding economy.

Transportation

The City of Piedmont supports the following transportation strategies:

- Operate and Maintain the Existing System.
- Enable Seamless Mobility with Unified Trip Planning and Fare Payments.
- Reform Regional Transit Fare Policy.
- Build a Complete Streets Network.
- Advance Regional Vision Zero Policy through Street Design and Reduced Speeds.
- Advance Low-Cost Transit Projects.

Economic

The City of Piedmont supports the following economic strategies:

- Expand Childcare Support for Low-Income Families.
- Create Incubator Programs in Economically-Challenged Areas.
- Retain Key Industrial Lands through Establishment of Priority Production Areas.

Housing

Strategies and policies in the Plan should include reclamation of brownfield sites to make more land suitable for housing, particularly in transit-rich and high resource areas as well as mechanisms to overcome the high cost of land in transit-rich and high resource areas.

The City of Piedmont supports the following housing strategies:

- Fund Affordable Housing Protection, Preservation, and Production.
- Require 10 to 20 Percent of New Housing to be Affordable.

Environmental

The City of Piedmont supports the following environmental strategies:

- Adapt to Sea Level Rise.
- Modernize Existing Buildings with Seismic, Wildfire, Drought, and Energy Retrofits.
- Maintain Urban Growth Boundaries.
- Protect High-Value Conservation Lands.
- Expand the Climate Initiatives Program.

Thank you for your time and attention to these suggestions, comments, and requests for further information. To follow up on and/or respond to the content of this correspondence, please reach out to Kevin Jackson, Director of Planning and Building for the City of Piedmont at kjackson@piedmont.ca.gov or (510) 420-3050.

Sincerely,

CITY OF PIEDMONT



Sara Lillevand
City Administrator

cc: City Council
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