

August 7, 2020

Therese W. McMillan
Executive Director
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Dear Ms. McMillan:

Thank you for the opportunity to review the Plan Bay Area 2050 Draft Blueprint (Blueprint). The City of San José agrees with the overall strategies and objectives of the Blueprint for transportation, economics, housing, environment, and advancing equity. The City understands its regional responsibility to provide housing for our residents, and we will continue to strive towards providing our fair share of housing for all income segments and household types as we have for decades. The City strongly supports MTC's transportation strategies to enable seamless mobility with unified trip planning and fare payments and reform to the regional transit fare policy. The City of San José also supports all the housing strategies that are listed in the Blueprint. Housing is vital and affordable housing is key to strengthen economic growth, promote economic mobility, and to provide household stability and wellness.

The historic land use patterns in the Bay Area have led to less than ideal environmental, quality of life and equity outcomes. The City of San José shares MTC and ABAG's goals of reducing greenhouse gas emissions and housing and transportation costs for low-income families. The Envision San José 2040 General Plan (Plan) sets forth major strategies, goals, and policies to transform San José from a "bedroom community" to a regional employment center that is balanced with housing. One of the key goals of the General Plan is to achieve a ratio of 1.1 jobs per employed resident within the timeframe of the Plan.

The City of San José appreciates the increase in projected job growth; however, we are concerned that San José may not be given adequate funding for transportation improvements proportional to the projected job and residential growth. Santa Clara County is projected with 41 percent of the regional household growth (559,000 units) and 44 percent of the regional job growth (612,000 jobs). The transportation strategy identifies \$29 billion allocated to the New Transbay Rail Crossing project, but the strategy has not defined the criteria for county priority projects (\$44 billion allocated) or other regional priority projects (\$22 billion allocated). The City of San José proposes that transportation improvements serving the Santa Clara County growth areas and regional hubs (i.e., Diridon, Transbay, and the future East Bay Hub) are identified as projects with dedicated funding, similar to the New Transbay Rail Crossing project. This would include funding for Diridon Station and associated rail projects, the Airport Connector, and the Stevens Creek Transit line.

The City of San José supports the Plan Bay Area's increased emphasis on housing production, preservation, and protection of residents in rapidly changing neighborhoods. The City hopes the Blueprint would include strategies for attaining sufficient resources to achieve the goal of preserving existing deed-restricted affordable housing and other housing goals. We are, however, concerned with the allocation of more housing to the City of San José. With only 0.82 jobs per employed resident, San José is in fact the largest bedroom community in the United States. The Blueprint's focus on South Bay job centers, allocates more housing to San José and ignores cities elsewhere in the region that are higher-resource or have undersupplied housing relative to jobs.

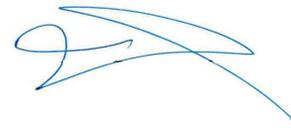
Many other cities to the north of San José are transit rich and the addition of housing units in those communities can support ridership. This imbalance in the location of housing has contributed to the Bay Area's current housing crisis. Please see additional technical and clarification comments attached.

We look forward to continuing to work with you on the preparation of Plan Bay Area 2050 Blueprint and its implementation and appreciate your consideration of our comments prior to finalizing the plan.

Sincerely,



Nanci Klein
Director of Economic Development



Jacky Morales-Ferrand
Director of Housing



Rosalynn Hughey
Director of Department of Planning,
Building and Code Enforcement



John Ristow
Director of Department of Transportation

Attachment:
Technical and clarification comments

Technical and Clarification Comments

Subject Area	Comment
Transportation Strategies	Overall, City of San José supports the Transportation Strategies. We do request that projects serving the Santa Clara County growth areas to be placed in equal or higher priority to the 2 nd Transbay Crossing that is a project listed as a strategy.
Transportation Strategies	<u>Document: <i>Draft Blueprint Findings</i>¹</u> The City of San José strongly supports: <ul style="list-style-type: none"> • Enable Seamless Mobility with Unified Trip Planning and Fare Payments, and • Reform Regional Transit Fare Policy.
GHG Gap and Additional Policies	<u>Document: <i>Draft Blueprint Findings</i></u> The City of San José strongly supports: <ul style="list-style-type: none"> • Require GHG offsets for all highway projects, • Reform on- and off-street parking policies, and • Implement zero occupancy vehicle fees.
SJC Airport Connector	Thank you MTC for working with us on the Airport Connector eligibility for regional funds.
Funding Transportation Projects	Santa Clara County, including San José, needs access to funds for planning and project development in Phase 1, to reduce long single-passenger commutes and greenhouse gas emissions for our residents. please consider how. Final Blueprint needs to clarify that project in Phase 2 can access regional funds when they are ready.
Growth Areas vs. Transit Investments	Growth projected in the South Bay but investment for improvements is not proportional. The City is concerned that the goal of transforming growth areas into transit-orient places would not be achieved without the proper transit investments.
Regional Hubs	There is no definition or listing of strategic transit hubs (Diridon, Transbay, and future East Bay Hub). Final Blueprint needs to identify significant regional hubs and allocate specific project funding to these hubs.

¹ https://www.planbayarea.org/sites/default/files/pdfs_referenced/4a_PBA50_DraftBlueprintFindings.pdf

Technical and Clarification Comments

Subject Area	Comment
Jobs/Housing	<p><u>Document: <i>Technical Appendix: Draft Blueprint Growth Pattern</i></u>²</p> <p>Growth projections are for the North Santa Clara County superdistrict to add 159,000 homes 12% of the region's but 423,000 jobs 30% of the region's total. That would increase the jobs-homes imbalance by 264,000 in an area that is not getting major transit investments in the Draft Blueprint. The job growth for this area, currently poorly connected to the region's transit networks, is projected to roughly equal the employment growth of all of San Francisco County and Alameda County combined (444,000).</p> <p>The transit investments in the Draft Blueprint do not reflect the projected growth in travel demand. One reason the draft Blueprint is missing the greenhouse gas (GHG) reduction goals and projects high increases in transit crowding on Caltrain and VTA may be this demand and investment mismatch.</p> <ul style="list-style-type: none"> • What investments has MTC examined that would address the increased travel demand in the North Santa Clara County superdistrict? • What measures has MTC looked at to shift employment growth to nearby superdistricts with better transit infrastructure and jobs-housing balances? • Which of those investment or growth strategies were advanced or not and why?
Jobs/Housing	<p><u>Document: <i>Equity and Performance Outcomes</i></u>³</p> <p>Compared to 2015, the jobs/housing ratio significantly worsens in the East Santa Clara County superdistrict (east San José), a disproportionately minority and low-income area. The East Santa Clara County superdistrict adds 93,000 homes but only 16,000 jobs, causing the disproportionately low-income and minority residents of this area to out-commute to other areas.</p> <p>What strategies or project were included to improve the jobs-housing ratio or the mobility of east San José residents?</p>
Jobs/Housing	<p><u>Document: <i>Equity and Performance Outcomes</i></u></p> <p>The City proposes that the Blueprint focus on strategies to the allow more homes closer to the regional job centers, rather than shifting employment.</p>
Development Assumptions and Effect on Growth Geographies	<p><u>Document: <i>Technical Appendix: Draft Blueprint Growth Pattern</i></u></p> <p>The MTC/ABAG's analysis appears to assume that small-lot multifamily development will not produce many new homes. Refinements or additional housing strategies are needed in the final plan to make small lot redevelopment of "missing middle" housing viable.</p>

² https://www.planbayarea.org/sites/default/files/pdfs_referenced/PBA2050_BP_HousingJobsGrowth_072120.pdf

³ https://www.planbayarea.org/sites/default/files/PBA2050_Draft_BPOutcomes_071720.pdf

Technical and Clarification Comments

Subject Area	Comment												
Transit Crowding	<p><u>Document: <i>Equity and Performance Outcomes</i></u> Under 2050 Blueprint transit crowding improves except for South Bay operators</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Operator</th> <th>2015</th> <th>2050 trend</th> <th>2050 Blueprint</th> </tr> </thead> <tbody> <tr> <td>VTA</td> <td>0%</td> <td>82%</td> <td>83%</td> </tr> <tr> <td>Caltrain</td> <td>8%</td> <td>32%</td> <td>50%</td> </tr> </tbody> </table> <p>This is a result of the mismatch between where growth occurs (41 – 44% Santa Clara County) and where most new transit capacity investment occurs (e.g., Transbay Corridor).</p>	Operator	2015	2050 trend	2050 Blueprint	VTA	0%	82%	83%	Caltrain	8%	32%	50%
Operator	2015	2050 trend	2050 Blueprint										
VTA	0%	82%	83%										
Caltrain	8%	32%	50%										
Healthy Outcomes	<p><u>Document: <i>Equity and Performance Outcomes</i></u> The City proposes using annual incidents (fatalities and injuries) per capita, not annual incidents per 100 million VMT. Use of VMT as denominator makes policies that reduce VMT appear to make safety worse, when the opposite is true.</p>												
Affordable Housing and Commuting	<p><u>Document: <i>Equity and Performance Outcomes</i></u> The Final Blueprint should provide measurable metrics on whether new residential development would reduce in-commuting (displacement of residents to other counties).</p>												
Housing in Growth Areas Strategies	<p><u>Document: <i>Draft Blueprint Findings</i></u> Under the strategy “Allow a Greater Mix of Housing Types and Densities in Growth Areas,” what is the list of, or criteria for “select” Priority Development Areas, Transit-Rich Areas, and High-Resource Areas? The clarification will allow the City of San José to evaluate the strategy.</p>												
Housing Strategies	<p>The City of San José is encouraged by the analysis which shows that Bay Area resident’s housing and transportation costs would decrease by 2050. The City, however, is concerned that residents would still be extremely cost burdened under the Blueprint’s strategies with low-income households projected to pay 83 percent of their income toward housing and transportation, leaving little money for food, medical expenses, and other necessities.</p>												
Affordable Housing Analysis	<p>MTC defines low-income households as earning \$45,000 per year. The City suggests using TCAC AMI levels of ELI, VLI, and LI to demonstrate how the strategies would impact the housing and transportation affordability of these groups and include the share of these households in the overall population. These categories would align with how affordable housing is planned and funded.</p>												

Technical and Clarification Comments

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<p>Preservation of Deed-restrict Affordable Housing</p>	<p>The City supports the goal of preserving 100% of existing deed-restricted affordable housing. Santa Clara County has the largest preservation problem of the nine Bay Area Counties, being at risk of losing an additional 2,059 restricted affordable units in the next ten years. Over 1,000 restricted homes are located in San José and preserving 100% of the existing deed-restricted affordable housing stock will prevent the displacement of thousands of San Jose families. The City hopes the Blueprint would include strategies for attaining sufficient resources to achieve this goal.</p>
<p>Diversity and Residential Displacement</p>	<p>The City appreciates the section regarding diversity. It’s a great start. However, it is not sufficient to discuss diversity without including analysis and impacts to different race and ethnic communities. Here are some of our suggestions:</p> <ul style="list-style-type: none"> • Under “Will Bay Area Communities Be More Inclusive?” include the projected share of single family zoned and multifamily zoned land in each of the listed areas. This information would help demonstrate the reversal of exclusionary zoning policies described in the description. • Under “Will Bay Area Residents Be Able To Stay In Place?” include the racial makeup of the listed neighborhood areas and a category of “All Other Tracts.” This can demonstrate any disproportionate outcomes in displacement and gentrification experienced by neighborhoods of color. It would also be helpful to include the number of estimated low-income households that would be displaced by 2050.