



## City of Alameda • California

October 13, 2016

Ken Kirkey,  
Planning Director,  
Metropolitan Transportation Commission

Miriam Chion,  
Director of Planning & Research,  
Association of Bay Area Governments

Subject: City of Alameda Comments on Draft Preferred Scenario/Plan Bay Area 2040

Dear Mr. Kirkey and Ms. Chion:

Thank you for the opportunity to comment on the Draft Preferred Scenario/Plan Bay Area 2040. (DPS) The City of Alameda and its citizens have been consistent supporters of the region's efforts to plan for a sustainable Bay Area and address global warming and climate change. Alameda has established two Priority Development Areas (PDAs) and identified significant acreage in the PDAs to accommodate Plan Bay Area growth. Alameda strongly supports the two fundamental principles that have been the foundation of the regions past planning efforts:

- A successful plan for a sustainable Bay Area must be based upon strong connections between land use and transportation, and
- A successful regional plan must be an equitable plan. The development and transportation challenges faced by the region must be equally shared by all the cities and counties in the region.

Unfortunately, the DPS falls short on both principles.

### **The DPS Ignores the Land Use and Transportation Relationships in Alameda.**

Alameda's transportation system is in desperate need of State and regional transportation funding for much needed improvements to accommodate regional growth. Our local and transbay buses are filled to capacity, and our ferries are near capacity and occasionally have to turn back riders at the dock. Despite our fragile transportation infrastructure and services, the DPS plans a **38%** increase in households in Alameda over 30 years with no plans for increasing Alameda's connectivity to the regional roadway or transit systems. Given Alameda's limited connectivity to the region, such growth is unsustainable. In contrast, the DPS plans for a 28% increase in Fremont, a 25% increase in San Leandro, a 20% increase in Berkeley, and only an 18% increase in Hayward. All of these cities benefit from multiple access points to the regional network and at least one BART station, which reduces peak hour transportation impacts.

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**The DPS Ignores Alameda's PDA Designations:** The DPS plans for **64%** of Alameda's household growth to occur outside of the designated PDAs in existing historic neighborhoods, on a wildlife refuge, and in the city's business areas. In contrast, the DPS assumes 29% of Berkeley's growth to occur in non-PDAs, 10% of San Leandro's growth in non-PDAs, and only 0.4% of Fremont's growth in non-PDA areas.

**The DPS is Not Equitable.** The DPS places the burden for the region's household growth on the cities that have historically carried the burden, such as Alameda, Oakland, San Francisco, Emeryville, Berkeley, and Fremont. For cities that have historically avoided the burden of assisting the region accommodate new households, the DPS simply perpetuates this historic inequity. This inequity is reflected in an apparent correlation between average household incomes in a city and the amount of growth that city is expected to accommodate in the DPS. There also seems to be a correlation between how much growth a city is expected to accommodate and the amount of existing rental housing stock and the amount of existing multifamily housing that exists in that city. Cities like Alameda with a high percentage of renters and a high percentage of multifamily housing, seem to be the cities that are asked to accommodate more growth, while more wealthy cities with predominately single family detached, owner occupied housing are planned for much less growth.

The Plan Bay Area and the State must address this inequity through changes in transportation funding. State law needs to change to ensure that the cities that accommodate the region's growth get all of the region's transportation related tax revenues, including gas taxes. As a region, we cannot continue to spend much needed transportation dollars in communities that are refusing to take responsibility for the region's housing needs. The cities that are taking on all of the region's burden deserve all of the region's transportation funds. The health of the environment and the region depend upon it.

**Alameda's Request.** We have a few simple requests:

Please amend the DPS to remove the 1,425 households planned on the Federal Nature Preserve (home to the endangered Least Tern), which is also subject to State of California Tidelands restrictions on residential uses, remove the 5,000+ households planned for the South Shore Shopping Center and the Marina Village Shopping Centers, and remove the 190 households planned for the Wind River Office Campus.

Please reallocate these 6,600+ households to cities in the region that are carrying a smaller percentage burden than Alameda. Our neighbors in Oakland, Emeryville and San Francisco are already doing more than their share.

Please ensure that Plan Bay Area 2040 takes a strong stand on the need for the State to make structural changes to the statewide distribution of transportation tax revenues. Cities like Alameda, Oakland, Berkeley, and San Francisco that are working to create a sustainable Bay Area are in desperate need of additional transportation funding. Without it, our cities will not be able to accommodate the housing burdens for the entire region. If

we fail, the Regional Plan fails, and we will have all failed to fulfill our responsibilities to future generations of Bay Area residents.

Sincerely,



Andrew Thomas, MCP and AICP  
Assistant Community Development Director

Cc: Mr. Steve Heminger, MTC Executive Director  
Alameda City Council  
Alameda Planning Board  
Ms. Jill Keimach, City Manager, Alameda