

**Department of
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Steve Heminger
Executive Director
Metropolitan Transportation Commission
375 Beale St.
San Francisco, California 94105

Paul Bradford
Acting Executive Director
Association of Bay Area Governments
375 Beale St.
San Francisco, California 94105

RE: Contra Costa County Comments on the Draft Preferred Scenario of Plan Bay Area 2040

Dear Mr. Heminger and Mr. Bradford:

The Contra Costa County Department of Conservation and Development (DCD) appreciates the effort the regional agencies have expended in order to develop the draft Preferred Scenario for Plan Bay Area 2040 – the Bay region’s next Regional Transportation Plan (RTP) planned for completion in 2017. MTC staff members Ken Kirkey and Matt Maloney provided the Contra Costa Planning Directors with a thorough presentation outlining the draft Preferred Scenario at their September 14, 2016, meeting. Below are DCD’s general comments on the draft as it relates to the County, in particular regarding housing unit and job allocations for unincorporated Contra Costa County communities. Exhibit A includes more specific comments on the proposed allocations by Transportation Analysis Zone (TAZ).

- Our primary concern with the allocation of households and jobs in Contra Costa is the exacerbation of our county being primarily a producer of housing, with residents having to commute elsewhere for employment. The draft Preferred Scenario forecasts an increase of over 115,000 new households in Contra Costa over the life of the Plan (through 2040), an *increase* of 26,500 (23%) over the 2013 RTP forecast of nearly 89,000 new households. At the same time, job growth is forecast to grow by only 112,500, a 9% *reduction* from the 2013 RTP forecast of nearly 122,500 new jobs. This approach, further segregating housing and employment, conflicts with the assertion that this process is “...refining the Bay Area’s ideal development pattern...” as described in the ABAG/MTC memo from August 30th transmitting the land use allocations.

Contra Costa County and the cities within have been diligent about seeking a better jobs/housing balance. Our residents already have the longest commutes in the Bay Area (Source: MTC Vital Signs), and under the draft Preferred Scenario, this will only worsen as residents attempt to access living wage jobs located further and further from their homes. East Contra Costa, home to three of

the top five longest commute cities in the entire region, is projected in the draft to grow by 34,500 households through 2040, with new jobs increasing by only 16,000 jobs in that timeframe, a divide that will drive East County's workers-per-job ratio from 2.4 in 2040 under the 2013 RTP to 2.5 in the draft Preferred Scenario. Although Contra Costa residents have invested significant local dollars into the expansion of transportation alternatives in East County, including the widening of SR-4 and extension of eBART to Antioch, these investments will struggle to keep up with the thousands of commuters who will need to travel outside the area for work. While other counties in the region have the opposite issue with the jobs/housing imbalance, Contra Costa County has included several policies and initiatives to bring jobs closer to the workforce and more available housing. In addition to the educated workforce and available housing, Contra Costa County has both existing and proposed job centers that are easily accessible to the region via BART and eBART. Transit ridership numbers can increase immensely without the need for additional capital funds by utilizing the significant unused capacity on the reverse commute routes.

- The establishment of a Priority Production Areas program (formerly Priority Industrial Areas) is an important new regional planning tool and should be promptly implemented. As discussed above, Contra Costa County has a significant jobs-housing imbalance and too many residents need to commute out of the County each day for work. For this reason, we recommend the proposed Priority Production Areas be treated with the same significance as Priority Development Areas (PDAs). We recognize that other areas may be adding jobs faster than they are adding housing, but for areas such as Contra Costa County, it is critically important to also make job growth a high priority.

Manufacturing and industrial jobs are critical in Contra Costa County. Nearly 55 miles of shoreline from Hercules to Oakley has been the focus of Contra Costa County and participating cities as part of the Northern Waterfront Economic Development Initiative. This effort seeks to capitalize on underutilized industrially-zoned land with existing ship and rail transportation opportunities and a nearby workforce to stimulate the economy by expanding the existing industrial, maritime, and manufacturing uses and providing incentives for additional development of this unique area. We are anticipating significant job growth in the six cities and unincorporated areas (18,000 new jobs by 2035), and this vision is not reflected in the draft Preferred Scenario. Realizing the economic potential of the Northern Waterfront could be aided by the Priority Production Area program and associated grants, as we have seen with the OBAG program for Priority Development Areas (PDA) under the last two RTPs.

- We have noticed several inconsistencies between the projections and adopted plans and known future development. It appears that the allocations for the Priority Development Areas within the unincorporated areas deviate from what the County proposed. Based on adopted plans and active development projects, the County provided very specific jobs and housing unit numbers for these PDAs. Changes to those projections should be proposed by the local jurisdiction, and not subject to speculation by the Regional Planning Agency.

- There are a number of TAZs that show a job loss – and in the case of San Ramon a significant loss of jobs. There are areas where we may not anticipate job growth, but we do not anticipate job loss in the County and in particular in the San Ramon area.
- The ‘No Project’ alternative appropriately assumes no expansion of Contra Costa’s existing urban growth boundaries. While urban growth boundaries in other counties may be more fluid, Contra Costa’s voter-approved Urban Limit Line under the County’s Measure L, and the Contra Costa Transportation Authority’s Measure J Growth Management Program (GMP), are difficult to amend due to the rigid GMP requirements.
- As a County, it would be very helpful to have estimates that break down the anticipated development between city and County unincorporated areas. Even at the TAZ geography, it is difficult to understand where ABAG is assigning household and job growth.
- ABAG presents housing data as “Households” and we track housing units. There is a correlation between households and housing units, but they are not 1:1. It is difficult for jurisdictions to predict household growth as it relates to a vacancy rate, as well as the potential for more than one household to share a housing unit. At minimum, vacancy rate assumptions should be provided to better estimate anticipated housing unit numbers.

Thank you for this opportunity to comment on the draft Plan Bay Area. Contra Costa County looks forward to working collaboratively with MTC and ABAG as the Preferred Scenario is developed and adopted in 2017.

Sincerely,



John Kopchik
Director

Cc: Members, Contra Costa County Board of Supervisors
David Twa, County Administrator
Julie Bueren, Public Works Director
Daniel Peddycord, Public Health Director
Julie Enea and Lara Delaney, County Administrator’s Office

Exhibit A

Unincorporated Area	TAZ	ABAG Household (HH) Growth	ABAG Job Growth	County HH Estimate	Notes
	1040	112	64		
	1041	529	-571		
	1042	37	6		
Kensington	1043	51	163	13	HH growth is a higher than vacant; may be able to meet with 2nd units.
Kensington	1044	53	-7	17	HH growth is a higher than vacant; may be able to meet with 2nd units. Do not anticipate any areas with net loss of jobs.
	1045	68	75		
	1046	34	-24		
	1047	96	436		
	1048	131	137		
	1049	295	445		
	1050	56	279		
	1051	750	853		
	1052	26	-8		
Portions of East Richmond Heights	1053	91	-23	3	Minimal HH in unincorporated area - mostly in city. Do not anticipate negative job growth in any area.
	1054	55	189		
	1055	232	229		
	1056	158	414		
	1057	3237	152		
	1058	3017	738		
	1059	5082	19142		
	1060	244	621		
	1061	1295	988		
Portion of North Richmond	1062	1044	3039	14	Minimal HH and job growth in unincorporated area - mostly in city.
	1063	292	1368		
	1064	132	210		
	1065	149	191		
	1066	270	1574		
	1067	166	309		
North Richmond	1068	4838	723	520	WAY too high and based on never-adopted North Richmond Specific Plan - estimated new HH is 520; job growth is okay as that area is seeing more light industrial and warehousing jobs.
North Richmond	1069	4747	4547		No new HH growth anticipated in unincorporated area - all within City of Richmond; some job growth in unincorporated area.
	1070	44	97		
	1071	108	186		

Rollingwood	1072	106	476	3	Minimal HH and job growth in unincorporated area - mostly in city.
	1073	51	246		
El Sobrante	1074	334	940	245	HH Growth in unincorporated area estimated at 245. Some in City of Pinole Potential PDA? Otherwise city area is commercial; jobs okay.
El Sobrante	1075	115	356	30	HH growth in unincorporated area estimated at 30 units, remainder in city. Jobs also mostly in city.
East Richmond Heights	1076	41	5	51	HH and job growth okay.
El Sobrante	1077	234	127	148	HH growth a little high; job growth okay.
El Sobrante	1078	104	86	82	HH and job growth okay.
El Sobrante	1079	142	254	84	HH growth a little high; job growth okay.
Tara Hills	1080	12	115	26	HH and job growth okay; maybe even a little low by 10 units.
Bay View/Montalvin Manor	1081	64	110	138	HH Growth a little low - estimated at 138.
	1082	605	261		
	1083	2000	1410		
	1084	127	137		
	1085	92	188		
	1086	177	362		
Briones Hills area	1087	226	0	86	HH growth a little high; jobs okay.
Rodeo	1088	220	154	1	All HH and job growth in City of Hercules.
Rodeo/Crockett	1089	4819	143	196	HH grossly overestimated – CCC estimates 196 HH. Jobs a little too high.
Crockett	1090	146	717	31	HH growth too high by 100 units +; jobs also too high.
	1091	134	548		
	1092	80	2204		
	1093	123	363		
Martinez - Mountain View	1094	253	706	96	Only about 100 units in unincorporated area - the rest in the city. Limited jobs in unincorporated as well.
Martinez - Vine Hill	1095	64	681	228	HH growth too low. Estimated at 228. Jobs may be a little high.
Martinez - Vine Hill	1096	679	1179	280	Only about 280 HH in unincorporated area, remainder in city. Jobs may be too high unless lots of new airport related development occurs.
Bay Point/Concord/CNWS	1097	49	1201	23	HH growth may be a little high, but okay; job growth okay.
	1098	17944	28739		
Ayers Ranch area	1099	182	39	32	Limited HH and Job growth in unincorporated area, mostly in City of Concord.
	1100	511	98	5	Mostly in City of Concord- very small sliver of unincorporated county.
	1101	90	62		

Unincorporated					HH okay; we do not anticipated any job loss in any particular area.
Clayton and rural CCC	1102	34	-6	37	
	1103	251	145		
	1104	75	26		
	1105	36	-11		
	1106	261	347		
	1107	77	152		
	1108	107	274		
	1109	230	95		
	1110	634	313		
	1111	84	288		
	1112	154	1342		
	1113	2558	2625		
	1114	883	88		
	1115	440	74		
	1116	63	338		
	1117	143	97		
	1118	184	827		
	1119	238	95		
	1120	198	285		
					What is the number allocated to unincorporated CCC? Approved an additional 100 units for a total of 200, but not sure if PDA already increased or where within TAZ growth is anticipated. Jobs okay.
Contra Costa Centre	1121	622	3257	100	
Martinez - Pacheco	1122	1214	5879	0	All HH and job growth in city.
Martinez - Pacheco	1123	216	793	14	Most of HH and job growth within city.
	1124	175	815		
Alhambra Valley	1125	157	92	11	Most of HH and job growth within city.
Martinez- Pacheco	1126	240	-24	11	Most of HH and job growth within city.
	1127	147	852		
	1128	74	15		
	1129	141	609		
					Most of HH and job growth within city; not anticipating any job loss in a particular area.
Reliez Valley	1130	87	-23	20	
					Unincorporated area anticipated to accommodate 76 units, too low. Hard to tell without city/unincorporated breakdown.
Alhambra Valley and Reliez Valley	1131	95	9	76	
	1132	413	-188		
Acalanes Ridge and Reliez Valley	1133	141	223	41	Estimate 41 units in unincorporated area; remainder in city boundaries. Most of job growth within cities.
	1134	146	600		
					Estimated 92 units within unincorporated CCC, remainder in the city. Jobs growth looks okay in city/county combined.
	1135	441	158	92	
Contra Costa Centre	1136	193	471	51	
	1137	312	1583		
	1138	125	267		

Portions of North Gate	1139	63	79	23	Minor growth within unincorporated area. Most HH and almost all jobs within city.
	1140	60	216		
Portions of North Gate and Shell Ridge	1141	108	797	41	Some HH growth potential within unincorporated area; most job growth within city.
Portion of San Miguel	1142	42	-95	10	Small number of HH growth in unincorporated area. Job loss seems high.
Shell Ridge	1143	198	405	21	Very small HH growth in unincorporated area, most HH and job growth within city.
San Miguel	1144	291	-160	17	Very small HH growth in unincorporated area, most HH and job growth within city.
	1145	2895	2022		
	1146	1266	1094		
Saranap and Castle Hill	1147	95	334	53	Unincorporated area anticipated to accommodate 53 units; remainder in city. Jobs may be high.
	1148	2390	66		
Saranap	1149	100	214	257	HH growth is low - estimated at least 250 in unincorporated area alone. Job growth seems about right.
	1150	366	202		
	1151	111	-71		
	1152	677	446		
	1153	40	202		
	1154	246	-4		
	1155	31	23		
	1156	48	14		
	1157	44	113		
	1158	147	391		
	1159	31	558		
	1160	63	1		
Alamo	1161	419	608	86	Estimated 86 units within unincorporated area, remainder in cities. Jobs mostly in city, some in unincorporated area possible.
Alamo	1162	16	153	4	HH estimated at 4; jobs seem high.
Portions of Alamo	1163	48	-89	11	Only 11 HH in unincorporated CCC, rest in city. Although no job growth anticipated, loss of jobs is not anticipated.
Alamo	1164	61	-246	63	HH growth is accurate. No job growth is anticipated; loss of jobs is not anticipated.
Alamo/Diablo	1165	111	52	61	Unincorporated area HH growth estimated at 61 units, jobs seems about right.
Slivers of Blackhawk	1166	189	325	3	All HH and job growth in city.
	1167	441	26		
	1168	3711	443		
	1169	490	-276		
San Ramon - Norris Canyon	1170	326	700		

San Ramon - Norris Canyon	1171	85	115	260	HH Growth is a little low - anticipated around 100 units in unincorporated Norris Canyon from 2010; all job growth within city.
	1172	81	113		
	1173	54	45		
	1174	54	79		
Doughty Valley	1175	1571	-2462	445	Within just DV, anticipated 450 new units; more within city. This is a job center and we are not anticipating job loss within the City of San Ramon. Should be job increase.
Blackhawk, Camino Tassajara, unincorporated	1176	506	255	1765	HH growth is much too low if counting from 2010. Includes lots of development within DV plus Alamo Creek. Job growth also seems far too low.
Discovery Bay / Byron	1177	1967	57	1399	HH growth might be a little high or a portion of estimate within City of Brentwood. Job growth may be a little low, in particular if Byron Airport commercial development is implemented, an estimated 200+ jobs
	1178	12274	1435		
Unincorporated Brentwood	1179	1967	1251	58	Most of HH and job growth within city.
Sandmound Slough	1180	2212	21	34	Most of HH and job growth within city. Job growth seems way too low
Bethel Island	1181	281	98	755	HH Growth is low if Delta Coves (entitled) is built out. Estimated 755 units in unincorporated area alone. Job growth seems about right.
	1182	4001	2654		
	1183	1963	483		
	1184	79	67		
	1185	426	559		
	1186	450	719		
	1187	174	769		
	1188	83	608		
	1189	3001	2068		
	1190	146	31		
	1191	117	-36		
	1192	87	-46		
	1193	201	488		
	1194	-17	156		
	1195	2801	135		
1196	293	1	763*	Potential new units in an unincorporated area and will be annexed to either Antioch or Pittsburg. Estimated HH seems about right. Any new jobs within city limits.	
1197	21	843			
1198	150	619			
1199	2093	889			
Portion of Bay Point (south of Highway 4)	1200	195	128	325	HH units seems low. 325 units in unincorporated area plus potential city HH growth. Jobs seems about right.
	1201	66	-9		

	1202	220	40		
	1203	81	176		
	1204	171	679		
	1205	514	524		
	1206	455	470		
Sliver of Bay Point	1207	88	50	1	All HH and job growth in city. HH growth is low - estimated 370 units. Job growth is way low.
Bay Point	1208	288	29	373	HH Growth is way low - estimated between 300 - 530 new units. Job growth a little low.
Bay Point	1209	113	151	533	
Bay Point	1210	79	54	90	HH and job growth about right.

** This project is in development and final HH depends on a number of factors; 763 is too high and ABAG estimate might be about right**