

June 1, 2017

MTC-ABAG,
Plan Bay Area 2040 Public Comment
Bay Area Metro Center,
375 Beale Street, Suite 800,
San Francisco, CA 94105

SUBJECT: Public comments for the Draft Plan Bay Area 2040 and the Draft Environmental Impact Report

Thank you for the opportunity to comment on the Draft Plan Bay Area 2040 and the associated Draft Environmental Impact Report. The San Mateo County staff from the Planning and Building Department, Office of Sustainability, and County Health System have reviewed these documents and have the following comments for your consideration:

Comments on Plan Bay Area

Chapter 3, Employment and Household Projections, Page 33:

In regard to the "Asian/Other" category used in projecting growth of race/ethnicity in the Bay Area, please clarify what "other" represents. Please also clarify why the "other" category was integrated with "Asian" and not separated out as its own category?

Chapter 4, Key Transportation Strategies, Investments and Projects Section:

While the Plan provides detailed information on three specific categories around the Bay Area's transportation strategy – (1) operate and maintain, (2) modernize, and (3) expand – it does not provide any strategies for how all the different "patch-work-like" public transportation systems in the Bay Area (e.g., BART, Caltrain, SamTrans, Muni, SMART, AC Transit, etc.) can better collaborate and work more efficiently to provide a more integrated, reliable, easy-to-use service for the general population. A recommended 4th strategy for inclusion in the Plan would be "integrate". Having a more integrated, reliable and easy-to-use public transportation system will incentivize and increase higher ridership, thus helping to further reduce traffic congestion and its associated GHG emissions. This strategy may potentially help the Plan inch closer to meeting its "Transportation System Effectiveness" target, specifically "Increase non-auto mode share by 10%", a target that the Plan is falling slightly short on currently, as described in Table 4.9.



Chapter 5, Action Plan:

- **Ensure Community Participation:** The Action Plan should explicitly convey efforts to meaningfully engage underserved communities to assist with the design and implementation of policies, strategies and programs that will impact their livelihoods.

Housing

- The projections for household growth in the County seem to understate the likely potential given the low income housing zoning designations in the County's certified Local Coastal Program (LCP). The LCP designates a site in El Granada and two sites Moss Beach for Medium High Density Residential (8.1 to 16 units per acre). One site is over 10 acres in size and could support up to 150 units. The data provided by ABAG staff for TAZ 293, which includes both Moss Beach sites indicates that PBA 2040 proposes reducing projected household growth in this TAZ from 535 new housing units to 181. Please revise the projections to incorporate both likely single family growth household growth and the County's designated affordable housing sites.
- **Promote Healthy Housing:** Stable, healthy, and affordable housing protects health and provides the ability to engage in healthy opportunities. Currently many low-income residents live in substandard conditions that expose them to adverse health impacts. Efforts to incentivize the preservation and rehabilitation of housing should promote healthy design guidelines, the use of high quality materials, and green buildings techniques.
- **Incentivize jurisdictions that take actions to limit the displacement of vulnerable residents:** We commend the efforts to incentivize the development of housing and affordable housing. The Action Plan should go further to outline specific actions to incentivize local jurisdictions to support and protect residents from involuntary displacement.

Economic Development

- **Promote Quality Jobs and clean industries:** The Action Plan should incorporate language that will ensure its outlined actions will lead to the creation and retention of family-supporting jobs and industries that improve public health and do not further exacerbate environmental degradation.

Resilience

1. The Resilience Actions focus primarily on building resiliency across physical structures. The action plan should also consider social and economic vulnerabilities and challenges for Resilience Planning.
 - Help build and increase social and economic resilience, especially in low income and disadvantaged communities

- Adaptation and Resilience Investments should be integrated with economic development initiatives to offer work force training opportunities and promote career pathways and quality jobs for low income and disadvantaged communities.
 - Make equity a key consideration for any funding provided for adaptation and resilience efforts.
2. Incorporate a cross-sector approach to addressing resilience in Priority Development Area planning that seeks to link public health, emergency preparedness, transportation, land use and community development.
 3. The Resiliency Actions are heavily focused on sea level rise and natural hazards. This section would be strengthened by including actions to assess potential vulnerability to other climate change impacts such as heat, precipitation, air quality and wildfires and identify policies, systems and programs to build resiliency across these impacts.
 4. Apply a Public Health Lens: While this section addresses the need to tackle and adapt to natural hazards such as earthquakes, floods, and fires, further actions to address the health impacts of climate change such as the adverse health effects of exposure to extreme heat events, interruption of water and food supplies, and air quality hazards. These actions should pay particular attention to vulnerable communities as to not exacerbate existing health inequities. The action plan should encourage robust partnerships between regional agencies and public health departments.
 5. Adaptation and Resilience Investments Should Promote Quality Jobs and Career Pathways for Underserved Residents. Existing and new funding sources identified to advance resilient communities should promote family-supporting jobs and offer training opportunities for underserved residents.

Comments on the Draft Environmental Impact Report (DEIR)

The DEIR describes three alternatives, with a preferred alternative that concentrates a majority of transportation funding in the three largest cities that will be absorbing the majority of the projected regional housing growth during the plan horizon. Counties and cities in lower density areas would get less transportation funding benefit per capita under this scenario. It is important to keep in mind that each county has important regional transportation resources that need to be maintained, particularly after such a harsh winter as the one we just experienced. For example San Mateo County beaches are a popular weekend destination for residents from around the region, with roadways leading to and along the coast at or over capacity on most weekends. Similarly rural roads support the popular farm to table – “locavore” movement in the Bay Area. Many of these roads were hard hit by the recent storms. While solving the housing crisis is critical, a holistic transportation funding strategy is needed to ensure that all the region’s needs are met, including recreation, agriculture, and other non-urban needs.

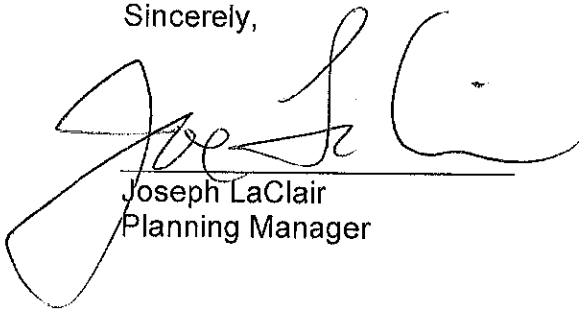
On page 2.1-32, the DEIR lists a number of fixed-guideway improvements in PBA 2040, but fails to mention Caltrain's electrification. Please include this project in the list of regional investments that will partially address Level of Service F conditions in San Mateo County.

Table 2.39 states that 30 acres of "Prime Farmland" could be impacted by transportation projects identified in the DEIR/S. The DEIR/S also states that all projects in the coastal zone would obtain Coastal Development Permits to ensure compliance with the California Coastal Act and the County's certified Local Coastal Program (LCP). The County's LCP prohibits uses other than agriculture in Prime Agricultural lands. Policy 5.1 in the County's LCP defines Prime Agricultural land as those lands with soils of Class I or II in the US DA Soil Conservation Service Land Use Capability Classification, among other things. Please clarify that prime agricultural land as defined in the LCP cannot be used for transportation projects, or that the definition of Prime Agricultural land in the DEIR does not include prime agricultural lands as defined in the LCP. A change to this policy would be necessary to allow such encroachment, and such a policy change is subject to a vote of the citizens of San Mateo County.

Table 2.3-7 Identifies Protected Open Space Acres Potentially Affected by Proposed Development, and includes 7 acres in San Mateo County. Although it is unclear whether this estimate includes lands within unincorporated San Mateo County, and lands within the Coastal Zone, we want to raise a caution that open space lands in the Coastal Zone enjoy similar protections as those granted to agricultural land in the LCP.

Please contact me with any questions at 650/363-1865.

Sincerely,



Joseph LaClair
Planning Manager