Dear Mr. Kirkey,

Re: Plan Bay Area Draft Plan, March 2017

As the regional entity responsible for housing and transportation for the Bay Area, we are heartened to see MTC and ABAG ("Agency") continue to take a more active role in ensuring that Plan Bay Area (the "Plan") isn’t simply a document that sits on the shelf but is instead fully implemented. We commend and appreciate the Agency’s effort to create CASA and for its overall leadership on regional housing issues.

The Plan presents a unique opportunity to make strides toward improved transportation and affordable housing conditions throughout the Region. To ensure better affordable housing outcomes, we offer the following feedback on the draft Plan dated March 2017.

The Action Plan needs to be more comprehensive and detailed to address all of the Bay Area’s affordable housing needs. The Housing Actions identified in the Action Plan provide a starting point for addressing the Region’s affordable housing needs. And, while CASA can identify necessary game-changing solutions in funding, regulation, and legislation that will further aid implementation, the Plan can and should be augmented to include known solutions such as prioritizing public land for affordable housing. In order to begin to grasp the full complement of supplementary strategies needed to full fund the region’s affordable housing needs, the Agency needs to monitor the impact of the Housing Impact Plan (Table 5.1 in PBA Draft) and provide regular progress reports.

The Agency should turn its eye towards implementation. The Agency’s efforts to successfully increase zoning capacity in 51 PDAs is commendable and the Agency should now turn its eye towards implementation by incenting, assisting, and holding jurisdictions accountable for achieving the affordable housing goals within their respective PDAs. In addition to the Plan targets that are being
monitored, the Agency should also collect and analyze metric around jobs and housing balance and fit.

**The Plan should include more aggressive affordable housing requirement in PDAs.** Given the link between transit-oriented affordable housing and decreased VMT and the fact that many jurisdictions exceed their respective communities’ needs for market rate housing, at least 25 percent of housing built in PDA’s should be affordable to households earning 80 percent AMI and below – an example already set by other public agencies such as the City of San Jose (for its Urban Villages) and the Santa Clara Valley Transportation Authority.

**The Plan should ensure better connection between transit and housing.** We need to build housing throughout the region, a fact that is recognized by both the RHNA process and PBA. Not all cities, however, are close to mass transit and residents rely on bus travel to move from homes to jobs and services. It is important to ensure that when routes are considered that the transit-housing connection is maintained. An example is Morgan Hill, which has done a great job in adding affordable housing, but is now seeing a reduction in bus service for those new residents. It is hard to ask City leaders to add more housing when the transit linkage is not available.

We thank the Agency for its leadership on housing and transportation issues and look forward to collaborative efforts to improve housing and transportation conditions across the Region.

Last, but not the least, we also commend staff for the outreach and engagement around the draft Plan and for the opportunity to provide feedback.

Sincerely,

Pilar Lorenzana
Deputy Director