



June 1, 2017

Adam Noelting, Senior Planner
375 Beale Street, Suite 800
San Francisco, CA 94105

Subject: Draft Plan Bay Area 2040 and Draft Environmental Impact Report

Dear Adam:

Thank you for the opportunity to comment on the Plan Bay Area 2040 and accompanying Draft Environmental Impact Report (DEIR). The Santa Clara Valley Transportation Authority (VTA) offers the following comments on the Draft Plan and DEIR.

Draft Plan – Action Plan and Relationship to Local Efforts

Plan Bay Area 2040 attempts to address transportation and land use as directed by SB 375 legislation. While VTA supports the efforts of focusing growth in and around PDAs, we would still emphasize how each PDA is not alike. Santa Clara County continues to have considerable job growth and some of the PDAs and areas that could be designated as PDAs in this County support more jobs than housing. Housing and jobs are two equal ends in the travel demand equation and a policy approach that considers both ends is the most balanced and sustainable over time. VTA encourages MTC to include employment specific PDAs in future rounds of PDA designation, and to consult with VTA and other agencies on strategies for bringing employment focused areas into the regional planning process.

Plan Bay Area 2040 is developing an Action Plan to monitor progress for the Plan with an emphasis on affordable housing. VTA recommends that any discussion regarding affordable housing be inclusive of Local Agency input. The development of the Action Plan must include elements that can be practically implemented by Local Agencies. Some efforts to address affordable housing with cities lie with changes to Local Agency General Plans that may not be feasible.

To address the housing shortage in Santa Clara County, local voters have approved Measure A in November 2016. Measure A is a general obligation bond that may generate up to \$950 million for the acquisition or improvement of real property in order to provide affordable local housing for vulnerable populations. The Santa Clara County Office of Supportive Housing (OSH) is developing the implementation strategies for the program. VTA encourages MTC to coordinate with OSH to understand the program and its implications. The efforts that are being undertaken locally show our County's willingness to address affordable housing concerns, and VTA believes the Action Plan should reward and incentivize agencies that have taken local action. Additionally, any new funding sources for housing should not be created at the expense of transportation funding.

Draft Plan – Housing Growth Patterns and Action Items

VTA recommends adding a comparison column for local General Plan projections in Table 4.2 of the Draft Plan to determine if any adjustments or deficiencies are present. VTA suggests adding an action item to the Housing Actions listed on page 74 titled “Leverage Housing

Investments near Transit”. This action should be supported by providing grant funding to local agencies for policy work that attempts to modify or support Transit Oriented Development.

Draft Plan – Forecasting and Supplemental Land Use Modeling Report

With 25% of the projected 2040 employment growth already having occurred within the period of 2010-2015, VTA is concerned that only moderate revisions have been made to the forecast as compared to the previous Plan Bay Area document. The forecasted growth may not represent the recent growth experienced during the last five years.

The documentation describing the Urban Sim Model is lacking in the supplemental Land Use Modeling Report, particularly with regards to the development of the simulation tool for existing conditions and specifically, base year model calibration. This is a concern considering that the Urban Sim tool is directly used to develop the Plan Bay Area Preferred and Alternative development scenarios. Confidence, in terms of outcomes of the Plan Bay Area scenario analysis, would be enhanced with transparent and detailed model documentation. VTA recommends transparently providing the Urban Sim model documentation background reports and base year model validation to instill a sense of confidence prior to the release of the Final EIR.

Draft Plan and DEIR – CEQA Streamlining Opportunities

VTA appreciates the discussion provided in Section 1.1.8 of the DEIR regarding CEQA Streamlining Opportunities under SB 375, SB 226 and SB 743 in relation to Plan Bay Area, the region’s Sustainable Communities Strategy/Regional Transportation Plan (SCS/RTP). This information should prove helpful to Lead Agencies and project applicants wishing to take advantage of these streamlining opportunities as they pursue or approve projects consistent with the SCS.

VTA notes that one of the Supplemental Reports on the Plan Bay Area website provides the Statutorily Required Plan Maps associated with the draft Plan. VTA has several comments and questions about these maps:

- For Map S-22, Transit Priority Project (TPP) CEQA Streamlining, it is unclear how MTC developed this map, what data sources were used, and how MTC interpreted the criterion “Within ½ mile of major transit stop or high-quality transit corridor in the RTP” which is part of the definition of as Transit Priority Project. VTA requests that MTC provide a clear explanation of how this map was developed, the underlying assumptions, and data sources, and VTA requests that the files be made available in GIS format and/or in an online mapping interface.

- During the NOP stage, VTA requested that MTC clarify the methodology for determining the consistency of land use plans and projects with the SCS and clarify whether the level of detail in Plan Bay Area will be sufficient to make these determinations. Based on VTA staff's review of the draft Plan and DEIR, it is still unclear whether sufficient information is available for Lead Agencies and applicants to determine the SCS land use designation and intensity for a specific parcel. VTA requests that MTC make the Plan's land use files available in GIS format and/or in an online mapping interface to facilitate these streamlining determinations.

DEIR – Transportation Analysis and Mitigations

The DEIR Transportation analysis identifies a Potentially Significant impact before mitigation (Impact 2.1-3) in which "Implementation of the proposed Plan could result in a significant increase in per capita VMT on facilities experiencing level of service (LOS) F compared to existing conditions during AM peak periods, PM peak periods, or during the day as a whole." The DEIR identifies several mitigation measures that could be implemented to address this impact, including the advancement of corridor-level plans and implementation of projects on severely congested facilities, and incorporating a range of Transportation Demand Management (TDM) strategies into individual land use and transportation projects and plans.

VTA supports the approach MTC has taken to mitigating this impact, relying on a combination of TDM strategies and corridor-level plans and improvements. In particular, VTA supports the inclusion of TDM mitigation requirements for new developments, providing incentives to use alternative modes and reduce driving, developing TDM-specific performance measures, and implementing data collection programs to determine the effectiveness of certain TDM strategies. This approach will help Lead Agencies tailor transportation mitigation measures to local conditions and to reflect the growing trend of target-based TDM programs and trip caps such as those implemented at Stanford University, in the North Bayshore area of Mountain View, in the Moffett Park area of Sunnyvale, and in other communities in Santa Clara County and around the Bay Area.

Thank you for the opportunity to review both documents. If you have any questions, please call me at (408) 321-7093.

Sincerely,



Chris Augenstein, AICP
Deputy Director, Planning

During the past year, the Department has been engaged in a study of the problems of the Federal Government. The study has been conducted in a series of workshops, and the results of the study are being reported to the President in a series of memoranda. The first memorandum, which was submitted to the President on December 1, 1960, dealt with the problems of the Federal Government in general. The second memorandum, which was submitted to the President on December 15, 1960, dealt with the problems of the Federal Government in the area of the economy. The third memorandum, which was submitted to the President on December 22, 1960, dealt with the problems of the Federal Government in the area of the environment. The fourth memorandum, which was submitted to the President on December 29, 1960, dealt with the problems of the Federal Government in the area of the defense. The fifth memorandum, which was submitted to the President on January 1, 1961, dealt with the problems of the Federal Government in the area of the foreign relations.

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Very truly yours,
John F. Kennedy
President