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Comments of Plan Bay Area 2050 Draft Blueprint
August 10, 2020

I was surprised to see that in the Draft Blueprint (June 6, 2020) the only detailed numbers given for growth in housing and jobs was done not for cities but for "Superdistricts".

The major conclusion of the overall analysis was that jobs growth would be concentrated in the South Bay--particularly in Superdistrict #9 (West Santa Clara County). This single district would contain 30% of all new jobs produced in the Bay Area between 2015 and 2050. (With only 12% of the new households in Superdistrict #9, it would produce huge impacts on its neighbors.)

Superdistrict #9 would be made up of portions of the cities of Santa Clara, Mountain View, Palo Alto, Milpitas and San Jose (plus Sunnyvale). This would mean there is no local city government that could effectively act on the whole (or possibly even distinguish its partial impacts on the whole district).

Yet the surrounding RHNA allocations would be based on the dramatic growth in new (and recent past) job growth. How can you act to separate important decisions about targets for job and housing growth from the very jurisdictions that will be responsible for the dealing with the consequences of that growth--congestion, traffic, high and rapidly rising housing prices, and growing income inequality.

Further, how can you push the concepts of job growth concentrated in specific "Superdistricts" when California Code requires you to explore "alternative ways of improving large intraregional jobs and housing imbalances".

This looks clearly like an attempt to place increasing authority for longer-term land use planning decisions in the hands of non-elected regional bodies. At the same time, "Superdistricts" make effective responses of local governments who are directly responsible to local voters virtually impossible.

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