

**From:** [Dave Vautin](#)  
**To:** [info@planbayarea.org](mailto:info@planbayarea.org)  
**Subject:** FW: Public Comment Re: Plan Bay Area 2050  
**Date:** Monday, August 10, 2020 10:18:16 PM  
**Attachments:** [Plan Bay Area 2050 Response.pdf](#)  
[ATT00001.htm](#)  
[PLAN BAY AREA 2050.pdf](#)  
[ATT00002.htm](#)

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**\*External Email\***

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Metropolitan Transportation Commission  
Association of Bay Area Governments

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**From:** Therese W. McMillan <[tmcmillan@bayareametro.gov](mailto:tmcmillan@bayareametro.gov)>  
**Sent:** Monday, August 10, 2020 9:56 PM  
**To:** Alix Bockelman <[ABockelman@bayareametro.gov](mailto:ABockelman@bayareametro.gov)>; Matt Maloney <[mmaloney@bayareametro.gov](mailto:mmaloney@bayareametro.gov)>; Dave Vautin <[DVautin@bayareametro.gov](mailto:DVautin@bayareametro.gov)>  
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Therese W. McMillan  
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Begin forwarded message:

**From:** Bobbi López <[bobbi@todco.org](mailto:bobbi@todco.org)>  
**Date:** August 10, 2020 at 9:42:04 PM PDT  
**To:** "[info@planbayarea.org](mailto:info@planbayarea.org)" <[info@planbayarea.org](mailto:info@planbayarea.org)>  
**Cc:** "Therese W. McMillan" <[tmcmillan@bayareametro.gov](mailto:tmcmillan@bayareametro.gov)>, "[mayor@cityofberkeley.info](mailto:mayor@cityofberkeley.info)" <[mayor@cityofberkeley.info](mailto:mayor@cityofberkeley.info)>

**Subject: Public Comment Re: Plan Bay Area 2050**

**\*External Email\***

Dear Director Mcmillan, Honorable Jesse Arreguin, and ABAG/MTC Staff,

Attached please find two letters of input in regards to Plan Bay Area 2050 as the public comment period began July 10, 2020 and closes today, August 10, 2020.

Sincerely,

Bobbi Lopez



August 8, 2020

Honorable Jesse Arreguin, President  
Association of Bay Area Governments/  
Metropolitan Transportation Commission  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105-2066

Therese McMillan, Executive Director  
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**RE: PLAN BAY AREA 2050**

Dear ABAG and MTC Commissioners and staff,

We appreciate the years of labor put into the creation of the Plan Bay Area 2050 blueprint. We believe the strongest document created by MTC/ABAG in guiding this conversation is the Equity Analysis Report from 2017, which stated that “32% of lower-income households in Central City communities identified as “Communities of Concern” were at risk of displacement.” The report also went on to state that: “the housing crisis is disproportionately affecting low-income households, as high costs consume an even larger share of family budgets and scarcity of affordable units limits housing options” and “while almost every household in the Bay Area is experiencing high housing costs, these conditions have an oversized impact on low-income populations.” For these reasons, we need a 2050 Plan that prioritizes affordable housing, centers balanced growth/development; economic justice; and equity in access to investments.

Unfortunately, many of the proposed strategies in Plan Bay Area’s 2050 Blueprint do not fully address these issues. Trickle down has been the unofficial policy for housing and economic growth in the Bay Area, and we need a drastic change, especially as COVID-19 ravages working class and BIPOC communities, who are 83% of the population in Communities of Concern.

**Our Response To Some Of The Strategies Listed In The Plan Bay Area 2050:**

**1. Transform Aging Malls and Office Parks into Neighborhoods**

- Strongly Support. We were advocating for AB 3107 (Bloom) at the state level which was recently pulled but would have allowed residential as an allowable use on commercial (excluding industrial).

- We first identified the enormous potential of such a policy directive in our report of housing development potential of shopping mall and office park parking lots in the nine county Bay Area two years ago. We identified over 200 such potential sites larger than one acre in size, with development potential for more than 200,000 new housing units. But – *we also found that housing was not a permitted use today on 75% of those locations!*
- This should include **high affordability levels of 20%** or follow a local jurisdiction, if it has a higher requirement.

**2. Require 10 to 20 Percent of New Housing to be Affordable**

- a. The City of Oakland had a 28% goal for affordable housing construction in its Housing Cabinet Report, but only about 7% of their yearly construction was for low and very low-income people. Oakland is not alone, many cities failed to meet low and very low-income affordable housing construction goals in the region. What are we really going to do different than what was written in Plan Bar Area 2040? And If we couldn't meet our affordable housing goals in a good economy, how will we do it, now that we slip into a recession as a result of COVID? Fundamentally, designating that 10-20% of new housing be affordable is far from the meeting the demand for low- and middle-income people. It simply is not enough.
  - b. Cities need to increase impact fees and inclusionary housing requirements where the market can bare a greater percentage based on nexus studies.
  - c. Also, proposed and current laws at the state level further undercut this strategy for our region. A developer can now receive a huge density bonus and incentives like reduced parking requirements at the state level for building moderate amounts of affordable housing. For sound local housing policies, we must research the impacts of the state density bonus and other laws.
  - d. To meet our Regional Housing Needs Assessment goals for low-income housing construction, we need to immediately inventory of all state, county, city, or other publicly owned land that is developable and move that these properties be made available to either 100% affordable construction where possible or 50% affordable construction. Public land is for the public good. Most cities have not implemented ordinances on public lands policies, don't have databases of said property, or have been selling off their properties to market rate developers.
- 3. Fund Affordable Housing Protection, Preservation and Production. Raise an additional \$1.5 billion in new annual revenues to leverage federal, state, and local sources to protect, preserve and produce deed-restricted affordable housing.**
- a. The state needs to commit at least \$2 billion additionally to affordable housing just to minimize existing homelessness much less respond to potential growing pockets of homelessness due to COVID-19.
  - b. We should engage in progressive revenue measures that don't further burden our working-class and generate much needed revenue to build affordable housing.
- 4. Further Strengthen Renter Protections Beyond State Legislation. Building upon recent tenant protection laws, limit annual rent increases to the rate of inflation, while exempting units less than 10 years old.**

- a. Agreed. We should expand rent control to newer buildings and push on our state to further address Costa Hawkins reform.
  - b. Along with renter protections, we need to more strongly protect low income homeowners against predatory lending and foreclosures.
- 5. Allow a Greater Mix of Housing Types and Densities in Growth Areas. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas, and select High-Resource Areas**
  - a. We strongly support high density in transit rich areas, including the re-zoning of single-family neighborhoods as long as this includes infrastructure, affordability, and transit investments.
  - b. We believe a large portion of transit rich areas should be dedicated to low income housing as working people disproportionately depend on public transit. According to the Equity Analysis Report from 2017, “low-income populations in the region account for 25 percent of the total population but 53 percent of all transit trips, indicating not just their higher propensity to use transit but also a greater dependence on that mode.”
  - c. We’ve heard from affordable housing developers that heights also have the adverse impact of making land “more expensive.” How do we mitigate this and ensure a level playing field between market and affordable housing developers in terms of land acquisition in transit rich areas?
- 6. Reduce Barriers to Housing Near Transit and in Areas of High Opportunity. Reduce parking requirements, project review times, and impact fees for new housing in Transit-Rich and High-Resource Areas, while providing projects exceeding inclusionary zoning minimums even greater benefits.**
  - a. These incentives are best when offered in return for a higher commitment to affordability in neighborhoods experiencing gentrification and displacement.
- 7. Assess Jobs-Housing Imbalance Fees on New Office Developments**
  - a. “According to a study conducted by the University of California Davis in 2015, 69 percent of the lack of affordable housing close to low- and moderate-wage jobs, which usually co-locate with high-wage jobs, creates an even bigger imbalance for low- and moderate-income households. This jobs-housing mismatch is one of the primary drivers of high displacement risk, and higher housing and transportation costs for the region’s lower-wage workers.” While fees are key, so is a thoughtfulness to where office projects are located in relation to jobs.
  - b. The other component is the housing fit. It is not enough to build housing; we need to make sure that it is economically diverse and is affordable to existing residents.
- 8. Complete Streets**
  - a. We support creating complete streets and investments in bike infrastructure should be coupled with equity proposals that ensure affordable bicycle access and education to communities of color.
  - b. We also oppose the use of law enforcement which can potentially and further criminalize communities already experiencing high levels of policing.

**9. Advance Low-Cost Transit Projects. Complete a limited set of transit projects that performed well in multiple futures and require limited regional dollars to reach fully funded status.**

- a. We should look at Cities like Oakland, that are making capitol project investments based on an equity analysis. Their methodology in distributing paving monies or bond money for parks projects requires that projects are given public equity scores.

**10. Transit Fare Costs**

- a. Public transportation is the primary means that many low-income and minority populations use to travel in the region. It was estimated in your Equity report, that “About 75 percent of AC Transit’s riders are low-income and 78 percent are minorities.” This means, as we move into economic instability and increased poverty, we need to think about long-term subsidies to off-set travel costs for low-income people which in term promotes transit first models.

**11. Per-mile tolling**

- a. We must consider the impact to persons with disabilities, who may be solo drivers.
- b. We are concerned that this is a regressive taxation measures that only exacerbates economic inequity. Our focus should be on connectivity and building a first-class seamless transit system that motivates people out of their cars and into our public transit.

We strong support many of the strategies not referenced including climate change efforts, building modernization concepts, seamless mobility, reducing speeds, and increasing our Transbay connectivity. If you have any questions, please feel free to reach out to me at [Bobbi@todco.org](mailto:Bobbi@todco.org).

Sincerely,

Bobbi Lopez

Director of Regional Community Engagement and Public Policy, BAFCA