



Bay Area Regional Health Inequities Initiative

Alameda County | City of Berkeley | Contra Costa County | Marin County | Napa County | City and County of San Francisco | San Mateo County | Santa Clara County | Santa Cruz County | Solano County | Sonoma County

May 31st, 2017

VIA ELECTRONIC EMAIL: info@PlanBayArea.org

Metropolitan Transportation Commission

Bay Area Metro Center

375 Beale Street, Suite 800

San Francisco, CA 94105-2066

Re: BARHII's Comments on the Draft Plan Bay Area 2040 and the Draft Environmental Impact Report

Dear MTC Commissioners and ABAG Board Members,

On behalf of the Bay Area Regional Health Inequities Initiative (BARHII), we would like to thank you for the opportunity to comment on the Draft Plan Bay Area 2040 (PBA 2040) and the Draft Environmental Impact Report (DEIR). BARHII is a collaborative of the eleven Bay Area Public Health Departments that plan and work together to achieve more equitable health outcomes in our region. Integrated regional land use, housing and transportation planning under PBA 2040 has the potential to improve public health by supporting affordable transportation access and safe streets; stable, affordable housing and neighborhoods; and an economy that provides opportunities for all residents and workers. We have welcomed the opportunity to partner with our regional planning agencies to maximize these potential health equity gains in PBA 2040. With this intent, we outline suggestions for the Action Plan and the DEIR below.

Action Plan

Resilience

- **Incorporate Health Equity in All Actions.** The Resiliency Actions are heavily focused on infrastructure and natural hazards (earthquake, flooding, and fire) with only Action #2 focusing on communities with high social vulnerability and potential exposure to hazards. This section would be made stronger by including actions designed to improve community health and resilience. It should, for instance, assess potential vulnerability to high heat due to impervious surfaces and include appropriate mitigations, ensure targeted outreach and engagement of climate vulnerable communities, and identify policies to ensure that the needs of these communities are met.

- **Provide Expanded Policy Leadership on Resilient Housing.** In addition to making houses resilient to natural hazards, the concept of housing resiliency should also include measures that improve the daily health of the residents residing in those houses. Such measures include providing weatherization, reducing toxic exposures such as lead, asbestos, mold and pests/vectors, and requiring advanced air filtration in developments near sources of air pollution.

- **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.

Economic Development

- **Promote Quality Jobs and Clean Industries.** The Action Plan should incorporate language that will ensure its outlined actions lead to the creation, appropriate training for, and retention of family-supporting jobs and industries that improve public health and do not further exacerbate environmental degradation. For example, criteria and incentives for Production Priority Areas should promote the creation and preservation of middle-wage and living-wage jobs and clean industries.

- **Improve Economic Modelling Capacity.** Include an additional action that explicitly address the need to improve existing modelling capacities in order to more accurately measure the impact that PBA 2040 land use policies and transportation investments have on jobs at all income levels. In this way, we will be able to better measure the direct, indirect, and induced impact of transportation investments on the creation and preservation of middle-wage jobs and assess whether or not land-use policies are incentivizing or hindering the location of middle-wage industries.

Housing

- **Promote Healthy Housing.** Old and aging housing stock and the slow production of new affordable housing units force many low-income residents to live in substandard conditions, which expose them to adverse health impacts¹. Existing and future funding sources and preservation and rehabilitation programs should promote healthy design guidelines and green buildings.

- **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 existing and addition sources of funding and strategies to preserve existing affordable units and to incentivize local jurisdictions to support anti-displacement measures.

- **Accelerate Funding and Legislative Actions.** The Action Plan relies on CASA's future work plan to advance new funding and legislative solutions, but that work plan will take a couple of years. In addition to this strategy, the Action Plan should identify immediate actions that MTC and ABAG can take to pursue a strong legislative strategy to advance affordable housing and the protection of low-income tenants from displacement. It should also outline the existing and future sources of funding that could be conditioned to incentivize the development of affordable and healthy housing—for example RM3.

Comprehensive Recommendation:

¹ Bay Area Regional Health Inequities Initiative. Displacement Brief. 2016. Available at: <http://barhii.org/wp-content/uploads/2016/02/BARHII-displacement-brief.pdf>

- **Engage and Work with Impacted Communities.** Throughout the Action Plan it should be clear that investments and strategies will be driven and informed by impacted communities. For example, the impact of resilience investments and strategies could be maximized if vulnerable communities already facing environmental and health disparities are key strategic partners in the design, implementation, and monitoring of these strategies.

Draft Environmental Impact Report

Housing:

- **Clarify the Role Publicly Funded Development Projects Play in Intensifying Displacement Pressures.** The DEIR includes an excellent description of the housing and displacement crisis in the Bay Area. This description would be strengthened by clarifying the role that publicly funded development projects—in this case those proposed by PBA 2040—often play in intensifying displacement pressures², and specifically addressing this link in the impacts analysis and mitigation measures.
- **Provide Sufficient Detail on the Nature of Environmental Impacts of Displacement.** The DEIR takes a strong step forward by addressing the environmental impacts of displacement due to rising rents. However, the DEIR does not provide sufficient detail about the nature or significance of these impacts. Please provide more detail about the impacts of displacement to human health (see our synthesis of the literature³), and potential impacts on VMT, climate, and air quality.

Air Quality:

- We are strongly supportive of the DEIR's inclusion of detailed air quality modeling and health concerns. In particular, we appreciate the attention to the location of sensitive receptors in Transit Priority Areas with high TAC/PM/Cancer risks, the analysis of air quality changes in CARE versus non-CARE communities and the inclusion of recommendations from BAAQMD's *Planning Healthy Places*. However, it is extremely worrying that the plan shows increased air quality inequities in already overburdened CARE communities. Therefore, we make the following recommendations for the Plan and EIR:
 - **Mitigation Measures and the Plan Should Include Increased Deployment of Zero-Emission and Near-Zero* emission Technologies.** (*near-zero emission under the definition used in the Freight Emission Reduction Action Plan).
 - **Include Further Detail and Implementation Timelines for Mitigation Measures 2.2-5 and 2.2-6 in the DEIR and Draft PBA 2040 Action Plan.**
 - **Include Actions that MTC, ABAG, BAAQMD and Other Regional Actors Can Take to Increase Local Uptake/Implementation of Mitigation Measures 2.2-5 and 2.2-6.** While MTC/ABAG cannot ensure that local project sponsors or jurisdictions follow mitigation measures, you can provide technical assistance, training, grants, or other incentives to encourage progress towards mitigation.

² See for Example: Gentrification, Displacement and the Role of Public Investment: A Literature Review http://iurd.berkeley.edu/uploads/Displacement_Lit_Review_Final.pdf

³ Bay Area Regional Health Inequities Initiative. Displacement Brief. 2016. Available at: <http://barhii.org/wp-content/uploads/2016/02/BARHII-displacement-brief.pdf>

- **Identify specific Communities (by Census Tract) Expected to See Inequitable Increases in Air Pollution.** Ensure that regionally controlled/funded programs include targeted, enforceable provisions to improve air quality in these communities.

Noise

- **Model Projected Exposure to Noise and Vibration by Census Tract.** Disaggregate by race and income.

We again thank you for the opportunity to comment on the Draft PBA 2040 and DEIR. Please let us know if you have any questions on the above recommendations and how to best partner with you to implement our suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Jones', with a stylized, cursive script.

Melissa Jones, Executive Director
Bay Area Regional Health Inequities Initiative

DISPLACEMENT BRIEF

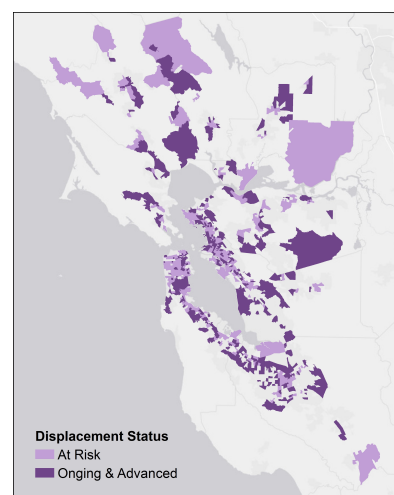
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HOUSING INSECURITY AND DISPLACEMENT IN THE BAY AREA

The Bay Area is in the midst of an unprecedented period of economic growth, adding nearly 200,000 jobs in the past decade.¹ Along with lagging housing production and renewed investment in central cities, this growth has fueled dramatic increases in housing costs, with rents rising almost 40% between 2010 and 2014.² Yet, over 1 million jobs region-wide pay less than \$18 per hour (or \$36,000 a year for full time work), making it extremely difficult to afford housing.³ Indeed 89% of Bay Area renter households earning less than \$35,000 a year are considered rent-burdened, meaning they spend more than 30% of their household budget on housing.⁴ With budgets stretched to the breaking point, households experience housing insecurity and are vulnerable to displacement from their homes and neighborhoods.

Households may be displaced for many reasons—rising rents, poor housing or neighborhood conditions, or (new) development to name a few—and all these types of displacement can have health impacts. Research indicates that nearly half of Bay Area census tracts are affected by gentrification, displacement and exclusion (21%) or at risk (26%) of these occurring (see Figure 1)⁵.

FIGURE 1: Gentrification, Displacement and Exclusion



Source: UC Berkeley REWS

TABLE 1: Gentrification and Displacement by Tract

COUNTY	UNDERGOING & ADVANCED	AT RISK
Alameda	24%	32%
Contra Costa	17%	18%
Marin	18%	11%
Napa	15%	25%
San Francisco	25%	64%
San Mateo	28%	28%
Santa Clara	24%	12%
Solano	13%	16%
Sonoma	11%	26%
Region	22%	27%

Source: UC Berkeley REWS

TABLE 2: Percent of Households Rent Burdened by Income

HOUSEHOLD INCOME	% RENT BURDENED
Less than \$35,000	89%
\$35-50,000	72%
\$50-75,000	39%

Source: UC Berkeley REWS

While every county and most cities are affected (see Table 1), displacement risk is concentrated among the approximately 350,000 low-income renter households within Priority Development Areas.⁶ In addition to being slated for significant transportation investments, many of these areas are the focus of our health department's resources, as we work to ensure that residents have access to safe environments, good jobs and schools, parks, reliable and affordable transportation and other amenities that help people live healthy lives and improve a child's chances of success later in life.⁷ Displacement can mean that communities with poor health outcomes fail to benefit from public investments in their former neighborhoods.⁸

At the same time, some outer suburban areas of the Bay Area have seen dramatic increases in low-income households, and people of color.^{9,10} As the suburbanization of poverty has progressed, fewer low-income people live near transit,¹¹ which can provide an essential lifeline to jobs, schools and medical appointments. It has also strained city budgets, the social safety net, philanthropic giving and public health departments—making it difficult to keep people healthy.^{12, 13, 14}

HEALTH IMPACTS OF HOUSING INSECURITY AND DISPLACEMENT

Research shows that housing unaffordability, insecurity and displacement can impact health in the following ways.

Unhealthy Tradeoffs: When housing costs are high, working families have to make difficult choices.

- Households may accept older or poorly maintained housing that contains mold or pests which can trigger asthma, or which have dangerous appliances, fixtures and chemicals that can lead to falls, burns and exposure to toxins such as lead.^{15 16}
- Low-income households that can comfortably afford their housing are able to spend almost five times as much on healthcare and a third more on food than their severely cost burdened peers.¹⁷ They're also more likely to go to medical appointments and take needed medication.^{18 19}

Mental Health Impacts: The emotional toll of displacement and living with the threat of displacement is significant, affecting mental wellbeing, sense of belonging and community cohesion.

- People experiencing housing insecurity are almost three times more likely to be in frequent mental distress than those who have secure housing.²⁰
- Research shows emotional strain from physical environments directly influence the onset and severity of diseases such as asthma.²¹

Effects on Children and Families: The health impacts of housing instability are particularly intense for children, causing behavioral problems, educational delays, depression, low birth weights, and other health conditions such as asthma.^{22,23,24,25,26}

- Children who move frequently had a one year academic delay, lower test scores, and a lower likelihood of finishing school, displaced children are far more likely to have frequent absences from school,^{27, 28, 29 30} and children in crowded housing have lower math and reading achievement and behavioral problems.³¹

Long Commutes, Air Quality, Congestion and Health: Without adequate housing near job centers, many low- and moderate-income Bay Area employees must commute long distances to work, worsening congestion and air quality for Bay Area communities.

- Long commuting distance is associated with lower rates of physical activity, lower cardio-respiratory fitness, and higher Body Mass Index, stress and blood pressure.³²
- Residents who have been displaced often must commute long distances and pay higher transportation costs; the benefit of lower-cost housing can be greatly diminished if households must pay for longer commutes. For every dollar decrease in housing costs, households see a 77 cent increase in transportation costs.³³

CREATING HEALTHY HOUSING: THE FIVE P'S OF HOUSING STABILITY†

PROTECTION of existing residents. Protecting residents means ensuring renters can remain in their homes and don't experience the health impacts of housing instability or displacement and can continue to contribute to a healthy, vibrant community.

PRESERVATION of existing housing at all affordability levels. Preserving housing at all affordability levels means a commitment to maintaining affordable units despite changing economic conditions, and replacing units at the same affordability levels for the same residents when preserving units is impossible. Preservation of housing is inexpensive and ensures residents can remain active and engaged in the communities they call home.

PRODUCTION of new housing units at a diversity of affordability levels. The region is behind in housing production, particularly for units affordable to low-income residents. Regional entities can make balanced housing production a priority through regulations and incentives for developers as well as through a commitment to using public resources for affordable housing.

PARTICIPATION of residents and community leaders in decision-making processes that impact their housing stability. True community participation in planning processes leads to better outcomes that work for community members, and when residents are engaged and invested, health outcomes improve.

PLACEMENT of housing near transit, jobs and amenities. The places we live have a huge impact on our health. Housing in the Bay Area should support residents' health in a comprehensive, holistic way. This means locating homes by transit and healthy food sources and away from sources of pollution.

Adapted from Get Healthy San Mateo County

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- ¹ Metropolitan Transportation Commission. <http://www.vitalsigns.mtc.ca.gov/jobs>
- ² Association of Bay Area Governments. *Addressing Displacement in the Bay Area*. 2015. Available at: <http://abag.ca.gov/files/ABAGDisplacementWhitePaper.pdf>
- ³ Bay Area Regional Prosperity Plan Steering Committee. *Economic Prosperity Strategy*. 2014. Available at: http://www.spur.org/sites/default/files/publications_pdfs/Economic_Prospersity_Strategy.pdf
- ⁴ United States Census. 2014 American Community Survey.
- ⁵ Zuk, Miriam. Regional Early Warning System for Displacement Typologies Data Series. UC Berkeley. 2015. Available at: http://www.urbandisplacement.org/sites/default/files/images/cci_rews_data_2015-08-21.xlsx
- ⁶ Heminger, S, Rapport, E. Understanding Displacement in the Bay Area—Definition, Measures and Potential Policy Approaches: Memo to Joint MTC Planning Committee with the ABAG Administrative Committee. September 4, 2015.
- ⁷ Harvard University, Equality of Opportunity Project. Available at: <http://www.equality-of-opportunity.org/>.
- ⁸ Heminger, S, Rapport, E. Understanding Displacement in the Bay Area—Definition, Measures and Potential Policy Approaches: Memo to Joint MTC Planning Committee with the ABAG Administrative Committee. September 4, 2015.
- ⁹ Federal Reserve Bank Of San Francisco. *Community Development Research Brief: Suburbanization of Poverty in the Bay Area*. 2012. Available at: <http://www.frbsf.org/community-development/files/Suburbanization-of-Poverty-in-the-Bay-Area1.pdf>
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- ¹⁶ Ibid.
- ¹⁷ Joint Center for Housing Studies of Harvard University. (2013). *The State of the Nation's Housing 2013*. Retrieved from <http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/son2013.pdf>
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† GetHealthy San Mateo County, <http://www.gethealthysmc.org>