

October 4, 2016



CITY OF SAN PABLO  
City of New Directions



Metropolitan Transportation Commission  
375 Beale Street, Suite 800  
San Francisco, CA 94105

SENT VIA EMAIL: [info@mtc.ca.gov](mailto:info@mtc.ca.gov)

**RE: Comments from the City of San Pablo for the Draft Plan Bay Area 2040 Land Use Scenarios**

Dear MTC Public Information Staff:

The City of San Pablo has reviewed the Draft Preferred Plan Bay Area 2040 Land Use Scenario and is submitting the following comments:

1. The City of San Pablo is a disadvantaged community and considered a community of concern. We have embraced Plan Bay Area and adopted three PDAs as an approach to greenhouse gas (GHG) reduction. As additional support of greenhouse gas reduction, the City signed ABAG's Memorandum for the East Bay Corridors Initiative to collaborate at a corridor level on GHG reduction. We obtained a CCTA grant to complete a Targeted Industries Study on green jobs. For these reasons, we are pleased to see that Draft Results for Performance Targets, and Equity Measures, and a Draft Transportation Strategy have been created and are identified as critical components of the overall Draft Preferred Plan Bay Area 2040 Land Use Scenario.
2. The City is pleased to see that the total household projections for 2040 for the City of San Pablo have been reduced to a total of 9,600 units, which includes the anticipated potential growth of the three Priority Development Areas in the City for the total number of potential new households. Additionally, the City appreciates that a lower number - 8,950 for existing households for 2010 - has been incorporated into the Draft Preferred Plan Bay Area 2040 Land Use Scenario.
3. ABAG has reduced its 2040 projection for jobs, from a total of 10,680 to 10,000, for the City and the three PDAs. The City of San Pablo continues to strive to meet the job creation projections for the Draft Preferred Plan Bay Area 2040 Land Use Scenario by the 2030, the term of the City of San Pablo General Plan, and the 2040 Plan Bay Area document.
4. The City acknowledges the following statement in the Plan Bay Area 2040 Draft Land Use Scenario, where ABAG states, "many PDAs may not be able to accommodate forecasted growth and require additional policy interventions to increase their development potential. As a result, ABAG assumes a range of regional policy and investment strategies in the draft preferred land use scenario to increase development potential in PDA's, and influence the overall regional pattern. These strategies are described as follows:

- Current urban growth boundaries/limit lines are kept in place.
- Inclusionary zoning is applied to all cities with PDAs, meaning that these jurisdictions are assumed to allow below-market-rate or subsidized multi-family housing developments.
- All for-profit housing developments are assumed to make at least 10 percent of the units available to low-income residents, in perpetuity (via deed restrictions).
- In some cases, PDAs were assigned higher densities than what those cities currently allow.
- The cost of building in PDAs and/or Transit Priority Areas (TPAs) is assumed to be reduced by the easing of residential parking minimums and streamlining environmental clearance
- Subsidies are assumed to stimulate housing and commercial development within PDAs."

While the City may agree with the overall intent of these six strategies, the City needs to consider the implications of inclusionary zoning for future residential housing development, as well as the possibility of easing residential parking minimums. The City continues to use the infill exemptions as allowed by CEQA, when they are applicable and appropriate, and will apply for future funding and grants, as we have three PDAs which makes the City of San Pablo a strong candidate for future transportation related grants.

Thank you for the opportunity to comment on the Plan Bay Area Draft 2040 Land Use Scenario. Please feel free to contact Development Services Director, Michele Rodriguez at [MicheleR@sanpabloca.gov](mailto:MicheleR@sanpabloca.gov), or 510-215-3030, if there are questions about these comments.

Sincerely,



Matt Rodriguez  
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Copies:

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