



LEAGUE OF WOMEN VOTERS OF THE BAY AREA

An Inter-League Organization of the San Francisco Bay Area



May 14, 2013

Amy Worth, Chair
Metropolitan Transportation Commission

Mark Luce, President
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

Re: Plan Bay Area

Dear Chair Worth and President Luce:

The League of Women Voters of the Bay Area, representing 3,000 members in 20 local Leagues within the region, has followed and has strongly supported the progress of regional planning in the San Francisco Bay Area for more than 50 years. This draft Plan Bay Area is the first consolidated regional plan that coordinates land use planning and transportation planning, with a plan to meet regional housing needs, as well as preserving open spaces and considering the impact of the Bay level rise and specific air pollution impacts.

This draft Plan is a good example of successful collaboration among the Bay Area's regional agencies, primarily Metropolitan Transportation Commission and the Association of Bay Area Governments, together with local cities and counties who initiated the Priority Development Areas within their jurisdictions, and regional open space organizations who proposed the Priority Conservation Areas.

The draft Environmental Impact Report for the Plan concludes that the plan will result in 100% of the Bay Area's population growth being housed in urban areas, with no new sprawl development, during the 18-year period covered by the Plan. Overall, over 2/3 of all regional growth by 2040 is allocated within PDAs, which are expected to accommodate 79% of new housing and 63% of new jobs.

The League places a high priority on reducing carbon and other emissions from cars and light trucks that worsen air quality and the impacts of climate change. We are pleased that the draft Plan slightly exceeds the threshold of a 15% per capita reduction in greenhouse gases (GhG) within the Bay Area by 2035 that is required by the California Air Resources Board, pursuant to SB 375. The reduction in emissions is expected to be achieved as a result of the Plan's encouragement for more compact development in areas with good transit service, in order to reduce the need to drive. The growing use of hybrid and electric vehicles in the Bay Area will also play a role in the reductions.

Specific Comments

1. Add Elements of the Equity, Environment, and Jobs Alternative

The Equity, Environment, and Jobs (EEJ) alternative is judged the “environmentally preferred alternative. We strongly urge that the elements of the alternatives that offer superior benefits to the environment, provide robust incentives for affordable housing, and enhance the services of the transit systems be included in the draft Plan . Specifically these measures call for encouraging more low-income housing development through zoning changes, more funds for transit services, and the elimination of all road expansions. The Transit Priority Focus (TPF), calls for upzoning high quality transit areas, more funding for transit and less for the express lane network, which are variations on the same theme, which we would support. We do not believe that the tax on vehicle miles travelled, or development fee in areas with high vehicle miles of travel are viable at this time.

2. Funding Issues related Affordable Housing and Housing Displacement

During the time period required to prepare the draft Plan, a major source of funding for implementation of affordable housing was removed from local cities and counties – namely Redevelopment Housing Set-Aside Funds. While the Plan includes the Transit Oriented Affordable Housing grant program, this is a drop in the bucket. We applaud San Francisco for their new voter-approved funding and San Mateo County for using the residual funds from RDA for affordable housing purposes. We fear that in the process of implementing PDAs that housing will be built, but that it will not be affordable to those most in need, and that existing affordable housing may be displaced.

3. Transportation Priorities and Transit Operations Funding

The draft Plan places primary emphasis on maintaining the existing transportation system. However, the funds allocated to transit operations in the draft Plan do not appear to be adequate to restore the service cuts made during the past few years or to meet the needs of the Bay Area’s growing population. Moreover, the Plan specifies that transit agencies are to be given funds as rewards for increasing ridership and improving productivity – goals that do not take into account the diverse needs of many residents for affordable transit. But transit services are also needed in off-peak hours and to multiple kinds of destinations to serve the needs of a diverse population. The focus on a narrow mission for transit – that of cutting operating costs – threatens the public service goal of meeting the needs of all residents. We urge that consideration be given to shifting draft Plan funding to transit operations and transit system maintenance.

4. Impact of Sea Level Rise

We commend the regional agencies for their collaborative work to study the rise in sea and Bay water levels that will increase at an accelerating rate over the Plan’s duration. We are concerned, however, that areas most vulnerable to flooding and sea level rise

contain some of the Bay Area's most significant transportation infrastructure, and the draft Plan includes projects to expand and improve many of these facilities. Recommended mitigations range from risk assessments to new designs for infrastructure, levees, seawalls, and setbacks. Before new infrastructure and facilities are built in flood-prone areas, risk assessments need to be performed and mitigation measures, together with funding mechanisms to implement them, need to be designed.

5. Implementation Issues

We are concerned that a recent study of the Priority Development Areas indicated only a 62% readiness capability. Because of the long process in certifying PDAs, downswings in the economy and loss of funding sources such as redevelopment a percentage of PDAs may not be viable in the future. There will need to be a process of designating new replacement areas, and/or refinement of the overall Plan. We support the process of local application, with adopted plan status, and local funding match with regional certification within the overall Plan.

We also understand the intent of the One Bay Area Grant program to be implemented by the county Congestion Management Agencies. We have already heard complaints from those who fear "loss of funding for areas outside PDAs", which is not exactly true because this is a transfer of regional grant funding for allocation within each County. On the other hand, it is important that a regional oversight over the process during this initial phase needs to be maintained, to assure that this transfer complies with the intent of the OBAG grants.

In conclusion, the LWVBA supports the process that has been used to develop the Plan Bay Area, and agrees in general that the draft Plan, with the revisions we have mentioned, reflects an important vision for the future of the San Francisco Bay Area,

Sincerely,

Marion Taylor, President

cc: Steve Heminger, MTC
Ezra Rapport, ABAG